

DEFINITIONS

Except where the context otherwise requires, the following terms and abbreviations shall apply throughout these Policies;

“The Group” means SLP and its subsidiaries collectively.

“Non-Management Level” means the employees below the level of Assistant Managers of the Group.

“Management Level” means the Assistant Managers, Managers, General Managers and the Directors of the Group.

“Bribery” means offering, giving, receiving or soliciting something of value (for example money or information) in an attempt to illicitly influence the decisions or actions of a person with a position of trust within an organization.

“Corruption” means the abuse of entrusted power for personal gain. However, corruption has a broader definition than bribery. These policies therefore refer to “bribery and corruption” as a standard term to cover all types of gratification.

1. OBJECTIVES

- 1.1 The purpose of this Policy is to reiterate the Group’s commitment to full compliance with the Anti-Bribery and Corruption laws that may be applicable.
- 1.2 To ensure that the Group has adequate procedures in place to prevent and detect bribery and corruption.
- 1.3 To protect the Group against the possible penalties and repercussions resulting from acts of bribery and corruption or being associated with such behavior.

2. APPLICABILITY

This Policy is applicable to all Directors and employees of the Group. The reporting requirement of this policy is also applicable to the Group’s customers and suppliers. This policy is intended to supplement all applicable laws, rules, and other corporate policies.

3. ANTI-BRIBERY AND CORRUPTION POLICIES

The policy covers the following;

- 3.1 Any gift must be unsolicited or not be perceived as affecting business judgement or to influence views of conduct or to obtain an improper advantage. Gifts should only be offered to and received in connection with a customary business or cultural occasion. Cash, kickbacks or the equivalent advantages are absolutely prohibited.

Gifts must not exceed the threshold of RM500 (for Management level) and RM100 (for Non-Management level) and in any event, must not occur more than 2 times a year with the same person.

Any gift offered / received with the amount above the threshold of RM500 (for Management level) and RM100 (for Non-Management level) is subject to the approval from the ABC Committee. The gifts above the thresholds shall not be possessed by any one individual, it should be shared among the employees.

The ABC Committee Members shall strictly refuse any luxury personal gift.

- 3.2 Any gift offered / received within the thresholds must be reported to the ABC Committee on a semi-annual basis, for book-keeping purposes, and both the amount and description of any transaction must be recorded, and further to ensure that there is a reasonable relationship between the substance of a transaction.

The receiving / giving of hospitality or gifts will be declared in a prescribed form (Form 188).

- 3.3 Hospitality (meals and entertainment) must be unsolicited or not be perceived as affecting business judgement. Meals and entertainment should only be offered to and received from the Group representative dealing with the customers, suppliers, contractors, business associates in conjunction with legitimate business meetings, conferences or events hosted or supported by the Group.

The Hospitality amount shall be in accordance to the budget allocated.

- 3.4 The Group has allocated RM 10,000 per annum for Corporate Social Responsibility activity inclusive charitable contribution to registered associations or educational institutions. Amounts may vary from time to time upon review and approval by the Board of Directors budgetary allocation for such purposes.

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- 3.5 The Group does not accept and will not make any form of facilitation payments of any nature.
- 3.6 All Directors and employees shall declare to the Group any conflicts of interest they may have with the Group using the prescribed form (Form 192).
- 3.7 This Policy shall be consistent and interact with other Group policies such as the Code of Conduct & Ethic and whistleblowing among others.

4. TRAINING AND COMMUNICATION

- 4.1 The Group shall conduct an awareness program for all employees on the Group’s policies regarding anti-bribery and corruption, integrity and ethics.
- 4.2 The training shall be given at least once a year to employees at all levels regardless of category of bribery risks as well as refresher and newly joined employees. Having this training in place to ensure all employees understand the Group’s roles and responsibilities in preventing the risks of bribery and corruption.
- 4.3 The Human Resource Department shall maintain records to identify which employees have received training and update the training schedule based on policy needs.
- 4.4 The ABC Committee shall monitor / review internally with employees to have the acknowledgement from all the employees that they are aware of this policy and its implications.
- 4.5 Our zero-corruption approach to bribery and corruption shall be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

5. REPORTING OF POLICY VIOLATIONS

- 5.1 Any director and employee who knows of bribery or corrupt activity occurring in the Group, is encouraged to raise the concerns or whistle blow at an early stage as possible.
- 5.2 The provision, protection and procedure of the Whistle Blowing Policy for reporting of the violations of the policy are available on SLP website.
- 5.3 Reports made in good faith, shall be addressed in a timely manner and without incurring fear of reprisal regardless of the outcome of any investigation.
- 5.4 The confirmed case of bribery or corruption should be reported to the Malaysian Anti-Corruption Commission (“MACC”).

6. RESPONSIBILITIES OF DIRECTORS & EMPLOYEES

- 6.1 All Directors & employees must acknowledge that they have read, understood and complied with these policies and its implications as stated in 6.3
- 6.2 The prevention, detection and reporting of bribery and corruption are the responsibility of all Directors & employees. All Directors & employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 6.3 Disciplinary action will be taken to against:
- Any Director or employee who violates the terms of this Policy; OR
 - any Director / employee who has direct knowledge of potential violations of this Policy but fails to report to ABC Committee; OR
 - Any Director / employee who misleads or hinders investigations inquiring into the potential violations of this Policy

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The form of disciplinary actions is including:

- Termination of employment; OR
- Revaluation or termination contract with third party

7. RECORD KEEPING

- 7.1 The Group must have proper and complete records of all payments made to third parties in the usual course of business as these would serve as evidence that such payments are not linked to any bribery and corruption or unethical conduct.
- 7.2 All accounts, invoices, documents and records related to dealings with third parties should be prepared and maintained with accuracy and completeness.

8. MONITORING AND REVIEW

- 8.1 The ABC Committee shall monitor and review the implementation of these policies bi-yearly, considering its suitability, adequacy and effectiveness.
- 8.2 Directors and employees are responsible for the success of these policies and should ensure they use it to disclose any suspected danger or wrongdoing.
- 8.3 Directors and employees are invited to comment on these policies and suggest ways in which it might be improved. All comments, suggestions and queries should be addressed to the ABC Committee via suggestion box located at the Production walkway.

COMPLIANCE HELPDESK

The Group is committed to zero corruption and believes that honesty and integrity provide the best foundation for the Group.

In regards to reporting or whistle blowing of any suspicious or wrongful deed, please approach any ABC Committee Members.

- **Email** auditcomm@sinliplas.com.my
- **Letter** SLP Resources Berhad, PT1, Lot 57A Lorong Perusahaan 5, Kulim Industrial Estate, 09000 Kulim, Kedah, Malaysia.
(**Attention:** SLP Anti-Bribery & Corruption Committee)