

HUMAN RESOURCES POLICY & PROCEDURE

POLICY NUMBER	PAGE	1	DATE
HR-AB-01	OF	2	1 st July 2024
ISSUED BY			APPROVED BY
Head of People & Human Resources			Chief Operating Officer
SUBJECT			DISTRIBUTION
Anti Bribery Policy			Human Resources

ANTI BRIBERY POLICY

Objectives:

PEOPLElogy Group is committed to conducting its business ethically and in compliance with all applicable laws and regulations, including the Malaysian Anti-Corruption Commission Act 2009. Bribery and corruption undermine trust, fairness, and integrity in business transactions, and PEOPLElogy Group prohibits any form of bribery or corrupt activity in all its operations.

This policy applies to all directors, officers, employees, contractors, consultants, agents, and any other individuals or entities acting on behalf of PEOPLElogy Group ("covered individuals").

Policy Statement:

PEOPLElogy Group strictly prohibits the offering, giving, solicitation, or acceptance of any bribe, kickback, or other improper payment, whether directly or indirectly, to or from any person or entity, including public officials, customers, suppliers, competitors, or any other third parties, in order to gain an improper business advantage.

Compliance with Laws and Regulations:

Covered individuals are required to comply with all applicable anti-corruption laws and regulations, including but not limited to the Malaysian Anti-Corruption Commission Act 2009, and to adhere to ethical standards of conduct at all times.

Prohibited Activities:

The following activities are strictly prohibited:

- Offering, giving, promising, or authorizing bribes, kickbacks, or other improper payments to any person or entity, including public officials or private individuals, for any purpose.
- Soliciting, receiving, or accepting bribes, kickbacks, or other improper payments from any person or entity, in exchange for any business advantage or favorable treatment.
- Engaging in any form of corrupt activity, including but not limited to extortion, embezzlement, money laundering, or any other unlawful conduct intended to obtain or retain business or personal gain.

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Gifts, Entertainment, and Hospitality:

Reasonable and proportionate gifts, entertainment, or hospitality may be offered or accepted in accordance with applicable laws and regulations and PEOPLElogy Group policies and procedures. However, gifts, entertainment, or hospitality should never be offered or accepted if they could create a conflict of interest or influence business decisions.

Reporting Procedures:

Covered individuals are encouraged to report any suspected or actual violations of this policy promptly to Human Resource Department. Reports will be investigated promptly and confidentially, and appropriate disciplinary action will be taken against individuals found to have violated this policy.

Training and Awareness:

PEOPLElogy Group will provide appropriate training and awareness programs to ensure that covered individuals understand their obligations under this policy and are equipped to recognize and prevent bribery and corruption.

Compliance Monitoring:

PEOPLElogy Group will monitor compliance with this policy through regular audits, reviews, and assessments to identify any areas of non-compliance and implement corrective actions as necessary.

Compliance with the Policy:

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment, as well as legal consequences, including fines, penalties, and criminal prosecution.

Review and Updates:

This policy will be reviewed periodically to ensure its effectiveness and compliance with applicable laws and regulations, and updates will be made as necessary.