



## **MILUX CORPORATION BERHAD**

[Registration No. 199401027937 (313619-W)]

(Incorporated in Malaysia)

## **ANTI-BRIBERY AND CORRUPTION POLICY**

**(A) Introduction**

This Anti-Bribery and Corruption Policy ("Policy") has been developed as part of the anti-bribery and anti-corruption program of Milux Corporation Berhad ("MILUX" or "the Company"). MILUX does not condone bribery and corruption and expects its Directors, employees and business associates to adhere to the same principle in their business conduct with or on behalf of MILUX.

MILUX advocates the reporting of real or suspected cases of bribery and corruption. Individual with any suspicion or concern is strongly encouraged to raise a report via the channel as outlined in MILUX's Whistleblowing Policy.

This Policy should be read together with MILUX's other policies, procedures and guidelines. The Company recognises the compliance of all applicable corruption laws and regulations, including the Malaysian Anti-Corruption Commission Act 2009 and the Penal Code.

**(B) Scope**

This Policy applies to MILUX's Board of Directors (executive and non-executive), employees (permanent, part-time and contractual) and business associates.

**(C) Definitions**

- (I) "Bribery and Corruption" refers to the use of position of trust for dishonest gain, through the act of giving, soliciting, accepting or receiving gratification, directly or indirectly, as an inducement to act or otherwise in relation to the person's principal affair.
- (II) "Business Associate" refers to any individual or organisation that MILUX comes into contact with during the course of its business, including actual and potential customer, supplier, distributor, business contact, agent, advisor, consultant, subcontractor and joint venture partner.
- (III) "Gratification" may come in the form of money, donation, loan, fee, reward, gift, valuable security, property or interest in property of any description whether movable or immovable, or any other similar advantage.
- (IV) "Facilitation Payment" refers to payment made to an individual of power to speed up a process to secure license, permit or undue advantage.

**(D) Gift and Entertainment**

- (I) MILUX understands that the exchange of business courtesies, such as modest gift or entertainment, is customary in the creation of goodwill between two business entities and maintaining good customer's relationship.
- (II) All gift and entertainment given or received by MILUX shall be appropriate, and not be in violation of any existing laws and regulations. Gift and entertainment are only acceptable should the following principles are observed:
- a. Good Faith  
The intention of the gift and entertainment must be given as a creation of goodwill, and not as a means of gaining undue or unmerited advantage or in return of an unjust favour.
  - b. Non-Conflict  
Directors and employees should only offer/ accept gift and entertainment when it does not place him/ her in a position of conflict of interest to the Company.
  - c. Reasonable Value  
Directors and employees should only offer/ accept gift and entertainment when the value involved is modest and not lavish.
  - d. Infrequent  
Gift and entertainment are considered acceptable if it is made/ received infrequently.

**(E) Facilitation Payment**

All MILUX's Directors, employees and business associates shall not offer, give, request, solicit, accept and receive any form of undue advantage which can be perceived as a facilitation payment. Any instance of non-compliance shall be reported in accordance to the procedures prescribed in the MILUX's Whistleblowing Policy.

**(F) Political Donation**

The Company does not endorse the gifting of donation to political party or candidate. While MILUX's Directors, employees and business associates are not restricted to making any donations by their own means, they will not be eligible for any reimbursement by the Company.

**(G) Charitable Donation**

MILUX allows charitable donation where it is made in good faith and does not contain any malicious intent, such as concealing immoral or illegal payment. Donation and sponsorship are to be compliant with existing laws and regulations.

**(H) Audit and Record Keeping**

- (I) The Company is to retain financial records regarding gift made to/ received from business associates in good faith in an accurate and complete manner.
- (II) Regular audits shall be conducted within MILUX to ensure compliance to this Policy. Such audits may be conducted internally or by an external party.
- (III) Any failure to record transactions accurately, falsifying or creating misleading information or influencing others to do so could constitute a fraud and result in serious disciplinary action.

**(I) Non-Compliance**

- (I) Directors and employees discovered to be in violation of this Policy may be subjected to disciplinary actions including termination of appointment or employment.
- (II) The Company shall endeavour to terminate the contracts of its business associates should they proven to be involved in any form of bribery and corruption.
- (III) Legal action may also be taken against all offending parties depending on the severity of the offences.

**(J) General**

This Policy is general and does not cover all instances of bribery and corruption. Employees and business associates are advised to seek clarification and assistance from MILUX should they have any queries.