



## **SOODE (JOHOR) SDN. BHD.**

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### **Anti-Bribery and Whistleblowing Guideline**

This guideline is to provide all employees with a good overview of how to ensure business is conducted without bribery, corruption or any similar kind of unethical act according to our company's anti bribery & whistleblowing policy. Our company will enforce the said policy, observe the enforcement and provide guidance to all employees.

#### **Anti-Bribery Policy**

- 1) Bribery is defined as any action which would be considered as an offence of giving or receiving 'gratification' under Malaysia Anti-Corruption Commission Act 2019 ("MACCA"). In practice, this means 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 organization.
- 2) Our company may take legal action in cases of corruption or other unlawful behavior as follows:
  - a) Solicitation, Bribery and Corruption.
  - b) Receiving facilitations Payment.
  - c) Prohibition on Commissions, Discounts and Secret Profits.
  - d) Receiving Gifts and Entertainment.
  - e) Political Contributions, Sponsorships and Donations.

#### **Whistleblowing Policy**

- 1) Whistleblowing is defined in this policy as an attempt by an employee or stakeholder (i.e. shareholders / customers / suppliers) to disclose through established channels, genuine concerns about unethical behavior, malpractices illegal acts, failure to comply with regulatory requirements or what he or she believes to be a wrongdoing committed by another (other) employee(s) within the company.
- 2) A report can be made to disclose any wrongdoing as follows;
  - a) Taking or giving favors, kickbacks, bribes and privileges.
  - b) Corruption or fraud.
  - c) Misuse of funds or assets.
  - d) Theft or embezzlement.
  - e) Disciplinary offence or criminal offence
- 3) Employee may report any illegal conduct to the persons listed below via a personal confidential meeting, post, email, feedback box or website:
  - a) Director
  - b) General Manager

Prepared by,

HR Department