

PLS PLANTATIONS BERHAD

ANTI-BRIBERY POLICY ("ABP")

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ANTI-BRIBERY POLICY



I. OVERVIEW

The Group's reputation and good standing are dependent on its directors, officers, members of management, employees and business associates who perform services for or on behalf of the Group (herein referred as "associated persons") acting responsibly and conducting business in a corrupt-free manner. Therefore, all associated persons of the Group shall comply with the statutory regulations and requirements governing the anti-bribery offences in Malaysia or any other countries that the Group operates.



II. OBJECTIVE

The objective of the ABP is to guide our associated persons in taking reasonable actions and steps to ensure compliance with the provision on referral, facilitation, gift, hospitality and entertainment, sponsorship and donation (the "offerings") in the ABP.

For the avoidance of doubt, expenses incurred for offerings permitted under the ABP shall still be subjected to the authorisation, requisition, payment, and reimbursement procedures defined under the Group's standard operating procedures.



III. DEVIATION

Generally, when being approached to provide any form of offerings and gratifications inconsistent with the provisions in the ABP, the associated persons shall:

- (i) Explain to the person about the provisions in this ABP and seek their understanding and respect of this policy; and
- (ii) Report any action in conflict with the provisions, according to the Group's whistleblowing procedures.

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IV. GIFTS



Occasion

Receiving and offering gifts happen during festive seasons, opening ceremonies, campaigns, shareholders meetings, and corporate social events.

Common gifts received or offered include fruits basket, hampers, goodies bags, red/green packets and flowers.

Prohibition, Limit & Practice

When giving or receiving gifts, directors, officers, management, and employees shall ensure that such gift giving and receiving are guided by and adhere to the following principles:



- a) Customary, lawful and transparency;
- b) No expectation of favour or advantages from recipients;
- c) No influence on the business judgement of the recipients; and
- d) No corrupt/ criminal intentions are involved.

In addition to adhering to the above principles, gift giving and receiving exceeding the following limits shall be subject to the approval of the Financial Assessment Committee ("FAC"):

- RM3,000 per year for directors; and
- RM500 per year for officers, management, and employees.

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III. GIFTS

Prohibition, Limit & Practice (Cont.)

In addition, when receiving gifts above the prescribed limit, all directors, officers, management, and employees are required to:

- a) Surrender all gifts received to the HR Department;
- b) Declare the gifts in the 'Gifts Receipt Declaration Form'; and
- c) Obtain approval from FAC for retaining the gifts for him/herself or to share the gifts with staff members. When the recipient is the FAC members, they shall abstain from approving the transaction.



Immediate family members of any directors, officers, management, and employees of the Group should also adhere to the above principles, the prescribed limit, declaration and approval procedures when giving to and receiving any gifts from business associates, their employees, or the family members of such business associates.

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IV. HOSPITALITY & ENTERTAINMENT

Occasion

The common forms of hospitality and entertainment in the Group include but are not limited to food, beverages, travelling allowances, accommodation, and transportation.



The prescribed occasions allowed for the offering and acceptance of hospitality and entertainment are:

- Festive celebrations;
- Customary ceremonies;
- Site visits; and
- Official business meeting, function, events, and trips.

Prohibition, Limit & Practice

Besides observing the similar principles on customary, lawful and transparency; no expectation of favour or advantages from recipients; no impact on business judgement of the recipients; and no corrupt/ criminal intentions involved, all offering of hospitality and entertainment shall be limited to the above prescribed occasions, and the amount for such offering shall be subject to the approval of FAC.



Save for the festive celebration and customary ceremony occasions, the Group will not extend hospitality and entertainment to family members of business associates and any third parties who are not involved in business dealings with the Group.

On the other hand, directors, officers, management, or employees shall not accept hospitality and entertainment except for the prescribed occasions organised by the business associates and with official invitation addresses to PLS.

Similarly, immediate family members of directors, officers, management, and employees shall not accept or offer hospitality or entertainment from and to all business associates, their employees, and the family members apart from the festive celebration and customary ceremonies.

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IV. HOSPITALITY & ENTERTAINMENT

Prohibition, Limit & Practice (Cont.)

Directors, officers, management, and employees and their family members who decided to accept hospitality and entertainment from business associates which are inconsistent with the above provisions, shall bear their own expense and explain to the offeror about the Group's hospitality and entertainment policy and seek their understanding and respect of this policy.



Notwithstanding the above, this hospitality and entertainment policy does not apply to reimbursable expenses covered in the Group's Employee Handbook.

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V. REFERRAL



Occasion

At PLS Group, referral payment is made in the form of fee or commission to associated persons for successfully procuring business, projects, tenants, purchasers, and customers.

Prohibition, Limit & Practice

The Group prohibits referral payment to:

- a) Government officials;
- b) Individuals representing any regulatory authorities (“Regulatory Representatives”); and
- c) Any nominee identified by these Regulatory Representatives.



All referral payments shall only be made in accordance with the market and industry norm and shall be subjected to the approval of the FAC or any other Committee as may be designated by the Board from time to time.

In order to avoid any potential and perceived conflict of interest, all members of the FAC or other Committee as designated by the Board, shall disclose their interest and abstain from deliberation and voting on the transactions involving referral payment to be paid to them or their immediate family members.

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VI. FACILITATION



Occasion

Facilitation is an action and process made to speed up approval and application processes.



Prohibition, Limit & Practice

At PLS Group, we follow and comply strictly with all internal and external procedural requirements for application and would not seek facilitation to expedite application and approval processes for our business dealings and transactions.

The Group does not tolerate offering and acceptance of monetary and/ or non-monetary payments and benefits for facilitation purposes to and from any business associates for assisting facilitation.

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VII. SPONSORSHIP & DONATION

Occasion

Sponsorship and donation in the form of monetary benefits or equivalent, equipment or other benefits to charitable causes are part of the Group's corporate social responsibility ("CSR").



Sponsorships and donations are usually contributed for the following occasions and organisations:

- i. Schools and education related organisations;
- ii. Sports events;
- iii. Festive celebration;
- iv. Yayasan/ foundation;
- v. Charitable Organisations; and
- vi. Non-Governmental Organisations.

On the other hand, the Group may receive sponsorships and donations from business associates during corporate celebrations.

Prohibition, Limit & Practice

Request for sponsorships and donations can only be initiated by Heads of Department and subject to FAC for approval.



Contribution of sponsorships and donations shall be recorded, documented, and supported by a formal request and acknowledgement of receipt by the recipients to promote transparency and safeguard the reputation of the Group from any allegations of bribery.

Directors, officers, management and employees or their immediate family members shall not receive or seek sponsorships and donations from any of the Group's business associates except for charitable causes only and at the same time shall make a declaration on the sponsorship and donation received.

Appendix A

GIFTS RECEIPT DECLARATION FORM

All directors, officers, management and employees must declare the gift received in accordance to the Group's Gifts Policy and surrender their gifts to the HR Department if the amount exceeds the prescribed limits. Gift received by the immediate family shall also be declared by completing this Declaration Form by the personnel of the immediate family members. Any personnel who fail to comply with this declaration procedure will be subjected to disciplinary action.

I. Gift's Details		
1.	Date Received	:
2.	Received from	:
3.	Name of the Organisation	:
4.	Description (or Photo Attachment)	:
5.	Actual / Estimated Value (RM)	:
6.	Purpose / Occasion	:
II. Recipient's Details		
1.	Name	:
2.	Designation	:
3.	Division / Department	:
4.	Relationship of the business associates with the Group?	

Appendix A

GIFTS RECEIPT DECLARATION FORM (Cont.)

III. Details of Family Members of the Recipient	
1. Name	:
2. Family Member Relationship with the Recipient	:
IV. Surrender to HR Department	
Collected By (Name)	:
.....	
Signature	
Designation:	
Date:	
V. Approved by the Financial Assessment Committee:	
Name of FAC Representative	:
.....	
Signature	
Date:	

Appendix B

SPONSORSHIP & DONATION RECEIPT DECLARATION FORM

All directors, officers, management, employees, and their immediate family must declare sponsorship & donation received from any of the Group's business associates for charitable causes initiated by them on personal capacity. Any personnel who fail to comply with this declaration procedure will be subjected to disciplinary action.

A. Details of Director/ Officer/ Management/ Employee (Delete Those Not Applicable)	
1. Name	:
2. Designation	:
B. Details of Family Members Involved in Securing the Sponsorship and Donation	
1. Name	:
2. Family Member Relationship	:
C. Sponsorship & Donation's Details	
1. Date Received	:
2. Charitable Organisation	:
4. Actual / Estimated Amount (RM)	:
5. Reason	:
D. Sponsor's / Donor's Details	
1. Name of Organisation	:
2. Person-in-Charge	:
3. Contact Number	:
4. Sponsor's / Donor's Relationship with PLS	: