



ASTINO BERHAD & ITS SUBSIDIARIES

**ADEQUATE PROCEDURES TO COMBAT CORRUPTION:
T. R. U. S. T.**

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PRINCIPLE I: TOP LEVEL COMMITMENT

1.1 Top Management (C-Suite/Business Owner)'s Statement

A) Commitment

The Executive Chairman takes the primary responsibility for the establishment and effectiveness of the anti-corruption programme. As per section 4.1.3 of the GIACC *Guidelines on Adequate Procedures*, this means Astino Berhad (“the Company”) & its subsidiaries (collectively “the Group”):

1. Practices the highest level of integrity and ethics
2. Complies fully with the applicable laws and regulatory requirements on anticorruption
3. Effectively manages the key corruption risks of the company

B) Requirement

In order to achieve this goal, the Executive Chairman requires that the Group:

1. Establishes, maintains and periodically reviews the anticorruption compliance program which includes clear policies and objectives that adequately address corruption risks;
2. Promotes a culture of integrity within the organisation;
3. Conducts bribery risk assessments at least once every three years or when instructed by the Executive Chairman;
4. Issues instructions on communicating the Group’s policies and commitments to anticorruption both internally and externally;
5. Encourages the use of reporting/whistleblowing channels in relation to real or suspected corruption incidences, or inadequacies in the anticorruption compliance program;
6. Assigns and adequately resources a competent person to be responsible for anticorruption compliance, including advice and guidance;
7. Ensures that the lines of authority for the person responsible for the programme are appropriate, each and to the top management/business owner or equivalent;
8. Ensures that the results of any audit, review on risk assessment, control measures and performance are reported to the top management or equivalent, Company’s directors and the Group’s directors and relevant management.

The memo issued by the Executive Chairman on 20th March 2020 and updated on 18th December 2020 establishes the top-level commitment of the Group in the area of anti-corruption.

PRINCIPLE II: RISK ASSESSMENT

2.1 Bribery Risk Assessment Process

Objectives

The objectives of the bribery risk assessment are:

- To identify, measure and rank critical bribery risks in the Group that has the potential influence over the overall operations and management of the Group using a structured approach in line with the size of the Group.
- Discuss high-level bribery prevention solutions and implementation plans.

Approach

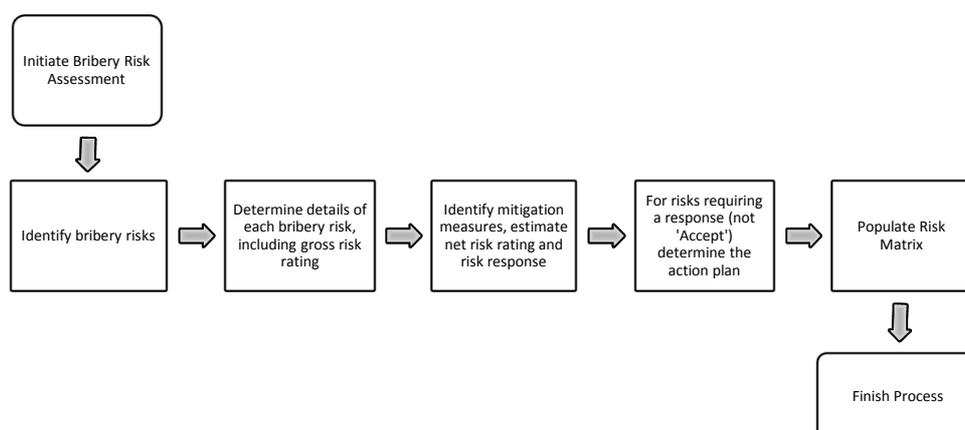
The Bribery Risk Assessment (BRA) forms the basis of the anti-bribery programme. Assessments are to be conducted periodically, at least once every 3 years.

Assessments are to include:

- Opportunities for corruption arising from system weaknesses
- Financial transactions which may disguise corruption payments
- High-risk business activities
- External parties (business associates / agents) where bribery is likely to be present
- Supply chain bribery opportunities (inbound and outbound)

BRA Process Flow

The process below is used by the Group to conduct its bribery risk assessment:



2.2 Bribery Risk Assessment Methodology

2.2.1. Initiation and management

The bribery risk assessment was initiated by the Executive Chairman. The exercise was managed by the Head of Departments.

2. Identify General Bribery Risks

Using the *Bribery Risk: Initial High-Level Assessment* template, the main areas of bribery risk carried by the business were identified.

Information established by the high-level assessment was then used to begin populating the bribery risk templates.

3. Identify Mitigating Controls, Net Risk, Response & Action Plan

For each bribery risk identified, the mitigating controls were logged. An estimate was then made on the effectiveness of the controls, which in turn was used to estimate the net risk rating. From this, the risk treatment was identified, along with the action plan.

4: Populate Risk Matrix

Using the net risk rating, the bribery risks identified were placed on the risk matrix to show the exposure of the company to bribery risk.

Risk matrix: 5x5

Almost certain	Moderate	Major	Major	Critical	Critical
Likely	Minor	Moderate	Major	Major	Critical
Possible	Minor	Moderate	Moderate	Major	Major
Unlikely	Minor	Minor	Moderate	Moderate	Major
Rare	Insignificant	Minor	Minor	Minor	Moderate
	Insignificant	Minor	Moderate	Major	Critical

5. Present Results to Top Management, Review and Finalise

The completed bribery risk templates and risk map were presented to the top management to confirm the data and action plans. Responsibilities for carrying out the action plans then allocated to the relevant members of the Group.

The Executive Chairman instructed the bribery risk assessment to be refreshed in every 36 months' time or anytime when deemed needed.

The results of the bribery risk assessment are included in document named 'Astino Berhad Bribery Risk Assessment'.

PRINCIPLE III: UNDERTAKE CONTROL MEASURES

3.1 Anti-Bribery and Corruption Policy

3.1.2 The Group's Anti-Bribery and Corruption Policy

- a) Anti-Bribery and Corruption Policy is that bribery and corruption in all its forms as it relates to the Group's activities is prohibited.
 - b) Bribery and corruption may take the form of anything of value, such as money, goods, services, property, privilege, employment position or preferential treatment. Group's Personnel and its business associates shall not therefore, whether directly or indirectly, offer, give, receive or solicit any item of value, in the attempt to illicitly influence the decisions or actions of a person in a position of trust within an organisation, either for the intended benefit of the company or the persons involved in the transaction.
 - c) The anti-bribery and corruption policy apply equally to its business dealings with commercial ('private sector') and Government ('public sector') entities. Even the possible appearance of bribery and corruption is to be avoided, in particular when dealing with Government officials.
 - d) The Group is committed to conducting its business ethically and in compliance with all applicable anti-bribery and corruption laws and regulations in every country where we do business. The anti-bribery and corruption policy therefore apply to all countries worldwide, without exception and without regard to regional customs, local practices or competitive conditions.
- a) The Group shall conduct regular risk assessments to identify the bribery and corruption risks affecting the business, set anti-bribery and corruption objectives, and assess the effectiveness of the controls in achieving those objectives.
 - a) No Personnel or external party will suffer demotion, penalty or other adverse consequences in retaliation for refusing to pay or receive bribes, or participate in other illicit behaviour, even if such refusal may result in the Group losing business or experiencing a delay in operations.
 - b) Personnel who, in the course of their activities relating to their employment at the Group, encounter actual or suspected violations of this policy are required to report their concerns using the available reporting channels. Reports made in good faith, either anonymously or otherwise, shall be addressed in a timely manner and without incurring fear of reprisal regardless of the outcome of any investigation.
 - c) Retaliation in any form against Personnel where the person has, in good faith, reported a violation or possible violation of this policy is strictly prohibited. Any company personnel found to have deliberately acted against the interests of any person who has in good faith reported a violation or possible violation of this policy shall be subjected to disciplinary proceedings including demotion, suspension, dismissal or other actions (including legal action) which the Group may pursue. The same policy applies to external parties who have reported a violation or possible violation of this policy.

3.1.6 Audit and Compliance

Regular audits shall be conducted to ensure compliance to this policy. Such audits may be conducted internally by the Group or by an external party. Audit documentation should include performance improvement action plans. The results of audits shall be reported to the top management/business owner, directors and senior management as appropriate.

3.1.7 Sanctions for Non-Compliance

- a) Non-compliance as identified by the audit and any risk areas identified through this and other means shall be reported to Executive Chairman in a timely manner in accordance with the level of risk identified.
- b) The Group regards bribery and acts of corruption as serious matters and will apply penalties in the event of non-compliance to this policy. For Personnel, non-compliance may lead to disciplinary action, up to and including termination of employment.
- c) For external parties, non-compliance may lead to penalties including termination of contract. Further legal action may also be taken in the event that the Group's interests have been harmed by the results on non-compliance by individuals and organisations.

3.1.8 Monitoring and Continuous Improvement

- a) The Group is committed to continuously improve the operations and effectiveness of its anti-bribery and anti-corruption initiatives.
- b) The Group shall monitor its operating environment, identify changes in bribery risk, and seek opportunities for improving the anti-corruption initiatives.
- c) The Executive Chairman shall ensure regular assessments of the anti-corruption initiatives are carried out, to ensure its scope, policies, procedures and controls match the bribery and corruption related risks faced by the company.
- d) The Group endeavours to impact the business environment where it operates. This includes supporting initiatives in the private and public sectors which are likely to improve the integrity of its operating environment.

3.2 Due Diligence

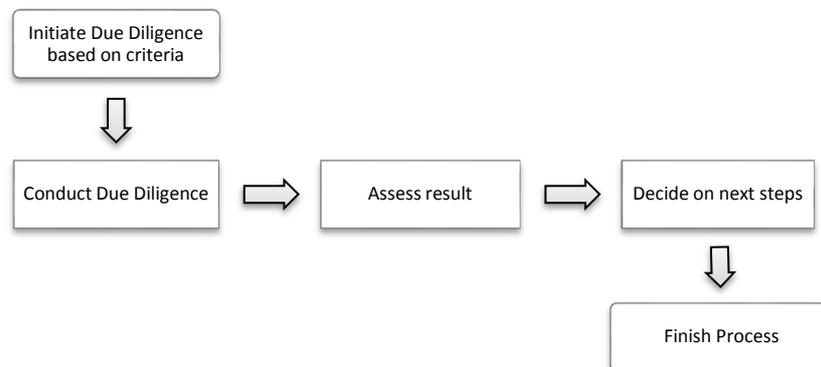
3.2.1 Introduction

The essential requirement of due diligence is to know one's partner when working with business associates to achieve the necessary deliverables. Due diligence is conducted in order to assess the nature and extent of bribery risks relating to planned or on-going relationships with specific categories of business associates; or specific categories of Personnel in certain positions.

3.2.2 Due diligence approach

- a) The due diligence process should be aimed at obtaining sufficient information in order to assess the bribery risks posed by certain activities/projects/transactions, business associates or potential Personnel where a **more than minor bribery risk has been identified**.
- b) In relation to organisations, there are certain factors that may be taken into consideration by the company, such as:
 - i. The legitimacy of a business associate, as demonstrated by indicators such as Corporate registration documents or annual filed accounts.
 - ii. The identity of shareholders and top management of the business associates, and whether they have a reputation for bribery, fraud, dishonesty, or similar misconduct.
 - iii. Have been investigated, convicted, sanctioned or debarred for bribery or similar criminal conduct.
- c) With regards to Personnel, due diligence should be conducted to:
 - i. Verify the accuracy of a prospective Personnel's qualifications;
 - ii. Obtaining satisfactory references from a prospective Personnel's former employers;
 - iii. Taking reasonable steps to ascertain if prospective Personnel have been involved in bribery by for example checking with the prospective Personnel's former place of employment or conducting a basic Web search.
- d) Though there is no one methodology for carrying out a due diligence check, generally speaking, the process is as such:
 - i. Identify the party that will undergo a due diligence check;
 - ii. Conduct the check;
 - iii. Use the results to decide on next steps: continue / stop / put on hold pending further investigation
- e) The results of the due diligence checks should be documented and retained for the duration of the relationship.

3.2.3 Due diligence process



Business associates

- a) The criteria for conducting due diligence on business associates based on bribery risk includes:
 - Bidding for a trade order value more than RM500,000 or non-trade order for value more than RM5,000.
 - To be employed as an agent or intermediary when dealing with government departments or officials.
 - Sales agency where more than 5% commission is derived from the sales value.
- b) Due diligence will be conducted from the following methods:
 - Google search using the name of the business associate + e.g. 'corruption'
 - Check that the company is legally compliant with relevant database e.g. SSM, CTOS
- c) Senior Accountant to assess results and make decision:
 - Continue with appointment
 - Cease appointment
 - Terminate relationship
 - Obtain further information
- d) Determine next steps and relevant parties:
 - Procurement or respective department

Prospective/existing Personnel

- a) The criteria for conducting due diligence on Personnel based on bribery risk includes:
 - All personnel when offer a position with job grade ME and above, sales or procurement when joining the Group.
 - When appointed / promoted to job grade ME and above, sales or procurement position.
- b) Due diligence will be conducted from the following methods:
 - Google search using the name of the person
 - Relevant database (PDRM/ MACC/ Insolvency division) or
 - Reference check with previous employer
- c) Executive Director or above to assess results and make decision:
 - Continue with appointment
 - Cease appointment
 - Terminate employment
 - Obtain further information
- d) Determine next steps and relevant parties:
 - Human Resource Department

3.2.4 Due diligence checklist

A sample due diligence checklist can be found in the Appendix A of this Policy.

3.3 Reporting Concerns (Whistleblowing)

3.3.1 Whistleblowing Policy

a) Policy Statement

The Group is committed to achieving and maintaining high standards of behaviour at work.

b) Reporting and Investigation

i. All employees and stakeholders (i.e. shareholders/ suppliers/ customers) are encouraged to report genuine concerns about unethical behaviour, malpractices, illegal acts or failure to comply with regulatory requirements without fear of reprisal should they act in good faith when reporting such concerns;

ii. Reports should be made to the Executive Chairman using the channel provided by the Group:

Name : Ng Back Teng
 Email : ngbt@astino.com.my
 Telephone: +604 582 2620
 Mail : Mark Strictly Confidential
 Astino Berhad
 Lot 1499 & 1500, MK 11,
 Jalan Changkat,
 14300 Nibong Tebal,
 Seberang Perai Selatan, Penang.

iii. In the case where reporting to management is a concern, then the report should be made to the Chairman of Audit & Risk Management Committee. Channel of reporting to the Chairman of Audit & Risk Management Committee is:

Name : Dr Cheah Soo Jin
 E-mail : cheahsoojin1234@gmail.com
 Telephone: +604 228 0511
 Mail : Mark Strictly Confidential
 Astino Berhad
 Suite 12-A Level 12
 Menara Northam
 No. 55 Jalan Sultan Ahmad Shah 10050 Penang
 Attention: Chairman of the Audit & Risk Management Committee

iv. The Group accepts reports from anonymous sources. However, they will only be pursued if there is sufficient information to facilitate an investigation.

v. The Group shall protect the information disclosed in whistleblowing reports by all means possible. Only the Executive Chairman shall have access to the report.

vi. If there is sufficient evidence that a corruption incident has occurred and contact details are provided, the discloser may be advised to report the incident directly to the MACC to secure official discloser protection.

c) Assurances and protection against retaliation

- i. The discloser shall receive no retaliation for a report that was provided in good faith, i.e. was not done primarily with malice to damage another person or the organisation. Such protection is accorded even if the investigation later revealed that the whistleblower is mistaken regarding the facts, rules and procedures involved.
- ii. Anyone who retaliates against a discloser will be subjected to disciplinary action, which may include termination of employment, demotion, or other legal redress.

d) False or malicious reports

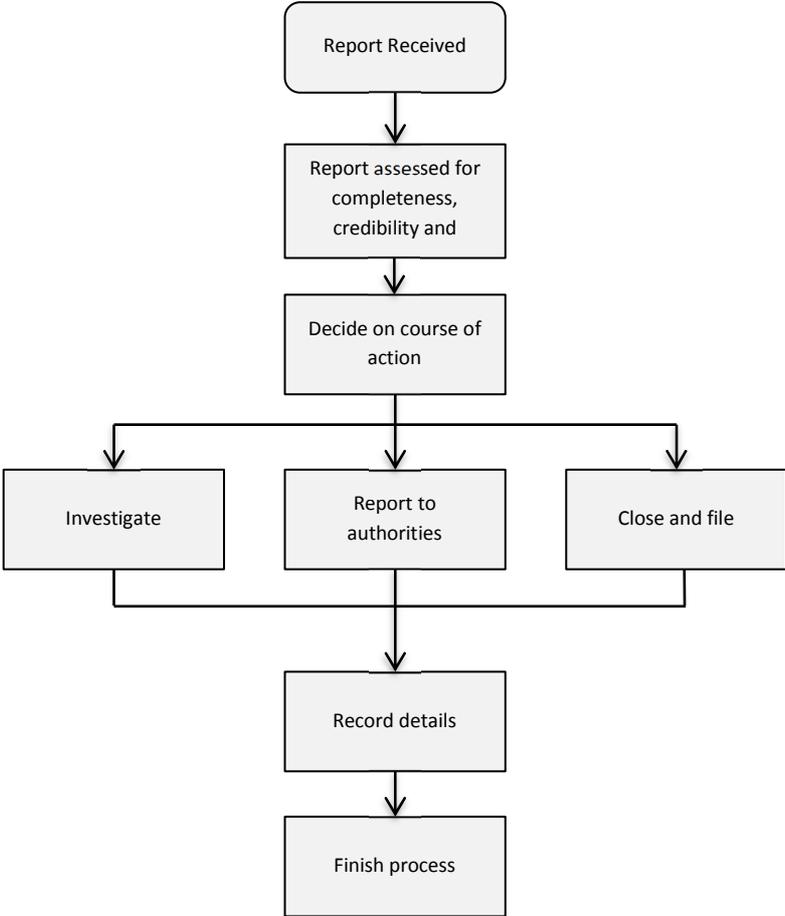
The Group will take disciplinary action against any discloser who makes a false report or knowingly slanders and/or commits a defamation on others. Disciplinary actions may include termination of employment, demotion, or other legal redress.

e) Incidents of corruption with evidence

The Group will decide whether or not to forward reports received to the MACC. Reports which include the items below should be submitted to the MACC:

- i. Material evidence of an incident of bribery and corruption
- ii. Specific details of the transaction(s)
- iii. Names of specific individuals
- iv. Other information considered substantial by investigators, in consultation with compliance manager(s)
- v. All reporting to the MACC must be done at the earliest opportunity once the materiality of the case is proven.

Whistleblowing Flowchart



3.4 Policy on Conflicts of Interest

3.4.1 Definition of “Conflicts of Interest”

Conflicts of interest arise where a person has an involvement such as a family relationship, Company shareholding or employment position which brings their personal interests into conflict with the best interests of the Group they work for.

3.4.2 Conflicts of Interest Policy

- a) All Personnel are required to declare any conflict of interest, actual or potential, as soon as they become aware of it.
- b) Conflicts are to be declared to the Personnel’s immediate manager, who will discuss the matter with the Executive Chairman, and take appropriate action.
- c) The HR Manager shall make a record of disclosed conflicts of interest for future reference.
- d) Prospective Personnel are to disclose all conflicts of interest with the Group during the hiring process so they can be discussed with the hiring Manager.
- e) Any Personnel failed to declare will be viewed seriously and treated as a gross misconduct and if proven may lead to dismissal.

3.4.3 Conflicts of Interest Declaration

A sample declaration can be found in the Appendix B of this Policy.

3.5 Policy and procedures for Gifts, Entertainment, Hospitality and Travel

3.5.1 Anti-bribery and corruption commitment

The Group is committed to conducting business with integrity. This means avoiding practices of bribery and corruption of all forms in the Group’s daily operations.

3.5.2 Receiving Gifts

- a) Personnel are prohibited from directly or indirectly, receiving any gifts, kickbacks or guarantees in any form that may compromise their judgement and decision making.
- b) Any gift offered by an external party that is of significant value should be politely declined and returned without offending or disrupting the business relations with the party, with the explanation that acceptance of the gift is not permitted the Group’s policy.
- c) Only the following may be received by Personnel:
 - i. **Corporate gifts** of insignificant value (defined as less than RM25.00), such as diaries, pens, calendars and notebooks.

- ii. **Items** given equally to all participants during official functions such as a door gift, provided that the items are of insignificant value
 - iii. **Festive hampers and other perishable goods** must be delivered to the office and declared via 'Gift and Hospitality Declaration' form. The items must be distributed amongst the recipient's team if allowed. The donor organisation should not be disclosed if at all possible.
 - iv. **Gifts given at an official event** where refusal would be offensive, e.g. for presenting at a conference, or where the donor is very insistent. Such gifts value more than RM25.00 must be declared to the recipient's manager, who will decide whether the gift can be retained by the recipient or kept by the company.
- d) Under no circumstances may any Personnel accept gifts in the form of cash or cash equivalent or in any other form, including but not limited to:
- i. Cash, commission, cheques, loans, credits cards in any currency, lottery tickets, coupons or gift vouchers of any kind;
 - ii. Shares/equity interest in any registered company;
 - iii. Personal discounts or perks not offered generally;
 - iv. Awards or prizes of any significant value more than RM100.00. If less than RM100.00 must be declared via 'Gift and Hospitality Declaration' form.
 - v. Trade point cards of any retailer; and/or
 - vi. All other gifts from external providers which might be perceived to influence the behaviour of the recipient.
- e) Family members of Personnel are strictly prohibited from receiving gifts from any external providers having financial dealings with the Group, where the provision of the gift may influence the actions of the Personnel while performing their duties with the company.
- f) A sample of 'Gift and Hospitality Declaration' form can be found in the Appendix C of this Policy.

3.5.3 Giving gifts

- a) Personnel are expected to exercise good judgement when offering gifts to external parties. Gifts should not be excessively extravagant, and must not be given with corrupt intent. Gifts should be given openly and transparently, and feature company branding, where possible.
- b) Giving of gifts should not be done frequently and/or during specific time periods, such as during tenders or contract negotiations, to ensure that no influence is exerted on the decision-making process.
- c) **Please refer SOP-CE-01 clause 6.7, 6.8, 6.9 & 6.10 for terms and conditions applied excluding during festive period.**

3.5.4 Giving and receiving hospitality

- a) The practice of giving and receiving reasonable and proportionate hospitality is regarded as a normal business activity. Hospitality may take many forms, but generally it consists of **meals, travel or transportation, accommodation, and recreation**.
- b) Personnel are expected to declare when receiving meals (value more than RM3,000.00) and any value of travel or transportation, accommodation, and recreation from external parties using 'Gift and Hospitality Declaration' form.
- c) Hospitality given and received by Personnel who have interactions with external parties as part of their role should be clearly related to the business between both parties. It should not be received or given so frequently that questions might be raised on the intentions or integrity of the giver or receiver, and not be so lavish as to indicate the corrupt intent is involved.
- d) Personnel are absolutely prohibited from either paying for or participating in any activities that might bring the company into disrepute. Such activities include lavish or immoral entertainment activities such as gambling, hostess entertainment, karaoke with the presence of guest relations officers or their equivalent, massages, unregulated violent sports, illicit drugs and intoxication by alcohol.
- e) Personnel are free to accept hospitality from friends and relatives, provided the hospitality does not influence their actions in any way in the course of performing their duties Astino Berhad. If hospitality is provided which might influence (or appear to influence) the actions of the person, they should discuss the matter with their supervisor and if necessary, make a conflict of interest declaration.

3.5.5 Government Officials

The Group is totally not allowing any Personnel hosting Government officials in any event.

3.5.6 Violations

Non-compliance to this policy will be considered as major misconduct and the Personnel(s) involved will be subjected to disciplinary action, which may include dismissal. The offence may also be escalated to the relevant enforcement authorities for further action.

3.6 Policy on Donations, Sponsorships and Political Donations

- a) The Group takes its responsibility to the wider community seriously and provides both financial and non-financial support for recognised causes. However, such donations and benefits may be misused by certain parties as a subterfuge for corruption.
- b) Requests for donations and sponsorships should be subject to a simple due diligence check using a web search to ensure the legitimacy of the recipient organisation.
- c) Political donations may only be made by the top management/business owner. Donations must be made to the official bank account of the party and a receipt retained. Provision of non-financial support such as venues, vehicles, sound equipment etc. at the Group's expense should not be used to influence political decisions and are to be recorded for future reference. Please refer ATB-BHT/11-700.

3.7 Policy on Facilitation Payments

- a) A **“facilitation payment”** is defined as a payment or other provision made personally to an individual in control of a process or decision. It is given to secure or expedite a routine or administrative duty or function. Although such payments are customary under certain circumstances, the laws of many countries, including Malaysia, prohibit it.
- b) The Group has a zero-tolerance policy for the use of facilitation payments in relation to its business operations. This policy prohibits its use by either Company personnel or business associates acting on behalf of the Company and the Group.
- c) Personnel are expected to notify the Compliance Manager when they encounter any requests for a facilitation payment. In addition, if a payment has been made and personnel are unsure of the nature, the Compliance Manager must be notified immediately, and the payment recorded accordingly.
- d) Only in the event that a personnel's security is at stake is it permitted to make the payment. The personnel must immediately report the incident to their supervisor to record the details and keep a record of what was spent.

3.8 Policy on Financial Controls

- a) Financial controls are the management systems and processes implemented by the organization to manage its financial transactions properly and to record these transactions accurately, completely and in a timely manner.
- b) The Group requires the necessary financial controls in order to ensure its financial transactions are properly processed and recorded to prevent the occurrence of bribery and corruption.
- c) The Group requires the separation of duties, so that the same person cannot both initiate and approve a payment.
- d) The Group requires tiered levels of authority for payment approval. In practice, this means that larger transactions require more senior management approval.

- e) Cash is often used as a vehicle for bribery and corruption due to the difficulty of tracking when and how it is employed. Therefore, the Group requires that the use of cash in daily operations is restricted to the minimum, with a full record of receipts maintained for all cash payments.
- f) In general, Personnel reimbursements for expenditure on behalf the Company or the Group shall only be made on the basis of official receipts. Handwritten receipts are to be avoided wherever possible. Please refer AB-CPS/13-335.
- g) The categorisation and descriptions of all payments and transactions shall be accurately and clearly recorded in the Group's accounts, in line with existing applicable legislation and internal controls.
- h) The Group shall carry out periodic financial audits at regular intervals. The reviews shall be carried out by an independent person or organisation, as per the requirements of the Companies Commission of Malaysia (SSM).

3.9 Policy on Non-Financial Controls

- a) Non-financial controls are the management systems and processes implemented by the organization to help it ensure that the procurement, operational, commercial and other non-financial aspects of its activities are being properly managed.
- b) The Group is committed to implementing the necessary non-financial controls to mitigate any bribery risks that may arise through the procurement process.
- c) Where possible and reasonable, the Group should award contracts through a competitive process, on the basis of the best value for money.
- d) The Group holds a policy of separation of duties, such that wherever practical, the operational Personnel / departments ordering goods and services are kept separate from Personnel/departments conducting procurement and/or making payment.

3.10 Policy for Document Control and Record Keeping

- a) It is important for the Group to maintain records on the controls used for the adequate procedures.
- b) Policies and procedures should be stored in a secure location with restricted access to making changes.
- c) Records arising from the procedures (i.e. due diligence checks, conflicts of interest declarations, gift & hospitality declaration and etc.) must be kept in a safe place, and backed up regularly.
- d) The Group's Compliance Manager has overall responsibility for the document control and record keeping of anti-corruption related documents.
- e) The Compliance Manager shall monitor and check the condition of the documents and records at the filing locations periodically to prevent damage, deterioration or loss.

PRINCIPLE IV: SYSTEMATIC REVIEW, MONITORING AND ENFORCEMENT

4.1 Policy and procedures on Monitoring, Reviewing and Enforcing the Anti-Corruption Initiatives

- a) The Executive Chairman will ensure that regular reviews are conducted to assess the performance, efficiency and effectiveness of the anti-corruption programme, and ensure the programme is enforced. The reviews will form the basis of any efforts to improve the existing anti-corruption controls in place in the organisation.

- b) For this purpose, the Group is committed to:
 - i. plan, establish, implement and maintain a bribery risk-based monitoring programme, which covers the scope, frequency, and methods for review;
 - ii. identify and resource competent person(s) to perform an internal audit, in relation to the organisation's anti-corruption measures;
 - iii. conduct continual evaluations and improvements on the organisation's policies and procedures in relation to corruption;
 - iv. consider an external audit by a qualified and independent third party at least once every three years to obtain assurance that the organisation is operating in compliance with its policies and procedures in relation to corruption;
 - v. monitor the performance of Personnel in relation to any anti-corruption policies and procedures to ensure their understanding and compliance with the organisation's stance in their respective roles and functions; and
 - vi. conduct disciplinary proceedings against Personnel found to be non-compliant to the programme.

- c) The results of reviews and audits shall be reported to the top management/business owner for consideration and implementation of recommendations.

Anti-Corruption Programme Audit Plan

The audit plan for the anticorruption programme is set out in the document name 'Astino Berhad Anti-Corruption Audit Plan.'

PRINCIPLE V: TRAINING AND COMMUNICATION

5.1 Communications Policy

- a) The Executive Chairman will ensure that communications are conducted both internally and externally regarding the anti-corruption programme.
- b) Communications will include information on key policies and procedures, including Anti-bribery policy; conflicts of interest; gifts, entertainment etc; facilitation payments; reporting channel.
- c) Communication channels may include personal briefings, email, Internet/intranet, face-to-face briefings, phone calls and etc.

Anti-Corruption Programme Communication Plan

Objective: To raise awareness on the anti-corruption programme

- General understanding and awareness on integrity and the anti-corruption programme
- More detailed information on specific items
- Where to obtain further help and information

NO	WHAT	HOW	TO WHOM	BY WHO	WHEN	LANGUAGES
1	The importance of integrity for the Group with information on the anti-corruption programme - message from top management - why the anti-corruption programme is needed, what it will do for the company - main policies - location of documentation (policies & procedures) - implications for participating in corruption - where to obtain help and further information	Team Briefings Email blasts Online Information (Company Website) Printed materials	Internal parties	HR Department	At launch of the anti-corruption programme	English

NO	WHAT	HOW	TO WHOM	BY WHO	WHEN	LANGUAGES
2	Bulletin updates - updates on policies and procedures - incidents in the news - case studies	Email blast Team Briefings Online Information (Company Website)	Internal parties	Compliance Manager	6 months after launch of programme (if any)	English
3	Briefing for contractors and vendors Includes: - Guidelines on gifts & hospitality - Information on whistleblowing	Email blast Printed materials	Contractors, suppliers / vendors, Strategic Business Partners	Procurement Personnel Respective H.O.Ds	June'2020 Or whenever engage with new vendor	English

5.2 Training Policy

- a) The Group shall conduct adequate training to ensure all Personnel exposed to bribery and corruption risk are aware of policies and procedures set out to establish the anticorruption programme.
- b) Where relevant, training may also be provided for business associates which may expose the Group to corruption risk such as agents, intermediaries and others acting on behalf the company.
- c) Vendor/supplier/contractors procuring goods and services to the Group may also receive training if deemed appropriate.
- d) Training for personnel considered to be in high-risk positions should be done at least once every 24 months and whenever new recruits for position with job grade ME and above, sales and procurement, with a record kept of training provided and attendance. Training should be tailored to the role and include examples of likely corruption scenarios.