



ORIENTAL FOOD INDUSTRIES HOLDINGS BERHAD
(Registration No. 199601017418 (389769-M))

ANTI-BRIBERY AND CORRUPTION POLICY

PURPOSE

The purpose of this Anti-Bribery and Anti-Corruption Policy is to reiterate OFIH's commitment in ensuring full compliance by the Group, its subsidiaries, its Directors, officers, Employees of the Anti-Bribery and Anti-Corruption laws.

POLICY STATEMENT

Oriental Food Industries Holdings Berhad and its Group of Companies namely Oriental Food Industries Sdn Bhd, Oriental Food Marketing (M) Sdn Bhd and OFI Properties Sdn Bhd (collectively referred to as "OFIH" or "the Group") are committed to conducting business in accordance with all applicable laws, rules and regulations with the highest ethical standards. The Board of Directors (BOD) adopts a zero tolerance approach towards bribery and corruption which clearly reflects the tone from the top.

SCOPE

This policy applies to every individual working for the Group at all levels including Directors, Senior Management, Managers, officers, employees (whether permanent, fixed-term or temporary), business associates (consultants, contractors, trainees, agents, clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, subcontractors, suppliers, vendors, advisors, distributors, representatives, intermediaries, investors, government and public bodies, including their advisors, representatives and officials, politicians and political parties) or any other person associated with OFIH, or any of its subsidiaries and its employees, wherever located (collectively referred to as Employees in this policy).

HANDLING OF BRIBERY AND CORRUPTION

Employees must not engage in any form of bribery, either directly or through any third party.

If possible bribery or corruption has been detected, the issue will be dealt with immediately by the ABAC Compliance Unit (including but not limited to, investigation) and reported to the Top Management, RMAC and the Board in confidence and need-to-know basis.

If bribery or corruption has been made by an Officer, Employees, Business Associate or any Third Party, the incident shall be reviewed by ABAC Compliance Unit and reported to the authorities if the ABAC Compliance Unit reasonably believe that the involvement of the authorities is required by the law or if the result of the investigation conducted justifies such action.

If bribery or corruption has been made by an Officer, Employees or Business Associate or any Third Party, the contract or agreement should be reviewed and a decision made as to whether mitigation can take place or the employment or contract should be terminated.



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Any Officers, Employees and Business Associates found to be non-compliance with the policies, procedures and requirements of this Framework or non-compliance with relevant laws and regulations in relation to anti-bribery and corruption in any jurisdiction, shall be subject to the following actions as determined appropriate, judging from the seriousness of the offence or non-compliance as recommended by the ABAC Compliance Unit and determined by Top Management or the Board (if the non-compliance involve member of the Top Management):

- a) Warning Letter/Show Cause Letter in accordance with applicable Standard Operation Procedure;
- b) Suspension from works or contract in accordance with applicable Standard Operation Procedure;
- c) Penalty and/or damages in relation to the non-compliance or offences in accordance with applicable Standard Operation Procedure;
- d) Demotion after going through proper due enquiry or investigation process, as the case maybe and in accordance with applicable Standard Operation Procedure;
- e) Dismissal after going through proper due enquiry or investigation process, as the case maybe and in accordance with applicable Standard Operation Procedure;
- f) Termination of contract in accordance with the terms of the contract, after going through proper due enquiry or investigation process, as the case maybe and in accordance with applicable Standard Operation Procedure.

Audit rights should be exercised by the Group when there is reasonable suspicion of an act of bribery or corruption has occurred and the Third Party has not addressed the concerns in a satisfactory manner.

ABAC Compliance Unit to ensure that the identity of the informer is protected and such informer will be protected from reprisal, including any form of harassment and victimization, as a consequence of his genuine disclosure and comply with relevant laws and regulations in relation to protection of whistleblower.

HOSPITALITY AND GIFTS

The BOD has adopted a "No Gift Policy" notifying all suppliers and business associates via email whereby, subject only to certain narrow exceptions, all Officers, Employees and Persons Connected with such Officers or Employees are prohibited from directly or indirectly receiving or providing gifts. Business Associates acting for or on behalf of the Group is required to put in place similar measure whereby such Business Associates or Persons Connected with them are prohibited from directly or indirectly receiving or providing gifts at any time including during the festive season.



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Employees or members of their immediate families (spouse, parents, children, or siblings) should not provide, solicit or accept cash or its equivalent (gifts, invitation for meals etc.), entertainment, favours, gifts or anything of substance to or from competitors, vendors, suppliers, customers or others that do business or are trying to do business with the Group or where there is any suggestion that a return favour will be expected or implied. This shall also cover situations during festive seasons.

Where the employee is uncertain how to handle the situation and/or thinks it is not appropriate to decline the offer of a gift, then approval must be sought from the Group Managing Director or Group Chief Executive Officer.

Where the gift is delivered to the individual or Group by a Third Party without prior knowledge of the intended recipient or an opportunity to return the gift, the recipient is required to surrender the gift and complete the "Gift, Benefit and Hospitality Declaration Form" (OFI-AD-F15) and submit the same to the HR Department.

A copy of the completed Gift, Benefit and Hospitality Declaration Form shall be submitted to ABAC Compliance Unit for review and report to RMAC and the Board at the scheduled meeting by ABACCU.

RAISING A CONCERN

Every person, to whom this Policy applies too, is encouraged to raise their concerns about any bribery issue or suspicion of malpractice at the earliest possible stage.

If he/she is unsure whether a particular act constitutes bribery or corruption or if he /she has any other queries, these should be raised with their respective Manager/HOD or the Management.

It is the responsibility of every person to inform and report the matter to the respective Manager/HOD, the Top Management, the ABACCU or through the whistle blowing channels as soon as possible if he/she has been offered a bribe by a Third Party, asked to make one, suspect that this may happen in the future or believe that he/she is a victim of another form of corruption or other unlawful activity.

Every person should refuse to accept or make the payment from or to a Third Party, explain the Group's Anti-Bribery and Anti-Corruption Policy against accepting or making such payment and make it clear that the refusal is final and non-negotiable because of this Policy. If the person encounters any difficulty making this refusal, he/she should seek assistance from the Manager/HOD or Management.