



PERBADANAN NASIONAL BERHAD

ANTI-BRIBERY AND CORRUPTION POLICY

Version 1.0
PERNAS/ID/POLICY/003

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ABBREVIATIONS AND DEFINITIONS

I. Abbreviations

BARC	Board of Audit and Risk Committee
BOD	Board of Directors
CEO	Chief Executive Officer
CSR	Corporate Social Responsibility
HCD	Human Capital Department
HOD	Head of Division
Hodp	Head of Department
ID	Integrity Department
MACC	Malaysian Anti-Corruption Commission
MC	Management Committee
PERNAS	- Perbadanan Nasional Berhad (Group) and its subsidiaries
WPG	- Whistleblower Policy and Guidelines

II. Definitions

In this document, the following words shall have the meaning hereby assigned to them except where the context otherwise requires:

TERM	DEFINITION
ABC Policy	refers to Anti-Bribery and Corruption Policy
ABMS	refers to Anti Bribery Management System (MS ISO 37001:2016)
Bribery	means any act or omission considered as an offence of giving or receiving "gratification". This may be in the form of offering, giving, receiving, or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person in a position of trust within an organisation. "Gratification" is as defined in the Section 3 of Malaysian Anti Corruption Commission Act 2009 as follows:

TERM	DEFINITION
	<p><i>(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;</i></p> <p><i>(b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;</i></p> <p><i>(c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;</i></p> <p><i>(d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;</i></p> <p><i>(e) any forbearance to demand any money or money's worth or valuable thing;</i></p> <p><i>(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</i></p> <p><i>(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).</i></p> <p>Bribery may be "outbound", ie someone who influences the actions of someone external, such as a Government official or important decision-maker in favour of Pernas.</p> <p>It may also be "inbound", where an external party is attempting to influence someone within Pernas such as a decision-maker or someone with access to confidential information.</p>
Corruption	<p>means abuse of entrusted power for personal gain as defined by Transparency International; or</p> <p>acts of extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.</p>

TERM	DEFINITION
Business Associates (Third Party)	any party with which the organisation has, or plans to establish, some form of business relationship, including but not limited to clients, joint venture partners, consortium partners, contractors, consultants, sub-contractors, suppliers, service providers, vendors, advisors, agents, distributors, representatives, intermediaries, and any other persons or entities who provide work, goods or services or act for or on behalf of Pernas ("Third Parties").
He/His	Denote both male and female
Gifts	Defined as anything of value such as money or cash equivalent vouchers, goods, services, loans, tickets, free fares, shares, lottery tickets, travelling facilities, entertainment expenses, club membership, any form of commission, hampers, jewellery, decorative item and any item of high value that is given to directors (executive and non-executive) or employees.
Entertainment	(a) The provision of recreation; or (b) The provision of accommodation or travel in connection with or for the purpose of facilitating entertainment of the kind mentioned in item (a) above, with or without consideration paid whether in cash or in kind, in promoting or in connection with a trade or business activities and/or transactions
Facilitation Payment	payment or other provision made (eg extravagant gifts, meals or favours of value) personally to an individual in Pernas in control of a process or decision or given by an individual in the Pernas to other parties in control of a process or decision in order to secure or expedite a routine or administrative duty or function.
Government or Public Official	refers to any officer or employee or anyone acting in an official capacity on behalf of a government or any department or agency. Includes, without limitation, candidates for public office, officials of any political party and officials of state-owned enterprises.
Pernas Employee	A person employed by Pernas, whether confirmed in a position or on probation, or any other person employed on contract,

TERM	DEFINITION
	temporary basis or secondment or appointed by Pernas (inclusive of interns and apprentices)
Support Letter	refers to a document in any form of communication that is conveyed either verbally or in writing which includes letters, memos, minutes, emails, short message services, oral conversations, telephone calls or other forms intended to support an application or influence decision making.

PREFACE

This Document

The purpose of this document is to have standard principles and practices in exercising ABC Policy within Pernas. This document will be communicated throughout the organisation where the organisation will ensure that all relevant personnel clearly understand Pernas approach towards anti-bribery and corruption.

Target Audience

This ABC Policy is meant for Pernas (Group) and its subsidiaries, to all their directors (executive and non-executive), employees or representatives who are directly or indirectly involved in managing day to day business and operations functions.

Compliance with Laws and Regulations

This ABC Policy shall at all times comply with and be subject to the laws and regulations of Malaysia. In the event of any conflict or inconsistency between the laws and regulations of Malaysia, the latter shall prevail.

Interpretation of the Policy

It is the responsibility of all employees of Pernas to observe and comply with, at all times, the provisions of the ABC Policy contained herein. Where interpretation of the ABC Policy is required, ID should be consulted.

Related Document

This ABC Policy should be read together with other related internal policies and/or external guidelines (where relevant) issued by the governing authorities.

Change Request

For any recommendation on proposed amendments or changes that need to be made to this ABC Policy please forward to ID.

Document Creation Information

This ABC Policy document is created by the ID and approved by Pernas BOD.

Validity and Review of the Policy

- The effective date of this ABC Policy shall be immediately upon approval by the BOD.
- This ABC Policy shall be reviewed every three (3) years or as and when deemed necessary by BOD or BARC.

Getting Help

If you have any queries regarding this ABC Policy, please contact the ID.

1.0 INTRODUCTION

- 1.1 Pernas had on 2 March 2022 implemented MS ISO 37001:2016 ABMS. On 27 January 2023, Pernas has obtained the MS ISO 37001:2016 ABMS certification which is valid for three (3) years.
- 1.2 The ABC Policy has been developed as part of the requirement sets out in the MS ISO 37001:2016 ABMS. It is imperative for Pernas to have a clear and unambiguous ABC Policy on the company's position in relation to bribery and corruption. This will forms the cornerstone of an effective integrity management system.
- 1.3 The nature of Pernas activity requires its personnel to engage in business with a wide range of parties, both internal and external. Thus, this ABC Policy establishes the boundaries on interactions with all parties. Hence, Pernas employees shall uphold high levels of personal and professional values in all business interactions and decisions.

2.0 OBJECTIVE

- 2.1 This ABC Policy sets out the Pernas overall position on bribery and corruption in all its forms. It also sets out the reasonable and proportionate measures to ensure the Pernas does not engage in corrupt practices for its own advantage or benefit.
- 2.2 Ensure that Pernas has adequate procedures in place to prevent and detect bribery and corruption.
- 2.3 Provide information and guidance for directors and employees on how to recognise and deal with potential bribery and corruption issues.
- 2.4 Protect Pernas against possible penalties and repercussions resulting from acts of bribery and corruption or being associated with such behaviours.

3.0 SCOPE

- 3.1 This ABC Policy applies to all directors, employees of Pernas (Group) and its subsidiaries, consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with the Pernas (including third parties).
- 3.2 In the context of this ABC Policy, third party refers to any individual or organisation that Pernas meets and works with. It refers to actual and potential clients, customers, suppliers, affiliates, training providers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.
- 3.3 Any arrangements that Pernas makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

4.0 ANTI-BRIBERY AND CORRUPTION STATEMENT

Pernas is committed in applying the highest standard of ethical conduct with integrity in all its business activities and daily operation. Every employee and individual acting for and on behalf of Pernas is responsible for upholding our reputation by conducting Pernas business with honesty and professionally.

Pernas adopts a zero-tolerance approach against all forms of bribery and corruption, whether direct or indirect, and is committed to acting professionally, fairly and with integrity in all business dealings and relationships in all jurisdictions in which it operates. Pernas is committed to implementing and enforcing effective measures to counter bribery and corruption which are

punishable offences in accordance with the anti-bribery and corruption laws as follows:

1. Inculcate and practice ethical virtues in Pernas and to prevent any possibilities that could lead to unethical practices;
2. Comply with and adhere to the provisions of the Malaysian Anti-Corruption Commission Act 2009 (Act 694) and other applicable laws, regulations, rules, policies and procedures to which they are bound to observed in the performance of their duties;
3. Pernas Board of Directors and Management Committee members are committed to implementing controls and review for continual improvement through Pernas ABMS (MS ISO 37001:2016);
4. Provide channels and encourage reporting on alleged corrupt activities through the Pernas WBG;
5. Pernas shall take strict actions for any non-compliance and violation of the ABC Policy by any of its employees or business associates and will take necessary disciplinary action in accordance with its policies, procedures, directives and guidelines and/or initiation of legal proceedings against those involved;
6. Pernas has established an independent ID that is responsible for monitoring compliance of the ABMS and directly reports to Pernas BOD;
7. Pernas shall undertake to review the bribery risk assessment annually; and
8. Pernas will collaborate and work closely with MACC to combat and to prevent corruption in our organisation.

5.0 RESPONSIBILITY

5.1 Board of Directors

5.1.1 Sets commitment towards prohibition of bribery and corruption in the business conduct within Pernas.

5.1.2 Approves the ABC Policy.

5.1.3 Ensure the alignment of ABC Policy to the strategy of Pernas.

5.1.4 Maintains oversight on ABC governance, ensuring that the best practices of ABC management system is established, implemented, maintained and reviewed to adequately address the Pernas bribery and corruption risks.

5.1.5 Promotes appropriate ABC culture within Pernas.

5.2 Senior Management

5.2.1 Provides overall direction on the establishment, implementation and periodic review of ABC Policy.

5.2.2 Ensure the integration of ABC Policy requirements into key organisation functions such as human resource, procurement, and finance, and enhance the underlying controls on these key functions so as to support ABC Policy requirements.

5.2.3 Ensure that the ABMS requirements are applied and complied with within Pernas.

5.2.4 Supports the resource allocation and investment in a robust and effective ABC Policy.

5.2.5 Supports adequate training and awareness programmes for the employees of Pernas.

5.2.6 Promotes appropriate ABC culture within Pernas.

5.3 Pernas Employee

- 5.3.1 Employees Pernas Employees including the directors are required to adhere to this ABC Policy at all times.
- 5.3.2 Pernas Employees including the directors are required to carry out those responsibilities and obligations relating to the Pernas anti-bribery and corruption stance, which includes the following:
 - 5.3.2.1 Be familiar with applicable requirements and directives of the policy and communicate them to subordinates;
 - 5.3.2.2 To ask ID if any questions about this ABC Policy arise or if there is a lack of clarity about the required action in a particular situation;
 - 5.3.2.3 Always raise suspicious transactions and other "red flags" (indicators of bribery or corruption) to immediate superiors for guidance on the next course of action;
 - 5.3.2.4 Be alert to indications or evidence of possible violations of this ABC Policy;
 - 5.3.2.5 Promptly report violations or suspected violations through appropriate channels;
 - 5.3.2.6 Not misuse their position or Pernas name for personal advantage; and
 - 5.3.2.7 Attend and complete required anti-bribery and corruption training as required.

- 5.3.3 When dealing with business associates, Pernas Employees shall not:
 - 5.3.3.1 express unexplained or unjustifiable preference for certain parties;
 - 5.3.3.2 make any attempt at dishonestly influencing their decisions by offering, promising or conferring advantage;
 - 5.3.3.3 exert improper influence to obtain benefits from them; and

5.3.3.4 directly or indirectly offer or make promise or corrupt payments, in cash or in kind for a specific favour or improper advantage from them.

5.3.4 When dealing with external parties in a position to make a decision to Pernas benefit (such as a Government official or client), Pernas employees shall not:

5.3.4.1 offer, promise or make any attempt at dishonestly influencing the person's decision by directly or indirectly offer or make promise of corrupt payments, in cash or in kind;

5.3.4.2 be involved in any discussions regarding business or employment opportunities, for their own personal benefit or for the benefit of the external party;

5.3.4.3 otherwise abuse the decision-making and other delegated powers given by the BOD or senior management, in order to illicitly secure an outcome which would be to the commercial advantage to themselves and/or Pernas; and

5.3.4.4 exert improper influence to obtain personal benefits from them.

6.0 ANTI-BRIBERY AND CORRUPTION PRINCIPLES

- 6.1 All forms of bribery and corruption as provided in the definition is prohibited.
- 6.2 Bribery and corruption may take the form of anything of value, such as money, goods, services, property, privilege, employment position or preferential treatment.
- 6.3 Pernas employees shall not whether directly or indirectly, offer, give, receive or solicit any item of value, in the attempt to illicitly influence the decisions or actions of a person in a position of trust within an

organisation, either for the intended benefit of Pernas or the persons involved in the transaction.

- 6.4 This ABC Policy applies equally to its business dealings with commercial ('private sector') and Government ('public sector') entities, and includes their directors, employees, agents, and other appointed representatives at all levels. Even the possible appearance of bribery or corruption is to be avoided, in particular when dealing with Government officials.
- 6.5 No employee will suffer demotion, penalty, or other adverse consequences in retaliation for refusing to pay or receive bribes or participate in other illicit behaviour, even if such refusal may result in the company losing business or experiencing a delay in business operations.
- 6.6 Pernas recognises the value of integrity in its directors and employees. Pernas recruitment, training, performance evaluation, remuneration, recognition, and promotion for all employees shall be designed to recognise integrity.
- 6.7 Pernas committed to conduct due diligence checks on prospective employee, particularly as it relates to appointment to position where bribery or corruption risk has been identified.
- 6.8 Pernas does not offer employment to prospective employees in return for previous favour or in exchange of improper favour.
- 6.9 Pernas awards contracts and employee positions purely based on merits. Support letters in all forms shall not be recognised as part of the business decision making process.

7.0 RECOGNITION OF LOCAL AND INTERNATIONAL LEGISLATION

- 7.1 Pernas is committed to conducting its business ethically and in compliance with all applicable laws and regulations in the countries where its business is conducted.

7.2 Prohibition of bribery and acts of corruption, companies to establish and maintain accurate books and records, and to have sufficient internal controls are governed by the following laws which is not exhaustive:

- 7.2.1 Malaysian Anti-Corruption Commission Act 2009;
- 7.2.2 Malaysian Penal Code;
- 7.2.3 Malaysian Companies Act 2016;
- 7.2.4 Malaysian Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001;
- 7.2.5 US Foreign Corrupt Practices Act 1977; and
- 7.2.6 UK Bribery Act 2010.

7.3 In cases where there is a conflict between mandatory laws and the principles contained in this and other policies, the law shall prevail.

8.0 GIFTS, ENTERTAINMENT AND HOSPITALITIES

- 8.1 The gifts, entertainment and hospitalities are governed by Pernas Gifts, Hospitality, Donation, Sponsorship and Similar Benefits Policy and Guidelines.
- 8.2 The Gifts, Hospitality, Donation, Sponsorship and Similar Benefits Policy and Guidelines stipulated specific approval(s) is/are required before incurring specific types or amounts of spend when it comes to giving of gifts and entertainment, as well as receiving of gifts and entertainment.
- 8.3 All employees must comply and adhere to any restrictions stipulated in the Gifts, Hospitality, Donation, Sponsorship and Similar Benefits Policy and Guidelines.

9.0 FACILITATION PAYMENT

- 9.1 Pernas adopts a strict policy of prohibiting the use of facilitation payments in its business. Facilitation payment is a payment or other

provision made personally to an individual in control of a process or decision. It is given to secure or expedite the performance of a routine or administrative duty or function.

- 9.2 Pernas prohibits accepting or obtaining, either directly or indirectly, facilitation payments from any person for the benefit of himself or for any other person. Pernas views facilitation payments as seriously as bribery and corruption.
- 9.3 Employee shall decline to make the payment and report to CEO and/or ID immediately when they encounter any requests for a facilitation payment.
- 9.4 If a payment has been made due to exceptional circumstances, the following steps must be taken:
 - 9.4.1 Keep a record of the details of the incident and reason for the payment;
 - 9.4.2 Report the incident to CEO or ID or to the HOD or Hodp immediately; and
 - 9.4.3 Report the payment to the relevant authorities, if necessary or required by law.
- 9.5 Any Pernas employees having any suspicions, concerns or queries regarding a payment made on Pernas behalf, or on any perceived improper business practices, he should raise these by reporting via the channel as outlined in Pernas WBP.

10.0 DEALING WITH PUBLIC OFFICIALS

- 10.1 Employee should seek guidance from their immediate superior and approval from the level of authority prior to providing any gift, entertainment or corporate hospitality to public officials.
- 10.2 If approval is obtained to provide gift, entertainment or corporate hospitality to public officials, employee(s) must ensure that the gift, entertainment or corporate hospitality is not excessive and lavish, and

must be commensurate with the official designation of the public official and not his personal capacity.

- 10.3 Employee must also be aware of local laws governing the activity and to ensure compliance.

11.0 POLITICAL CONTRIBUTIONS

- 11.1 Pernas does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office.
- 11.2 Use of Pernas facilities, equipment and resources by political parties for any political campaign or political party function is not permitted unless has been approved by the appropriate and approving authority.

12.0 LETTER OF SUPPORT

12.1 Receiving Letter of Support

- 12.1.1 Pernas may from time to time receive support letter from suppliers, vendors or business associates. As a rule, Pernas awards contracts and employee positions purely on a merit basis. Support letters in all forms shall not be recognised as part of Pernas business decision-making process.
- 12.1.2 Pernas does not entertain support letters and requests for special privileges. Pernas shall prevent external parties from using their position to influence Pernas decision-making for personal gain including for their family and friends.
- 12.1.3 If support letters are received or as part of the submission of documents, Pernas shall evaluate such documents, including support letters on the same basis of merit and prudence, and shall not be unduly influenced by such support letters.

12.2 Issuing Letter of Support

12.2.1 Pernas may need to issue support letters for certain parties as part of its normal business operations. Such support letters shall be issued by qualified and authorised persons in Pernas and shall be factual and true and reflect the competency/capability of the said party.

12.2.2 The letter of support or recommendation may be issued for the following purposes:

- a. Status of Employment/ Employment confirmation of Pernas employee; and
- b. Reference Letter to Pernas past employee/business associates on testimonial/confirmation of performance or work.

13.0 BUSINESS ASSOCIATES (THIRD PARTIES)

13.1 All business associates (any party with which Pernas has, or plans to establish, some form of business relationship, including but not limited to clients, joint venture partners, consortium partners, contractors, consultants, sub-contractors, suppliers, service providers, vendors, advisors, agents, distributors, representatives, intermediaries, and any other persons or entities who provide work, goods or services or act for or on behalf of Pernas ("Third Parties"), including but not limited to their employees, affiliates or any other third parties or sub-contractors who have been engaged by the Third Parties to perform services for, or provide products to, or act for or on behalf of Pernas (collectively, "Personnel"), are required to comply with this Policy, and all other policies as it relates to them.

13.2 In circumstances where Pernas retains controlling interest, such as in certain joint venture agreements, business associates, partners or affiliates are required to adhere to Pernas ABC Policy. Where Pernas does

not have controlling interest, associates are encouraged to comply the same.

- 13.3 Due diligence should also be carried out with regards to any business associates, partners or affiliates intending to act on Pernas behalf as an agent or in other representative roles, to ensure that the entity is not likely to commit an act of bribery or corruption in the course of its work with Pernas.
- 13.4 Due diligence may include a search through relevant databases, checking for relationships with public officials, self-declaration, and documenting the reasons for choosing one particular business associate over another. The results of the due diligence process must be documented, retained for at least seven years and produced on request by the custodian of the process.
- 13.5 Pernas shall include standard clauses in all contracts with business associates, partners or affiliates that enable Pernas to terminate the contract in the event that bribery or an act of corruption has been proved to occur. Additional clauses may also be included for business associates, partners or affiliates acting on Pernas behalf where a more than minor bribery risk has been identified.
- 13.6 Declaration of bidders, suppliers and consultants to avoid corrupt practices are stipulated in Pernas Integrity Pact.

14.0 CONFLICT OF INTEREST

- 14.1 All parties must avoid conflict of interest. A conflict of interest exists when a personal interest or activity interferes or appears to interfere with the duties that he performs or interfere with the best interests of Pernas. A conflict of interest may unconsciously influence even the most ethical person and the mere appearance of a conflict may cause one's acts or integrity to be questioned.

- 14.2 All parties are expected to use their judgment to act, at all times and in all ways, in the best interests of Pernas during engagement and while performing their duties. As such, all parties should attempt to avoid actual or apparent conflicts of interest.
- 14.3 When making decisions related to Pernas, all parties have a duty to act in Pernas best interests and avoid even the appearance of a conflict. For instance, a conflict of interest may occur when a person or a family member receives a personal benefit as a result of his position with Pernas or he takes a business opportunity that is meant for Pernas. Similarly, the person may not use his position at Pernas to request personal benefits for himself or his family members.
- 14.4 If employee discover that a personal activity or association could compromise or appear to compromise their objectivity or ability to make impartial business decisions, they should disclose it immediately to their HOD or Hodp.
- 14.5 A conflict of interest may also arise from the person's personal relationship with a customer, supplier, vendor, competitor, business partner, or other Pernas employee, if that relationship impairs or may be perceived to impair his objective business judgment.
- 14.6 Employee shall be alert to potential and perceived conflict of interest situations and shall diligently assess and avoid such activity or situation. Such situations could arise:
 - 14.6.1 when he exercises or can be seen as exercising preference for his own interests or the interests of his family/ household members, associates or friends at the expense of the interest of Pernas;
 - 14.6.2 when he influences or can be seen as influencing Pernas decisions on dealings in favour of a business, enterprise or entity owned or

partially owned by him, his close family / household members, associates or friends; and

14.6.3 when he or any business, enterprise or entity owned or partially owned by him, his close family / household members, associates or friends competes or is seen as competing with or against Pernas or any qualifications, courses or other offering.

14.7 The best rule for any situation that appears to present a conflict of interest is to "abstain and disclose". If it is not possible to avoid participating in the event or activity creating the conflict:

14.7.1 promptly disclose the potential conflict and submit your request to your HOD or Hodp; and

14.7.2 avoid participating in decisions that might raise the appearance of a conflict until you receive appropriate direction from the senior management who shall consider the facts and circumstances of the situation to decide whether corrective or mitigating action is appropriate.

14.8 Declaration of conflict of Interest of Pernas Employees, members of procurement, bidders, suppliers and consultants are stipulated in Pernas Integrity Pact.

15.0 ANTI-BRIBERY AND CORRUPTION FUNCTION

15.1 Pernas shall establish and maintain an anti-bribery and corruption function within the ID to oversee the design, implementation and management of the ABMS.

15.2 The ID shall perform functions below equipped to act effectively against bribery and corruption:

15.2.1 overseeing the design and implementation by the organisation of the ABMS;

- 15.2.2 providing advice and guidance to personnel on the ABMS and issues relating to bribery and corruption;
- 15.2.3 ensuring that the ABMS conforms to the requirements of this document;
- 15.2.4 reporting on the performance of the ABMS to the MC, BARC and BOD as appropriate;
- 15.2.5 adequate to manage effectively the bribery risks faced by the organisation; and
- 15.2.6 escalate to HCD for the cause of action to be taken against personnel found to be non-compliant with the provisions of the ABC Policy;

15.3 Appropriate resources shall be provided for effective operation of the ABMS and the ID is staffed with persons who have the appropriate competency, knowledge and independence.

16.0 CONTINUOUS IMPROVEMENT (MONITORING AND REVIEW)

- 16.1 In maintaining the ABMS, Pernas is committed to adhere the requirements set out in MS ISO 37001:2016 ABMS. Any need for improvements will be applied as soon as possible.
- 16.2 Pernas shall monitor the legal and regulatory regimes where it operates and any changes to Pernas business environment and risks and identify opportunities for ABMS improvement. A report should be submitted to the MC, BARC and/or BOD on a periodic basis for the appropriate action to be taken.
- 16.3 Regular assessments of the ABMS should be carried out to ensure its scope, policies, procedures and controls match the bribery and corruption related risks faced by Pernas. The ID is responsible for monitoring the effectiveness of this policy and will review its implementation on a regular basis.

- 16.4 Employee are encouraged to offer their feedback on this ABC Policy if they have any suggestions for improvement. Feedback of this nature should be addressed to the ID.
- 16.5 ID are the owner of the ABC Policy that responsible for the review and update of the policy. The review needs to be done every three (3) years or as and when required by the MC or BARC or BOD to ensure compliance with the latest requirements.

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