



## APPENDIX E

**CAM RESOURCES BERHAD (200001032704 [535311-D])**

### ANTI-BRIBERY AND CORRUPTION POLICY

#### 1. Introduction and Objective

1.1. This policy reflects CAM Resources Berhad (CAMRES)’s commitment to conducting business ethically and lawfully.

1.2. The Board of Directors has adopted this policy to:

- a) maintain CAMRES’ zero-tolerance stance against bribery and corruption;
- b) define the responsibilities of directors and employees in aligning CAMRES’ position on bribery and corruption; and
- c) provide guidance for all directors, employees and business associates to recognise and address bribery and corruption issues in day-to-day business operations.

#### 2. Definitions

2.1. For the purpose of this Policy:

“CAMRES or CAMRES Group or the Group”	CAM Resources Berhad and its subsidiaries
“business associates”	Any individual or organisation comes into contact with during work, which includes actual and potential customers, suppliers, contractors, agents, consultants, intermediaries, distributors and government or public bodies (including their advisors, representatives and officials, politicians and political parties).
“bribery”	Act of corruptly giving, agreeing to give, authorising, promising, offering, soliciting, receiving, or agreeing to receive any gratification as an inducement or a reward for an improper performance of a party.
“directors”	Executive Directors, Non-Independent Non-Executive

	Directors and Independent Directors of CAMRES and its subsidiaries.
“employees”	All individuals directly contracted to the Group on an employment basis, including permanent and temporary employees.
“facilitation payments”	Any form of unofficial payment made to an individual in control of a process or decision to secure or expedite the performance of a routine action or administrative duty.
“gratification”	Shall has the meaning as defined in the MACC Act, i.e.: <ul style="list-style-type: none"> <li>i. money, donation, gift, loan, fee, reward, security, property or interest in property, financial benefit, or any other similar advantage;</li> <li>ii. any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;</li> <li>iii. any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;</li> <li>iv. any valuable consideration of any kind, discount, commission, rebate, bonus, deduction or percentage;</li> <li>v. any forbearance to demand any money or money’s worth or valuable thing;</li> <li>vi. 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</li> <li>vii. any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (i) to (vi).</li> </ul>
“hospitality”	Considerate care of guests, which may include refreshments, accommodation, and entertainment at various venues, with or



	without the presence of a representative from CAMRES, along with travel arrangements.
“political contribution”	Any contribution, made in cash or in-kind, to support any political party or candidate.
“public official”	A position or occupation established by law or by the act of a government body to exercise the authority of the government in the provision of public services.

### 3. Scope

This policy applies to all CAMRES’ directors, employees and any potential/existing business associates performing services for or on behalf of the Group, as defined in clause 2.1. It is applicable wherever the Group conducts business.

### 4. Our Anti Bribery and Corruption Stance

- 4.1. CAMRES maintains a zero-tolerance stance for bribery and corruption. Directors, employees and business associates are strictly prohibited from soliciting, receiving, procuring, offering, or giving bribes in any form. This commitment spans the entire Group, requiring dedication from all stakeholders. Adherence to the Group’s anti-bribery stance and relevant policies is mandatory.
- 4.2. The Group strictly adheres to anti-bribery legislation, including the laws of Malaysia and any country where it conducts business.
- 4.3. CAMRES endeavors to prevent acts of bribery and corruption by directors, employees and business associates.
- 4.4. Violation of this policy will be treated seriously, resulting in disciplinary actions for employees and termination of relationships for business associates.



## **5. Gifts, Entertainment and Hospitality**

- 5.1. The Group recognises that the giving and receiving of gifts, entertainment and hospitality can be a delicate matter, particularly in certain cultural or situational contexts where such practices hold significance in business etiquette. These exchanges are occasionally used to foster goodwill and strengthen working relationships with business associates.
- 5.2. Gifts, entertainment and hospitality must comply with the law, align with the giver's or receiver's policies and be consistent with local custom, which may vary across cultures. They should be reasonable, modest and genuine.
- 5.3. These gestures should not be intended or perceived as influencing business decisions. Any attempt to use gifts, entertainment or hospitality to unduly influence decisions is considered a bribe. CAMRES refrains from soliciting gifts, hospitality or favours of any value and ensures that its actions do not create an obligation for others to provide such offerings.
- 5.4. All permitted gifts, entertainment and hospitality must adhere to CAMRES's Anti-Bribery and Corruption (ABC) Guidelines and meet the following conditions:
  - a) Transparent
  - b) Avoid conflict of interest
  - c) Not given to influence when there is a pending business decision.
  - d) Modest/nominal value, avoiding frequent or obligatory occurrences, such as festive, ceremonial, or corporate gifts.
  - e) Not interpreted as gaining an unmerited advantage.

Additional details are outlined in the ABC Guidelines.

## **6. Dealing with Public Official**

- 6.1. Employees should avoid offering and/or accepting gifts, entertainments and hospitality from or to public officials and/or their family or associates, whenever possible.
- 6.2. Approval from the Executive Chairman and Group Managing Director, following ABC Guidelines, is mandatory for any offers or acceptance of gifts, entertainment and hospitality involving public officials.



- 6.3. Directors, employees and business associates must exercise extra care when dealing with public officials to avoid activities or transactions that could be construed, or appear to be or attempts to bribe a public official.

## **7. Facilitation payments**

- 7.1. The Group's directors, employees and business associates are strictly prohibited from giving or receiving facilitation payments, directly or through a third party.
- 7.2. Employees must notify their General Manager of any requests for facilitation payment. If a payment has been made and its nature is uncertain, immediate notification and consultation with the General Manager are required. The General Manager is responsible for transparent recording and prompt return of such payments to the giver(s).
- 7.3. In situation jeopardising the safety of an employee or involving coercion for payment, the Employee must promptly report the incident to the General Manager.

## **8. Donations and Sponsorships**

- 8.1. Donations and sponsorships to non-political organisations are allowed in accordance with the ABC Guidelines. However, these contributions must be made in good faith, without any expectation of reciprocal benefits or to influence the decision of the recipient.
- 8.2. To prevent actual or perceived conflicts of interest, the Group will refrain from making contributions or donations to or sponsoring events of interested or related parties of directors, employees and business associates, unless explicit approval is obtained from the Managing Director. In cases involving the Managing Director, approval will be sought from the Board
- 8.3. Any contribution made must comply with applicable laws and should not involve promises or expectations of favourable treatment in return.

## **9. Political Contributions**

- 9.1. CAMRES refrains from contributing or donating to any political party or candidate currently holding public office or running for public office.



9.2. CAMRES' resources, including funds, services, properties, premises and facilities, cannot be utilised to endorse any political party or candidate in public office or seeking election to public office.

9.3. While directors and employees within the Group are allowed to make personal political contributions, CAMRES will not provide reimbursements to any director or employee for such personal contributions.

## **10. Business Rewards, Rebates, Commissions, or Other Incentives**

10.1. The Group may utilise various promotional and marketing tools such as business rewards, rebates, discounts, or incentives to promote and encourage business or explore new business opportunities. These may include extraordinary and non-routine reward programs.

However, it is important to avoid improper reward programs that could be perceived as bribes to gain or retain business advantages. Therefore,

- (a) the Group refrains from providing questionable business reward program that contradict anti-bribery laws and regulations.
- (b) Business-related reward programs by the Group must fulfil the following conditions:
  - be formally documented as part of the provider's reward program, contract, policies (e.g. credit policy), or minutes of meeting or discussion; and
  - apply to all or be based on business-related parameters (e.g. applicable to all customers or those exceeding a certain order amount).

## **11. Dealing with External Parties**

11.1. Dealings with any external parties, including regulatory authorities and business associates must be conducted transparently and without any undue influence. All procurement or business dealings with these parties should comply with relevant laws and adhere to CAMRES' policies and procedures.

11.2. The Group expects external parties, especially those representing or acting on behalf of CAMRES to align their behaviour with the Group's values and ethical standards. The actions



of these external parties can have legal implications and impact the Group's reputation. Therefore, due diligence in the selection process of business associates should include bribery and corruption elements.

## **12. Recruitment of Employees**

The recruitment of employees should be based on approved selection criteria to ensure the hiring of the most qualified and suitable individuals. This is essential to eliminate any potential for corruption in the recruitment process. In alignment with this principle, thorough background checks should be conducted when hiring individuals for key management positions, considering their significant responsibilities in decision-making.

## **13. Training and communication**

CAMRES will regularly conduct training sessions to educate its directors and employees on ABC policies. Additionally, CAMRES' zero tolerance approach to bribery and corruption must be communicated to all key business associates by providing them with a copy of this policy to them. The electronic version of this policy will also be uploaded to <https://camres.com.my/camres/board-charter/>.

## **14. Monitoring and Review**

14.1. CAMRES' General Managers conduct regular reviews of internal controls aimed at mitigating the risk of bribery and corruption. These reviews are periodically reported to the Board or as needed.

14.2. Such internal control measures and procedures to address bribery and corruption risks are subject to regular audits to verify their effectiveness. The findings of these audits shall be reported to the AC and appropriate actions are taken in response.

## **15. Responsibility**

15.1. The Board has oversight of this Policy and all General Managers within the Group are responsible for ensuring compliance with this Policy by their respective subordinates.

15.2. Every director and employee of the Group is required to be familiar with and comply with this Policy



## **16. Reporting and Recording**

- 16.1. All accounts, invoices, letters, agreements, documents and records must be accurately prepared and completely maintained. Keeping records "off-book" to facilitate or conceal improper payments is strictly prohibited.
- 16.2. The respective business units are responsible for maintaining all financial records and documentary evidence justifying payments to and receipts from any person.
- 16.3. All records must be retained for a minimum of seven (7) years from their date of generation and produced upon request.

## **17. Violation of this policy**

- 17.1. Any violation of this Policy will be treated seriously by the Group and may result in various actions, including but not limited to the review of contracts, employment, or appointment, disciplinary actions, dismissal, termination of business relationships, and/or reporting to the authorities, in accordance with applicable laws and regulations.
- 17.2. Anyone, including the general public, who becomes aware of or suspects a violation of this Policy is encouraged to report concerns through the whistleblowing mechanism outlined in the Group's Whistleblower Policy, available at <https://camres.com.my/camres/board-charter/>. Non-discrimination or retaliation will occur against any individual for raising genuine concerns or reporting violations, potential violations, or suspected violations of this Policy.
- 17.3. A violation of this Policy may also constitute a violation of applicable laws, leading to criminal penalties and civil liabilities for the involved business associates. All CAMRES directors and employees are expected to cooperate in any investigations into such misconduct.

## **18. Review of this Policy**

This Policy was approved by the Board on 23.02.2024 and is subject to review at least once every three (3) years or as necessary, in response to changes in laws and regulations or as deemed necessary by the Board.