



IOI PROPERTIES

**IOI PROPERTIES GROUP BERHAD
201301005964 (1035807-A)**

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

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Appendix A – Integrity Pledge

1. MESSAGE FROM GROUP CHIEF EXECUTIVE OFFICER

We are TRUSTED - to conduct our business with integrity, without which nothing we do matters.

IOI Properties Group Berhad and its subsidiaries (“**IOIPG**”) firmly believe in maintaining a workplace culture with strong ethics and integrity. We are committed to create a business environment that is fair, transparent and free from bribery and corruption.

We operate in a global economy where bribery and corruption are widely regarded as unacceptable ways of conducting business. They prevent economic growth and development, and they are also illegal in most countries around the world. Consequently, any director, employee, officer, consultant, contractor or third-party agent of IOIPG that engages in bribery or corrupt practices, risks severe consequences for IOIPG and themselves, such as reputational damage, prosecution, fines and imprisonment.

IOIPG practices a *zero-tolerance approach* against all forms of bribery and corruption. In line with this, we have put in place an Anti-Bribery and Anti-Corruption Framework which comprises a set of key policies, procedures, standards and guidelines to address the bribery and corruption risks in IOIPG. Any breach of these policies, procedures, standards and guidelines will be regarded as a serious matter and may result in disciplinary action, dismissal or termination of contract.

This Anti-Bribery and Anti-Corruption Policy (“**ABC Policy**”) is designed to help you recognise potential bribery and corruption issues, to guide you on acceptable and unacceptable behaviours and to tell you where to go for further information. Where applicable, it should be read in conjunction with IOIPG’s other standard operating procedures and policies. If there is any conflict or inconsistency, the stricter provision shall prevail.

We expect all our employees and business associates to have a clear understanding of and to conduct themselves in accordance with this ABC Policy. This ABC Policy is not, however, intended to cover all possible situations that may arise nor to provide definite answers to all questions regarding bribery and corruption.

If you have a concern that is not addressed directly within this ABC Policy, or you are unclear about any of the contents of this ABC Policy, please contact our Integrity Committee (integrity@ioiproperties.com.my). An electronic version of this ABC Policy is available at <https://www.ioiproperties.com.my/corporate-governance>.

Thank you for your support and commitment.

Lee Yeow Seng
Group Chief Executive Officer

2. DEFINITIONS

The following definitions are included in this ABC Policy:

Board	refers to the Board of Directors of IOI Properties Group Berhad.
bribery	refers to the act of giving, promising, offering, accepting, receiving or soliciting any gratification (including payment of cash, gift, entertainment or inducement of any kind) with the intent to (a) obtain or retain business for IOIPG; or (b) obtain or retain advantage in the conduct of business for IOIPG. It also refers to any bribery offence prohibited under the MACC Act and the relevant anti-bribery laws in your jurisdiction.
Business Associates	refers to contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, representatives and other third parties performing work or services, for or on behalf of IOIPG.
conflict of interest	means when a person's own interest either influences, have the potential to influence or is perceived to influence their decision making.
corruption	means 'the abuse of entrusted power for personal gain' as provided by <i>Transparency International</i> . For this ABC Policy, corruption is primarily defined as any action which would be considered as an offence of giving or receiving 'gratification' under the MACC Act.
Directors	include all independent and non-independent directors, executive and non-executive directors of IOIPG, and shall also include alternate or substitute directors.
disciplinary offence	means any action or omission which constitutes a breach of discipline in IOIPG as provided by law or IOIPG's Code of Conduct and Business Ethics, policies and/or contract of employment, as the case may be.
donation and sponsorship	refer to charitable contributions and sponsorship payments made to support the community, organisation and/or individuals.
Employees	refer to any individual who is employed by IOIPG, either permanent, temporary or on contract, Directors, officers and Committee members of IOIPG.
facilitation payments	shall have the definition consistent with that provided by <i>Transparency International</i> , which means a small bribe, also called a 'facilitating', 'speed' or 'grease' payment, made to secure or expedite the performance by a person performing a routine or administrative duty or function as a form of gratification.
gifts	includes cash, cash-equivalent and non-cash gifts including but not limited to corporate gifts such as pens, mugs, clothing, collectibles, gift baskets and hampers, flowers, food, hospitality bags etc.
hospitality	includes the following advantages that may be given to any person or organisation including their family members and Business Associates: (a) entertainment (such as golf activities, tickets to sporting events etc.);

	<p>(b) meals and drinks; and</p> <p>(c) travel and / or accommodation (whether or not packaged with conferences, seminars, study trip or other benefits).</p>
IOIPG / we / us / our	refers collectively to IOI Properties Group Berhad, its subsidiaries and any business entity which is directly or indirectly (a) wholly or majority owned; (b) controlled; or (c) managed, by IOI Properties Group Berhad.
MACC Act MACC Amendment Act 2018	refers to the Malaysian Anti-Corruption Commission Act 2009 and the Malaysian Anti-Corruption Commission (Amendment) Act 2018, as amended from time to time.
Public Officials	<p>refers to an officer or employee of:</p> <p>(a) any government (including civil servants, local government and armed forces) or government agency;</p> <p>(b) regulatory, statutory or administrative body; or</p> <p>(c) company or business entity in which a governmental body has an ownership interest or over which such governmental body may, directly or indirectly, exercise a dominant influence (i.e. state owner commercial enterprises),</p> <p>whether local or foreign, or anyone receiving remuneration from public funds.</p>
Whistleblower	refers to any person who makes a report of improper conduct under this ABC Policy.
you / your	refers to any person to whom this ABC Policy applies.

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3. INTRODUCTION

3.1 What are the laws on anti-bribery and anti-corruption?

An increasing number of countries are adopting laws to punish bribery and corruption, even when it is committed outside their own borders. In the countries in which IOIPG operate, bribery and corruption are criminal offences and the penalties can be severe for individuals, i.e. imprisonment and could cause irreparable damage to IOIPG's brand and reputation. The relevant laws include the Malaysian Anti-Corruption Commission Act 2009 (revised 2018), the Malaysian Penal Code (revised 1977), the Malaysian Companies Act 2016, the Criminal Law of the People's Republic of China as well as the Prevention of Corruption Act and the Penal Code of Singapore.

Under the MACC Act, the legal consequences for non-compliance include fine of unlimited amount and/or imprisonment of up to twenty (20) years. A commercial organisation commits an offence if an associated person corruptly gives any gratification with intent to obtain or retain business or an advantage in the conduct of business, for the commercial organisation.

"Gratification" means:

- (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;
- (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; 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).

If an offence is committed by a commercial organisation, the MACC Act also deems its directors, controller, officer, partner or persons concerned in its management of affairs to have committed the same offence. In accordance with the Guidelines on Adequate Procedures as promoted by the Department of the Prime Minister of Malaysia, pursuant to sub-section 5 of Section 17A of the MACC Act, as provided by Section 4 of the MACC Amendment Act 2018, the provisions Section 17A establishes the principle of criminal liability (corporate liability) for corrupt practices of employees and/or any person(s) associated with IOIPG in cases where such corrupt practices are carried out for IOIPG's benefit or advantage.

It is therefore important that you understand how bribery and corruption may be committed and the legal consequences arising from such act as well as to take steps to prevent bribery and corruption from happening. This ABC Policy shall serve as a guidance to all in IOIPG on addressing issues relating to corruption, improper solicitation, bribery and other corrupt practices and activities which may arise in the ordinary course of business. It is the responsibility of every party associated with IOIPG to strictly adhere to IOIPG's anti-corruption policies and standards. In the event where there is ambiguity over any policies or practices which relate to this ABC Policy, employees must always seek the advice of their immediate supervisor or head of department. If the ambiguity persists, their concerns shall be directed to Group People & Culture or the Group CEO for clarification and direction.

3.2 What is the scope of this ABC Policy?

This ABC Policy is applicable globally. If you are travelling outside of Malaysia, you are subject to the laws of the country you are in but the principles of this ABC Policy must be adhered to regardless of whether or not that country has specific anti-bribery or anti-corruption laws.

In cases where there is a conflict between the specific anti-bribery and anti-corruption laws and the principles contained in this ABC Policy, the stricter provision shall prevail.

3.3 Who is covered under this ABC Policy?

This ABC Policy applies to all Employees and Business Associates.

Joint venture companies in which IOIPG is a non-controlling shareholder or partner and associated companies are encouraged to adopt this ABC Policy as the bare minimum or similar principles and standards as part of their anti-corruption framework.

3.4 Who is responsible for this ABC Policy?

The Board continues to lead IOIPG's anti-bribery and anti-corruption efforts and has overall responsibility for ensuring that this ABC Policy complies with IOIPG's legal and ethical obligations. The Board will provide the necessary leadership, resources and support for the implementation of this ABC Policy.

The Integrity Committee has primary and day-to-day responsibility for implementing and overseeing this ABC Policy. The Integrity Committee shall regularly report to the Risk Management Committee and ultimately the Board concerning the implementation and effectiveness of this ABC Policy.

Every Employees and Business Associates are responsible for understanding this ABC Policy. Management at all levels shall ensure that those reporting to them are made aware of and understand this ABC Policy and are given adequate and regular training on it. Our Employees must also ensure that this ABC Policy is properly communicated to our Business Associates.

4. GIFTS AND HOSPITALITY

Policy Statement

IOIPG practices a "No-Gift" policy where our Employees and Business Associates are prohibited from giving and receiving any form of gifts unless they are permitted under the limited circumstances in Section 4.2 below.

All Employees and Business Associates are also prohibited from giving and receiving any form of hospitality unless they are permitted under the limited circumstances in Section 4.3 below.

Such prohibition of giving and receiving gifts and hospitality extends to family members and representatives of the Employees and Business Associates.

4.1 General Rule

IOIPG strictly prohibits the giving and receiving of gifts or hospitality for improper purposes, or that could impair our judgment or independence, or be open to misinterpretation.

As a general rule, you should not give or receive gifts or hospitality which you would feel uncomfortable explaining to your colleagues, your family or the media. In such cases, you must not try to hide gifts and hospitality by giving or receiving them through a third-party intermediary.

If you have any doubts about the propriety of accepting a gift or hospitality, do not be embarrassed to decline the offer by referring to this ABC Policy and report to your immediate superior or manager, if appropriate, or the Integrity Committee.

4.2 Permitted Gifts

- (a) Corporate branded stationery or mementos such as plaques, pens, photo frames and calendars, commemorative books or other appropriate materials given or received as a token of appreciation. For example:

- in relation to hosting/organising or as an invited speaker/panellist at corporate or industry related events such as conferences, seminars, exhibitions, presentations, talks or other events; or
 - as part of the door gifts, collectibles or rewards to our hotel guests, visitors to our malls, members of our loyalty programme or golfers at our golf course.
- (b) When refusing the gift is deemed to be offensive to the sender or when it is against business etiquette or is impractical to do so.
- (c) In conjunction with any festive season or other ceremonial occasion.

All gifts offered or received pursuant to paragraphs (b) and (c) above with a value of more than RM500 must be recorded in the Gift Register. In no circumstances may our Employees (or anyone on their behalf) offer or receive gifts in the form of cash or cash equivalent to or from any party having business dealings with IOIPG.

4.3 Permitted Hospitality

Occasional dining and entertainment such as refreshments or meals offered or received in the course of business meetings or to foster good business relationships which is considered reasonable within the local business community. Such dining and entertainment must be within general ethical boundaries, not extravagant or unjustifiably expensive or overly frequent.

Even in the exceptional circumstances set out in Sections 4.2 and 4.3, our Employees and Business Associates are expected to exercise proper judgment in handling gifts and hospitality, and behave in a manner set out below:

- conscientiously maintain the highest degree of integrity;
- always exercise proper care and judgement;
- avoid conflict of interest;
- refrain from taking advantage of your position or exercising your authority to further your own personal interest at the expense of IOIPG; and
- comply with laws, rules and regulations, and IOIPG's policies and procedures.

5. DONATIONS AND SPONSORSHIPS

Policy Statement

IOIPG prohibits its Employees and Business Associates from making donations to political parties or individual politicians on its behalf.

IOIPG will only provide charitable or educational donations and sponsorships if they are ethical and legal according to local written laws.

5.1 Political Donations / Contributions

As a matter of general policy, our Employees and Business Associates must not make or offer monetary or in-kind political donations or contributions to political parties or individual politicians or towards political campaigns or initiatives for or on behalf of IOIPG.

Any request for political donations or contributions must be approved by the Board in advance and can only be made where such donations or contributions are permitted under the law and within the appropriate limits established by law.

We do recognise the right of our Employees and Business Associates to participate as individuals in the political process and make political donations or contributions. However, you must make it clear that you do not represent IOIPG's views and that your views and actions are your own.

In addition, you must ensure that any donations or contributions are made in accordance with applicable law and adequate consideration has been given to potential conflicts of interest arising between your professional capacity and your personal affiliation to political parties.

5.2 Charitable or Educational Donations and Sponsorships

Pursuant to IOIPG's commitment to Corporate Social Responsibility ("CSR") and sustainable development, we support CSR initiatives as part of the contributions to the communities and environment.

It is however important that all charitable or educational donations and sponsorships are made in accordance with IOIPG's policies.

Even in these exceptional circumstances, our Employees and Business Associates are expected to exercise proper judgment in making such donations and sponsorships, and behave in a manner set out below:

- must not be used as a conduit to circumvent, avoid or evade the laws, rules or regulatory requirements. More importantly, it shall not be used to facilitate bribery, corruption or illegal/money laundering activities;
- not with the intention to obtain or retain business/advantage for IOIPG, to influence or perceived to be able to influence judgement or business decisions, to reward for improper performance of responsibilities, or to receive preferential treatment;
- does not contradict with applicable laws, rules, regulations and policies;
- be made to well established and legitimate organisation having an adequate organisational structure to guarantee proper administration of the funds; and
- due diligence and conflict of interest checks shall be performed prior to the donation and sponsorship, to avoid potential bribery/corruption.

6. FACILITATION PAYMENTS

Policy Statement

Our Employees and Business Associates shall not directly or indirectly offer, promise or give a facilitation payment to a Public Official or other third party for any reason or in any form.

6.1 General Rule

Our Employees and Business Associates must not offer, promise, give, request, accept or receive anything which might reasonably be regarded as a facilitation payment to or from any Public Official or other third party. This is illegal under the MACC Act as it falls within the meaning of "gratification".

If you receive a request or if you are offered facilitation payments, you must report it to the Integrity Committee and/or through IOIPG's whistleblowing channel.

6.2 Exception

If there is a situation where your safety and security is at stake or you have been coerced to make facilitation payment, you should immediately report such incident to your immediate superior or manager, if appropriate, or the Integrity Committee. Making facilitation payment in such situation is the only exception which can be used as a defence when faced with allegation of bribery or corruption.

7. DEALING WITH BUSINESS ASSOCIATES

Policy Statement

IOIPG expects its Business Associates to similarly adopt a “No-Gift” policy and to comply with this ABC Policy when conducting business on our behalf in any capacity.

We do not allow the use of Business Associates to undertake any activity which is prohibited for our Employees under this ABC Policy. No payment should be made through or to a Business Associate if it is known or suspected that all or part of the payment will be used for a purpose which violates this ABC Policy.

7.1 Guidance

Business Associates have been identified as the main focus for IOIPG’s anti-bribery and anti-corruption efforts as they are considered high risk throughout the property development and construction industry.

Accordingly, our Employees should exercise caution when dealing with Business Associates especially when they are assisting IOIPG to market or promote projects, obtain or retain business or engaging with government or government officials. For example, if a Business Associate paid a bribe to obtain business for IOIPG, we could be liable for failing to prevent bribery by the Business Associate which performed services for or on our behalf.

7.2 Measures

Prior to engaging Business Associates to act for or on behalf of IOIPG, due diligence must be performed on such Business Associates to assess the bribery and corruption risk of working with them. Where a risk is identified, you must seek advice from your immediate superior or manager, if appropriate, or the Integrity Committee before proceeding with the engagement.

Our Employees must also comply with all applicable IOIPG’s standard operating procedures before engaging any Business Associates. This include informing them of this ABC Policy and with effect from the date of this ABC Policy, all Business Associates must submit an Integrity Pledge in the form prescribed by IOIPG prior to appointment or engagement.

The form of **Integrity Pledge** can be found in **Appendix A** of this ABC Policy.

Our Business Associates should be supervised and monitored from time to time for compliance with this ABC Policy. Where breach or suspected breach is identified, immediate action must be taken. Failure to comply with this ABC Policy by our Business Associates may lead to immediate termination of contract and/or claim for damages.

8. DEALING WITH PUBLIC OFFICIALS

Policy Statement

No one acting on behalf of IOIPG should exert, or attempt to exert, any improper or illegal influence on Public Officials.

It is prohibited to make improper or secret payments or transfer of items of any value (including facilitation payments) to Public Officials directly or indirectly through intermediaries, or to a third party while knowing that all or a portion of the payment or transfer will go directly or indirectly to a Public Official.

8.1 Guidance

Our Employees and Business Associates must comply with all applicable laws, conduct themselves with integrity and apply the highest ethical standards whenever they deal or otherwise engage with Public Officials.

You must take extra care when dealing with any Public Official. It is against this ABC Policy to make improper or secret payments or transfer of items of any value (including facilitation payments) to a Public Official. It would also be a breach of this ABC Policy if you use agents or third parties to make improper or secret payments or transfer of items of any value (including facilitation payments) to a Public Official on behalf of IOIPG.

This prohibition extends to provision of gift, entertainment or hospitality to Public Officials or their family/household members in exchange for any benefits, favours, advantages or results.

8.2 Measures

If any information is requested by any Public Official, our Employees must always consult their immediate superior or manager, if appropriate, or the Integrity Committee before responding to such request and ensure that all information provided is in good faith, truthful and accurate.

If you have any doubts on whether any payment constitutes an improper, secret and/or facilitation payment, please refer to the Integrity Committee.

9. CONFLICT OF INTEREST

Our Employees should avoid situations in which personal interest may interfere with their professional obligations or duties. You must not use your position, official working hours, the resources and assets of IOIPG, or information available to you for personal gain or to IOIPG's disadvantage.

In situations where a conflict does occur, you are required to declare the matter as per the IOIPG's Conflict of Interest Disclosure Statement.

If you are unsure whether you have either an actual, potential or perceived conflict of interest, you should consult your immediate superior or manager, if appropriate, or the Integrity Committee.

10. BUSINESS REWARDS, REBATES, COMMISSIONS OR OTHER INCENTIVES

The nature of IOIPG's business may involve the use of various promotional and marketing tools such as business rewards, rebates, discounts or other incentives. That said, certain business-related incentives may be of questionable nature or may constitute a bribe or corruption formulated with the intention to obtain or retain an undue business advantage.

Whilst IOIPG does not prohibit our Employees and Business Associates from giving or receiving business-related incentives, it shall however be aligned with the following principles:

- not contradictory with applicable laws, rules, regulations and policies;
- formally documented as part of the incentive program or contract; and
- applicable to all or its applicability is based on business-based parameters (i.e. applicable to all customers or applicable to customers exceeding certain purchase value).

11. WHAT TO DO IF YOU HAVE A QUERY OR CONCERN?

11.1 Queries

If you have any queries in relation to this ABC Policy or the applicable laws, please contact the Integrity Committee.

11.2 Concerns

If you suspect or believe that this ABC Policy has been, or is being breached, you have an obligation to report your concerns through the reporting channels below.

- (a) Whistleblowing Committee: whistleblow.ioipg@ioiproperties.com.my
- (b) Integrity Committee: integrity@ioiproperties.com.my
- (c) Letter: IOI Properties Group Berhad, Level 23A, IOI City Tower 2, Lebuhr IRC, IOI Resort City, 62502 Putrajaya, Malaysia (Attention: Integrity Committee / Group Legal)

11.3 Protection to Whistleblower

Your concerns will be taken seriously, treated in a confidential manner and investigated promptly. Where permitted by laws, your anonymity will be protected if you wish, but you may be required to provide a statement as supporting evidence to any investigation.

You can be sure that retaliation directed against anyone who makes such a report will not be tolerated. We will protect anyone who makes a legitimate report. However, anyone who files a malicious or vexatious report, and particularly if they persist with the allegations, may amount to a disciplinary offence.

12. REVIEW, MONITORING AND ENFORCEMENT

12.1 Audit and Continuous Improvement

IOIPG is committed in its anti-bribery and anti-corruption efforts to maintain the integrity and to ensure good governance within IOIPG.

The Integrity Committee will monitor the effectiveness and review the implementation of the Anti-Bribery and Anti-Corruption Framework regularly to ensure its scope, policies, procedures and controls are adequate for the bribery and corruption risks faced by IOIPG.

The reviews and audits carried out either internally or by an external party shall be reported to the Audit Committee on a need basis for consideration and implementation of any recommendations.

12.2 Consequences of Non-Compliance

IOIPG regards any act of bribery and corruption seriously and will take appropriate actions in the event of non-compliance of this ABC Policy:

- (a) For Employees, non-compliance may amount to disciplinary offence and/or termination of employment.
- (b) For Business Associates, non-compliance may lead to termination of contract and/or claim for damages.

IOIPG also reserves the right to report any non-compliance to the Malaysian Anti-Corruption Commission.

13. TRAINING AND COMMUNICATION

IOIPG will conduct adequate training to ensure that you are informed of the Anti-Bribery and Anti-Corruption Framework in place and your roles in the fight against bribery and corruption.

Training and communication of this ABC Policy to Employees can be summarised as follows:

- (a) New Employees shall undergo a briefing and training on this ABC Policy as part of the onboarding process.
- (b) Existing Employees shall be made aware of this ABC Policy.

- (c) Completion of the relevant anti-bribery and anti-corruption training is compulsory for all Employees.
- (d) If deemed necessary, certain trainings be repeated or refresher courses be conducted to any Employees in any business unit/division.

Business Associates shall also be made aware of this ABC Policy and be provided trainings, as appropriate.

This ABC Policy is made available to Employees, Business Associates and the general public on IOIPG's official website and internal communication platform.

14. RESPONSIBILITIES OF EMPLOYEES

Employees are responsible for understanding and complying with this ABC Policy, including the following:

- be familiar with applicable requirements of this ABC Policy and communicate to others in the team;
- ensure compliance of this ABC Policy and that all relevant transactions and payments are properly documented and reported;
- always raise suspicious transactions to immediate superior or manager, if appropriate, or the Integrity Committee for guidance on the next course of action;
- promptly report violations or suspected violations of this ABC Policy through appropriate channels;
- attend anti-bribery and corruption training as required; and
- not misuse your position or IOIPG's name for personal advantage.

When dealing with Business Associates, Employees shall not:

- express unexplained or unjustifiable preference for certain parties;
- make any attempt at dishonestly influencing Business Associates' decisions by offering, promising or conferring advantage;
- exert improper influence to obtain benefits from Business Associates; or
- directly or indirectly offer or make promise, in cash or in kind, for a specific favour or improper advantage from Business Associates.

15. REVISION

This ABC Policy may be amended from time to time.

It is the responsibility of each Employee to keep yourself updated on this ABC Policy.

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Appendix A

INTEGRITY PLEDGE

Company Name ("We" or "Business Associate")	
Company Registration Number	
Nature of business relationship with IOIPG	

1. We, including our directors, officers and employees, hereby confirm that we have read and fully understood the provisions of IOIPG's Anti-Bribery and Anti-Corruption Policy ("ABC Policy") and hereby acknowledge that IOIPG has zero tolerance towards all forms of bribery and corruption.
2. We undertake to IOIPG that we shall not directly or indirectly give, promise, offer, accept, receive or solicit any form of improper payments, financial benefits, rewards or any valuable consideration ("Gratifications") to or from any of IOIPG's directors, employees, officers, representatives or other persons associated with or controlled by or acting on behalf of any of them (including their family members) in exchange for business favours, information, favourable treatment, improper benefits or advantage or inducement to do or not to do something.
3. We agree to abide by the terms and conditions governing the business relationship with IOIPG, with reference to any contracts, letter of offer, letter of appointment, engagement letter or any document to the similar effect; and IOIPG's relevant policies and procedures.
4. In furtherance to the above, we pledge, commit and undertake that:
 - (a) we shall fully comply with the ABC Policy and shall promptly notify IOIPG of any breach and/or suspected breach of the ABC Policy;
 - (b) we shall strictly comply with all current laws and regulations relating to anti-bribery and anti-corruption including but not limited to the Malaysian Anti-Corruption Commission Act 2009 (and its amendments) ("MACC Act") and the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001, ("AMLATFA") and shall have in place the necessary adequate procedures for meeting the standards and requirements in accordance with the MACC Act;
 - (c) if at any time we and/or any of our directors, employees, officers, subcontractors, agents or other third parties acting for or representing us is or has been found to have violated any of the undertakings or declarations stipulated herein and/or being investigated for bribery or corruption, IOIPG shall be entitled to, without prejudice to any other rights or remedies that IOIPG may have or any other appropriate action which IOIPG may take, terminate any and/or all agreements between IOIPG and ourselves with immediate effect and without any liability to IOIPG. We shall fully indemnify and hold IOIPG and its directors and employees harmless from and against any and all claims, losses, liabilities, damages, penalties, costs and expenses howsoever arising as a result thereto;
 - (d) the ABC Policy may be updated, amended or revised from time to time to ensure its adequacy in implementation and we, upon receiving the updated, amended or revised ABC Policy, shall fully adhere to all provisions thereto.

INTEGRITY PLEDGE (continued)

5. We declare that: *(tick whichever is applicable)*

- we are not aware of any actual, potential or perceived conflict of interest situations with IOIPG or other stakeholders of IOIPG's business.

- apart from the actual, potential or perceived conflict of interest situations declared in the IOIPG's Conflict of Interest Disclosure Form, we are not aware of any other actual, potential or perceived conflict of interest situations with IOIPG or other stakeholders of IOIPG's business.

For and on behalf of the Business Associate,

.....

Name :
Designation :
NRIC / Passport No. :
Date :
Company Stamp :