

ANTI BRIBERY AND CORRUPTION POLICY

Introduction

OPS Paper Products Sdn Bhd (“**OPS**” or the “**Company**”) is committed to adopting a zero-tolerance policy to combat against all forms of corruption and bribery. We practice acting professionally in every aspect of business deals and relationship anywhere and at all times with the principles of anti-bribery and corruption, which will be elaborated further in this Anti-Bribery and Corruption (“**ABC**”) Policy.

Scope

This ABC Policy is applicable to:

- a) All individuals including but not limited to Board of Directors and employees (permanent and on contract), regardless of their designation and role.
- b) All individuals or organizations that may come in contact with the OPS at work, which includes but are not limited to actual and potential customers, suppliers, vendors, business contacts, agents, representatives, advisers, consultants, contractors, subcontractors.

Definition

The definition for “bribery” and “corruption” are stated below:

- a) “**Bribery**” defined as the offer, promise, giving, demanding, or receiving of a benefit in exchange for an activity that is illegal, unethical, a violation of trust, or incorrect contract performance. Gifts, hospitality, payments, incentives, jobs, favours, and other benefits are all examples of inducement. It makes no difference whether the bribe is given or received directly or indirectly through a third party, or whether it is for the recipient's or another's advantage.
- b) “**Corruption**” defined as the abuse of authorised power for personal benefit which include acts of extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.

Areas of Impact

a) Gifts, Entertainment and Hospitality

OPS encourage the use of good judgement, discretion, and moderation when giving or accepting gifts or entertainment in business dealings. Gifts and entertainment given or received must be in compliance with local law, must not violate the giver's and/or receiver's policies on the matter.

We do not solicit gifts, entertainment, or favors of any value from persons or companies with which the Company does business. We will not act in a manner that would place any vendor or customer in a position where they may feel obligated to make a gift, provide entertainment, or provide personal favors to do business or continue to do business with OPS.

All benefits (including gifts and entertainment) must be reasonable in value, infrequent in nature, transparent and open and not given to influence or obtain an unfair advantage.

b) Facilitation Payments and Kickbacks

OPS do not allow making or accepting, facilitation payments or kickbacks of any kind. Any request (in any form) for kickbacks must be refused and reported to the Head of Department or Operation Director as soon as possible.

c) Charitable Donations

OPS allows charitable donations including sponsorships that are made only in good faith and complies with existing laws and regulations. All charitable donations can only be made with the approval of the Company's Board of Directors. Personal donations without approval will not be eligible for reimbursement.

The Company does not endorse any donation or contribution to political parties. Such donations are to be made only in a personal capacity and will not be eligible for reimbursement by the Company.

d) Money Laundering

Money laundering is strictly prohibited in any kind.

Reporting Violations

If any employee has been offered a bribe from a person or business partners of the OPS or the employee has been offered something of value and are uncertain whether the employee can accept it, the employee should report the matter immediately.

Any employee with any suspicious, concerns or queries regarding any improper business practices, the employee should raise these matters to the Head of Department or Finance & Admin Manager who will pass this information to the Operation Director.

Policy Review and Revision

ABC Policy is periodically reviewed and will be enhanced when necessary to ensure compliance with the Malaysia Anti-Corruption Commission Act 2009 (“MACC Act”) and other applicable laws of Malaysia.


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Cherrie Chin Hsiao Yen
Operation Director
2nd September 2024