

ANTI-CORRUPTION AND ANTI-BRIBERY

1. Directors and employees shall not, in any circumstances, be involved in any form of acts of corruption or bribery, either directly or indirectly as follows:
 - 1.1. give or receive any form of gratification including agreeing to accept or attempting to obtain, from any party, for themselves or for any other party;
 - 1.2. give or receive gifts, entertainment and/or sponsorship not in accordance to the Group's policies as well as any applicable anti-corruption laws;
 - 1.3. abuse of power; and
 - 1.4. make false claims by themselves or through a third party with intent to deceive or mislead.
2. Directors and employees shall not, in any circumstances, give or offer to give any bribe or gratification to any party as an incentive or a reward for doing or forbearing to do, or for having done or forborne to do any act in relation to Group's affairs or businesses, or for showing or forbearing to show favour or disfavour to any person in relation to Group's affairs or businesses
3. Directors and employees shall refrain f any activity or behaviour that could give rise to the perception or suspicion of any corrupt conduct or the attempt thereof in their official capacity as well as well as outside of work so as to protect the good name of the Group.
4. Directors and employees shall not, accept or obtain, directly or indirectly, any commission, discounts, secret profits or any other benefit (cash or in-kind) in respect of any goods or services sold or purchased or other businesses with the Group.
5. Directors and employees shall not provide facilitation payment to any local or foreign officials with a view of expediting a routine business action for the Group. Any requests for facilitation payment should be refused without exception and reported immediately to the Quality, Legal and Risk Department.
6. Directors and employees shall not use their position for any gratification or benefits, whether for themselves, family members, or any persons with close personal relationship, when making business decisions for the Group, in which they have interest in, directly or indirectly.
7. It is the responsibility of all persons to report such solicitations of bribes or gratifications to the Audit and Risk Management Committee ("ARMC") of TMC and/or an officer of the Malaysian Anti-Corruption Commission or to a police officer. It should be noted that it is an offence under Section 25(1) of the Malaysian Anti-Corruption Commission Act 2009 on the failure of any persons to report to the authority when they have been solicited, whether directly or indirectly, for any bribe or gratification, whether received in their official capacity or in the course of their employment or outside of work.
8. The Directors shall ensure that these guidelines are followed:
 - a. Top Level Commitment: to ensure that it practices the highest level of integrity and ethics.
 - b. Risk Assessment : to conduct comprehensive risk assessment on a yearly basis
 - c. Undertake Control Measures : to ensure policies are followed

- d. Systematic Review, Monitoring and Enforcement : To consider appointing an external auditor to conduct an audit at least once every three years to show that TMC is operating in compliance with its policies and procedures in relation to corruption.
- e. Training and Communication : To provide its employees and business associates with adequate training to ensure thorough understanding of TMC's anti-corruption position