 <b>BINTULU PORT</b>	<b>BINTULU PORT HOLDINGS BERHAD</b>	DOC NO	IMS-BPHB- POLICY-GLC-01
		REVISION	01
<b>LEVEL I</b>		ISSUE DATE	1 March 2026
<b>POLICY</b>			

# ANTI-BRIBERY AND CORRUPTION

<b>BINTULU PORT HOLDINGS BERHAD LEVEL I</b>	<b>DOC NO</b>	<b>IMS-BPHB-GLC- POLICY-01</b>
	<b>REVISION</b>	<b>01</b>
<b>POLICY</b>	<b>ISSUE DATE</b>	<b>1 MARCH 2026</b>
	<b>PAGE</b>	<b>1 of 18</b>

<b><u>TABLE OF CONTENT</u></b>		<b><u>PAGE</u></b>
1	Revision Record	3
2	Objective	4
3	Policy Statement	4
4	Definition	5
5	No Gift Policy	6
6	Entertainment	9
7	Corporate Hospitality	9
8	Entertainment and Corporate Hospitality that are not Permissible	11
9	Political Contribution	11
10	Corporate Social Responsibility (CSR) Sponsorships and Donations	11
11	Dealing with Public Officials	11
12	Anti-Money Laundering	12
13	Conflict of Interest	13
14	Training and Communication	13
15	Referral to Authorities	13

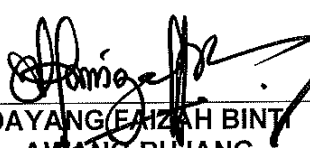

<b>BINTULU PORT HOLDINGS BERHAD LEVEL I</b>	<b>DOC NO</b>	<b>IMS-BPHB-GLC- POLICY-01</b>
	<b>REVISION</b>	<b>01</b>
<b>POLICY</b>	<b>ISSUE DATE</b>	<b>1 MARCH 2026</b>
	<b>PAGE</b>	<b>2 of 18</b>

16	Facilitation Payment	14
17	Dealing with Third Parties	14
18	Due Diligence	14
19	Management of Letter of Support	14
20	Declaration of Assets	15
21	Whistleblowing Policy	16
22	Responsibilities	17
23	Record Keeping	17
24	Further Clarifications	18

BINTULU PORT HOLDINGS BERHAD LEVEL I	DOC NO	IMS-BPHB-GLC- POLICY-01
	REVISION	01
POLICY	ISSUE DATE	1 MARCH 2026
	PAGE	3 of 18

**Revision Record**

Revision No.	Details Of Revision	Date
00	Initial release	28 <sup>th</sup> November 2019
01	1 <sup>st</sup> Revision	24 <sup>th</sup> February 2026

PREPARED BY	ENDORSED BY	APPROVED BY
		
DAYANG EZZAH BINTI AWANG BUJANG	DATO RUSLAN BIN ABDUL GHANI	BPHB Board of Directors in BPHB Board Meeting No.1/2026 on 24 <sup>th</sup> February 2026
General Manager, Group Legal Counsel	President/Group Chief Executive Officer Bintulu Port Holdings Berhad	

<b>BINTULU PORT HOLDINGS BERHAD LEVEL I</b>	<b>DOC NO</b>	<b>IMS-BPHB-GLC- POLICY-01</b>
	<b>REVISION</b>	<b>01</b>
<b>POLICY</b>	<b>ISSUE DATE</b>	<b>1 MARCH 2026</b>
	<b>PAGE</b>	<b>4 of 18</b>

## **1.0 OBJECTIVE**

- 1.1** The objective of this Anti-Bribery and Corruption Policy (hereinafter referred to as the "ABC Policy") is to serve as a guideline to Bintulu Port Holdings Berhad Group (hereinafter referred to as "BPHB Group") to deal with bribery and other corrupt activities, including fraud, entertainment, corporate hospitality, political contributions, corporate social responsibility, sponsorships, donations and matters that may arise in the course of its business.
- 1.2** This ABC Policy is not intended to provide definitive answers to all questions on bribery and corruption but rather to provide the clear guidance as to how BPHB Group addresses and prevents bribery and corruption issues.
- 1.3** This ABC Policy is applicable to all Board of Directors and employees of BPHB Group except as otherwise stated in this ABC Policy. All business associates such as contractors, subcontractors, consultants, agents, representatives who are performing works and services for or on behalf of BPHB Group and any other third parties who may come into contact in the course of doing business with BPHB Group are required to comply with this ABC Policy in its relevant part when performing such works or services.
- 1.4** Engaging in bribery or corrupt practices can have severe consequences for all parties be it the Board of Directors, employees of BPHB Group, business associates and any third parties. Employees of BPHB Group may face disciplinary action which may lead to dismissal and legal action. Furthermore, the Board of Directors, business associate and third parties may face legal proceedings which lead to fines and sentence to imprisonment whilst BPHB Group may face serious damage to its reputation in the public market worldwide, financial losses, and disbarment from business as well as other negative consequences.
- 1.5** This ABC Policy will supersede any other existing policies (if any) relating to bribery and corruption. If this Policy conflicts with any laws on bribery and corruption that are enforceable, the said law shall prevail, and one shall comply with the said law.
- 1.6** The custodian for this ABC Policy is the Governance, Integrity and Compliance (GIC) Department.

## **2.0 POLICY STATEMENT**

- 2.1** It is the BPHB Group's policy to conduct all of its business in an honest and ethical manner with transparency, accountability and integrity in line with the Malaysian Anti-Corruption Commission (MACC) Act 2009.
- 2.2** The BPHB Group adopts a zero-tolerance approach to all forms of bribery and corruption and is committed to acting professionally and fairly in all of its business dealings and relationships. BPHB Group will avoid acts which might adversely affect the integrity and reputation of the BPHB Group.
- 2.3** The BPHB Group encourages employees and stakeholders to raise concerns in good faith or on the basis of a reasonable belief, in confidence, without fear of

<b>BINTULU PORT HOLDINGS BERHAD LEVEL I</b>	<b>DOC NO</b>	<b>IMS-BPHB-GLC- POLICY-01</b>
	<b>REVISION</b>	<b>01</b>
<b>POLICY</b>	<b>ISSUE DATE</b>	<b>1 MARCH 2026</b>
	<b>PAGE</b>	<b>5 of 18</b>

reprisal.

- 2.4** It provides the employees of BPHB Group with information and guidance on how to recognize, deal and combat corruption in furtherance to BPHB Group's commitment to lawful and ethical behaviours at all times. It also explains the authority and independence of the anti-bribery function established to oversee the implementation of this Policy.
- 2.5** The ABC Policy is set out to protect BPHB Group against penalties, fines and other repercussions resulting from acts of bribery and corruption or being associated with such behavior that will damage and tarnish the reputation of the BPHB Group.
- 2.6** The BPHB Group supports the continual improvement of its Anti-Bribery Management System (ABMS) to strengthen effectiveness and enhance internal controls.

### **3.0 DEFINITION**

<b>Business Associate</b>	means external party with whom the organization has or plans to establish some form of business relationship.
<b>BPHB Group</b>	refers to Bintulu Port Holdings Berhad.
<b>Board of Directors</b>	means any person occupying the position of director of a corporation by whatever name called and includes a person in accordance with whose directions or instructions the majority of the directors of a corporation are accustomed to act, as well as an alternate or substitute director.
<b>Company</b>	means Bintulu Port Holdings Berhad.
<b>Employees of BPHB Group</b>	means any person, irrespective of his occupation, who has entered into a contract of service with BPHB Group.
<b>Family members</b>	include spouse(s), children (including step-children and adopted children), parents, step-parents, siblings, step-siblings, grandparents, grandchildren, in-laws and extended relative such as uncles, aunts, nieces and nephews.
<b>Public Official</b>	means any person holding a legislative, administrative, or judicial office, whether by appointment, election or succession, or any person exercising a public function, including for a public agency or public enterprise, or any official or agent of a public domestic or international organization or any candidate for public office.
<b>Third Party(ies)</b>	means any individual or organization that is independent of the organization.

BINTULU PORT HOLDINGS BERHAD LEVEL I	DOC NO	IMS-BPHB-GLC- POLICY-01
	REVISION	01
POLICY	ISSUE DATE	1 MARCH 2026
	PAGE	6 of 18

#### 4.0 NO GIFT POLICY

##### 4.1 Receiving Gifts

- 4.1.1 Generally, employees of BPHB Group are prohibited from directly or indirectly, receiving any gifts, kickbacks or guarantees in any form that may compromise an employee's judgement and decision making.
- 4.1.2 Although the general principle is to immediately refuse or return such gifts, there may be very limited situations where refusing a gift is likely to seriously offend and may affect BPHB Group's business relationship with the third party. In such cases, the gift may be accepted on behalf of the BPHB Group and immediately declared. The gift may then be politely returned with a note explaining BPHB Group's "No Gift Policy"
- 4.1.3 The practice to be applied is whether in all the circumstances the gift is reasonable and justifiable rather than lavish and extraordinary, bearing in mind that what may normally be viewed as small or insignificant in some countries can be of significant value to another. The intention behind the gift should always be considered and nothing should be specifically expected or demanded in return.
- 4.1.4 All employees of BPHB Group shall declare immediately the acceptance of gift in the **Gift and Hospitality Activity Reporting Form (GHARF)** for submission to Head of Division who will then decide the treatment of the gift.
- 4.1.5 All Board of Directors when faced with this situation of accepting gift from third parties are required to inform the Company Secretary as soon as reasonably practicable to seek advice whether a gift may be accepted or should be declined.
- 4.1.6 In any event of conflict of interest, the Head of Division shall not approve the acceptance of such gift and shall politely return such gift with a note of explanation about BPHB Group's No Gift Policy.
- 4.1.7 The Head of Division may approve the acceptance of the said gift but shall determine the treatment of the gift whether to:-
- i. Donate the gift to charity; or
  - ii. Hold it for display in the Division; or
  - iii. Share it with other employees of BPHB Group in the Division; or
  - iv. Permit it to be retained by the employee.
- 4.1.8 In doing so, the Head of Division is expected to exercise due care and proper judgment taking into account pertinent circumstance including the character of the gift, its purpose, the position/seniority of the person providing the gift, the business context, reciprocity, applicable laws and cultural norms.

<b>BINTULU PORT HOLDINGS BERHAD LEVEL I</b>	<b>DOC NO</b>	<b>IMS-BPHB-GLC- POLICY-01</b>
	<b>REVISION</b>	<b>01</b>
<b>POLICY</b>	<b>ISSUE DATE</b>	<b>1 MARCH 2026</b>
	<b>PAGE</b>	<b>7 of 18</b>

#### **4.2 Providing Gifts**

Generally, employees of BPHB Group are not allowed to provide gifts to third parties with the exception of the President/Group Chief Executive Officer (CEO) and Vice President.

#### **4.3 Exceptions to the No Gift Policy**

4.3.1 Although generally BPHB Group practices a "No Gift Policy," there are certain exceptions to the general rule whereby the receiving and provision of gifts are permitted in the following situations.

4.3.2 Exchange of gifts at the company-to-company level (e.g. gifts exchanged between companies as part of an official company's visit/courtesy call and thereafter the said gift is treated as Company's property).

4.3.3 Gifts from BPHB Group to external institutions or individuals in relation to BPHB Group's official functions, events and celebrations (e.g. commemorative gifts or door gifts offered to all guests attending the event).

4.3.4 Gifts from BPHB Group to its Board of Directors and/or employees of BPHB Group and/or their family members in relation to an internal or externally recognised company's function, event and celebration (e.g. in recognition of Board of Directors' or employee's service to the company).

4.3.5 Token gifts of nominal value normally bearing BPHB Group's logo (e.g. t-shirts, pens, diaries, calendars and other small promotional items) that are given out equally to members of the public, delegates, customers, partners and key stakeholders attending events such as conferences, exhibitions, training, trade shows etc. and deemed as part of the BPHB Group's brand building or promotional activities.

4.3.6 Gifts to third parties who have no business dealings with BPHB Group (e.g. monetary gifts or gifts in-kind to charitable organisations).

#### **4.4** Even in the above exceptional circumstances, Board of Directors and employees of BPHB Group are expected to:

- i. Exercise proper care and judgment in handling gift activities;
- ii. Conscientiously maintain highest degree of integrity;
- iii. Avoid any conflict of interest;
- iv. Refrain from taking advantage of position or exercising authority to further own personal interest at the expense of BPHB Group; and
- v. Comply with all applicable laws, rules, regulations and BPHB Group's policies and procedures;

<b>BINTULU PORT HOLDINGS BERHAD LEVEL I</b>	<b>DOC NO</b>	<b>IMS-BPHB-GLC- POLICY-01</b>
	<b>REVISION</b>	<b>01</b>
<b>POLICY</b>	<b>ISSUE DATE</b>	<b>1 MARCH 2026</b>
	<b>PAGE</b>	<b>8 of 18</b>

**4.5** The giving of gifts is not prohibited if the following requirements are met:

- i. Not done with the intention of influencing a third party to obtain or retain business or a business advantage or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- ii. Complies with relevant laws enforceable;
- iii. Not a cash or a cash equivalent such as vouchers, discounts, coupons, commissions, shares, etc;
- iv. Taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time; and
- v. Given openly, not secretly.

## **5.0 ENTERTAINMENT**

5.1 BPHB Group recognises that providing and receiving modest entertainment is a legitimate way of building business relationships and a common practice within the business environment to foster good business relationships with third party. As such, eligible employees of BPHB Group are allowed to entertain third party through a reasonable act of hospitality as part of business networking as well as a measure of goodwill towards the recipients.

### **5.2 Receiving Entertainment**

5.2.1 BPHB Group recognises that the occasional acceptance of a reasonable and modest level of entertainment provided by third parties in the normal course of business is a legitimate way to network and build good business relationships.

5.2.2 However, it is important for Board of Directors and employees of BPHB Group to exercise due care and proper judgment before accepting entertainment offered or provided by a third party. This is not only to safeguard BPHB Group's reputation, but also to protect Board of Directors and employees of BPHB Group from allegations of impropriety or undue influence.

5.2.3 Employees of BPHB Group shall declare any entertainment received through GHARF.

<b>BINTULU PORT HOLDINGS BERHAD LEVEL I</b>	<b>DOC NO</b>	<b>IMS-BPHB-GLC- POLICY-01</b>
	<b>REVISION</b>	<b>01</b>
<b>POLICY</b>	<b>ISSUE DATE</b>	<b>1 MARCH 2026</b>
	<b>PAGE</b>	<b>9 of 18</b>

5.3 Providing Entertainment

5.3.1 Board of Directors and employees of BPHB Group should always exercise proper care and judgment when providing entertainment to third parties especially when it involves public officials to ensure compliance with the Malaysian anti-bribery and corruption laws.

5.3.2 Board of Directors and employees of BPHB Group are strictly prohibited from providing or offering to provide entertainment with a view to improperly cause undue influence on any party in exchange for some future benefit or result. Any acts of this nature, whether provided directly or indirectly through an intermediary, may be construed as an act of bribery and corruption.

5.3.3 Employees of BPHB Group shall declare any entertainment provided through GHARF.

**6.0 CORPORATE HOSPITALITY**

6.1 Corporate hospitality is generally defined as "corporate events or activities organised by an organisation which involves the entertainment of employees of BPHB Group and third parties for the benefit of that organisation".

6.2 Corporate events and activities include but are not limited to sporting events, gala dinners, concerts or activity based events.

6.3 Corporate hospitality arrangements/activities should conform to the following basic principles:

- i. Transparency, in that all corporate hospitality is reported and written approval is obtained, with all related records properly maintained;
- ii. Proportionality, i.e. the corporate hospitality, shall not be too excessive. In addition, the corporate hospitality shall commensurate with the recipient's official capacity and not provided in his/her personal capacity;
- iii. Reasonableness in ensuring that the corporate hospitality is not lavish; and
- iv. Bona fide, where the intention to offer and/or provide the corporate hospitality is done with good and legal intention.

6.4 Receiving Corporate Hospitality

6.4.1 As a general principle, BPHB Group strictly prohibits Board of Directors and employees of BPHB Group from soliciting corporate hospitality nor are they allowed to accept hospitality that is excessive, inappropriate, illegal or given in response to, in anticipation of, or to influence a favourable business decision for example, from parties engaged in the procurement process i.e. in a tender or competitive bidding exercise.

<b>BINTULU PORT HOLDINGS BERHAD LEVEL I</b>	<b>DOC NO</b>	<b>IMS-BPHB-GLC- POLICY-01</b>
	<b>REVISION</b>	<b>01</b>
<b>POLICY</b>	<b>ISSUE DATE</b>	<b>1 MARCH 2026</b>
	<b>PAGE</b>	<b>10 of 18</b>

6.4.2 Notwithstanding the above, BPHB Group recognises that the occasional acceptance of an appropriate level of hospitality given in the normal course of business is usually a legitimate contribution to building good business relationships. However, it is important for the Board of Directors and employees of BPHB Group to exercise due care and proper judgement before accepting the hospitality. This is not only to safeguard the BPHB Group's reputation, but also to protect the Board of Directors and employees of BPHB Group from allegations of impropriety or undue influence.

6.4.3 Employees shall declare any corporate hospitality received through GHARF.

#### 6.5 Providing Corporate Hospitality

6.5.1 BPHB Group recognises that providing corporate hospitality to its stakeholders be it through corporate events, sporting events or other public events, is a legitimate way to network and build goodwill in business relationships.

6.5.2 While providing corporate hospitality is a reflection of BPHB Group's courtesy and goodwill, every employee of BPHB Group shall exercise proper care and reasonable due diligence, particularly when the arrangements involve public officials. This is to protect the BPHB Group's reputation against any allegations of impropriety or the perception of bribery especially when the arrangements could influence or be perceived to influence the outcome of a business decision and are not reasonable and bona fide expenditures.

6.5.3 All expenses incurred to provide the corporate hospitality shall be properly documented, receipted and recorded in the BPHB Group of Companies' records.

6.5.4 Employees shall declare any corporate hospitality provided through GHARF.

#### **7.0 ENTERTAINMENT AND CORPORATE HOSPITALITY THAT ARE NOT PERMISSIBLE**

7.1 Board of Directors and employees of BPHB Group are required to decline any offers of gift, entertainment or corporate hospitality that are not permissible as follows:-

- i. When offered by parties engaged in any official dealing with BPHB Group.
- ii. When comes with a direct or indirect suggestion, hint, understanding or implication that in return, a desired or expected outcome is required ("quid pro quo");
- iii. Illegal or in breach of the laws enforceable

<b>BINTULU PORT HOLDINGS BERHAD LEVEL I</b>	<b>DOC NO</b>	<b>IMS-BPHB-GLC- POLICY-01</b>
	<b>REVISION</b>	<b>01</b>
<b>POLICY</b>	<b>ISSUE DATE</b>	<b>1 MARCH 2026</b>
	<b>PAGE</b>	<b>11 of 18</b>

iv. Lavish, extravagant or excessive or may adversely affect BPHB Group's reputation;

v. Sexually oriented or may otherwise tarnish BPHB Group's reputation.

7.2 In the event of doubts on the appropriateness of accepting entertainment or corporate hospitality offered by third parties, employees of BPHB Group are required to either decline the offer or consult the Head of Division or the GICD. The Board of Directors shall consult the Company Secretary to decide on the appropriate treatment in line with the No Gift provisions.

## **8.0 POLITICAL CONTRIBUTION**

8.1 BPHB Group prohibits any contributions or donations whether in the form of monetary or in kind to political parties, political party officials or candidates for political office. Board of Directors and employees of BPHB Group shall be deemed to be acting in their own personal capacity and not on behalf of the BPHB Group in the event that they had contributed to any political parties or candidates without any appropriate authorization or approval.

## **9.0 CORPORATE SOCIAL RESPONSIBILITY (CSR), SPONSORSHIPS AND DONATIONS**

9.1 Corporate Social Responsibility (CSR) refers to a company's commitment to operate in an ethical, sustainable, and socially responsible manner. It involves initiatives that benefit society, the environment, and the economy beyond core business activities, including areas such as environmental stewardship.

9.2 As a responsible corporate citizen, BPHB Group is committed to building strong relationships with local communities and contributing to national well-being. All CSR initiatives, including sponsorships and donations, must comply with BPHB Group policies and be duly approved by the President/Group Chief Executive Officer or the Board of Directors, where applicable.

## **10.0 DEALING WITH PUBLIC OFFICIALS**

10.1 Board of Directors and employees of BPHB Group shall exercise caution when dealing with public officials including foreign public officials. BPHB Group does not make any contributions to public officials except in accordance with the law and with written approval or authorisation of the President/Group Chief Executive Officer. In the event approval has been obtained for providing gift or entertainment or corporate hospitality to any public officials or foreign public officials, one shall ensure that the gift or entertainment or corporate hospitality is not excessive and lavish, and shall commensurate with the official designation of the public official and not his personal capacity.

10.2 In dealing with public officials or foreign public officials, Board of Directors and

<b>BINTULU PORT HOLDINGS BERHAD LEVEL I</b>	<b>DOC NO</b>	<b>IMS-BPHB-GLC- POLICY-01</b>
	<b>REVISION</b>	<b>01</b>
<b>POLICY</b>	<b>ISSUE DATE</b>	<b>1 MARCH 2026</b>
	<b>PAGE</b>	<b>12 of 18</b>

employees of BPHB Group shall not:

- i. Circumvent any laws or policies with regards to gifts, entertainment and corporate hospitality even if it means that BPHB Group might lose out on business opportunities;
- ii. Be too complacent with certain public officials or local customs which he/she are familiar with;
- iii. Approve any request by public official to transfer the gift or entertainment or corporate hospitality to his/her family members or friends that are not authorised to accept such gift. In this situation, the public official must be informed that the transfer of gift or entertainment to third party other than the public official is against BPHB Group's policy;
- iv. Offer to provide gift, entertainment or corporate hospitality that are illegal or unduly dangerous, indecent, sexually oriented or disrespectful;
- v. Exceed the monetary threshold as specify in the approved policy of BPHB Group; and
- vi. Conceal, alter, destroy or otherwise modify any documentation that relates to entertainment or corporate hospitality to public officials.

#### **11.0 ANTI-MONEY LAUNDERING**

- 11.1 BPHB Group strongly objects to practices related to money laundering, including dealing in the proceeds of criminal activities.
- 11.2 Section 3 of the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 defines money laundering offences such as engaging, acquiring, receiving, possessing, disguising, transferring, converting, exchanging, carrying, disposing, concealing, removing from or bringing to Malaysia or to impede the establishment of the true nature, origin, location, movement, disposition, title of, rights with respect to, or ownership of directly or indirectly, the proceeds of an unlawful activity or instrumentalities.
- 11.3 Money laundering is a very serious crime and the laws governing this type of crime can have extra territorial effect, i.e. the application of the law is extended beyond local borders. The penalties for breaching anti-money laundering legislation are severe and can include imprisonment, fines, and extradition in foreign jurisdictions.
- 11.4 To avoid violating anti-money laundering laws, employees of BPHB Group are expected to always conduct counterparty due diligence to understand the business and background of BPHB Group's prospective business counterparties and to determine the origin and destination of money, property and services.
- 11.5 Counterparty means any party that the BPHB Group's is currently in

<b>BINTULU PORT HOLDINGS BERHAD LEVEL I</b>	<b>DOC NO</b>	<b>IMS-BPHB-GLC- POLICY-01</b>
	<b>REVISION</b>	<b>01</b>
<b>POLICY</b>	<b>ISSUE DATE</b>	<b>1 MARCH 2026</b>
	<b>PAGE</b>	<b>13 of 18</b>

relationship with or intends to do business in the future, either on a regular or once-off basis. Counterparties include but are not limited to contractors, sub-contractors, consultants, agents, and its representative.

## **12.0 CONFLICT OF INTEREST**

- 12.1 BPHB established Conflict of Interest practices to ensure the Board of Directors and all employees of BPHB Group conduct themselves with integrity and make decisions in the best interest of the Company.
- 12.2 Employees of BPHB Group shall avoid situations in which their personal interest could conflict – or appear to conflict – with the Company’s business.
- 12.3 Employees of BPHB Group shall not use personal influence or positions to get BPHB to do business or enter into any undertaking with a Company or a third party in which their family members or friends have an interest, directly or indirectly.
- 12.4 At all times, the Board of Directors and employees of BPHB Group shall not allow his/her independent judgment to be prejudiced by direct or indirect personal interests including that of his/her families.
- 12.5 In situations where a conflict of interest arises, members of the Board of Directors shall declare it to the Company Secretary, while employees of the BPHB Group shall complete a Conflict-of-Interest Declaration Form. The declaration shall be submitted to the Management for approval and endorsement, with a copy provided to the Group Human Capital for record-keeping.

## **13.0 TRAINING AND COMMUNICATION**

- 13.1 BPHB Group shall ensure that all Board of Directors and employees of BPHB Group, associates and third parties shall be informed of this ABC Policy through training and awareness.
- 13.2 The BPHB Group’s zero-tolerance approach to bribery and corruption should be communicated to all agents, suppliers, contractors, sub-contractors, consultants and business partners at the outset of the Company’s business relationship with them and as appropriate thereafter. Wherever possible, all third parties should be sent a copy of this ABC Policy at the outset of the business relationship.

## **14.0 REFERRAL TO AUTHORITIES**

- 14.1 BPHB is committed to the prevention of corruption and crimes involving any of employees of BPHB Group and/or any third parties.
- 14.2 BPHB shall ensure that any suspected or confirmed violation of anti-bribery laws is reviewed in accordance with internal investigation and reporting procedures. Where sufficient grounds exist, BPHB shall report the matter to the

<b>BINTULU PORT HOLDINGS BERHAD LEVEL I</b>	<b>DOC NO</b>	<b>IMS-BPHB-GLC- POLICY-01</b>
	<b>REVISION</b>	<b>01</b>
<b>POLICY</b>	<b>ISSUE DATE</b>	<b>1 MARCH 2026</b>
	<b>PAGE</b>	<b>14 of 18</b>

relevant authorities.

- 14.3 BPHB shall impose disciplinary action against any form of misconduct, in accordance to the disciplinary procedure as deemed fit.
- 14.4 If a misconduct involves or may lead to a criminal offence, BPHB shall, with the consent of Leadership Team and/or the Board, report the matter to the relevant authorities such as PDRM, MACC, or others, and may also impose disciplinary action in accordance with the applicable procedures.

#### **15.0 FACILITATION PAYMENT**

- 15.1 Facilitation is a payment or other provision made personally to an individual in control of a process or decision. It is given to secure or expedite a routine or administrative duty or function.
- 15.2 BPHB prohibits facilitation payments involving unofficial and improper payments or benefits, including gifts or entertainment, provided to secure or expedite a routine or necessary action as it is seen as a form of bribery and corruption.
- 15.3 All BPHB employees of BPHB Group and third-parties involved in any business dealing shall not offer, promise, give, request or accept anything which may reasonably be regarded as a facilitation payment.
- 15.4 Extortion payment is money or any form of payment forcibly extracted from an individual through real or perceived threats to health, safety, or liberty. It is made under coercion and does not constitute a voluntary act of bribery.
- 15.5 BPHB does not allow extortion payments. However, in exceptional situations where the health, safety, or liberty of an employee is at risk, the employee may take necessary measures to protect themselves. Any such incident must be reported to BPHB immediately for documentation and further action.

#### **16.0 DEALING WITH THIRD PARTIES**

- 16.1 Employees of BPHB Group shall be mindful and comply with all applicable rules to prevent corrupt business dealings and inappropriate business practices when dealing with third parties. This applies whenever employees of BPHB Group establish relationships with third parties. Employees of BPHB Group are responsible to take reasonable precautions to ensure third parties conduct business ethically.

#### **17.0 DUE DILIGENCE IN BUSINESS DEALING**

- 17.1 Employees of BPHB Group shall only engage with third parties if there is a legitimate need for the services or the goods that they provide.
- 17.2 The appropriate due diligence shall be conducted on the third party prior to any dealing to identify its background and business nature. Such due diligence

<b>BINTULU PORT HOLDINGS BERHAD LEVEL I</b>	<b>DOC NO</b>	<b>IMS-BPHB-GLC- POLICY-01</b>
	<b>REVISION</b>	<b>01</b>
<b>POLICY</b>	<b>ISSUE DATE</b>	<b>1 MARCH 2026</b>
	<b>PAGE</b>	<b>15 of 18</b>

should enable BPHB to determine the viability of the said third party based on their financial background, composition of Board of Directorship, shareholding and/or the standard of integrity of their business conduct. The due diligence conducted should include availability of relevant documentation on the said third parties.

- 17.3 BPHB should avoid dealing with any third parties known or reasonably suspected of corrupt practices or known or reasonably suspected to pay bribes.

## **18.0 MANAGEMENT OF LETTER OF SUPPORT**

- 18.1 BPHB will not tolerate any form of support from a third party that:-

- i. Causes BPHB or its employees of BPHB Group to exercise bias or preferential treatment towards the third party;
- ii. Disables BPHB or its employees of BPHB Group to make a decision objectively;
- iii. Causes BPHB or its employees of BPHB Group to abuse its power or authority; and
- iv. The outcome of any of the above may cause negative implication of the image and integrity of BPHB.

- 18.2 In the event of receiving any support letter, employees of BPHB Group shall take the following steps:-

- i. If support is received in writing; or
- ii. If the support is received verbally, the communication shall be recorded in writing along with the information of the party providing the support and the form of support; after which
- iii. Shall promptly report in writing the Support Letter received to the immediate superior for further instructions or action; and
- iv. If for any reason or impractical to report to the immediate superior, staff shall escalate to Management Team for further action.

## **19.0 DECLARATION OF ASSETS**

- 19.1 All employees of BPHB Group are required to declare their assets, financial commitments and business interests in accordance with the Asset Declaration Procedure.

<b>BINTULU PORT HOLDINGS BERHAD LEVEL I</b>	<b>DOC NO</b>	<b>IMS-BPHB-GLC- POLICY-01</b>
	<b>REVISION</b>	<b>01</b>
<b>POLICY</b>	<b>ISSUE DATE</b>	<b>1 MARCH 2026</b>
	<b>PAGE</b>	<b>16 of 18</b>

## **20.0 WHISTLEBLOWING POLICY**

- 20.1 BPHB Group has adopted the Whistleblower Policy which is designed to facilitate employees of BPHB Group and members of the public to disclose any improper conduct through the internal channel of BPHB Group which include but is not limited to, the following:-
- i. Breach of law (national or international) such as fraud, bribery and corruption.
  - ii. Breach of BPHB Group's Code of Conduct and Business Ethics (CoBE) and policies.
- 20.2 The Whistleblower Policy shall ensure that only genuine concerns either via whistleblower channel or any other means should be subjected to further investigation. Any disclosure which is found to be frivolous and vexatious shall not be entertained.
- 20.3 All complaints which are prima facie or fall under the Whistleblower SOP shall be logged in and to be investigated in accordance with the principle of natural justice.
- 20.4 Investigation shall focus on matters which may infringe the BPHB Group's principles/procedures/policies or may be detrimental to the interest, reputation and security of the BPHB Group.
- 20.5 Types of Protection for Whistleblowers: -
- i. Identity of the Whistleblower will be kept confidential and shall not be exposed to anyone including during the court proceedings.
  - ii. No civil, criminal, or disciplinary action will be taken against the informant for whistleblowing.
  - iii. The Whistleblower shall be protected from any detrimental action in reprisal for making the disclosure.
  - iv. Anyone who retaliates against the Whistleblower shall be subjected to disciplinary action, which may include termination of employment, demotion, or other form of legal actions.
- 20.6 Disclosure of Anonymous Whistleblower
- 20.6.1 Whistleblowers are encouraged to provide their name and contact details for confidentiality and protection. However, individuals who wish to report improper conduct may choose to remain anonymous. It's important to note that the anonymity of whistleblowers will be strictly maintained. Any misuse of the reporting channel will result in disciplinary or legal action where appropriate. The BPHB Group reserves the right to investigate any anonymous disclosure after considering the following: -

<b>BINTULU PORT HOLDINGS BERHAD LEVEL I</b>	<b>DOC NO</b>	<b>IMS-BPHB-GLC- POLICY-01</b>
	<b>REVISION</b>	<b>01</b>
<b>POLICY</b>	<b>ISSUE DATE</b>	<b>1 MARCH 2026</b>
	<b>PAGE</b>	<b>17 of 18</b>

- i. the seriousness of the case disclosed; or
- ii. the credibility of the claim; or
- iii. the likelihood of confirming the disclosure from credible sources.

20.7 Reports of improper conduct may be made through the following channels:

- a. Filling up the **Whistleblowing Form** for Report of Improper Conduct as provided in the Bintulu Port Holdings Website (IMS-SOP-GIC-02/L4/02);
- b. Email to **whistle@bintuluport.com.my**; (This email shall be received by Chairman of Audit Committee and Head of Governance, Integrity & Compliance)
- c. By **writing to Head of Governance, Integrity & Compliance**, 12th Miles, Tanjung Kidurong Road, P.O. Box No, 996, 97008 Bintulu, Sarawak; or
- d. **Hotline at 086-291362** from Monday to Friday during office hours (8:00 am to 5:00 pm).
- e. Meeting in person with the Head of Governance, Integrity & Compliance (by prior appointment).
- f. Official Website <https://www.bintuluport.com.my/whistleblower/>

## **21.0 RESPONSIBILITIES**

- 21.1 All Board of Directors and employees of BPHB Group shall ensure that they have read, understood and comply with this ABC Policy and are required to avoid any activity that might lead to or suggest a breach of this Policy. All Board of Directors and employees of BPHB Group are responsible for the prevention, detection and reporting of any bribery and other forms of corruption in the Group.
- 21.2 Employees of BPHB Group shall as soon as possible notify the Head of Division/Department or the IO should he/she suspects or believes that a breach of this Policy has occurred or may occur in the future.

## **22.0 RECORD KEEPING**

- 22.1 BPHB Group shall ensure and keep all financial records, all expenses claims relating to entertainment, gifts and have appropriate internal controls in place which will be the evidence for any payments made to third parties.

<b>BINTULU PORT HOLDINGS BERHAD LEVEL I</b>	<b>DOC NO</b>	<b>IMS-BPHB-GLC- POLICY-01</b>
	<b>REVISION</b>	<b>01</b>
<b>POLICY</b>	<b>ISSUE DATE</b>	<b>1 MARCH 2026</b>
	<b>PAGE</b>	<b>18 of 18</b>

**23.0 FURTHER CLARIFICATIONS**

- 23.1 Should you require further clarification with regards to this ABC Policy, depending on the subject concerned, you may consult the GICD or alternatively you can email any queries to [integrity@bintuluport.com.my](mailto:integrity@bintuluport.com.my)