



PRESS METAL ALUMINIUM HOLDINGS BERHAD

Registration No. 201601027232 (1198171-H)

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

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1. INTRODUCTION

- 1.1 Press Metal Aluminium Holdings Berhad (the “Company”) and its subsidiaries (collectively, the “Group”) are committed to ethical and transparent business practices.
- 1.2 The Group endeavours to comply with all applicable laws, rules and regulations of the governments, commissions and exchanges of the jurisdictions in which the Group operates.
- 1.3 This Anti-Bribery and Anti-Corruption Policy (“Policy”) shall be read in conjunction with the Company’s Code of Conduct, Code of Ethics and Whistle-Blower Policy and the Malaysian Anti-Corruption Commission Act 2009.

2. ANTI-CORRUPTION POLICY STATEMENT

- 2.1 We adopt a zero-tolerance approach towards all forms of bribery and corruption and undertake to comply with all the relevant anti-corruption laws in all the jurisdictions the Group operates in.
- 2.2 Corrupt activities also include the abuse of power, breach of trust, collusion, embezzlement, extortion, fraud, money laundering and trading in influence.
- 2.3 We shall ensure our full co-operation with the enforcement agencies and other competent authorities in the event of an investigation into corruption involving the Group.
- 2.4 This Policy elaborates on the core principles in the Code of Conduct and Code of Ethics.

3. OBJECTIVE

- 3.1 This Policy sets out the Group’s position on matters pertaining to bribery and other corrupt activities that may be encountered in the course of business for the purpose of providing guidance in dealing with and preventing acts of bribery and corruption.
- 3.2 It is intended to serve as a framework and not designed to cater for all situations and circumstances in which bribery and corruption may arise.

4. SCOPE

- 4.1 This Policy applies to –
 - (i) the Group and all of its Directors, Personnel and Intermediaries;
 - (ii) the Group’s business dealings with private and public sector entities, including their Directors, Personnel and Intermediaries; and
 - (iii) all the jurisdictions in which the Group operates.
- 4.2 In the event of a conflict between a mandatory law and the principles espoused in this Policy, the law shall prevail.

5. ABBREVIATIONS AND DEFINITIONS

5.1 The following abbreviations and definitions are employed in this Policy:

Definitions	Meaning
Abuse of power	: Where someone abuses a position of trust for the purposes of illicit gain.
AMLCFT	: Anti-Money Laundering and Countering Financing of Terrorism.
Board	: The Board of Directors of Press Metal.
Breach of trust	: A failure to act responsibly for someone who has given you something to keep safe e.g. money or a company's confidential information.
Bribery	: The offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action, which is illegal, unethical, or a breach of trust or to refrain from acting ¹ . Bribery can be a financial or in-kind undue advantage that can be paid directly or through intermediaries.
Business Associate or Counterparty	: An external party with whom the organisation has an existing or prospective business relationship with either on a regular or one-off basis e.g. clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors.
Collusion	: An agreement between people to act together secretly or illegally in order to deceive or cheat someone.
Conflict of interests	: When one's private interests either influence, have the potential to influence, or are perceived to influence one's decision-making on behalf of the Group.
Contract staff	: A person who provides services to the Group under a written contract.
Corporate gifts	: Either given by one organisation to another, with the appointed representatives of each organisation giving and accepting the gift, or promotional items given to the general public at events, trade shows and exhibitions for branding purposes. Corporate gifts usually bear the Company's name and logo and are of nominal value and include diaries, calendars, pens, notepads and festive gifts such as hampers, oranges and dates.

¹ *Business Principles for Countering Bribery (Transparency International 2009), OECD Anti-Bribery Convention, Art. 1; UN Convention against Corruption, Art. 15-16*

Definitions	Meaning
Corruption	<p>: Corruption is the act of giving or receiving of any gratification or reward in the form of cash or in-kind of high value for performing a task in relation to his/her job description.</p> <p>Four (4) main offences are specified in the MACC Act 2009:</p> <ol style="list-style-type: none"> 1. Soliciting / receiving Gratification (Bribe) [section 16 & 17(a) MACC Act 2009]; 2. Offering / giving Gratification (Bribe) [section 17(b) MACC Act 2009]; 3. Intending to deceive (False claim) [Section 18 MACC Act 2009]; and. 4. Using office or position for Gratification (Bribe) (Abuse of power / position) [Section 23 MACC Act 2009]. <p>The MACC regards bribery, fraud, abuse of power and money laundering as acts of corruption.</p>
CSR	: Corporate social responsibility
Director	: Includes all independent and non-independent directors, executive and non-executive directors of the Group and shall also include alternate or substitute directors.
Donation	: Charitable contributions made in cash or in kind to support the community.
Embezzlement	: The crime of secretly taking money that is in your care or that belongs to an organization or business you work for.
Employees	: All individuals directly contracted to the Group on an employment basis, including permanent and temporary employees.
Exposed Position	: Any position identified via risk assessment as being vulnerable to bribery which may include but is not limited to roles involving procurement or contract management; financial approvals; human resources; government relations; sales; negotiations with external parties; or other positions so identified by the Company.
Extortion	: The act of getting something, especially money, by force or threats.
Facilitation payment	: A financial payment made to a public official to expedite an administrative or routine process or decision which the payer is legally entitled to even without making such a payment.
Fraud	: The crime of obtaining money or property by deceiving people.

Definitions	Meaning
Group	: The Company and its subsidiaries, collectively.
Gratification	: (a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage; (b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity; (c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part; (d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage; (e) any forbearance to demand any money or money's worth or valuable thing; (f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and (g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f). (MACC Act 2009)
HOD	: Head of department.
Hospitality	: Food, drink, entertainment, etc. that an organisation provides for guests or business partners with or without the presence of the host.
Intermediary	: Agents and other appointed representatives of the Group.
Intern	: A trainee (paid or unpaid) who works for an organisation for a limited period of time to gain work experience.
LOA	: Limits of authority; written authorisation to individuals within the Company allowing them to commit the Company to doing certain things within prescribed limits.
MACC	: Malaysian Anti-Corruption Commission
MACC Act 2009	: The Malaysian Anti-Corruption Commission Act 2009 and any amendments or additions thereto or re-enactments thereof.
MCCG	: The Malaysian Code on Corporate Governance.

Definitions	Meaning
Money laundering	: A process of converting cash or property derived from criminal activities to give it a legitimate appearance.
Personal gifts	: Gifts given from one individual to another with the intention of creating or enhancing a personal relationship.
Personnel	: Employees, Contract staff and Interns, collectively.
Political contributions	: Contributions, financial or in kind, made directly or indirectly to a political party, elected officials or political candidates for general party support or political campaigning. Financial contributions can include loans. In-kind contributions can include gifts of property or services, advertising or promotional activities endorsing a promotional party, the purchase of tickets for fundraising events and contributions to research organisations with close political affiliations.
Press Metal or the Company	: Press Metal Aluminium Holdings Berhad (Company No. 201601027232 (1198171-H)).
SOP	: Standard operating procedures.
Sponsorship	: The provision of financial support to sports, arts, entertainment or other causes for business objectives and usually for brand or reputation management purposes.
Stakeholder	: Those parties who are directly or indirectly influenced by our business operations or can significantly influence our business operations such as shareholders and investors, employees, customers, suppliers, regulators, Government agencies, Non-Governmental Organisations, society and the communities in which the Group conducts its business.
Subsidiary	: A corporation in which the Company controls the composition of the board of directors, controls more than half of the voting power and holds more than half of the issued share capital excluding preference shares.
Trading in influence	Occurs when someone close to a key decision maker improperly exchanges the influence they have over that person for some advantage.

6. ANTI-BRIBERY AND ANTI-CORRUPTION

- 6.1 Bribery and corruption in all its forms as it relates to Press Metal's activities is prohibited.
- 6.2 Bribery and corruption may take the form of anything of value, such as money, goods, services, property, privilege, employment position or preferential treatment. Press Metal Directors, 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 Press Metal of the persons involved in the transaction.

- 6.3 The anti-bribery and anti-corruption statement above applies equally to its business dealings with commercial (“private sector”) and Government (“public sector”) entities, and includes their directors, personnel, agents and other appointed representatives.
- 6.4 Compliance with this Policy is **compulsory**.
- 6.5 Directors and Personnel must familiarise themselves with this Policy and complete the declaration as per Annexure 1.
- 6.6 Directors and Personnel must attend any anti-corruption training mandated by the Group.
- 6.7 Personnel must seek guidance from their superiors if they become aware of suspicious transactions.
- 6.8 Breaches or suspected breaches of this Policy must be promptly reported via the appropriate channels.
- 6.9 The Group’s Directors, Personnel and Intermediaries will not be penalised or suffer other consequences for refusing to pay or receive bribes or indulge in any other illicit behaviour even if such refusal results in the loss of business or any other adverse impact upon the Group’s operations.
- 6.10 The Group shall conduct due diligence on personnel in Exposed Positions to safeguard the interests of the Group.

7. CONFLICT OF INTERESTS

- 7.1 Situations in which personal interest could come into conflict with obligations or duties owed to the Group should be avoided or dealt with accordingly.
- 7.2 Directors and Personnel must not use their position, official working hours, the Group’s resources and assets for personal gain (including for the benefit of their family or friends) or to the Group’s disadvantage.
- 7.3 The Code of Conduct includes the following provisions to be observed by all Personnel:
 - The Company expects Personnel to perform their duties conscientiously, honestly, and in accordance with the best interests of the Group;
 - Personnel must take care to separate their personal roles from their Company positions when communicating on matters not involving the Company’s business; and
 - Personnel must avoid any personal, financial or other interest which may be in conflict with their duties and responsibilities to the Company. In this respect, Personnel are not permitted to be gainfully employed by any other organisation, company or business concern other than the Company without prior written consent of the Group Chief Executive Officer.
- 7.4 The Code of Ethics includes the following provisions to be observed by all Directors:

- Conflict of interests may arise in any situation in which a Director engages in an activity that detracts from or interferes with his or her full, loyal and timely performance of services to the Group, or has a financial interest that might influence the Director's judgment on behalf of the Company; and
- All such conflicts should be avoided, and Directors must report any actual, potential or apparent conflicts to the Board.

7.5 When Directors or Personnel are faced with a conflict-of-interest situation, they are required to complete the Conflict of Interest Disclosure Form as per Annexure 3 before review by immediate superior and submit to Human Resource Department.

8. DECLARATION OF ASSETS

8.1 In the event of suspicious behaviour, allegations and/or investigations relating to bribery or corruption, Group Internal Audit and Group Human Resources reserve the right to request the relevant Directors and Personnel to declare information regarding the assets owned by them as deemed necessary.

9. SPONSORSHIPS, DONATIONS AND POLITICAL CONTRIBUTIONS

9.1 All donation and sponsorship proposals must satisfy the Company's procedures, strategy and established criteria. Established entities with adequate operational procedures to ensure proper accountability for the funds should be selected.

9.2 Due diligence is conducted on all the proposed recipients to check whether they are affiliated to public officials or existing or potential customers. Donations and sponsorships must not be made to influence business decisions or to cover up undue payments or bribery.

9.3 The provisions relating to donations and sponsorships also apply to any CSR contributions.

9.4 All sponsorships, donations and direct or indirect political contributions must be approved by two Executive Directors regardless of the amount. Payments are monitored to ensure that the procedures are complied with.

9.5 All sponsorships, donations and political contributions must be accurately reflected in the Group's accounting books and records, be permitted by the applicable law and be capable of being publicly disclosed.

10. FACILITATION PAYMENTS

10.1 Facilitation payments are strictly prohibited by the Group. Personnel must immediately notify and consult their immediate superior when faced with a request for such a payment.

10.2 The Company recognises that, in exceptional circumstances, a facilitation payment may be an immediate recourse to protect the safety of an employee. In such situations, the prior approval of the Chief Executive Officer / Managing Director is required or, in an emergency, retroactively as soon as possible after the payment.

11. FINANCIAL AND NON-FINANCIAL CONTROLS

- 11.1 The Board has overall responsibility for maintaining the system of financial and non-financial controls, which provides reasonable assurance of effective and efficient operations and compliance with internal policies and procedures.
- 11.2 The internal audit function reviews the effectiveness of the financial and non-financial controls of all business and support units and subsidiaries on a regular basis and reports its findings to the Audit Committee.
- 11.3 Personnel must understand the internal controls relevant to their positions and comply with the policies and procedures related to those controls to ensure that effective and reliable business processes are in place.
- 11.4 The Company adopts a clear separation of duties for all job functions whether they are financial or non-financial in nature.
- 11.5 There must be at least two (2) levels of checking for jobs of a non-financial nature, i.e. the job performer and the checker.
- 11.6 For financial-related jobs, there must be at least three (3) levels of checking, comprising the job performer, the checker and the approver.
- 11.7 Where the financial activity involves disbursement or payment of funds, multiple signatories are required.

12. GIFTS, HOSPITALITY AND TRAVEL (“GHT”)

- 12.1 Directors and Personnel must not solicit or accept Personal Gifts (including cash or cash-equivalents), Hospitality or personal favours that could, in any way, influence, or appear to influence, business decisions in favour of any person or organisation with whom or with which the Company has, or is likely to have, business dealings. Cash-equivalents include discount vouchers, coupons, commissions, shares etc.
- 12.2 Any Personal Gift which violates this Policy must be politely declined or returned with an explanatory note from the affected Director or Personnel thanking the third party but politely explaining that the Policy prevents them from accepting Personal Gifts.
- 12.3 Directors and Personnel must not accept any other preferential treatment because of their positions with the Company which may, or be perceived to, place them under an obligation to reciprocate the preferential treatment.
- 12.4 Reasonable business-related GHT is allowable provided the following criteria are satisfied:
 - (i) **Bona fide:** the GHT must not give rise to a conflict of interests and must not be offered or accepted when there is a pending business decision;
 - (ii) **Integrity:** the provision or receipt of the GHT must not be potentially damaging to the reputation of the Group or cast doubt on the reputation of the person involved;
 - (iii) **Reasonableness:** the GHT is moderate and not so frequent that it places the recipient under an obligation; and
 - (iv) **Transparency:** the GHT must be capable of being disclosed.

- 12.5 Directors and Personnel must comply with all applicable policies, procedures, laws and regulations related to GHT in all countries in which the Group operates.
- 12.6 Directors and Personnel should avoid offering or accepting GHT to/from government officials. Where deemed appropriate, a Corporate Gift and not a Personal Gift may be given for a specific purpose. GHT must be reasonable and in accordance with the rank of the government officer so as to avoid the impression of the creation of an obligation on the part of the government official.
- 12.7 All offers and acceptance of GHT involving government officials must be approved by the relevant HOD and declared in the register.

13. BUSINESS ASSOCIATES

- 13.1 All Business Associates are expected to abide by ethical business practices and avoid corrupt practices, including bribery.
- 13.2 Appropriate due diligence including background checks, a document verification process and bribery risk assessment must be undertaken on any Business Associate before entering into a business relationship.
- 13.3 Where practicable, contractual clauses are included to enable the Group to terminate any contract in which bribery or corruption has been identified.
- 13.4 All Business Associates acting on behalf of the Group must contractually agree to abstain from bribery and corrupt practices.
- 13.5 If there are suspicions of bribery and corruption on the part of Business Associates in their dealings with the Group, we reserve the right to seek an alternative supplier for the goods or services.
- 13.6 Business Associates such as contractors, vendors, suppliers, consultants, joint-venture partners and Intermediaries are required to sign the declaration confirming they have been provided with a copy of the Policy and that they undertake to abide by the provisions of the Policy directly or indirectly applicable to them. The format of the declaration is as per Annexure 2.

14. MONEY LAUNDERING

- 14.1 The Group will, to the best of its ability and knowledge, conduct business with reputable customers with legitimate funds for legitimate business purposes.
- 14.2 The Group's Personnel are prohibited from being directly or indirectly involved in money-laundering activities.
- 14.3 Examples of such activities may include but are not limited to –
 - Payments made by third parties that are not parties to the contract;
 - Payments to accounts of third parties that are not parties to the contract;
 - Attempts to make payments in cash or cash equivalents; or
 - Payments made in currencies that differ from the invoices.
- 14.4 This section should be read in conjunction with the Group's AMLCFT Policy.

15. PROCUREMENT

- 15.1 All approved suppliers are required to submit a completed declaration form as per Annexure 2 of this Policy before any orders may be placed with them.

- 15.2 Suppliers are responsible for reporting violations of this Policy, including but not limited to instances of Procurement Personnel hinting at or soliciting for bribes, via the whistleblowing channels listed in Section 21 of this Policy.
- 15.3 All Procurement Personnel are expected to uphold the highest standards of integrity and act in the best interest of the Group, complying with the provisions of this Policy at all times.
- 15.4 Procurement Personnel are rotated within the department whenever deemed necessary by the HOD or top management.

16. APPOINTMENT OF DIRECTORS & RECRUITMENT OF PERSONNEL

- 16.1 The appointment of a new Director is a matter for consideration and decision by the full Board upon the appropriate recommendation of the Nomination Committee and in compliance with the provisions of the MCCG.
- 16.2 In identifying candidates for appointment as directors, the Board does not solely rely on recommendations from existing Board members, management or major shareholders. The Board utilises a variety of independent sources to identify suitably qualified candidates.
- 16.3 The Nomination Committee will assess the candidate's suitability by taking into account, *inter alia*, his/her ability to make informed business decisions, entrepreneurial flair and available time to fulfil his/her directorial responsibilities.
- 16.4 The Company's recruitment policy is to consider equally all persons with the appropriate experience and qualifications, regardless of age, gender, ethnicity, cultural background or other personal factors. Favouritism, whereby a person is selected regardless of qualifications or merit for a job because of affiliations or connections, is prohibited.
- 16.5 Background checks are conducted prior to interviews with candidates to be appointed to key roles.

17. LETTERS OF SUPPORT

- 17.1 The Company recruits, promotes and awards contracts purely on merit. As such, letters of support in all forms will not be considered in the decision-making process.

18. ANTI-BRIBERY AND ANTI-COMPLIANCE FUNCTION

- 18.1 The Company has established and will continue to maintain an Integrity Team to be responsible for all anti-bribery and anti-corruption compliance matters.
- 18.2 The Integrity Team shall perform functions below within the Company's structure, equipped to act effectively against Bribery and Corruption:
 - (a) Provide advice and guidance to Directors, Personnel and Business Associates on anti-corruption compliance programme and issues relating to bribery and corruption;
 - (b) Post-implementation reviews involving monitoring, measuring analysing and evaluating the performance of the Policy;

- (c) Periodic reporting to the top management and Audit Committee on the performance of the Policy;
 - (d) Monitoring the Company's legal, regulatory and business environments and risks for changes which will require amendments to the Policy; and
 - (e) Maintaining records and managing documentation related to the Policy.
- 18.3 The Integrity Team will be allocated adequate resources to operate efficiently and be staffed with Employees with the appropriate competence, authority and independence.
- 18.4 The Company will conduct regular risk assessments to identify the bribery and corruption risks facing the business, set anti-bribery and corruption objectives and assess the effectiveness of existing controls in achieving those objectives.

19. TRAINING AND COMMUNICATION

- 19.1 The Policy is posted on the Company's intranet and is accessible by all our Directors and Personnel and awareness is reinforced through messages on the Company's intranet and website, emails, newsletters, posters and the Employee's Handbook, video seminars/messages and town-hall sessions.
- 19.2 The Company conducts training programmes on the Company's position on bribery and corruption for all our Directors and Personnel in various formats, including seminars, videos and in-house courses, intranet or web-based programs.
- 19.3 All our new recruits are required to successfully complete an in-house training and assessment on the Policy as part of their induction programme. They are also required to sign a declaration that they have read and understood and will abide by the Policy. The format of the declaration is as per Annexure 1.
- 19.4 Our current Directors and Personnel are required to successfully complete the in-house training and assessment and sign the declaration as soon as practicable. It is envisaged that the declaration may be submitted electronically in the future.
- 19.5 The Human Resources Department will maintain records of the Directors and Personnel who have completed the training and assessment and have submitted the declaration to ensure that all the Group's Directors and Personnel comply with these requirements.

20. AUDIT AND COMPLIANCE

- 20.1 Periodic audits will be conducted either internally or by an external party to ensure compliance with this Policy.
- 20.2 The findings of the audits will be documented and form the basis for any process improvements.

21. REPORTING POLICY VIOLATIONS

- 21.1 In line with the level of risk, incidences of non-compliance and any risk areas identified by the audit or other means must be reported to the top management and Audit Committee in a timely manner.
- 21.2. For the Company's Directors and Personnel, punitive action taken for non-compliance may include disciplinary action up to and including the termination of their services / employment.
- 21.3 For external parties, penalties for non-compliance could include the termination of the affected contract(s).
- 21.4 Where the Group's interests have been harmed by the non-compliance, legal action may be pursued against such parties.
- 21.5 Bribery or corruption cases that have been proven beyond reasonable doubt shall be referred to the relevant authorities.
- 21.6 Stakeholders who encounter suspected, attempted or actual violations of this policy are encouraged to report such incidents promptly. Our Whistle-Blower Policy provides the following whistleblowing channels:

(a) Email: whistleblowing@pressmetal.com

(b) Post: ***To be opened by the Chairman of the Audit Committee only***

Attention: The Audit Committee Chairman
Press Metal Aluminium Holdings Berhad
Suite 61 & 62, Setia Avenue
No. 2 Jalan Setia Prima S U13/S
Setia Alam, Seksyen U13
40170 Shah Alam
Selangor
Malaysia

- 21.5 The whistleblowing channels may also be used to highlight inadequacies in the anti-corruption compliance programme.
- 21.6 Whistleblowing reports made in good faith, either anonymously or otherwise, will be investigated objectively without the threat of reprisal regardless of the outcome. The confidentiality of the whistle-blower's identity and the information reported is ensured.

22. PERIODIC REVIEW

- 22.1 This Policy will be reviewed at least once every three (3) years to ensure its effectiveness and consistency with the applicable legislation and regulatory requirements, reputational demands and changes in the business.

23. BOARD APPROVAL

- 23.1 This Policy was reviewed and approved by the Board on 28 May 2020.

DECLARATION FORM

I, _____, declare that I have read and understood the contents of Press Metal's Anti-Bribery and Anti-Corruption Policy ("Policy").

I hereby undertake to comply with the provisions and requirements set out in the Policy.

Name :
NRIC / Passport No. :
Designation :
Company :
Department :

THIRD PARTY DECLARATION FORM

1. We are the contractors / vendors / suppliers / agents / consultants / joint-venture partners / intermediaries* of Press Metal Aluminium Holdings Berhad (“Press Metal”).
2. We confirm that we have been provided with a copy of Press Metal’s Anti-Bribery and Anti-Corruption Policy (“Policy”) and undertake to abide by the provisions of the Policy which are directly or indirectly applicable to us.
3. We further undertake to promptly inform Press Metal of any actual or suspected / alleged breach of the Policy involving Press Metal’s Directors or Personnel (as defined in the Policy) and cooperate with Press Metal in any investigation of such a breach.
4. We acknowledge that the provisions as stated in this declaration form shall form part of the terms and conditions of our appointment and / or contract of service and, if we are found to have breached the Policy, Press Metal has the right to suspend or terminate the contract / agreement and disqualify us from tendering for future contracts.

Name of Authorised Signatory :
NRIC / Passport No. :
Designation :
Company :
Date :
Company Stamp :

** Please delete where not applicable.*

CONFLICT OF INTEREST FORM

Name :

Designation :

Department :

Company :

I hereby declare an actual/ potential Conflict of Interest as follows:

Dealing with Suppliers,
Customers, Agents or
Competitors

Board Membership

Outside Employment and
Activities Outside the Group

Family Members and Close
Personal Relationship

Investment Activities

Please state details:

Signature

Date:

Reviewer Signature

Date

HR Signature

Date