



## **AFI Anti-bribery and Anti-corruption Policy**

**18<sup>th</sup> March 2020**

### **Statement**

Bribery is the offering, promising, giving, providing, accepting or soliciting of an advantage as an inducement for action, or in order to gain any commercial, contractual, regulatory or personal advantage, and it may be illegal, and is certainly a breach of trust.

It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships wherever we operate, and in implementing and enforcing effective systems to counter bribery and corruption.

In an effort to encourage whistle-blowers to come forward with information on any alleged improper conduct, the Whistle-blower Protection Act 2010 in Malaysia provides safe avenues for them to make disclosures of such alleged improper conduct (whistleblowing) to the relevant authorities in good faith, by protecting their identities, providing them with immunity from civil and criminal proceedings and protecting them from detrimental action.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws in Malaysia in respect of our conduct both at home and abroad.

### **Reporting Concerns, Including Whistleblowing**

All employees and others associated with the Company are encouraged to report any concerns that they may have regarding potential breaches of this policy, including incidents relating to external agencies and third parties. This includes any instances where you may be the victim of attempted bribery.

The Company is fully committed to ensuring that there is a safe and confidential method of reporting any suspected wrongdoing in People Tray or to the nominated Officer. The Company's Whistle-blowing Policy, which is available, provides for procedure to be followed in this regard. AFI also permits employees, and anyone contractually associated with the Company to raise concerns of malpractice in the Company.

### **Training & Declaration**

The Company will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training/updates on how to adhere to this policy and will be asked to formally accept that they will comply with this policy.

The Company anti-bribery and anti-corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any Third parties at the outset of business relations, and as appropriate thereafter through the signed declaration of the AFI Integrity Pack.

## **Compliance and Audit**

All employees and partners of AFI shall read, understand and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for AFI, or under AFI control, or connected to AFI. You are required to avoid any activity that might lead to or suggest a breach of this Policy.

Employees must notify or report to his / her Manager as soon as possible if you believe or suspect that a breach of or conflict with this policy has occurred or may occur in the future by way of a bribery issue or any other malpractices.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal. We reserve our right to terminate our contractual relationship with you if you breach this Policy. Any breach of this policy could also result in imposition of large fines on the individual/third party and/or imprisonment on the individual and termination of contract with a Third Party.

The Board of the Company or any committee / person authorized by the Board for this purpose shall determine appropriate action in response to violations of this policy and for conducting internal audits for compliance to this policy. Anyone who breaches this policy shall indemnify AFI against all claims, actions, damages, losses, liabilities and costs, including reasonable legal fees, that may be incurred /suffered by AFI on account of any non- compliance of such person with this policy.

In case of dismissal of an employee or termination of the contractual relationship with any third parties for the breach of the policy, no money will accrue for payment by the Company in any manner whatsoever from the date of such dismissal/termination except the amount which is already accrued until then. Furthermore, if an employee wilfully ignores or turns a blind eye to any evidence of corruption or bribery within his / her department and/or around him / her, he / she would be considered to be involved in the act and accordingly, the same disciplinary action would be taken against him / her as if he/she was involved in the act intentionally.

## **Assessment and Investigation**

Deciding whether to undertake an investigation is a key part of AFI's response to detected or suspected corruption. Any investigation commenced following the reporting of alleged fraud, bribery or corrupt conduct will be undertaken on the presumption of innocence of the implicated individual(s). AFI's Compliance Officer will discreetly conduct a preliminary assessment of the alleged fraud, bribery or corrupt conduct based on the facts reported and/or appoint an investigator to determine whether the alleged fraud, bribery or corrupt conduct:

- Is without foundation; or
- Has the potential to damage to AFI's reputation and integrity; and/or
- Is of a fraudulent nature which requires referral to the relevant authorities for investigation; or
- Requires further action through disciplinary, civil or administrative proceedings to recover any monies lost.

## Post Investigation / Continual Improvement

Upon completion of the internal investigation, AFI will undertake the following post investigation activities:

- Seek the quantification and recovery of losses, as applicable.
- Report to the Board all information relating to the investigation.
- Advise the complainant to a report alleging fraud, bribery and corrupt conduct, of the outcome of an investigation.
- Discuss with relevant Senior Managers the findings and recommendations.

AFI management is responsible for taking appropriate corrective action to ensure adequate controls exist to prevent reoccurrences of similar misconduct including.

- Revisiting the risk register to ensure the findings of the fraud, bribery and corrupt conduct investigation are appropriately reflected within the fraud, bribery and corrupt conduct risk assessment; and
- Collecting data on concluded investigations for future tracking and monitoring purposes



**Mike Janssen**  
**General Manager**