

Anti-Bribery and Corruption Policy

1.0 Objective

Apollo Food Holdings Berhad (together with its subsidiaries, “the Group”) is committed to carry out business ethically in accordance with all requirements of anti-bribery and corruption laws, in particular the Malaysian Anti-Corruption Commission Act 2009 (“MACC Act 2009”).

This Anti-Bribery and Corruption (“ABC”) Policy serves as a guide on methods to prevent, deal and combat with activities involving bribery and corrupt that may arise in normal business operations. The ABC Policy is founded on the principles and values of Code of Conduct and Ethics approved by the Board and therefore, the Group upholds highest standards of integrity in all business interactions and a zero-tolerance on any and all forms of Bribery and Corruption (including but not limited to, the acts to promise, offer, give, accept or obtain any bribery and corruption and any attempt thereof).

2.0 Scope

This Policy is applicable to all employees and directors (executive and non-executive) of the Group, including temporary and contract staff (“employees”).

External parties who performing works or services for or acting on behalf of the Group are expected to comply with this policy.

3.0 Definitions

“The Group” means Apollo Food Holdings Berhad and its subsidiaries, which consist of Apollo Food Industries (M) Sdn Bhd and Hap Huat Food Industries.

“Business associates” is defined as an external party engaged by the Group or performing work or services for or on behalf of the Group, including suppliers, customers, contractors and other related parties.

“Bribery and Corruption” is defined as any action which would be considered as an offence of giving or receiving ‘gratification’ under the MACC Act 2009 and any amendment thereof after the effective date of this ABC Policy.

“Corporate hospitality” is defined as corporate events or activities which involves the entertainment of employees and third parties for the benefit of that organisation.

“Employees” means employees and directors, including temporary, contract staff or interns.

“Gratification” is defined under Section 3 of MACC Act 2009 and any amendment thereof after the effective date of this ABC Policy and includes but not limited to, abuse of function, abuse of public property, bribery, clientelism/cronyism, concealments, corruption, embezzlement, illicit enrichment, insider trading, kickback, money laundering, nepotism, obstructing of justice, patronage, trading in influence and facilitation money.

“High Risk Country” is defined as countries perceived to have high levels of corruption and which have score of less than 50 based on Corruption Perception Index published by Transparency International.

3.0 Definitions (continued)

“Lobbying” is defined as any direct or indirect communication with public officials, political decision-makers or representatives for the purposes of influencing government’s decisions and carried out by or on behalf of any organised group.

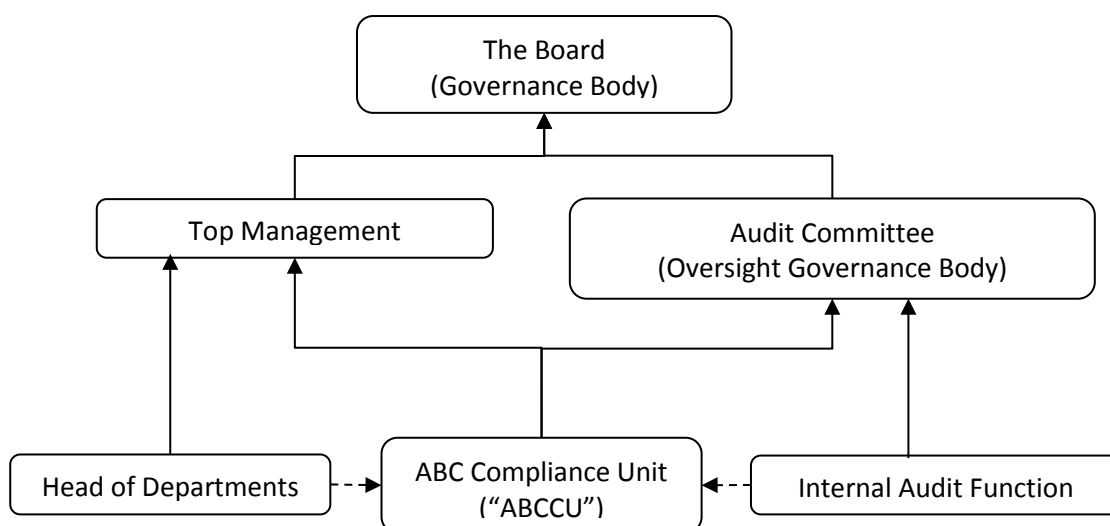
“Money laundering” is process of making large amounts of money illegally. Money laundering offences are defined under Section 4 of Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001.

“Person connected” is as defined under Section 197 of the Companies Act 2016 and any amendment thereof after the effective date of this ABC Policy and including Relative.

“Political exposed person” is defined as individual who is or has been entrusted with a prominent public function by any country.

“Public official” is defined as Officer of Public Body and Foreign Public Official.

4.0 Roles and Responsibilities



The roles and responsibilities of each function in the ABC Compliance Management (“ABCM”) are as follows:

<u>Function</u>	<u>Roles and Responsibilities</u>
Board of Directors (“the Board”)	<ul style="list-style-type: none"> • To review, determine and approve the Group’s ABC Policy and subsequent reviews; • To ensure the ABC Policy complies with the Group’s mission, vision, strategies and business objectives; • To ensure the adequacy and effectiveness of implementation of the ABC Policy by providing ultimate leadership and commitment to ABCM, including setting the ABC commitment and promoting appropriate ABC culture within the Group;

4.0 Roles and Responsibilities (continued)

Board of Directors ("the Board") (continued)	<ul style="list-style-type: none">• To set the risk appetite in relation to bribery and corruption risks and to review the results of the risk assessment to determine its adequacy;• To review incidents reported under whistleblowing channel, its progress and results on investigations and actions taken;• To receive and review the operation and performance of ABCM at planned interval (i.e. quarterly or half-yearly); and• To ensure adequate and appropriate allocation and assignment of resources for effective implementation and operation of ABCM.
Audit Committee ("AC")	<ul style="list-style-type: none">• To ensure that identified bribery and corruption risks are being responded appropriately with the result and recommendation reported to the Board;• To review the reports on the incidents reported under whistleblowing channel and whether adequate action plans have been taken;• To review the adequacy and effectiveness of the Group's governance, the ABC Policy established implemented by Top Management;• To manage bribery and corruption risks and complies with applicable anti-bribery laws and regulations as well as to review its performance with results and recommendation reported to the Board; and• To review whether adequate and appropriate resources are allocated and assigned to implement ABCM for its effective operation, with results and recommendation reported to the Board.
Top Management	<ul style="list-style-type: none">• To ensure that adequate and appropriate resources are allocated and assigned to implement and for effective and efficient operation of ABCM, including provide proper guidance and direction;• To cultivate appropriate ABC culture within the Group;• To establish appropriate reporting channel for suspected and actual bribery and corruption;• To ensure all employees within the Group have received adequate trainings in relation to ABC; and• To ensure ABC Policy is designed, established, implemented, maintained and reviewed to adequately and effectively manage bribery and corruption risks group wide.
Head of Departments	<ul style="list-style-type: none">• To integrate ABC Policy into the business processes under his/her control;• To assist with the development of the management action plans and implement these action plans;• To ensure ABCM, including objective, policy and procedures, is implemented and maintained to adequately and effectively manage bribery and corruption risks;• To continuously identify bribery and corruption risks and evaluate existing controls;

4.0 Roles and Responsibilities (continued)

Head of Departments (continued)	<ul style="list-style-type: none">• To ensure that his/her staffs understand the ABC Policy and the importance to comply the ABC Policy; and• To ensure staff receives adequate training on ABC Policy annually and upon joining.
Internal Audit Function	<ul style="list-style-type: none">• To perform review on the adequacy and effectiveness of the Group's governance and control structure based on the internal audit plan reviewed by AC and approved by the Board;• To review whether all relevant bribery and corruption risks have been identified and managed adequately for business activity under review and to report the same to AC; and• To verify compliance with the ABC Policy and relevant anti-bribery and corruption laws and regulations and to report the same to AC.
ABC Compliance Unit ("ABCCU")	<ul style="list-style-type: none">• To act as central contact and guide for ABC Policy within the Group;• To oversee the implementation of the ABC Policy approved by the Board; and• To review the performance on compliance of ABC within the Group and to report to the Top Management and the AC on the performance on compliance of the ABC Policy within the Group on scheduled interval or as and when required.

5.0 ABC Compliance Unit

ABCCU of the Group is outsourced and led by Needsbridge Advisory Sdn Bhd with assist from the Top Management and Head of Departments.

5.1 Authorities

ABCCU is vested with the following authorities:

- Have the adequate resources which it needs to perform its duties;
- Have full access to any information which it requires in the course of performing its duties; and
- Have direct communication channels with Top Management and the AC, as the case may be, to obtain information and feedback in performing its duties and to report the results of the review of the ABC Policy and the compliance thereof.

5.2 Independence and Objectivity

Needsbridge Advisory Sdn Bhd shall maintain independence and objectivity, as practical as possible, in performing its duties and responsibilities under ABCCU.

5.3 Confidentiality

All members of ABCCU shall have an obligation to treat all information received and discussed in carrying out its duties and responsibilities and in the meeting in a confidential manner.

If the matter relates to any one of the members of the ABCCU, he/she shall abstain completely from deliberating on such matter.

6.0 Risk Assessment

The risk assessment process shall be performed by the Group to determine the adequacy of existing and proposed control activities to mitigate existing and potential bribery and corruption risks.

The risk assessment shall be performed when deemed necessary in the following circumstances:

1. Major change in internal or external business environment;
2. Merger and acquisition as well as joint venture; or
3. Major change in business arrangements and business.

The Group shall performed the bribery risk assessment at least yearly and a comprehensive risk assessment on bribery shall be performed every three (3) years per Guidelines On Adequate Procedures Pursuant to Subsection (5) of Section 17A (5) under the Malaysian Anti-Corruption Commission Act 2009.

7.0 Gift

All employees are prohibited to act on behalf of the Group from directly or indirectly providing or receiving gifts. Under no circumstances may Group employees accept gifts in the form of:

- Cash or cash equivalent, including voucher, discounts or any other related forms;
- Receive or provide gift in High Risk Country;
- Gifts which come with a hint direct or indirect that some expected outcome is required in return for the gift;
- Gifts that would be illegal or in breach of local or foreign bribery and corruption laws;
- Gifts which are lavish or excessive, e.g. valued above the maximum threshold of RM300.00 or equivalent permitted by the Group; and
- Any gift which is given in conflict of interest situation.

Employees are responsible to inform external parties who dealing business with the Group that the existence of this policy and to request the external party understands for and adherence with this policy.

7.1 Receiving Gifts

The Group is aware that in certain cultures gift giving is part of business etiquette and it is a very delicate matter for exchanging gifts. Even if it may appear disrespectful to reject a gift from an external party, the gift must be politely returned with a note of explanation about the implementation of ABC policy in this situation.

In some exceptional situations whereby rejecting the gift is likely to seriously offend and may sever the Group's business relationship with an external party, accepting the gift is allowable with a maximum value of RM300.00. However, relevant employees are required to immediately or in any event not more than five (5) working days from receiving the gift to record the gift in the Gift/Entertainment/Corporate Hospitality/Travelling Register Form and submit it to the Head of Departments and Executive Chairman who will then decide whether to approve the acceptance of the gift or return it.

7.0 Gift (continued)

7.1 Receiving Gifts (continued)

In the event the acceptance of the gift is approved, the treatment of the gift will be either one of the following:

- Donate the gift to the charity;
- Hold it for department display;
- Share with other employees in the department; or
- Permit it to be retained by the employee.

Heads of Departments and Top Management are expected to exercise proper care and judgment in each case by take into account applicable circumstances including the gift's amount, characteristic, purpose, receiver's seniority, frequency and cultural norms.

Human Resource and Admin Department is responsible for preparation of summary of Gift/Entertainment/Corporate Hospitality/Travelling Register Form for submission and review by ABCCU and subsequent reporting to the AC and the Board during the scheduled meeting as required.

7.2 Providing Gifts

In general, all employees are not allowed to provide gifts to third party, unless approval is gained from the Head of Departments and the Executive Chairman. In accordance to the standard operating procedure related to application of gift and entertainment, the gifts shall not be more than RM300.00 and not more than 2 times per year.

All provision of gift to third party required prior approval from the Head of Department and Executive Chairman, relevant employees are required to apply for the intended gift to third party with the estimated value of entertainment in the Gift/Entertainment/Corporate Hospitality/Travelling Register Form and submit to the Head of Departments who will then decide whether to approve the provision of gift. If the Head of Departments and Executive Chairman decide not to provide gifts, relevant employees shall be prohibited to provide such gift.

All claims on gift shall be subject to the standard operating procedure on payment and claim and authority limit manual implemented by the Account Department. Details such as gift, organization's name and representatives which the gift provided to shall be recorded and posted accordingly in the accounting system for monitoring.

Account Department is responsible for preparation of summary for provision of gifts for submission and review by ABCCU and subsequent reporting to the AC and the Board during scheduled meeting as required.

7.3 Exceptions

There are certain exceptions whereby the receiving and provisions of gifts by employees are permitted in the following situations, subject to approval by Executive Chairman:

- Exchange of gifts at the Company-to-Company level;
- Gifts from the Group in relation to the Group's official functions, events and celebrations;

7.0 Gift (continued)

7.3 Exceptions (continued)

There are certain exceptions whereby the receiving and provisions of gifts by employees are permitted in the following situations, subject to approval by Executive Chairman (continued):

- Gifts to employees in relation to an internal or externally recognized corporate function, event and celebration;
- Token gifts (RM200.00 or below) of nominal value normally bearing the official logo of the Group or the giver that are given out to all participants attending official events organized or attended by the Group and for the Group's or the giver's brand building or promotional activities; and
- Gifts to external parties who have no business relationships with the Group, e.g. Donation and Sponsorship.

8.0 Entertainment and Corporate Hospitality

The Group's recognizes that providing or receiving modest entertainment and corporate hospitality are a legitimate way of business relationship as part of business networking and to foster good business relationship with external clients.

Employees and Directors are strictly prohibited from providing or offering to provide entertainment and corporate hospitality with a view to improperly cause undue influence on any party in exchange for some future benefits or results.

Certain types of entertainment and corporate hospitality activities which are never permissible and employee should immediately refuse if it involves the following:

- a) Any entertainment or corporate hospitality activities that comes with a direct/indirect suggestion, hint, understanding or implication that in return for the entertainment provided some expected or desirable outcome is required;
- b) Any entertainment or corporate hospitality activities that would be illegal or in breach of local or foreign bribery laws;
- c) Any entertainment or corporate hospitality in High Risk Country;
- d) Any entertainment or corporate hospitality activities that would be perceived as extravagant lavish and excessive or may adversely affect the reputation of Group. The limit for entertainment is restricted to maximum RM200.00 per headcount per event;
- e) Any entertainment or corporate hospitality activity which involves conflict of interest situation; and
- f) Any entertainment or corporate hospitality activity that is sexually oriented or may otherwise tarnish that reputation of Group.

8.1 Receiving Entertainment and Corporate Hospitality

Only eligible employees approved by Executive Chairman are allowed to receive entertainment and corporate hospitality from external party subject to the requirements stated above. All entertainment and corporate hospitality received shall be fill in the Gift/Entertainment/Corporate Hospitality/Travelling Register Form with the estimated value for approval.

8.0 Entertainment and Corporate Hospitality (continued)

8.1 Receiving Entertainment and Corporate Hospitality (continued)

Human Resource and Admin Department is responsible for preparation of summary of Gift/Entertainment/Corporate Hospitality/Travelling Register Form for submission and review by ABCCU and subsequent reporting to the AC and the Board during scheduled meeting as required.

8.2 Providing Entertainment and Corporate Hospitality

Only eligible employees approved by Executive Chairman are allowed to provide entertainment and corporate hospitality to external party subject to the requirements stated above. All entertainment and corporate hospitality provide shall be fill in the Gift/Entertainment/Corporate Hospitality/Travelling Register Form with the estimated value for approval.

All claims on entertainment and corporate hospitality shall be subject to the standard operating procedure on payment and claim and authority limit manual implemented by the Account Department. Details such as gift, organization's name and representatives which the entertainment and corporate hospitality provided to shall be recorded and posted accordingly in the accounting system for monitoring.

Account Department is responsible for preparation of summary for provision of entertainment and corporate hospitality for submission and review by ABCCU and subsequent reporting to the AC and the Board during scheduled meeting as required.

9.0 Corporate Social Responsibility ("CSR"), Donation and Sponsorship

All CSR programme, charitable donation and sponsorship provided by the Group must be in tune with the Group's normal business operations and reflect the Group to operate in an ethical manner.

Any CSR programme, donation or sponsorship shall only be made to a properly established and legitimate charity or organisation. The Group prohibits all employees to make any direct or indirect political donation to political parties, organisations or individual engaged in politics and the Group is not and will not affiliated with any political party, independent candidate or with any other organisation whose activities are primarily political.

In accordance with the standard operating procedure, all CSR programme, donation and sponsorship required prior approval from the Head of Departments and Executive Chairman. In the case where CSR programme, donation or sponsorship is rejected, all employees are prohibited to provide CSR programme, donation and sponsorship to such organisation or charity.

Based on the normal practice of the Group, only sponsorship received from school based in Johor State, Malaysia will be accepted. The sponsorship provided will involve sponsorship of the Group's products and any monetary sponsorship is strictly prohibited.

Sales Department is responsible for preparation of monthly listing of the CSR programme, donation or sponsorship made by the Group for monthly submission to Account Department and review by ABCCU and report to AC and the Board during scheduled meeting as required.

10.0 Travelling

Certain types of travelling which are never permissible if it involves the following:

- a) Any travelling that comes with a direct / indirect suggestion, hint, understanding or implication that in return for the travelling provided some expected or desirable outcome is required;
- b) Any travelling that would be illegal or in breach of local or foreign bribery laws;
- c) Any travelling which involve conflict of interest situation; and
- d) Any entertainment or corporate hospitality activity that is sexually oriented or may otherwise tarnish that reputation of Group.

10.1 Receiving Travelling

Relevant employees are allowed to received travelling from external party if such travelling is required for the purpose to perform his/her functions for the sole purpose to deliver the goods or services offered by the Group. All employees must not receive travelling with a view to improperly cause undue influence on any party in exchange for some future benefits or result in conflict of interest situation.

All provision of travelling by external party are subject to approval from Executive Chairman via Gift/Entertainment/Corporate Hospitality/Travelling Register Form. The completed Gift/Entertainment/Corporate Hospitality/Travelling Register Form for receiving such travelling shall be maintained by Human Resource and Admin Department for submission and review by ABCCU and subsequent reporting to the AC and the Board during scheduled meeting as required.

10.2 Providing Travelling

Travelling for the sole purpose of the products and services provided by the Group or provision of services by the suppliers is allowable subject to approval from Executive Chairman via Gift/Entertainment/Corporate Hospitality/Travelling Register Form. All employees must not provide or offer travelling with a view to improperly cause undue influence on any party in exchange for some future benefits or result in conflict of interest situation.

In situation where provision of travelling to Public Official is required, approval must be gained from Executive Chairman via Gift/Entertainment/Corporate Hospitality/Travelling Register Form. All claims on provision of travelling by all employees shall be subject to approval by Executive Chairman. Listing of the travelling provided by the Group is maintained by Account Department for submission and review by ABCCU and report to AC and the Board during scheduled meeting as required.

11.0 Facilitation Payment

Facilitate payment are typically small, unofficial payments made to secure or expedite a routine action that an official is obligated to perform. All employees acting for or on behalf of the Group must not offer, promise, give, request, accept or receive anything which might reasonably be regarded as a facilitation payment.

12.0 Tradition or Customary Practices

Unless prohibited by relevant local or foreign bribery and corruption laws and subject to the approval from Executive Chairman, only the followings can be provided by the Group or received by the Group and employees in relation to the tradition or customary practices within such country and in order to foster cordial working relationship with third party:

- a) Gift during festivities or red/green packet for wedding or birth of child as a sign of blessing or money donation as a token of condolences at funeral at an amount that is not more than RM1,000.00; and
- b) Contribution to the corporate event or official function (such as annual dinner or family day event) at an amount that is not more than RM3,000.00.

12.1 Receiving Token of Blessing or Condolences and Contribution

All token of blessing or condolences received, and contribution received by the Group for the corporate event or official function of the Group shall require approval by Executive Chairman via Gift/Entertainment/Corporate Hospitality/Travelling Register Form.

Human Resource and Admin Department is responsible for preparation of summary of Gift/Entertainment/Corporate Hospitality/Travelling Register Form for submission and review by ABCCU and subsequent reporting to the AC and the Board during scheduled meeting as required.

12.2 Providing Token of Blessing or Condolences and Contribution

All token of blessing or condolences given, and contribution made by the Group for the corporate event or official function of the third party shall require the approval of Executive Chairman via Gift/Entertainment/Corporate Hospitality/Travelling Register Form in accordance with standard operating procedure.

Account Department is responsible for preparation of summary for provision of token of blessing or condolences and contribution for submission and review by ABCCU and subsequent reporting to the AC and the Board during scheduled meeting as required.

13.0 Money Laundering

All employees acting on behalf of the Group must not involve, directly or indirectly in any money laundering activities.

14.0 Dealing with Public Official and Political Exposed Person

All employees acting for or on behalf of the Group must not offer, promise, give anything which might reasonably be regarded gift, entertainment, corporate hospitality, CSR programme, donation, sponsorship to Public Official or Political Exposed Person or Person Connected to them in country other than High Risk Country unless it is permissible under the applicable laws and regulations and prior approvals are obtained from Executive Chairman and subject to maximum threshold of RM1,000.

15.0 Lobbying

All Officers, Employees and Business Associates acting for or on behalf of the Group must not participate in any lobbying activities and must not offer, promise, give anything which might reasonably be regarded lobbying fees.

16.0 Control Activities

The financial controls, non-financial controls and due diligence process are implemented in order to manage and prevent bribery and corruption risks identified by the Group.

1. Financial Controls

The Group shall implement relevant financial controls that manage bribery and corruption risks and to manage the financial transactions properly and to record these transactions accurately, completely and in a timely manner.

Relevant financial controls are documented in the relevant standard operating procedures and work instructions maintained by the Group.

2. Non-Financial Controls

The Group shall implement relevant non-financial controls that manage bribery and corruption risks and to manage with respect to such areas as procurement, operational, sales, commercial, human resources, legal and regulatory activities.

Relevant non-financial controls are documented in the relevant standard operating procedures and work instructions maintained by the Group.

3. Due Diligence

Due diligence will be conducted on employees and third party (including any Business Associates that act on behalf of the Group) before entering into any official relationship with the Group. These include a search through relevant databases, background checks, document verification and self-declaration.

Relevant due diligence process for employees and third party are documented in the relevant standard operating procedures and work instructions maintained by the Group.

The financial controls, non-financial controls and due diligence process implemented are subject to continuous improvement based on the results of the subsequent risk assessment, incident management, responses to non-compliances and review, evaluation and continuous improvement.

17.0 Conflict of Interest

All employees and business associates acting for or on behalf of the Group (including Person Connected to them) shall comply with the Code of Conduct of the Group and must avoid situations in which personal interest could conflict with their professional obligations or duties and must not use their position and authorities, the Group's resources and assets, or information available to them for personal gain or for the benefit of the Person Connected to them or to the Group's disadvantage.

17.0 Conflict of Interest (continued)

All employees and business associates shall declare their interest and relationship via conflict of interest declaration form before entering an employment relationship or establishment of business relationship with the Group. Annual review on conflict of interest for all employees shall be performed and at any other time when become aware of an actual/potential/perceived conflict of interest.

18.0 Dealing with Business Associates

All forms of bribery and corruption are unacceptable and will not be tolerated. The Group dealings with business associates must be carried out in compliance with all relevant laws and consistent with the values and principles of this ABC Policy.

Supplier Evaluation Form and Customer Application Form must be filled in by all supplier and customer before appointment or engagement. Supporting documents such as statutory registration information, corporate profile, latest audited financial statements, directors and key management personal details, authorisation for credit information search, etc. should be obtained.

Business associate will be informed via ABC commitment and declaration form regarding the importance of countering bribery and corruption, expectations on the ways of business associates' employees to act and how to recognise and deal with particular bribery and corruption risks.

Annual performance appraisal for all business associates that are classified as higher risk in accordance to threshold set in respective department SOP are required to be performed by responsible Head of Departments at end of financial year.

19.0 Dealing with Employees

Any qualified and competent individual are provided with equal opportunity to be employed by the Group from various multicultural and multiracial background, sources from externally, local and internationally.

Candidate who intends to establish relationship with the Group is required to provide basic and important information via Employment Application Form. A Declaration of Interest Form and supporting documents such as identity registration documentation, employment history and evidence, education record and evidences, etc.

HR Department shall perform briefing of ABC Commitment, ABC Policy and ABCM of the Group to the candidate during interview. The HR Department is required to perform annual performance appraisal for all employees with the assistance of Head of Departments at end of the calendar year.

20.0 Whistle blowing / reporting Bribery

Any employees or stakeholders with a concerned about any form of malpractice, improper action, or wrongdoing by the employees or stakeholder are strongly encouraged to report the matter through ABCCU or via Whistle-blowing Policy published on the corporate website of the Group.

The Group believes that any employee with the knowledge of bribery in any form should not remain silent. The Group take all matters relating to bribery very seriously and employee strongly encouraged to raise incidents or behaviours that are not in accordance with the policy.

20.0 Whistle blowing / reporting Bribery (continued)

The Group recognizes that there may be some cases where no wrongdoing is found through internal procedures. Protection will be given under Whistleblower Protection Act 2010 and no disciplinary action taken if the disclosure is reasonable made in good faith and the information believed to be true.

21.0 Incident Management

The Group identifies actual and potential incidents of bribery and corruption via monitoring mechanism, audits, advice and speak-up channels and reputable media reporting or by the authorities as a consequence of other investigations.

All alleged bribery and corruption incidents will be investigated with the identity of the whistleblower being protected and the whistleblower will be protected from reprisal as a consequence of his genuine disclosure under Whistleblower Protection Act 2010.

If the bribery and corruption incident is against any applicable laws and regulations, the Group shall report to the relevant regulator soon.

22.0 Training and Communication

Training on this policy forms part of the induction process for all new employees. All existing employees will receive relevant training on how to implement and adhere to this policy. This ABC Policy will be posted on the Group's official corporate website.

The policy's existence and implementation will be communicated to all Business Associates who performing works or services for or acting on behalf of the Group through the respective Departments. Acknowledgement of the awareness of this policy will be documented.

23.0 Compliance

Any act of bribery in whatever form is unacceptable. The act of bribery, corruption and unfair competition is viewed as a gross misconduct. Disciplinary action will be taken against anyone who fails to comply with the ABC Policy up to and including dismissal. Failure to comply with policy may also leave employee open to a criminal prosecution under the act.

24.0 Monitoring

The Board, AC and Top Management will review the relevance and adequacy of ABC commitment and ABC Policy as well as the adequacy and effectiveness of ABCM. AC, Top Management and ABCCU will monitor the compliance of ABC Policy and prepare the compliance report for submission and subsequent reporting to the Board, AC and Top Management.

The findings from any internal audit or random checks done by the internal auditor will be directly reported to the Board.

There is no written policy can cover every situation that might arise or set forth a rule to follow in all situations that might arise. Obviously, there are other Group policies and practices, as well as common sense to adhere. Each member is specially given notice that the Group will enforce the rules set forth in this policy.

25.0 Record Keeping

We shall declare and keep a written record of the amount and reason for gifts, entertainment, hospitality and travel accepted and given including donations, sponsorships, and expenses of similar nature by whatever name called, and understand that such expenses are subject to management review.

The record shall document the following as a minimum:

- Identify of the giver and recipient (name of dividends and corporations they represent);
- The actual amount expended or last estimate (in respect of gifts, entertainment, hospitality and travel received);
- Purpose of the giving or receiving; and
- Frequency of the giving or receiving.

All records and documents for all ABC related will be kept by the Group at least seven (7) years.

26.0 Review and Approval

This Anti-Bribery and Corruption Policy is adopted by the Board on 22 June 2023.

Reference No:

APOLLO FOOD HOLDINGS BERHAD
COMPANY NO. 199401005792 (291471-M)

GIFT/ENTERTAINMENT/CORPORATE HOSPITALITY/TRAVELLING REGISTER FORM

Employee Name :	
Position :	
Department :	
Date :	

GIFT/ENTERTAINMENT/CORPORATE HOSPITALITY/TRAVELLING TO REGISTER				
Item Received	Description	Estimated / Actual Value	Given by (Giver Name and Organisation)	Remarks
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				

ADMINISTRATIVE			
HOD Remarks :		Signature :	
		Name :	
		Date :	
Executive Chairman Remarks :		Signature :	
		Name :	
		Date :	

Note:

1. Threshold for receiving/providing gifts are restricted to maximum RM300.00.
2. Threshold for receiving/providing entertainment and corporate hospitality are restricted to maximum RM200.00.