

ANTI- BRIBERY AND CORRUPTION POLICY

Introduction

BLD Plantation Bhd. and its subsidiaries (collectively referred to as “**BLDP Group**” or “**the Group**”) has adopted a zero-tolerance approach against all forms of bribery and corruption. This Anti-Bribery and Corruption Policy (“**ABC Policy**” or “**the Policy**”) is guided by the Guidelines on Adequate Procedures issued pursuant to Section 17A(5) of the Malaysian Anti-Corruption Commission Act 2009. The Policy is aimed to act as a guideline in addressing and dealing with issues related to improper solicitation, bribery and other corrupt activities that may arise in the course of business.

Application

This Policy is applicable to all employees, top level management, partners or any persons who are concerned with the management of the affairs of the Group and external parties or agents who perform services for or on behalf of the Group.

Definition

Bribery is the offering, promising, giving, accepting or soliciting any gratification for an advantage as an inducement for action which is illicit, unethical or a breach of trust to gain or retain a business advantage.

Corruption is the misuse of entrusted power for private gain.

Employee refers to a person who is employed under the company.

Gratification means—

- a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
- b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- e) any forbearance to demand any money or money’s worth or valuable thing;
- f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and
- g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).

The terms used in this document have the same meaning and interpretation as used under the Malaysian Anti-Corruption Commission Act 2009.

Gifts, Entertainment and Hospitality

The Group recognises gift giving, entertainment and hospitality practices are often appropriate courtesies to build good business relationships between the Group and parties that the Group conduct business with.

This Policy does not prohibit giving or accepting gifts, entertainment and hospitality as long as it is reasonable, lawful and bona fide in nature, and is in accordance with BLDP Group's **Gift, Entertainment and Hospitality Guidelines**.

Charitable Contributions

The Group shall ensure contribution or donations are made in good faith to charities and community projects. Due diligence assessment shall be conducted to review the background and reputation of the intended recipients. All charitable contributions must be reviewed and authorised by the Management or the Board where applicable. There must be adequate proof of receipt by the beneficiaries and all records of contributions must be kept by the Group.

Political Contributions

As a general principle, the Group is not allowed to make any political contributions to political parties, organisations, officials or candidates for political office.

Employees may choose to undertake personal political activities with own resources, as appropriate within the limits permitted by law. Employees must ensure their personal activities do not conflict with their duties and responsibilities to the Group.

Adherence and Compliance

The Group is committed to conducting business in an ethical manner and shall comply with all applicable laws and regulations wherever it is incorporated and carries on business in. It is obligatory for all employees to read, understand and adhere to the Policy, which is to be read in conjunction with the Group's **Code of Business and Ethics** and other policies and guidelines. A breach of any provisions of the Policy may result in disciplinary action.

External parties or agents acting for or on behalf of the Group are expected to understand and comply with the relevant aspect of the Policy. Violation of the Policy may result in blacklisting or termination of contract by the Group.

Whistleblowing Policy

A confidential and trusted reporting channel is established, which is accessible to both internal and external parties to raise concerns in confidence without fearing of reprisal. Legitimate reports on suspected fraud or corruption, dishonest practices and unlawful conducts shall be objectively investigated and addressed.

Please refer to the **Whistleblowing Policy** for further information.

This Policy may be reviewed and updated from time to time when deemed necessary.

Board Approval Date: 28 February 2020