

AHG GROUP ANTI-BRIBERY AND ANTI-CORRUPTION POLICY STATEMENT

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INTRODUCTION

1. Introduction

- 1.1 Attana Hospitality Group Sdn Bhd (Company No. 201801002246) (“AHG”) and its group of companies (collectively known as “AHG Group”) are committed to applying the highest standards of integrity and ethical conduct in all our business activities and operations. Fighting bribery and corruption is the responsibility of everyone in the organisation and setting the standard for anti-bribery and anti-corruption is part of the responsibilities of the Board of Directors, senior management, and employees of AHG Group.
- 1.2 AHG Group adopts a **Bribery-Corruption Free Business Environment** from any forms of bribery and corruption, and takes a stern stance against such acts.
- 1.3 Hence, it is important that the AHG Group complies with and conducts its business in accordance with requirements of all applicable laws, rules and regulations as well as relevant internal policies and procedures.

APPLICATION

2. Application

- 2.1 This AHG Group ABC Statement shall be read together with the Integrity Charter and Framework of AHG Group, Code of Business Ethics of AHG Group, Whistleblowing Policy of AHG Group, AHG Employee Handbook, and all the policies and procedures relating to AHG Group.
- 2.2 This AHG Group ABC Statement is applicable to its Board of Directors and members of the committees of the Board of Directors (collectively known as, senior management, employees of AHG Group, whether permanent or temporary, stakeholders of AHG Group, as well as its business counterparties (collectively referred to as “Representatives”). It is not intended to provide definitive answers to all questions regarding bribery and corruption, but rather to provide its Representatives with a basic introduction on how AHG Group combats bribery and corruption in furtherance of the AHG Group’s commitment to lawful and ethical behaviour at all times.
- 2.3 In the event of any inconsistency or conflict between the terms of this AHG Group ABC Statement and the law, the law shall prevail. If you perceive that a provision in this AHG Group ABC Statement conflicts with the law in your jurisdiction, you should consult with your Head of Department/Division, Human Capital Division or Business Process & Compliance Department of AHG.
- 2.4 AHG Group will abide by Malaysian Anti-Corruption Act 2009 (“MACC Act”) and any applicable laws in respect of countering bribery and corruption in all jurisdictions in which AHG Group operates or conducts its business. This includes, and is not confined to, those countries where AHG Group has offices.
- 2.5 It is important to remember that even if the country in which an act of bribery takes place does not have anti-bribery laws, the MACC Act and the laws of another country in which AHG Group operates or conducts its business may still apply. Bribery and corruption (or even the perception or an allegation of it):
 - i. Will damage AHG Group’s reputation; and/or
 - ii. Could cost AHG Group significant amounts of money both in respect of potential fines and the time spent in dealing with such issues and may lead to serious penalties on individual members of AHG Group including imprisonment and fines, or even the forfeiture of critical operating licenses and permits.

FAILURE TO COMPLY WITH THIS AHG GROUP ABC STATEMENT

3. Failure To Comply With This AHG Group ABC Statement

3.1 Engaging in bribery or corrupt practices can have severe consequences for you and AHG Group. You may face dismissal, fines and imprisonment, and AHG Group may face damage to reputation, financial loss and disbarment from business and other negative consequences. As for business counterparties, they may face termination, discontinuation, suspension of, or withdrawal from any business relationship.



OUR COMMITMENTS

4. Our Commitments

4.1 AHG Group is committed to:

- i. Upholding anti-bribery laws and securities laws that apply to AHG Group, including without limitation, the MACC Act;
- ii. Not offering bribes or condoning the offering of bribes of AHG Group's behalf;
- iii. Not accepting bribes, or agreeing to them being accepted on AHG Group's behalf;
- iv. Maintaining accurate books and records for all business dealing;
- v. Making sure that AHG Group's Representative are aware of and abide by AHG Group's values and policies;
- vi. Complying with the regulatory requirement including satisfying the AHG Anti-Bribery Management System (ABMS), and internal policies and procedure with regard to bribery and corruption;
- vii. Avoiding doing business with or affiliating AHG Group with others who do not accept AHG Group's values and policies, and who may harm AHG Group's reputation;
- viii. Performing ongoing monitoring of and auditing compliance with these principles;
- ix. Encouraging raising of concern via the established whistleblowing channels and as the Whistleblowing Policy of AHG Group; and
- x. Performing continual improvement of its policies and procedure pertaining to bribery and corruption matters including its ABMS

WAIVER

5. Waiver

5.1 This AHG Group ABC Statement shall be reviewed and updated from time to time in compliance with the requirements of all applicable laws. Any deviation or waiver from this AHG Group ABC Statement must be approved by the Board of Directors of AHG Group.