

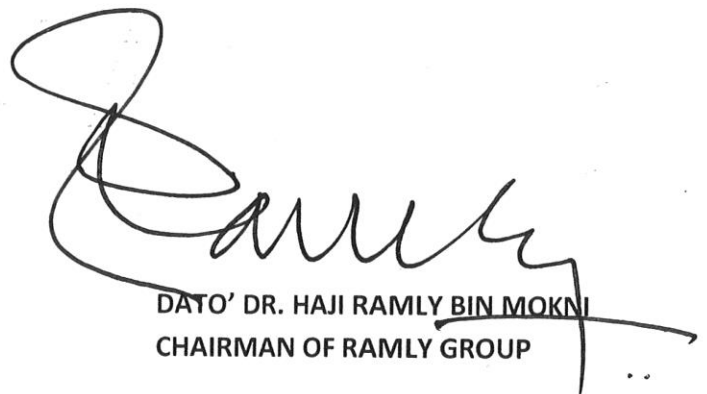
CONTENT

1.0	FOREWORD	02
	INTRODUCTION	
2.0	THE IMPLEMENTATION OF RAMLY GROUP ANTI-CORRUPTION POLICY AND GUIDELINES	03-04
3.0	GUIDELINES FOR GIVING AND RECEIVING GIFTS OF RAMLY GROUP	04-08
4.0	GIFTS POLICY AND GUIDELINES AND RECEIVING	08-09
5.0	GENERAL RULES THAT ARE APPLICABLE TO BOTH RECEIVING AND GIVING GIFTS	10
6.0	RECORD KEEPING	10-11
7.0	RECEIVING GIFTS: PRIOR NOTIFICATION	11-12
8.0	RECEIVING GIFTS: PRIOR APPROVAL	12-13
9.0	RECEIVING GIFTS	13-14
10	GIVING GIFTS	14
11.	CORPORAT SOCIAL RESPONSIBILITY (CSR), SPONSORSHIP AND DONATIONS	14-16
12.	POLITICAL CONTRIBUTIONS	16-17
13.	MONEY LAUNDERING	17-18
14.	IMPLEMENTATION COMPLIANCE OF RAMLY GROUP ANTI-CORRUPTION POLICY	18-19
15.	WHISTLE BLOWING POLICY	19-20

FOREWORD

ASSALAMUALAIKUM w.b.t and SALAM SEJAHTERA

- Ramly Group comprising Ramly Food Industries Sdn. Bhd., Ramly Food Processing Sdn. Bhd., Ramly Food Marketing Sdn. Bhd., Ramly Food Services Sdn. Bhd., Ramly Halal Logistics Sdn. Bhd., Ramly Halal Mart Sdn. Bhd., Ramly Project Management Sdn. Bhd., Ramly Poultry Integrator Sdn. Bhd., Ramly Halal Kiosk Sdn. Bhd., Ramly Mokni Holding Sdn. Bhd and Exxan Corporation Sdn. Bhd. (hereinafter referred to as "Ramly Group") is committed to ensure that all daily operations including transactions are implemented and executed ethically, professionally and pursuant to the law, particularly, compliance with the provisions under **Malaysian Anti-Corruption Commission Act 2009 (Act 694)**.
- Ramly Group adopted the "Zero Tolerance Policy" on all forms of corruption activities, abuse of power, bribery and misappropriation, as **Part IV** of the **Malaysian Anti-Corruption Commission Act 2009 (Act 694)**.
- Ramly Group on the awareness of current impact of corruption of which it has a negative influence on the nation's development process and the construction of values in society therefore, Ramly Group is determined to form people in Ramly Group in particular and citizens of society generally, for the establishment of the community with a strong personal and moral characteristics with the adaptation of religious and spiritual values as well as the existing legal compliance in order to combat corruption symptoms in all aspects of life.
- Ramly Group, based on the above mission, has taken an initiative to provide an Anti-Corruption Policy and Guidelines as a guide for Ramly Group's employees as well as for all contractors, sub contractors, suppliers, sub-suppliers, vendors, consultants, agents, wholesalers, sub-wholesalers, representatives and other parties or entities carrying out work or services for or on behalf of Ramly Group to understand and comply with this policy in an effort to curb and fight against corruption. The commitment and role of all parties are important in ensuring the success of Ramly Group in achieving the objectives.



DATO' DR. HAJI RAMLY BIN MOKNI
CHAIRMAN OF RAMLY GROUP

RAMLY GROUP ANTI-CORRUPTION POLICY AND GUIDELINES

1. INTRODUCTION

- 1.1 Bribery activities can cause leakages and wastage in an organization while affecting not only the perpetrator, but also the reputation of the organization and cause the organization to be exposed to risks and/or legal implications.
- 1.2 Ramly Group Anti-Corruption Policy and Guidelines will provide guidelines that explain the Anti-Corruption Policy and as guidance to all Ramly Group employees.
- 1.3 Ramly Group Anti-Corruption Policy and Guidelines will also be the practice of integrity besides complying to the law, in order to deter any corruption activity within Ramly Group, to know and understand corruption and methods of addressing corruption activities in performing daily task.

2. THE IMPLEMENTATION OF RAMLY GROUP ANTI-CORRUPTION POLICY AND GUIDELINES

- 2.1 This policy applies to every employee whether they are permanent or non-permanent employee of any company under Ramly Group including all of the directors (Executive and Non-Executive) of any company within Ramly Group.
- 2.2 Although the policy is specifically provided for the employees and directors of Ramly Group, Ramly Group requires that the policy to be applied to all contractors, sub-contractors, suppliers, sub-suppliers, vendors, consultants, agents, wholesalers and sub-wholesalers, representatives and other parties or entities that carry out work or services for or on behalf of Ramly Group.
- 2.3 Ramly Group Anti-Corruption Policy and Guidelines should be read in conjunction with "*Buku Panduan Pekerja*" (Employee Handbook of

Ramly Group), Standard Operating Procedures (“SOP”) of each Department within Ramly Group Companies, and the Department’s written instructions which will be given from time to time.

- 2.4 Ramly Group Anti-Corruption Policy and Guidelines stipulates that if any of the provisions and/or regulations in the Anti-Corruption Policy and Guidelines, Employee Handbook, other policies and manuals in Ramly Group companies or any other rules or regulations as set out in **para 2.3** above that are relevant and/or contrary to any applicable laws, regulations, by-laws in Malaysia, and the provisions of any applicable laws, regulations and/or applicable law in Malaysia shall prevail and shall not revoke the entire Ramly Group Anti-Corruption Policy and Guidelines and/or any of the rules, procedures in **para 2.4** unless there are clear contradiction in any of the provisions in the Ramly Group Anti-Corruption Policy and Guidelines, only then the contradict provision or policy is voidable.
- 2.5 Ramly Group Anti-Corruption Policy and Guidelines will be updated from time to time in accordance with the needs in ensuring that the policy is really effective in achieving its objectives in combating corruption in line with current legal provisions.
- 2.6 Ramly Group Anti-Corruption Policy and Guidelines will also adopt the Interpretation under **Section 3 of Malaysian Anti-Corruption Commission Act 2009 (Act 694)**.

3. GUIDELINES FOR GIVING AND RECEIVING GIFTS OF RAMLY GROUP

3.1 Definition of Gift

- 3.1.1 "Gift" is any value given to or received from any person or organization or any entity that Ramly Group does business with or actively considering doing business with (for example, vendors, consultants, customers) or any company in Ramly Group is competing with or any person employed by any such organization or entity, or who is directly or indirectly linked to a person's employment with any entity within Ramly

Group, whether or not to or from any such entity or person. Gifts include but are not limited to gifts, food, accommodation, loans, cash, rewards, benefits or advantages, entertainment, payment, commissions, favourable terms or discounts on any product or service, service, equipment, gifts, products, transportation, use of vehicles, vacations, or other facilities, stocks or other securities, house improvement, tickets, gift certificates, gift cards, discount cards, memberships, consulting or service relationships, or any other form of compensation or other benefits.

3.1.2 Gifts are deemed to be given or accepted by any employee of Ramly Group if the gifts are given or accepted by any of the following:

- Employee;
- Any family member or employee's relative, including but not limited to payment to or by, or employment, any family member or relative of the family; or
- Any person or other entity is directed to the employee or for employee's advantages.

3.1.3 In an unsure situation whether something is a gift, one shall assume that it is a gift and is subjected under this Gift Policy (for example, if vendor or potential vendor who is also a personal friend giving a birthday gift). It is important to avoid wrong perception even if it only appears to be awkward. Therefore, every transaction with an active and potential vendor, competitor, consultant, business partner or customer of Ramly Group should be considered and evaluated as a gift despite the belief that the transaction is fair and can obtain full return between the parties (for example, if vendor provides employment to family members or relatives or if an employee buys or sells a car from or to Ramly Group's business partner or its employee).

3.2 No Giving and Receiving Gifts Policy

- 3.2.1 The Policy of No Giving and Receiving of Gifts shall be strictly adhered to by employees of Ramly Group, any of the family members or relatives of the employee including but not limited to payment for or by educational institution or any member of the family or relative or any other person or entity directed by Ramly Group employees or for the advantages of Ramly Group employees.
- 3.2.2 The Policy of No Giving and Receiving of Gifts should be obeyed to prevent any conflict of interest or any possibility for conflict of interest to occur in any party whether in the existing business or potential business which may lead to the interpretation of the offences or gratification under **Section 3 of Malaysian Anti-Corruption Commission Act 2009 (Act 694)**.
- 3.2.3 It is the responsibility of the directors and/or management of Ramly Group to inform people outside Ramly group about the policy of not giving and receiving gift and requesting them to understand and comply with the Policy of No Giving and Receiving Gifts.

3.3 Exemption of the No Giving and Receiving Gifts Policy

- 3.3.1 Ramly Group realized that the giving and receiving of gift is a culture of Malay community, even in the practice of Islamic Religion, it is seen as a form of alms and appreciation as well as business ethics in certain business situation.
- 3.3.2 Despite acknowledging the Policy of No Giving and Receiving Gifts, Ramly Group in certain situation does allow the act of giving and receiving of the gifts in these circumstances:
- a) There are outsiders who insist on accepting the gift given by them; or

- b) The refusal of the given gifts may cause the party who gives, to be insulted and not respected and/or it may cause tension in business relationship with that party; or
- c) Gift-giving is a form of alms, culture and treatment to any party; or
- d) Gift-giving has become a culture and business ethic that has long been practiced by the parties; or
- e) Giving and receiving and/or exchanging of gifts as entertaining the guests attending the events of entertainment or it is considered as a part of an event; or
- f) Exchange of gifts between companies as part of a formal or informal visit; or
- g) Giving and receiving gifts for Corporate Social Responsibilities (CSRs) that may be in the form of sponsorships or donations or investment activities in any entity related to the business operations of Ramly Group; or
- h) Giving souvenirs in various forms with Ramly logo to any party as part of business marketing strategy; and
- i) Receiving and giving of gifts in the form of entertainments such as sports, dinner event and others that do not exceed the boundaries of Islamic Religion and moral values of the community.

3.3.3 All the exemptions stated herein are subjected to the Gift Policy and Guidelines set out herein and the entire Anti-Corruption and Guidelines Policy of Ramly Group.

3.3.4 The gift policy and guidelines are applicable to both the receiving and giving of gifts by Ramly Group employees, their family members and their relatives and any other person or entity acting as a family representative of Ramly Group. That person which may give or receive gifts, whether directly or

indirectly, shall comply with Gift Policy and Anti-Corruption Guidelines of Ramly Group.

3.3.5 Ramly Group sets a specific limit on the type and value of the gifts that can be accepted or given and requires visibility and disclosure of the gift regardless of its type or value.

3.3.6 The Gifts Policy and Guidelines have established specific rules for paying or offering to pay any value or gift to government officials or foreign government officials.

4. GIFTS POLICY AND GUIDELINES FOR GIVING AND RECEIVING

4.1 The following Gifts Policy And Guidelines are intended at assisting employees and supervisors in evaluating and determining the suitability of various types of gifts that are given or received.

4.2 **Appropriate Gifts** : By using good and moderate consideration, in the event of receiving from or offering to the non-governmental employees gifts or entertainment, a nominal value is appropriate and can establish good relations or "*ukhwah*" (*companionship*) and improve business relationships, provided that the requirements set forth in this Gift Policy are complied with in advance.

4.3 **Inappropriate Gifts**: Other types of benefits or advantages, gifts, and entertainment are absolutely wrong and unacceptable, whether in fact or clear in nature, are absolutely not permitted by any other provision under this Gift Policy. No person may accept, request, offer, give or approve the following types of gifts relating with any work in Ramly Group:

4.3.1 Any value of cash or equivalent value with cash, including but not limited to gift certificates, gift cards, or discount cards (although only redeemable for goods), stocks or other securities;

4.3.2 Benefit or advantages, gifts, or entertainment that will be unlawful or in violation of any law, regulation, or any of Ramly

Group Anti-Corruption Policy, including but not limited to corruption, bribery, or similar in nature.

4.3.3 Anything that is part of an agreement to do anything as a consideration for benefit, advantages, gift, or an entertainment.

4.4 Questionable Gifts : Anything that is unclear as to whether it is considered as "Appropriate Gifts" or "Inappropriate Gifts" may or may not be suitable depends on the fact and condition of the gift. In determining whether to accept, give or approve such gift the following factors shall be considered:

4.4.1 The gift, benefit or advantages or entertainment is unsuitable and will not be provided or accepted if it may influence the objectives or decisions of a co-worker or business, placing the recipient or the giver under any moral obligation or any other questionable obligation to any person or entity other than Ramly Group, compromising on the interest of Ramly Group, interrupting in order to release part of employee's duties, influencing employee's decision or their best judgement for it business, pressuring someone to respond or provide benefit or advantages, creating a sense of responsibility against any person or entity, or creating a real or perceived conflict of interest or a form of imbalance of the employee or Ramly Group itself.

4.4.2 Whether there are any significant business goals that are related to gifts (for example, the business will be discussed as part of the event).

4.4.3 Have already set the way, and set out on how it will be held onto the employees and other people outside Ramly Group.

4.4.4 Whether the gift, benefit or advantages or entertainment is modest, reasonable, and in good condition and held publicly without efforts to conceal the facts.

5. GENERAL RULES THAT ARE APPLICABLE TO BOTH RECEIVING AND GIVING GIFTS

Gifts may not be accepted or given to or by employees of Ramly Group, their family members and relatives or other entities acting on their instructions if any of the following statements are true:

- 5.1 The gifts that violates this Gift Policy or any other Anti-Corruption Policy of Ramly Group or any law or regulation, including without limitation, any laws or regulations relating to gifts, entertainment, benefit or advantages to public servants.
- 5.2 Such gifts require, or appear to require, the receiver or any entity of Ramly Group to violate this Gift Policy or any other Anti-Corruption Policy of Ramly Group or any law or regulation, including without limitation, any laws or regulations relating to gifts, entertainment, benefit or advantages to public servants.
- 5.3 That gift is an Inappropriate Gifts.
- 5.4 The gift requires notification and/or approval under this Gift Policy, and such notification or approval is not given or obtained.
- 5.5 If an employee is unsure whether the gift requires a notification, and/or obtained prior approval and/or to determine the business goals that are important under this Gift Policy, he shall assume that it requires such notification, approval and/or determination and shall provide notification and obtain the relevant approval thereof.

6. RECORD KEEPING

Each employee is responsible for keeping one copy of each notification, approval, and determination of such significant business, whichever is relevant, which he sends and/or receives under this Gift Policy. The supervisor, the executive who supervise in Ramly Group are not required to keep a copy of the notification, approval and/or determination of such significant business. If an employee is unable to provide a copy of the

notification, approval and/or determination of such significant business to prove adherence, the employee is deemed to violate this Gift Policy.

7. RECEIVING GIFTS: PRIOR NOTIFICATION

7.1 Notification for each gift that has a value equal to or more than RM100 ("Reporting Threshold") must be reported by the relevant employee in writing within three (3) working days from the date of receipt to all of the following ("Gift Notification "):

7.1.1 Employees' closest Supervisor;

7.1.2 The most senior executives in employee department, who report directly to the Chief Executive Officer; and

7.1.3 Email: **"hr_admin@ramly.com.my"**

7.2 Employees who report directly to the Chief Executive Officer shall submit the Gift Notification only to the Chief Executive Officer and email to **"hr_admin@ramly.com.my"**. The Chief Executive Officer shall submit the Gift Notification to the Chairman, and the Chairman shall submit Notification of Gifts to the designated Integrity Committee.

7.3 The difference in the reporting is whether it refers to a higher or lower value of gifts for an employee, individual and/or group of employees shall be approved by the Chief Executive Officer. Any such variation shall be delivered in writing to the employee before its implementation.

7.4 The following are the details that should be included in the notification:-

7.4.1 A complete description of the gift and the nature and/or business objectives relating to the said gift;

7.4.2 An actual value of the gifts or a reasonable estimation of the value with the documentation, if available upon supporting its estimation;

7.4.3 The name or entity who give the gift and their relationship with Ramly Group;

7.4.4 Recipients of the gifts in particular (example: employee, family member); and

7.4.5 Date upon receiving the gift.

8. RECEIVING GIFTS: PRIOR APPROVAL

8.1 Employees must obtain prior approval before they or their family members or their representatives could receive the gift:

8.1.1 Individually, or together with previous gifts received from the same source or its affiliates (including any person or entity controlling, controlled by, or under joint control of each other), equal to or exceeding RM500 ("Prior Approval Threshold") in any calendar year; or

8.1.2 Involves travelling or accommodation provided by someone or entity other than Ramly Group or employees of Ramly Group (including, but not limited to transportation and/or accommodation regardless of value).

8.2 The difference in the "Prior Approval Threshold" as to whether the value is greater or lower for an individual and/or group of employees shall be approved by the Chief Executive Officer. Any such variation shall be communicated in writing and/or by email to the relevant employee prior to its implementation.

8.3 The application for obtaining prior approval must be submitted to the most senior executive of the department (of which the Executive will report directly to the Chief Executive Officer) with the employee:-

8.3.1 Submit the Gift Notification (as per the rules stated herein) to its immediate supervisor, the most Senior Executive of the

department who reports directly to the Chief Executive Officer and email to “hr_admin@ramly.com.my”.

8.3.2 Receive a written support from his or her supervisor regarding the gift that he or she received; and

8.3.3 In the case of a gift under the **Clause 8.3.2** above, receiving a written support from its Supervisory Executive that there is a substantial business purpose to receive the gift (for example, the business will be discussed as part of the event).

8.4 No feedback from the Supervisor DOES NOT make it as an automatic approval. Employees who report directly to the Chief Executive Officer shall provide the Gift Notification only to the Chief Executive Officer and email to “hr_admin@ramly.com.my” and shall obtain the prior written approval from the Chief Executive Officer. The Chief Executive Officer shall issue the Notification of Gift to and obtain comment and advise from the Chairman, and the Chairman shall give the notification for approval and determination to the designated Integrity Committee.

9. RECEIVING GIFT

9.1 When a gift is given to Ramly Group for general distribution to the employees (for example as festive celebration, as a contest gift, or performance reward), the most senior member of the department who receives the gift must notify the gift or obtain the pre-approval of the gift depending on the value of the gift in accordance with other provisions of this Gift Policy.

9.2 Any notification of prior approval of a gift shall include, at least, all information required in Notification of Gift or Prior Approval (for each that is stated above) other than the names of the individual to whom the gift is distributed, and must also include the means of which the gift has been and will be distributed to an employee (for example, a random vote, as a gift for performance, as a gift in a contest).

- 9.3 Each employee who eventually receives the gift after the distribution, is not required to send a separate Gift Notification (as a limited exception). If an employee is unsure whether the gift is under this limited exception or requires a separate gift notification from other employees, he should assume that it is not exempted from submitting a notification Gifts and obtaining the relevant approvals.

10. GIVING GIFT

- 10.1 Subjected always in compliance with Ramly Group Anti-Corruption Policy and Guidelines and particularly the Gift Policy, gift giving is permitted.
- 10.2 The gift giving shall be properly and accurately recorded on the Company's Expenditure Statement in Ramly Group and subsequently recorded in the Expenditure Report with complete details.
- 10.3 Gift giving, entertainment, assistance, benefits and/or advantages to local government officials or foreign government officials or any other individual from the public sector is not allowed unless this gift giving has complied with Ramly Group Anti-Corruption Policy and Guidelines.
- 10.4 Gift giving, entertainment, assistance, benefits and/or advantages that has complied with Ramly Group Anti-Corruption Policy and Guidelines shall be regarded as a gift from Ramly Group and not a gift from any individual acting on behalf of Ramly Group.

11. CORPORATE SOCIAL RESPONSIBILITY (CSR), SPONSORSHIP AND DONATIONS.

- 11.1 As an Islamic Bumiputra company, Ramly Group is committed to building and assisting the community to improve their lives beside contributing to the nation's overall development. In fulfilling these

commitments, Ramly Group in performing their CSR activities, will be based on Ramly Group Anti-Corruption and Guidelines.

- 11.2 Ramly Group, beside its own initiative, may be requested to contribute or assist in any form by any party on the basis of Corporate Social Responsibility. In the event of such request, any employee of or acting on behalf of Ramly Group shall be cautious in fulfilling the request of the requesting party to prevent the existence of undue influence element in Ramly Group's business or the requesting party.
- 11.3 The recipient of the CSR, Sponsorship, Entertainment Gifts or Donations shall be ascertained its identity as an organization, an individual or a valid entity according to the law and due diligence shall be made so that no element of undue influence that leads to offence under **Section 3 of Malaysian Anti-Corruption Commission Act 2009 (Act 694)**.
- 11.4 CSR Activities, Sponsorship, Gifts, Entertainment or Donations should also be reasonably and cautiously structured to ensure that the benefit of CSR Activities, Sponsorship or Donation by Ramly Group meet its goals and target groups.
- 11.5 In order to ensure that the said activities can be carried out, Ramly Group shall comply with Ramly Group Anti-Corruption Policy and Guidelines of which specify that:-
 - 11.5.1 Due diligence on the recipients of CSR, Sponsorship, Gifts, Entertainment or Donation shall be made in advance to ensure that the organisation and/or the entity that benefits from such activities is authentic and fairly qualified.
 - 11.5.2 To ensure that the benefits of the activities of organised CSR, Sponsorship, Gifts, Entertainment or Donation are received by the intended recipient.

- 11.5.3 To ensure that the activities of CSR, Sponsorship, Gift, Entertainment or Donation has no element of corruption, undue influence that may lead to any offence under the Interpretation of Offences of **Section 3 of Malaysian Anti-Corruption Commission Act 2009 (Act 694)** and/or elements of offences under the provisions of other laws including offences under **zAnti-Money Laundering, Anti-Terrorism Financing And Proceed Of Unlawful Activities Act 2001 (Act 613)**.
- 11.5.4 To ensure that prior to the activities of CSR , Sponsorship, Gift, Entertainment or Donation, all related rules under Ramly Group Anti-Corruption Policy and Guidelines are fully complied with, beside in compliance with any applicable laws and regulations that is enforced as at material time as stated above.
- 11.5.5 To ensure commitment in carrying out the activities of CSR, Sponsorship, Gift, Entertainment or Donation are conducted in a transparent manner with noble values and integrity.
- 11.5.6 To ensure Sponsorship or Donation related to education are carried out based on the election of the recipient by approved criteria by scrutinising the academic qualifications and evaluations of the related examination of which the selection process shall be conducted in a transparent manner and shall be properly recorded as well as compliance with the laws available in the particular state and/or country.

12. POLITICAL CONTRIBUTIONS

- 12.1. Ramly Group does not make or offer any financial contribution or any other form of contribution to any political party, officer of any political party or any party candidate for any political party.

12.2 Ramly Group however, in certain circumstances, is allowed to make a financial contribution or any other form of contribution to any political party, officer of any political party or any party candidate for any political party if:-

12.2.1 A financial contribution or any other form of contribution that does not violate any laws, regulations or by-laws applicable at such time and of such place;

12.2.2 Financial contribution or any other form of contribution is made without promise, influence or expectation of any consideration, benefit, profit in any form whatsoever to the contributor, from the recipients;

12.2.3 Financial contribution or any other form of contribution is made in good faith to any government agency or any governmental entity and not to any individual who is connected with it and the financial contribution or any other form of contribution is made for contractual compliance and/or compliance with applicable laws, regulations or by-laws at such time and of such place; and

12.2.4 Financial contribution or any other form of contribution may be made upon fully complied with the relevant provisions in this Ramly Anti-Corruption Policy and Guidelines.

13. MONEY LAUNDERING

13.1 Money Laundering can be defined under **Section 3 of Anti-Money Laundering, Anti-Terrorism Financing And Proceed Of Unlawful Activities Act 2001 (Act 613)** as an act of a person engages, directly or indirectly, in a transaction that involves proceeds of an unlawful activity or instrumentalities of an offence; acquires, receives, possesses, disguises, transfers, converts, exchanges, carries, disposes of or uses proceeds of an unlawful activity or instrumentalities of an offence; removes from or brings into Malaysia, proceeds of an unlawful activity or instrumentalities of an offence; or conceals,

disguises or impedes the establishment of the true nature, origin, location, movement, disposition, title of, rights with respect to, or ownership of, proceeds of an unlawful activity or instrumentalities of an offence. This definition should be read in conjunction with the **Second Schedule of the Act 613** which lists other laws as a result of a severe offence for the purpose of money laundering offences.

13.2 Ramly Group does not compromise with any activities described in **para 13.1** above as it is not only violated the law but it also breach the bounds of Islam Religion.

14. IMPLEMENTATION COMPLIANCE OF RAMLY GROUP ANTI-CORRUPTION POLICY

14.1 To avoid the violation of the law, Ramly Group stipulates that:

14.1.1 Due diligence shall be made in advance to understand each business transaction and those who are involve in it, the purpose and background of a business with the organisation, the company and the entity in the business that is involve in the said business.

14.1.2 Ramly Group will also provide training, courses and programmes from time to time to ensure the understanding and subsequently, compliance with relevant laws.

14.1.3 Employees of Ramly Group should be alert of any actions, suspicious activities and behaviours by and from amongst its own employees, contractors, sub contractors, wholesalers, sub-wholesalers, consultants and/or any persons or entities acting for or with Ramly Group by reporting any such suspicious actions, activities and behaviors to the proper channels specified by Ramly Group's Anti-Corruption Policy and Guidelines.

- 14.1.4 Alternatively, employees may also upon suspicions to any act, activity and conduct from any party above and before the complaint or report is made, seek advice and/or negotiate with the designated Integrity Committee and are permitted to do so as stated in Ramly Group Anti-Corruption Policy and Guidelines.
- 14.1.5 All business transactions must be properly recorded in the ledger, documented and recorded completely together with related documents and shall be audited periodically through internal and external audits.
- 14.1.6 Ramly Group will also ensure that any party conducting business with Ramly Group will execute a Compliance Declaration with the law, in particular, **Malaysian Anti-Corruption Commission Act 2009 (Act 694)** and **Anti-Money Laundering, Anti-Terrorism Financing And Proceeds of Unlawful Activities Act 2001 (Act 613)**.

15. WHISTLE BLOWING POLICY

- 15.1 In addressing corruption activities, Ramly Group encourages openness and transparency in its commitment towards a high level of integrity and accountability.
- 15.2 Ramly Group encourages its employees and/or any persons to disclose corruption related activities and any other wrong doings. Ramly Group shall provide the best protection possible in concealing the identity and details of a party that reports and the report of any employee or any of third party who wishes to report and disclose corruption activities, misappropriation or wrongdoings that will occur or may occur and done by the reported person in Ramly Group or parties related to Ramly Group which would have a direct or indirect impact to Ramly Group.
- 15.3 Ramly Group will also ensure that all statement and evidence in relation to the report of the said corruption or misappropriation is

protected until investigations and actions by management and/or any other party directed by the management and/or any relevant authority is properly addressed and resolved completely. Complainant will be notified of the result of the report or disclosure made.

15.4 Protection of the complainant will be aligned as provided in the **Whistleblower Protection Act 2010 (Act 711)**. Pursuant to the act, Ramly Group will therefore give protection to the whistleblower in the form of concealing of their information, immunity from civil and criminal action and protection from detrimental action being taken against them.

15.5 The disclosures of corruption activities and wrongdoings shall be made in good faith based on honest and reasonable grounds at the material time without necessitating strong evidence from the whistleblower.

15.6 Report channels are as follows:-

15.6.1 Personally present and meet with any management and/or member of the Integrity Committee.

15.6.2 Email: "hr_admin@ramly.com.my".

15.6.2 Send Letter of Complaint to:-

Jawatankuasa Integriti
No: 14 & 16, Jalan 29/10A,
Taman Perindustrian IKS, Mukim Batu,
68100 Kuala Lumpur

RAMLY GROUP RESERVES THE RIGHT TO AMEND THE RAMLY GROUP ANTI-CORRUPTION POLICY AND GUIDELINES (RAMLY GROUP) FROM TIME TO TIME.