# ERUSAHAAN SADUR TIMAH MALAYSIA (PERSTIMA) BHD

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## **PERSTIMA Anti-Bribery and Corruption Policy Statement**

### **Policy Statement**

PERSTIMA is committed to applying the highest standards of ethical conduct and integrity in its business activities in the Malaysia and overseas. Every employee and individual acting on PERSTIMA's behalf are responsible for maintaining our reputation and for conducting company business honestly and professionally.

PERSTIMA condemns any form of bribery and corruption and is committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.

Employees must never, directly or through intermediaries, offer or promise any personal or improper financial or other advantage in order to obtain or retain a business or other advantage from a third party, whether public or private. Nor must they accept any such advantage in return for any preferential treatment of a third party. Moreover, employees must refrain from any activity or behavior that could give rise to the appearance or suspicion of such conduct or the attempt thereof.

### Gifts, Meals and Entertainment

Employees shall not be influenced by receiving favors nor shall they try to improperly influence others by providing favors. PERSTIMA permits normal and appropriate corporate entertainment, gifts, hospitality and promotional expenditure (given and received) to or from third parties that is undertaken for the purpose of establishing and maintaining good business relationships, to improve the image and reputation of PERSTIMA and to present PERSTIMA goods/services effectively.

The above allowed conditions are provided that it is in good faith and not offered, promised or accepted to secure an advantage for its employees or associated persons or to influence the impartiality of the recipient.

Gifts offered to third parties (such as customers, distributors, vendors, service providers, government officials, or other professionals) must be reasonable, modest and appropriate under the circumstances and must not create the appearance of improper influence or illegitimate advantage. Gifts should normally be offered only on customary business and cultural occasions and shall never include cash or cash equivalents.

#### **Reporting Illegal and Non-Compliant Practices**

Employees shall report any practices or actions believed to be inappropriate under this Policy or even illegal to their Line Managers or the appropriate members of the HR. If it is appropriate, in view of the nature of the reported matter, reports of violations may be made directly to higher levels including the Group's Managing Director. Where appropriate, complaints may be made on a confidential basis or through **Corporate Inquiry** which can be found inside our Company official website.

This policy is adopted by the Board on 28 May 2020.