



Astramina Group Berhad

Reg. No: 201901002673 (1311999-P)

Anti-Bribery and Anti-Corruption Policy

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SECTION OF POLICIES

1 Definitions

Term	Descriptions
Associate(s)	A person that refers to directors, senior managers, officers, employees, consultants, contractors, trainees, interns, agents, sponsors or any person associated with the Group or any of the branches or subsidiaries where the engagement has relation in between the commercial organization and its business associates which shall have the same meaning per MACC Act 2009
Board of Directors	Means the Board of Directors of Astramina Group Berhad, etc unless specifically stated otherwise.
Head of Committee	Dato' Foo Chi Ching, Managing Director
Committee Member	Appointed Committee Member (Senior Managers) by the Board of Directors
Company	Astramina Group Berhad
Employee	All employees with Astramina Group Berhad and its subsidiaries
Group	Astramina Group Berhad and its subsidiaries, Seasonings Specialities Sdn Bhd and Astramina Sdn Bhd
MACC	Malaysia Anti-Corruption Commission
MACC Act	Section 17A MACC Act 2009
Managing Director	Dato' Foo Chi Ching
Third Party(ies)	Means any individual or organization that an associate shall come in contact with in the course of work or engagement with the Group and includes existing clients, potential clients, suppliers, distributors, third party vendors, service providers, agents, advisers, business, associates and government / regulatory bodies including their advisors, representatives and officials, politicians and political parties.

2 Policy Statement

The Board of Directors of Astramina Group Berhad and its subsidiaries have established this Anti-Bribery and Anti-Corruption Policy (“Policy”).

The Group takes a zero-tolerance approach to all forms of bribery and corruption and takes strong stance against such act. We are committed to acting professionally with integrity in all our business dealings and relationship which includes compliance with the Malaysian Anti Corruption Commission (Amendment) Act 2018 and any amendments or re-enactments that may be made by the relevant authority from time to time.

3 Applicability

This Policy is applicable to the Group at all levels which includes associates and third parties.

4 Bribery

Under the MACC Act, bribery is defined as any action which would be considered as an offence of giving or receiving “gratification”.

“Gratification” is defined in the MACC Act to mean the following:

- (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;
- (b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- (c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- (d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- (e) any forbearance to demand any money or money’s worth or valuable thing;
- (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
- (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);

5 Unacceptable Practices

It is **NOT** acceptable to:

- (i) Give, offer a payment, promise to give, gift or hospitality to secure or an improper business advantage;
- (ii) Give, offer a payment, promise to give, gift or hospitality to a government official, agent or representative to facilitate, expedite or reward any action or procedure;
- (iii) Accept payment from a third party knowing or suspecting it is offered with the expectation that it will obtain a business advantage from them;
- (iv) Give or accept any gift which could be reasonable perceived to be in contravention of this Policy or applicable laws and regulations; or
- (v) Engage in any activity that may lead to the breach of this Policy

6 Facilitation Payments

The Group adopts a strict policy of prohibits the use of facilitation payments of its business. Small payments made to secure or expedite a routine action are considered a facilitation payment.

7 Donations and Sponsorship

Donations and sponsorship will be assessed on a case-by-case basis, based on the context of charity and legitimacy and so long it does not contravene by the laws and regulations. All donations are to be approved by the Managing Director and must be accurately documented and aligned with company's ESG/CSR initiatives.

8 Dealing with Third Parties

With the discretion of the Group, appropriate due diligence to be conducted when dealing with third parties and agencies to avoid the Group from being exposed to risks or third parties and agencies not following ethical business practices.

9 Gifts, Entertainment and Hospitality

Gifts and entertainment should only be given as a purely personal matter and must not be likely to induce the recipient to give anything in return. If the Group receives any proposal or suggestion to make (or indeed receive) any such payment, it must be reported immediately to the Managing Director.

Providing and Receiving Gift and Hospitality

The Group generally adopts a "No-Gift Policy" whereby all employees shall not solicit or accept any gifts from any third parties that may have a direct or indirect business interest with the Group. All employees are also prohibited from providing gifts to third parties.

However, non-cash gifts such as fruits, flowers, and token gifts/promotional items (such as diaries, note book, pens etc) and hampers with an approximate/actual value of less than RM500 are allowed. The Employee will need to declare or report the gift received to Managing Director within 5 working days.

The group also adopt a “No-Entertainment Policy” whereby all employees shall not provide or accept any meal/lunch invitation to/from third party with direct or indirect business interest except with presence of MD or prior approval from MD.

Conflicts of Interest

Conflicts of interest arise where there is personal interest that can be considered to have potential interference with objectivity in performing duties or exercising judgement for or on behalf of the Group. Employees must avoid situations in which their personal interest would conflict with their duties and responsibilities. Employees must not use their position, official working hours, the Group’s resources, or information available to them for personal gain or to the Group’s disadvantage.

In situations where conflict of interest arises, Employees are required to immediately declare the matter to their immediate supervisor.

10 Record Keeping

The Group to maintain proper and complete financial records and have in place sufficient internal controls to evidence payments made to or received from third parties.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as customers, suppliers, and business contracts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal improper payments.

11 Raising Concern and Protection for Raising Concern

11.1 Raising Concern

Employees are encouraged to raise concerns of potential or current suspicion of malpractices to their immediate superior or in the event of uncertainty of chain of reporting, to the Chairman or Committee Member.

11.2 Protection for Raising Concern

We take responsibility to ensure we act with integrity and encourage openness and will support anyone who raises a genuine concern in good faith. The Group assures that we are committed to ensuring no unfair or detrimental treatment for reporting in good faith.

12 On Going Training

Communication / dissemination of this Policy shall be made available to everyone within the Group and during orientation. The Group’s stand on zero policy toward bribery and corruption should be communicated to all. Adequate training will be given to new employees and business associates on this Policy.

13 Monitoring and Review

The Group shall monitor the effectiveness and review the implementation of this Policy. The Board of Directors shall be overall responsible to ensure the policies and procedures are adequate and effective and are in line with prevailing rules and regulations i.e. the MACC Act. All Employees are required to be familiar with and comply with this Policy.

This Policy shall be brought up for review once every three years basis during Company management review and present updated version for Board of Directors approval.

The Board of Directors must ensure that the Company has in place Adequate Procedure pursuant to the MACC guidelines on Adequate Procedures (T.R.U.S.T) which encompass the following:

- i. Top Level Commitment
- ii. Risk Assessment
- iii. Undertake Control Measures
- iv. Systematic Review, Monitoring & Enforcement and
- v. Training & Communication