

## ANTI-BRIBERY, CORRUPTION AND WHISTLEBLOWING POLICY

### 1. SCOPE AND DEFINITION

#### 1.1 Scope

The Anti-Bribery, Corruption and Whistleblowing Policy (“the Policy”) is applicable to all employees including senior management, directors (executive and non-executive) of CSC Steel Holdings Berhad and its subsidiaries (“CSC Malaysia” or “the Group”) in his/her respective role in the Group, including when dealing with external parties. All external parties dealing with CSC Malaysia shall also adhere to the main principles of the Policy.

#### 1.2 Definition

Bribery	Act of soliciting, giving, accepting or receiving gratification.
Corruption	Defined under the official portal of Malaysian Anti-Corruption Commission, it refers to an act of giving or receiving of any gratification or reward in the form of cash or in-kind of high value for performing a task in relation to his/her job function.
Donation and Sponsorship	Charitable contribution and sponsorship payment made.
Entertainment	The action of providing or being provided with enjoyment.
Facilitation Payment	A payment made to an individual in order to expedite or secure a process or decision, to the benefit of the payer.
Gift	In the form of goods or services, given as to show favour towards an occasion, a person or organization.
Gratification	Defined under Malaysian Anti-Corruption Commission Act 2009 (revised 2018), it means: <ul style="list-style-type: none"> <li>i. 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;</li> <li>ii. any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;</li> <li>iii. any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;</li> </ul>

	<ul style="list-style-type: none"> <li>iv. any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;</li> <li>v. any forbearance to demand any money or money's worth or valuable thing;</li> <li>vi. 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</li> <li>vii. any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs i to vi.</li> </ul>
Hospitality	Friendly reception and treatment of guests, including but not limited to, refreshment, transportation, lodging, entertainment.
Public Body	<ul style="list-style-type: none"> <li>i. any Federal or State Government in Malaysia;</li> <li>ii. any local authority and any other statutory authority;</li> <li>iii. any society registered under Societies Act 1966;</li> <li>iv. any sports body registered under Sports Development Act 1997;</li> <li>v. any co-operative society registered under Co-operative Societies Act 1993;</li> <li>vi. any trade union registered under Trade Unions Act 1959;</li> <li>vii. any youth society registered under Youth Societies and Youth Development Act 2007; and</li> <li>viii. any company or subsidiary company in which any of the public bodies has controlling power or interest.</li> </ul>

## 2. ANTI-BRIBERY AND CORRUPTION

- 2.1. The Group, led by the Board of Directors ("Board"), applies ZERO TOLERANCE on all forms of bribery and corruption regardless of public or private sectors and strives to be in full compliance with laws and regulations.
- 2.2. Reporting in good faith on bribery and corruption is encouraged by the Board and should be done via the Whistleblowing channel indicated in Section 12 of this Policy.
- 2.3. The employees of the Group must not participate in any corrupt activity. In the event of breach of the Policy, the employee(s) involved may be subjected to disciplinary action, including dismissal as well as civil and criminal liability.
- 2.4. This Policy will be made publicly available and easily accessible on the Group's website at [www.cscmalaysia.com](http://www.cscmalaysia.com)

### **3. RISK ASSESSMENT**

In line with the Group's Risk Management and Internal Control procedure, bribery and corruption risk assessments shall be conducted at least once every three (3) years and reported accordingly.

### **4. DUE DILIGENCE**

The Group has in place procedures or internal practices in relation to due diligence to be conducted on external parties such as customers, suppliers as well as prospective employees.

### **5. CONFLICTS OF INTEREST**

The Group has in place rules and regulations in relation to conflicts of interest which are documented in its Standards of Ethical Code and Conduct applicable to employees of all levels.

### **6. FACILITATION PAYMENTS**

6.1. The Group strictly prohibits the practice of facilitation payments. Employees shall not directly or indirectly, offer any form of facilitation payment to any party, including public officials.

6.2. In the event of employee(s) is/are being required to make facilitation payment, he or she shall report immediately to his direct superior for the necessary action to be taken.

### **7. GIFT, ENTERTAINMENT AND HOSPITALITY**

7.1. Entertainment, hospitality, corporate gifts, festive or ceremonial gifts may be provided/given to customers, suppliers or other parties where it should be given as an act of appreciation and there shall be no obligation or expectation of any favour in return.

7.2. CSC Malaysia recognises that exchange of business civilities such as gifts, entertainment and hospitality is customary in order to enhance business relationships. Such courtesy is allowed if those are appropriate and reasonable, is not intended to facilitate/influence the decisions of the person involved and is in full compliance with the Group's Public Relations and Donation procedure..

7.3. The expenses on purchase of gifts, providing entertainment and hospitality must be approved in accordance with the standard operating procedure of CSC Malaysia and shall be documented.

7.4. In execution of employee's duties to develop business relationship, employees may provide entertainment and / or business meal that are courteous and simple. Extravagant and wasteful entertainment and / or business meal are prohibited.

7.5. The employees of the Group must not directly or indirectly, request or offer gifts, entertainment or hospitality with the purpose to improperly manipulate the decisions of the person involved. If an employee is unsure of how to assess the intention, he or she may refer the matter to the immediate superior or head of department before proceeding.

7.6. In the event of receiving gifts from business partners of the Group, the employee(s) shall report to the Vice President of respective division in accordance to the standard operating procedure of the Group.

## **8. DONATIONS AND SPONSORSHIPS**

8.1. Any donation or sponsorship, including charitable contribution shall be done in a transparent manner and must be approved in accordance to the standard operating procedure of CSC Malaysia. Donations and sponsorships should never be meant to obtain business or advantage that may influence that outcome of a business decision.

8.2. Appropriate background checks shall be conducted prior to execution of donation or sponsorship, especially on charitable contributions as to ensure such contributions are allowed by applicable laws.

## **9. PUBLIC BODY & GOVERNMENT DEALINGS**

9.1. There shall be no political contribution to be made towards political parties or individual politicians. If any contribution is made, it must be permissible under applicable laws and with no expectation of favourable treatment in return.

9.2. The employees of the Group may participate in political activities at own capacity but their individual views and actions towards politics are not reflective of CSC Malaysia. There shall be no reimbursement on personal political contributions.

## **10. FINANCIAL AND NON-FINANCIAL CONTROLS**

The Group has in place financial and non-financial controls (e.g. segregation of duties, approval limits), especially for critical processes. Such controls are reviewed from time to time or when necessary for further improvements.

## **11. RECORD KEEPING**

The Group ensures that all records (i.e. documents) relevant to our risk assessment as well as control measures are properly kept and safeguarded for a minimum period of seven (7) years from the end of the relevant financial years.

## **12. WHISTLEBLOWING**

12.1. The Group has placed great importance of integrity in doing business and is committed to protect the interest of all stakeholder. As such, in to facilitate any

stakeholder who wants to complain about any corruption, suspected fraudulent or dishonest use or misuse of the Company's resources or properties by any individual or group of people with intention to obtain personal gain, the Group has established a standard operating procedure for whistleblowing.

- 12.2. Types of concern that shall be raised, including but not limited to, fraud, conflict of interest, bribery, corruption, misuse of authority, insider trading, and misappropriation of company assets.

### 12.3. **REPORTING CHANNEL**

12.3.1. Whistleblower can contact any member of the Whistleblowing Committee ("the WBC") through phone or email to make a complaint. The members of the WBC can be obtained from the Group's website.

12.3.2. The following information, which will be kept confidential, are required to be provided by the whistleblower in writing to lodge a complaint:

12.3.2.1. Legal name of the whistleblower

12.3.2.2. Contact number of the whistleblower

12.3.2.3. Whistleblower's relationship with the Group

12.3.2.4. Person(s)/position(s) relevant to the complaint

12.3.2.5. Description of complaint

12.3.2.6. Supporting evidence, if available

12.3.3. The WBC member may call upon the whistleblower for further clarification, especially those complaints that being made through phone without any written information.

12.3.4. A whistleblower who wishes to withdraw his/her disclosure shall do so in writing to a WBC member or the WBC while providing reason(s) for the withdrawal. Nevertheless, the Group reserves the right to continue with investigations relevant to the disclosure.

12.3.5. Upon completion of the investigation, the whistleblower will be notified by the WBC on the outcome of his/her disclosure.

### 12.4. **WHISTLEBLOWER PROTECTION**

12.4.1. Protection is conferred on whistleblowers in accordance with the Whistleblower Protection Act 2010 ("the Act"). No action shall be taken against any whistleblower who makes a complaint in good faith, such as:

12.4.1.1. Dismissing or threatening the whistleblower;

12.4.1.2. Taking disciplinary action or threatening to take disciplinary action against the whistleblower;

12.4.1.3. Subjecting the whistleblower to any form of harassment or abuse;

12.4.1.4. Imposing any penalty, directly or indirectly, on the whistleblower;

12.4.1.5. Discharging, demoting or discriminating against the whistleblower.

12.4.2. All other parties involved in the handling of a whistleblowing case is strictly bound by the Act.

12.4.3. The Group ensures that confidentiality of information is maintained throughout the whistleblowing process. All records will be kept secured and confidential by the investigation team (e.g. Internal Auditor) and no one shall have the right to ask for/view those information/records unless authorized by the Audit Committee of the Group.

### **13. TRAINING AND COMMUNICATION**

13.1. As a measure to promote a strong internal culture of anti-bribery and corruption, adequate training programme relevant to the Policy will be provided to all employees of CSC Malaysia. Our employees also, must read the Policy and understand the Group's position on anti-bribery, corruption and whistleblowing.

13.2. Records pertaining to training, education and communication programmes of employees are kept and maintained by the Administration Department for reference.

13.3. This Policy will also be communicated to all external parties which our Group deals with.

### **14. REGULAR MONITORING AND REVIEW**

14.1. CSC Malaysia understands that regular monitoring and systematic review are necessary as to ensure the efficiency and effectiveness of ongoing anti-bribery, corruption and whistleblowing programme.

14.2. The reviews will be planned and may be carried out either internally or by an external party, whichever appropriate as long as the party is competent and adequately resourced.

14.3. The results of audit and improvement plan (including all other matters in relation to the Group's anti-bribery and corruption programme) shall be reported to the Audit Committee of the Group accordingly.

14.4. The Group will also monitor its employees' understanding of anti-bribery, corruption and whistleblowing from time to time and undertake necessary measures (e.g. additional training sessions) to improve this aspect if needed.

14.5. This Policy will be reviewed by the Board periodically to ensure that it is kept up to date. Any changes or updates to this Policy must be approved by the Board.

**Approved and adopted by the Board of CSC Malaysia**

**Date: 15 December 2020**