



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY



1. Introduction

Tomypak Holdings Berhad ("**Tomypak**" or the "**Company**") is committed to conducting business ethically, honestly, and transparently. This Policy ensures compliance with all relevant laws and regulations, including the Malaysian Anti-Corruption Commission Act and other applicable laws.

2. Scope

This Policy applies to all directors, employees, consultants, contractors, and suppliers of Tomypak and its subsidiaries (collectively, "**Covered Parties**").

3. Definitions

- Bribery: Offering, giving, receiving, or soliciting any undue advantage to influence actions.
- Corruption: Misuse of entrusted power for private gain.

4. Prohibited Conduct

- Covered Parties must not engage in bribery or corruption.
- Offering, promising, giving, accepting, or soliciting any undue advantage, whether directly or indirectly, is strictly prohibited.

5. Gifts, Entertainment, and Hospitality

- Covered Parties must exercise caution in offering/giving or receiving gifts, entertainment, or hospitality.
- Gifts must be transparent, reasonable, and not intended to influence business decisions improperly.
- Acceptance or offer of gifts/hospitality of value exceeding the Approved Threshold must be disclosed using the applicable prescribed forms:
 - *FORM 3 Declaration of Hospitality Received*
 - *FORM 3A Declaration of Hospitality Offered*
 - *FORM 4 Declaration of Gift Received*
 - *FORM 4A Declaration of Gift Offered*

6. Business Partners and Due Diligence

- Tomypak expects all business partners, including suppliers, to adhere to this Policy.
- Transparent due diligence will be conducted on suppliers, contractors, and customers.
- Contracts must include explicit terms addressing bribery and corruption.
- Employees must perform thorough due diligence, especially for high-risk transactions.



7. Public Officials

- Engagement with public officials must be conducted with integrity.
- Offering money, gifts, or non-business travel to influence public officials is prohibited.
- Political contributions on behalf of Tomypak are prohibited.

8. Conflict of Interest

- All Covered Parties must avoid conflicts of interest that could lead to biased decision-making.
- Employees must report actual or potential conflicts related to their work using the designated form – *FORM 2 Declaration of Interests* as outlined in the Employee Handbook, and submit them to the local Human Resource department.
- Suppliers and other non-employee Covered Parties must manage any actual or potential conflicts of interest within their organisation in a manner consistent with the stringent standards inferred by Tomypak's process. Any such conflicts must be reported to their designated Tomypak contact or through a specified reporting channel, as outlined in their contractual agreements or Tomypak's Code of Conduct for Suppliers.
- Tomypak will maintain a transparent process for handling such reports, ensuring that conflicts of interest are addressed promptly and appropriately.

9. Donations and Sponsorships

- Tomypak conducts charitable donations and sponsorships responsibly.
- Due diligence will be conducted on all unfamiliar recipients, including completion of *Form 7 – Charitable Donations and Sponsorship*.

10. Compassionate Assistance

- Compassionate Assistance refers to support provided to individuals on humanitarian grounds, such as medical treatment or disaster relief.
- Such assistance must align with Tomypak's values and comply with all relevant laws and regulations.
- Proper due diligence, transparency, and approval processes must be followed, as outlined in Tomypak's internal guidelines.
- Compassionate Assistance is distinct from Donations and Sponsorships and is subject to separate procedures and controls.

11. Facilitation Payments

- Facilitation payments are generally prohibited.
- Exceptions may arise in cases where safety is at risk, with approval by the Managing Director.



12. Reporting and Whistleblowing

- Covered Parties are encouraged to report any suspected violations through established whistleblowing channels.
- The Company will protect whistleblowers from retaliation and keep reports confidential.

13. Training and Communication

- The Company will provide regular training tailored to specific roles and responsibilities.
- The Policy will be communicated to all Covered Parties, as defined in the Scope of this Policy, through appropriate channels.

14. Monitoring and Compliance

- The Company will monitor and periodically review the effectiveness of this Policy.
- Non-compliance may result in disciplinary action, including termination of employment.
- The Company may also report the matter to relevant authorities.

15. Conclusion

Tomypak's commitment to preventing bribery and corruption is unwavering. All Covered Parties must uphold the principles and values set out in this Policy.

16. Endorsement by the Board of Directors

This Policy has been reviewed and approved by the Board of Directors.
