

LANDMARKS

LANDMARKS BERHAD

Registration No: 198901007900 (185202-H)

T. R. U. S. T. POLICY TO COMBAT BRIBERY AND CORRUPTION (ANTI BRIBERY MANAGEMENT SYSTEM)

Approved by Board of Directors
on 29 May 2020

TABLE OF CONTENTS

BRIBERY AND CORRUPTION POLICY STATEMENT	4
T. R. U. S. T. POLICY	5
PRINCIPLE I: TOP LEVEL COMMITMENT	5
1.1 TOP MANAGEMENT: CHIEF EXECUTIVE OFFICER (“CEO”) STATEMENT	5
1) <i>Commitment for an ABMS</i>	5
2) <i>Application of Country Legislation</i>	5
3) <i>Governance, Integrity and Anti-Corruption Centre (“GIACC”) Requirements</i>	5
4) <i>T.R.U.S.T.</i>	6
5) <i>Setting Up ABMS And T.R.U.S.T.</i>	6
PRINCIPLE II: RISK ASSESSMENT	6
2.1 BRIBERY RISK ASSESSMENT (“BRA”) PROCESS	6
1) <i>Objectives</i>	6
2) <i>BRA Report</i>	7
3) <i>BRA Process Flow</i>	7
2.2 BRA METHODOLOGY.....	7
1) <i>Commencement by Management</i>	7
2) <i>Identify General Bribery Risks</i>	7
3) <i>Identify Mitigating Controls, Net Risk, Response & Action Plan</i>	7
4) <i>Populating Risk Matrix Chart</i>	8
5) <i>CEO & Top Management’s Review and Confirmation of Action Plans</i>	8
PRINCIPLE III: UNDERTAKE CONTROL MEASURES	8
3.1 LANDMARKS’ ANTI-BRIBERY AND CORRUPTION POLICY	8
3.2 AUDIT AND COMPLIANCE.....	9
3.3 SANCTIONS FOR NON-COMPLIANCE.....	9
3.4 MONITORING AND CONTINUOUS IMPROVEMENT	10
3.5 DUE DILIGENCE.....	10
3.6 POLICY FOR REPORTING CONCERNS (WHISTLEBLOWING)	12
3.7 POLICY ON CONFLICTS OF INTEREST	13
3.8 POLICY AND PROCEDURES FOR GIFTS, ENTERTAINMENT, HOSPITALITY AND TRAVEL.....	13
1) <i>Anti-Corruption Commitment</i>	13
2) <i>Receiving Gifts</i>	13
3) <i>Giving Gifts</i>	14
4) <i>Giving and Receiving Hospitality</i>	15
5) <i>Government Officials</i>	15
6) <i>Non-Compliance</i>	15
3.9 POLICY ON DONATIONS, SPONSORSHIPS AND POLITICAL DONATIONS	15
3.10 POLICY ON FACILITATION PAYMENTS.....	16
3.11 POLICY ON FINANCIAL CONTROLS	16
3.12 POLICY ON NON-FINANCIAL CONTROLS	17
3.13 POLICY FOR DOCUMENT CONTROL AND RECORD KEEPING.....	17
3.14 POLICY FOR ANTI-MONEY LAUNDERING	17

PRINCIPLE IV: SYSTEMATIC REVIEW, MONITORING AND ENFORCEMENT18

4.1 POLICY AND PROCEDURES ON MONITORING, REVIEWING AND ENFORCING THE ABMS..... 18

PRINCIPLE V: TRAINING AND COMMUNICATION18

5.1 LANDMARKS' ABMS TRAINING POLICY 18

5.2 LANDMARKS' ABMS TRAINING MATRIX TEMPLATE 19

5.3 ABMS COMMUNICATIONS POLICY 20

5.4 LANDMARKS' ABMS COMMUNICATIONS PROGRAMME 20

Objective: To raise awareness on Landmarks' ABMS 20

Bribery and Corruption Policy Statement

Landmarks Berhad's policy is that bribery and corruption ("*bribery*") in all its forms as it relates to the Company's activities have always been strictly prohibited.

The Company is committed by its Code of Ethics and Conduct as revised and approved by the Board of Directors on 29 May 2020 to cultivate a high standard of ethical conduct and integrity in its business operations in whichever country it operates by establishing adequate policies and practices to prevent bribery in compliance with country laws. With this T.R.U.S.T.* Policy the Company integrates the five characteristics namely T.R.U.S.T., as promoted by the Governance, Integrity and Anti-Corruption Centre: *Guidelines on Adequate Procedures* to be an integral part of the Company's Anti Bribery Management System ("ABMS") it sets up.

(*T.R.U.S.T. means: Top Level Commitment

Risk assessment

Undertake control measures

Systematic review, monitoring & enforcement

Training & communication)

The Company's ABMS will set up the lines of authority, its effectiveness will be periodically reviewed as it identifies bribery risks and the measures or procedures that may be needed to be put in place for appropriate action to be taken to contain or eliminate such bribery risks identified.

With this T.R.U.S.T. Policy and through the Company's ABMS, it can move towards greater governance and transparency as well as assurance of sanctioned commitments and strategies to uphold and strengthen its business integrity.

This T.R.U.S.T. Policy and the Company's ABMS will continuously inculcate awareness about our anti bribery policy and practices to all our personnel, clienteles, business associates and to the world at large.

This T.R.U.S.T. Policy forms the corner stone for the Company's ABMS to prevent bribery from pervading in the Company and its operations in whichever country it operates in. The Company will use the 5 principles of T.R.U.S.T as set out below to implement and drive the Company's ABMS.

T. R. U. S. T. POLICY

PRINCIPLE I: TOP LEVEL COMMITMENT

1.1 Top Management: Chief Executive Officer (“CEO”) Statement

1) Commitment for an ABMS

The Board of Directors of Landmarks Berhad (“*Landmarks*” or “*the Company*”) has directed the CEO to implement an ABMS for the Company.

The CEO through the Anti-Bribery and Corruption Officer (“*ABAC Officer*”) takes the primary responsibility for the establishment and effectiveness of ABMS and the adequate procedures to establish T.R.U.S.T. for the protection of Landmarks and the Board.

2) Application of Country Legislation

- a) Landmarks is committed to conducting its business ethically and in compliance with all applicable laws and regulations in the countries where it conducts its business.
- b) In Malaysia generally the relevant laws for an ABMS to address will be the Penal Code (Act 574), the Anti-Corruption Commission Act 2009 (Act 694) and the Companies Act 2016 (Act 777) and their respective amendments.

For Singapore, it will be their Penal Code (Chapter 224), Prevention of Corruption Act (Cap 241) and the Companies Act (Cap 50 2006 Rev Ed) and their applicable amendments.

For Indonesia, we will be concerned with the Criminal Code (revised 1999), Anti-Corruption Act Law (Law No. 11 of 1980), Eradication of Criminal Acts of Corruption (Law No. 31 of 1999), Case Handling Procedures for Corporate Crimes (Supreme Court Regulation No. 13 of 2016) and Limited Liability Companies (Law No. 40 of 2007) and their respective amendments.

In essence all these relevant country laws prohibit fraud, bribery and acts of corruption, and mandate that companies establish and maintain accurate books and records and sufficient internal controls.

- c) Landmarks recognises that in the event of a conflict between policies and principles contained in this and other policies or Standard Operating Procedures (“SOPs”) of the Company with a country law, the mandatory country laws where the Landmarks Group operates shall always prevail and applied within that country’s jurisdiction without however invalidating or affecting the legal efficacy of the remaining provisions that are not inconsistent with or prohibited by the country law.

3) Governance, Integrity and Anti-Corruption Centre (“GIACC”) Requirements

The characteristics for an ABMS is as set out in section 4.1.3 of the GIACC: *Guidelines on Adequate Procedures*, which requires the Company to:

- a) Practice the highest level of integrity and ethics;

- b) Comply fully with the applicable laws and regulatory requirements on anti-bribery and corruption (“*anti-corruption*”);
- c) Effectively manages the key bribery and corruption (“*bribery*”) risks of the Company; and
- d) Implement adequate procedures to establish and maintain T.R.U.S.T. for the protection of the Company and the Board.

4) T.R.U.S.T.

In order to have adequate procedures for establishing T.R.U.S.T., the Board requires that Landmarks:

- a) Establishes, maintains and periodically reviews its ABMS which includes clear policies and objectives that adequately address bribery risks;
- b) Promotes a culture of integrity within the Company;
- c) Conducts bribery risk assessments at least once a year or when instructed by the CEO;
- d) Issues instructions on communicating Landmarks’ policies and commitments to anti-corruption both internally and externally or implementation of ABMS;
- e) Encourages the use of reporting/whistleblowing channels in relation to real or suspected bribery incidences, or inadequacies in the ABMS;
- f) Assigns and adequately resources a competent person as ABAC Officer to be responsible for anti-corruption compliance, including advice and guidance;
- g) Ensures that the lines of authority for the person responsible for ABMS are appropriate for reporting to the CEO, Top Management, Board of Directors and relevant management; and
- h) Ensures that the results of any audit, review on risk assessment, control measures and performance are reported to the CEO, Top Management, Board of Directors and relevant management.

5) Setting up ABMS and T.R.U.S.T.

The memo issued by the CEO on 1st June 2020 kicks start the top-level commitment of the Company to set up the ABMS with the T.R.U.S.T. provisions for the Company’s implementation by the appointment of the ABAC Officer.

PRINCIPLE II: RISK ASSESSMENT

2.1 Bribery Risk Assessment (“*BRA*”) Process

1) Objectives

The objectives of the BRA are:

- To identify, measure and rank critical bribery risks in the Company that has the potential impact over the overall operations and management of Landmarks using a structured approach in line with the size of the Company.

- Platform to confer and decide on bribery prevention solutions and implementation plans.

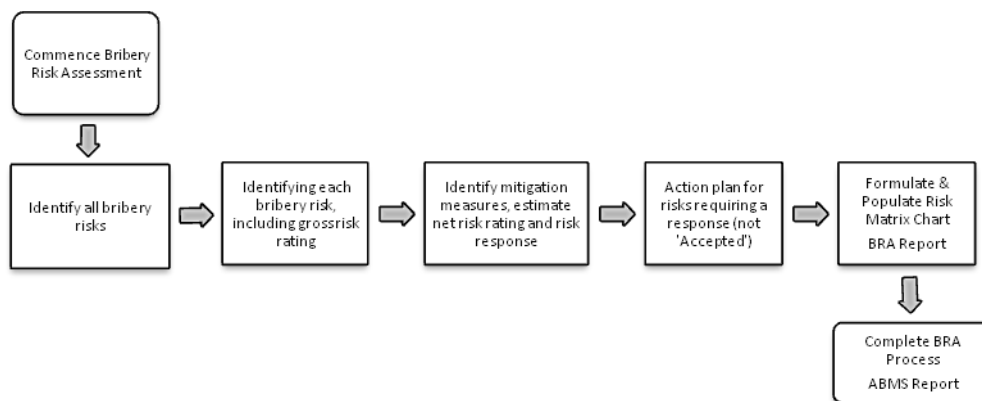
2) BRA Report

The BRA Report will be the basis upon which Landmarks' ABMS will be formulated to address. BRA shall be conducted at least once in every three (3) yearly period or as directed by the CEO for producing the BRA Report. BRA shall be for determining:

- Opportunities for bribery arising from system weaknesses;
- Supply chain bribery opportunities (inbound and outbound);
- Financial transactions used as subterfuge for bribery payments;
- External parties (business associates / agents) with corruptive practices repute; and
- High-risk business activities;

3) BRA Process Flow

The BRA process below shall be used by the Company to conduct its BRA to produce the BRA Report:



2.2 BRA Methodology

1) Commencement by Management

All BRA exercises shall be commenced by the CEO's directive and will be managed by Heads of Departments assisted by the ABAC Officer.

2) Identify General Bribery Risks

The main areas of bribery risk carried by the Company's business shall be identified and will be identified as they arise (using the *Bribery Risk High-Level Assessment* template). Information established by the initial high-level assessment will then be used to begin populating the bribery risk matrix chart templates (*BRA Matrix Chart* template) and it will be further developed and expanded as new risks are identified.

3) Identify Mitigating Controls, Net Risk, Response & Action Plan

For each bribery risk identified, the mitigating controls are logged. An estimate is then made on the effectiveness of the controls, which in turn is used to estimate the net risk

rating. From this, the risk is either acceptable risk and if not accepted a treatment will have to be identified for which the action plan can be developed.

4) Populating Risk Matrix Chart

Using the net risk rating, the bribery risks identified are placed on the below risk matrix chart to show the exposure of the Company to bribery risk.

Risk Matrix Chart: 5 x 5

		Moderate	Major	Major	Critical	Critical
	Critical (5)	Moderate	Major	Major	Critical	Critical
	Major (4)	Minor	Moderate	Major	Major	Critical
	Moderate (3)	Minor	Moderate	Moderate	Major	Major
	Minor (2)	Minor	Minor	Moderate	Moderate	Major
	Insignificant (1)	Insignificant	Minor	Minor	Minor	Moderate
		Low (1)	Medium (2)	Possible (3)	High (4)	Almost Certain (5)
		LIKELIHOOD				

5) CEO & Top Management’s Review and Confirmation of Action Plans

The completed BRA Report with the templates and risk matrix chart are presented to the CEO and Top Management to confirm the data or modify the recommended action plans. Responsibilities for carrying out the action plans are then allocated to the relevant personnel of the Company with time-line for implementation as appropriate.

The CEO may give instructions for a BRA Report to be reviewed and refreshed by Heads of Departments assisted by the ABAC Officer at least once every twelve (12) months and for the results of the BRA be compiled into a new BRA Report.

The results of the BRA and action plans as adopted by CEO from the BRA Report shall be compiled to be called **Landmarks ABMS Report** to be laid before the Board.

PRINCIPLE III: UNDERTAKE CONTROL MEASURES

3.1 Landmarks’ Anti-Bribery and Corruption Policy

- 1) Landmarks’ policy is that bribery in all its forms as it relates to the Company’s activities is strictly prohibited.
- 2) Bribery may take the form of anything of value, such as money, goods, services, property, privilege, employment position or preferential treatment. Landmarks’ personnel

and its business associates shall not therefore, whether directly or indirectly, offer, give, receive or solicit any item of value, in the attempt to illicitly influence the decisions or actions of a person in a position of trust within an organisation, either for the intended benefit of the Company or the persons involved in the transaction.

- 3) The anti-corruption policy applies equally to its business dealings with commercial ('private sector') and Government ('public sector') entities. Even the possible appearance of bribery is to be avoided, in particular when dealing with Government officials.
- 4) Landmarks is committed by its Code of Ethics and Conduct as revised and approved by the Board of Directors on 29 May 2020 to conducting its business ethically and in compliance with all applicable anti-corruption laws and regulations in every country where we do business. The anti-corruption policy therefore applies to all countries worldwide, without exception and without regard to regional customs, local practices or competitive conditions.
- 5) The Company shall conduct regular bribery risk assessments to identify the bribery risks affecting the business, set anti-corruption objectives, and assess the effectiveness of the controls in achieving those objectives.
- 6) No personnel or external party will suffer demotion, penalty or other adverse consequences in retaliation for refusing to pay or receive bribes, or participate in other illicit behaviour, even if such refusal may result in the Company losing business or experiencing a delay in operations.
- 7) In the course of their employment at Landmarks any personnel who encounters actual or suspected violations of this policy are required to report their concerns using the available reporting channels. Reports made in good faith, either anonymously or otherwise, shall be addressed in a timely manner and without incurring fear of reprisal regardless of the outcome of any investigation.
- 8) Retaliation in any form against personnel where the person has, in good faith, reported a violation or possible violation of this policy is strictly prohibited. Any Landmarks' personnel found to have deliberately acted against the interests of any person who has in good faith reported a violation or possible violation of this policy shall be subjected to disciplinary proceedings including demotion, suspension, dismissal or other actions (including legal action) which the Company may pursue. The same policy applies to external parties who have reported a violation or possible violation of this policy.

3.2 Audit and Compliance

Regular audits shall be conducted to ensure compliance to this policy. Such audits may be conducted internally by the Company or by an external party. Audit documentation shall include performance improvement action plans. The results of audits and recommendations shall be reported to the CEO, Top Management and Board of Directors as appropriate.

3.3 Sanctions for Non-Compliance

- 1) Non-compliance as identified by the audit and any risk areas identified through this and other means shall be reported to the CEO, Top Management and/or Board of Directors in a timely manner in accordance with the level of risk identified.
- 2) Landmarks regards acts of bribery as serious matters and will take immediate remedial measures in the event of discovery of non-compliance of this policy. For personnel, non-

compliance may lead to disciplinary action up to termination of employment including civil and/or criminal action.

- 3) For external parties, non-compliance may lead to action being taken including termination of contract. Further legal action civil and/or criminal may also be taken in the event that the Company's interests have been harmed by the results on non-compliance by individuals and organisations.

3.4 Monitoring and Continuous Improvement

- 1) Landmarks is committed to continuously improve the operations and effectiveness of its anti-corruption initiatives and policy.
- 2) The Company shall monitor its operating environment, identify changes in bribery risk, and seek opportunities for improving its anti-corruption measures and policy.
- 3) The CEO and Top Management shall ensure through regular assessments of the anti-corruption measures to ensure its scope, policies, procedures and controls match or can mitigate the bribery related risks faced from time to time by the Company.
- 4) Landmarks endeavours to impact the business environment where it operates. This includes supporting initiatives and measures in conjunction with the private and public sectors which are likely to improve and support the integrity of its operating environment.

3.5 Due Diligence

1) Purpose

The essential requirement of due diligence is to have an insight of one's partner or when working with business associates to achieve the necessary outcome. Due diligence in BRA is conducted in order to assess the nature and extent of bribery risks arising from relationships being initiated or on-going with specific categories of business associates, officials or persons in certain positions before committing into any serious business relationship.

2) Due Diligence Process

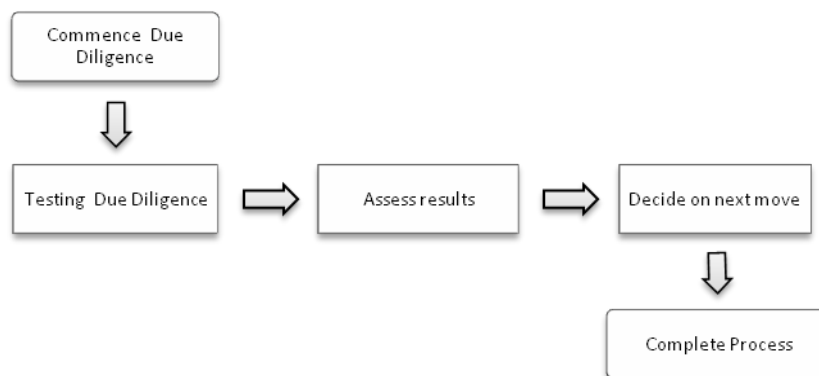
- 1) The due diligence process should be aimed at obtaining sufficient information in order to assess the bribery risks posed by certain activities/projects/transactions, business associates, officials or personnel potential or for promotion where a **more than minor bribery risk has been identified**.
- 2) a) Due diligence on personnel for bribery risk shall be conducted on:
 - i. All personnel when joining the Company;
 - ii. Before appointment / promotion to any management position (or when already in management);
 - iii. Before appointment to a position which involves working with external parties (vendor/supplier/contractor, clients/customers government agencies); and
 - iv. If a senior personnel considers it prudent to do a due diligence.
- b) Due diligence on personnel is conducted to:
 - i. Verify the accuracy of a prospective personnel's qualifications and personal/business reputation;

- ii. Obtaining satisfactory references from a personnel's former employers, business associates or bankers; and
 - iii. Taking reasonable steps to ascertain if the personnel have been involved in bribery by for example checking with the prospective personnel's former place of employment or search with CTOS Service Centre, Official Assignee Department, Police Diraja Malaysia ("PDRM"), Malaysian Anti-Corruption Commission ("MACC"), Trade or other Associations he maybe a member of or Web search.
- 3) a) In the Company's course of business or dealings due diligence based on bribery risk should normally be triggered in the following instances:
- i. Bidding for a major project > RM100,000;
 - ii. To be employed as an agent or intermediary when dealing with government departments or officials
 - iii. Sales agency where the commission is derived from a significant percentage of the sale value (< 5%);
 - iv. Procurement of hardware or goods or supply in aggregate is worth >RM100,000;
 - v. Where a senior personnel considers it prudent to do a due diligence.
- b) For due diligence based on bribery risk to be conducted on an organisation corporate or otherwise, these are factors that may be considered by the Company, such as:
- i. The credibility of a corporate business associate, as demonstrated by indicators such as Corporate registration documents (Form 9) or annual filed accounts/returns. In the case of any other organisation, at the Registrar of Societies or the enabling body that forms or is in charge of the organisation. Including the involvement in shady business or practices or from a search done at CTOS Service Centre
 - ii. The identity of shareholders and top management of the business associates, and whether they have a shady reputation, or have been investigated or convicted for bribery, fraud, dishonesty, or similar misconduct;
 - iii. It has been subject of investigation, conviction, sanction or debarred for bribery or similar criminal conduct; and
 - iv. Enquiries with or references from Trade or other Associations which it is a member.
- c) For due diligence based on bribery risk of a business associates (partners, sole proprietorship or person) will be conducted using the following methods:
- i. Check the accuracy of a prospective person's qualifications or business reputation;
 - ii. Obtaining satisfactory references from a prospective person's former employers or business associates or bankers; and
 - iii. Taking reasonable steps to ascertain if prospective person have been involved in bribery or shady practices by for example checking with the prospective person's former place of employment or search with CTOS

Service Centre, Official Assignee Department, PDRM, MACC, Trade or other Associations he may be a member of or Web search.

- 4) Head of Department to assess results and make decision:
 - a) Continue with appointment
 - b) Cease appointment
 - c) Terminate relationship
 - d) Obtain further information
- 5) Determine next steps and relevant parties:
 - a) Procurement / legal advisor / DD service provider
 - b) Consult CEO, Top Management or Board
- 6) Though there is no one methodology for carrying out a due diligence check, generally speaking, the due diligence process used should be able to:
 - a) Identify the party that will undergo a due diligence check;
 - b) Conduct a probing check; and
 - c) Give informative results to help decide on the next step: continue / not deal / put on hold pending further investigation.
- 7) The results of the due diligence checks should be recorded and kept for the duration of the business relationship.

A Due Diligence flow chart:



3.6 Policy for Reporting Concerns (Whistleblowing)

1) Whistleblowing Policy

The Whistleblowing Policy as approved by the Board of Directors 19 November 2018 and any revised Whistleblowing Policy where applicable shall be used as the channel for reporting and investigation of report of any misconduct including bribery.

3.7 Policy on Conflicts of Interest

1) Definition of “Conflicts of Interest”

Conflicts of interest arise where a person has an involvement amongst other things such as a family relationship, company shareholding, employment position or partnership which brings their personal interests into conflict with the best interests of the Company they work for.

2) Avoidance

- a) Directors and employees should avoid engaging in real or apparent conflict of interest situations, whether directly or indirectly, between themselves as individuals and the interest of the Group. Directors and employees must not use their position or knowledge gained in the course of their duties or employment for private or personal advantage, directly or indirectly.
- b) A Director or an employee shall avoid any situation in which the Director or employee has an interest in an entity or matter that may influence the Director or employee’s judgment in the discharge of his/her responsibilities.

3) Declaration and Disclosure

- a) All personnel are required to declare any conflict of interest, actual or potential, as soon as they become aware of it.
- b) Conflicts are to be declared to the personnel’s Head of Department or immediate manager, who will discuss the matter with the CEO, Top Management and Board of Directors, and take appropriate action.
- c) The HR Manager shall make a record of disclosed conflicts of interest for future reference.
- d) Prospective personnel are to disclose all conflicts of interest with the Company during the hiring process so they can be discussed with the hiring Head of Department or Manager.

3.8 Policy and procedures for Gifts, Entertainment, Hospitality and Travel

1) Anti-Corruption Commitment

Landmarks reiterates that it is committed to conducting business with integrity. This means avoiding practices of bribery of all forms in the Company’s daily operations.

2) Receiving Gifts

- a) Personnel are prohibited from directly or indirectly, soliciting for, receiving any gifts, free service, kickbacks or guarantees in any form (*gift*) that may compromise their judgement and decision making.
- b) Any gift offered by an external party that is of significant value should be politely declined and returned without offending or disrupting the business relations with the

giver, with the explanation that acceptance of the gift is not permitted under the Company's policy.

- c) **Exceptionally** only the following may be received by personnel:
- i. **Corporate gifts** of insignificant value (defined as less than RM500), such as diaries, pens, calendars and notebooks.
 - ii. **An item or set of different items available for random distribution to every participant** of an official function such as a door gift provided that the items are of insignificant value.
 - iii. **Festive hampers and other perishable goods of market value of less than RM500 in total for the package.** Provided that such items must be delivered to the office and distributed amongst the recipient's team. The donor organisation should not be disclosed if at all possible.
 - iv. **Gifts given at an official event** where refusal would be offensive, e.g. for an active role beyond attending a conference, or where the donor is very insistent. Such gifts must be declared to the recipient's Head of Department, who will decide whether the gift can be retained by the recipient or kept by the Company. In doubt refer to the CEO.
- d) Under no circumstances may any personnel accept gifts in the form of cash or cash equivalent or in any other form, including but not limited to:
- i. Cash, commission, cheques, loans, credits cards in any currency, lottery tickets, coupons or gift vouchers of any kind;
 - ii. Shares/equity interest in any registered company;
 - iii. Personal discounts or perks not offered generally;
 - iv. Awards or prizes of any significant value (> RM500);
 - v. Trade point cards of any retailer;
 - vi. All other gifts from external providers; and/or
 - vii. Provision of labour service and with or without materials and installation thereof; which might be perceived to influence the behaviour of the recipient.
- e) Family members of personnel are strictly prohibited from receiving gifts by virtue of the personnel's standing/relationship alone and not arising from family member's own business dealings or standing from any external providers having financial dealings with the Company, where the provision of the gift may influence the actions of the personnel in the course of performing their duties for the Company.

3) Giving Gifts

- a) Personnel are expected to exercise good judgement when offering gifts to external parties. Gifts should not be excessively extravagant, and must not be given with corrupt intent. Gifts should be given openly and transparently, and feature company branding, where possible.
- b) Giving of gifts should not be done frequently and/or during specific time periods, such as during tenders or contract negotiations, to ensure that no influence is exerted on the decision-making process.

- c) Personnel are to ensure at all times that the gesture of giving will not contravene or that the recipient complies with his company's SOP or country law that regulates his receipt of the personnel's gift.

4) Giving and Receiving Hospitality

- a) The practice of giving and receiving reasonable and proportionate hospitality is regarded as a normal business activity. Hospitality may take many forms, but generally it consists of **meals, travel or transportation, accommodation and recreation**.
- b) Hospitality given and received by personnel who have interactions with external parties as part of their role should be clearly related to the business between both parties. It should not be received or given so frequently that questions might be raised on the intentions or integrity of the giver or receiver, and not be so lavish as to indicate the corrupt intent is involved. When in doubt refer to your Head of Department or CEO.
- c) Personnel are absolutely prohibited from either paying for or participating in any activities that might bring the Company into disrepute. Such activities include lavish or immoral entertainment activities such as gambling, hostess entertainment, karaoke with the presence of guest relations officers or their equivalent, massages, unregulated violent sports, illicit drugs and intoxication by alcohol.
- d) Personnel are free to accept hospitality from friends and relatives, provided the hospitality does not influence their actions in any way in the course of performing their duties with the Company. If hospitality is provided which might influence (or appear to influence) the actions of the person, they should discuss the matter with their Head of Department or CEO and if necessary, make a conflict of interest declaration.

5) Government Officials

In the event that personnel are hosting Government officials, care must be taken to ensure that the hospitality provided is acceptable to their Government's SOP or if none, must be reasonable and proportionate and does not generate a sense of obligation towards the Company.

6) Non-Compliance

Non-compliance to this policy will be considered as a major misconduct and the personnel involved will be subjected to disciplinary action, which may include dismissal. The offence may also be escalated to concurrent action by the relevant enforcement authorities and claim by the Company.

3.9 Policy on Donations, Sponsorships and Political Donations

- 1) Landmarks takes its responsibility to the wider community seriously and provides both financial and non-financial support for recognised causes as part of its corporate social responsibility. However, it is noted that such donations and benefits may be abused by certain parties as a subterfuge for bribery or wrongdoing.
- 2) Requests for donations and sponsorships should be subject to a simple due diligence check using a web search to ensure the legitimacy of the recipient organisation.

- 3) Landmarks does not make financial or in-kind contributions to political parties, political party officials or candidates for political office. Use of the Company's facilities, equipment and resources by political parties for any political campaign or political party function is not permitted.
- 4) Donations may only be made by decision of the Top Management. Donations must be made to the official bank account of the receiving party and a receipt obtained. Provision of non-financial support such as venues, vehicles, sound equipment etc. at the Company's expense should be invoiced and receipt given for payment made for the record.

3.10 Policy on Facilitation Payments

- 1) A "**facilitation payment**" is defined as 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. Although such payments are customary under certain circumstances, the laws of many countries, including Malaysia, prohibit it.
- 2) Landmarks has a zero-tolerance policy for the use of facilitation payments in relation to its business operations. This policy prohibits its use by either Landmarks' personnel or business associates acting on behalf of the Company.
- 3) Personnel are expected to notify the Head of Department or CEO when they encounter any requests for a facilitation payment. In addition, if a payment has been made and personnel are unsure of the nature, the Head of Department or CEO must be notified immediately, and the payment recorded accordingly.
- 4) Only in the event that a personnel's security is at stake is it permitted to make such payment. The personnel involved must immediately report the incident to the Head of Department or CEO and to record the details and keep a record of what was spent.

3.11 Policy on Financial Controls

- 1) Financial controls are the management systems and processes implemented by an organisation to manage its financial transactions properly and to record these transactions accurately, completely and in a timely manner.
- 2) The Company shall put the necessary financial controls in place in order to ensure its financial transactions are properly processed and recorded to prevent the occurrence of bribery.
- 3) The Company shall ensure the separation of duties, so that the same person cannot both make requisition and approve/make a payment and better still another separate party to receive delivery of the item ordered.
- 4) The Company shall have in place tiered levels of authority for payment approval and cheque signatories. In practice, this means that larger transacted amounts require different levels of management or even Board's approval.
- 5) Cash is the common means for payment of bribes because it is difficult to trace as to when and how it is disbursed. Therefore, the Company requires that the use of cash in daily operations is restricted to the minimum as allowed by anti-money laundering provisions, with a full record of receipts maintained for all cash payments.
- 6) In general, personnel reimbursements for expenditure on behalf the Company shall only be made on production of official receipts provided handwritten receipts are always discouraged.

- 7) The categorisation and descriptions of all payments and transactions shall be accurately and clearly recorded in the Company's accounts, in line with existing applicable legislation, accounting principles and internal controls.
- 8) Periodic financial audits at regular intervals will be scheduled to be carried out by an independent person or organisation in accordance with the Companies Act or relevant regulatory authority.

3.12 Policy on Non-Financial Controls

- 1) Non-financial controls are the management systems and processes implemented by the organisation to help it ensure that the procurement, operational, commercial and other non-financial aspects of its activities are being properly managed.
- 2) The Company is committed to implementing the necessary non-financial controls to mitigate any bribery risks that may arise through the procurement process.
- 3) Where possible and reasonable, the Company should award contracts through a competitive process of having a minimum of three (3) quotes or by public tender, on the basis of the best value for money, quality or competency.
- 4) Landmarks holds a policy of separation of duties, such that wherever practical, the operational personnel / departments ordering the procurement of goods and services are kept separate from personnel/departments making payment and/or receiving the order.

3.13 Policy for Document Control and Record Keeping

- 1) It is important for the Company to maintain records on the controls used for maintaining the adequate procedures.
- 2) Policies and procedures should be documented and stored in a secure location with restricted access to making changes.
- 3) Records arising from the implementation of procedures (i.e. due diligence checks, conflicts of interest declarations, etc.) must be kept in a safe place, and backed up regularly.
- 4) Landmarks through the ABAC Officer has overall responsibility for the document control, record keeping and safe-keeping of anti-corruption related documents.
- 5) The ABAC Officer shall monitor and check the condition of the documents and records at the filing locations periodically to prevent damage, deterioration or loss.

3.14 Policy for Anti-Money Laundering

The Anti-Money Laundering Policy as approved by the Board of Directors on 26 February 2020 and any revised Anti-Money Laundering Policy where applicable will apply to any incidences of money laundering arising from bribery or misconduct.

PRINCIPLE IV: SYSTEMATIC REVIEW, MONITORING AND ENFORCEMENT

4.1 Policy and procedures on Monitoring, Reviewing and Enforcing the ABMS

- 1) The ABAC Officer will on behalf of the CEO ensure that regular reviews are conducted to assess the performance, efficiency and effectiveness of the ABMS, and to ensure the ABMS of the Company is in place and enforced. The reviews will form the basis of any efforts to improve the existing ABMS by updating and reinforcing anti-corruption controls and measures of the Company.
- 2) Under this policy, the Company is committed to:
 - a) plan, establish, implement and maintain the ABMS as an effective bribery risk-based monitoring programme, which covers the scope, frequency, and methods for review;
 - b) identify and resource competent person(s) to perform an internal audit, in relation to the Company's anti-corruption measures;
 - c) conduct continual evaluations and improvements on the Company's policies and procedures in relation to bribery;
 - d) consider an external audit by a qualified and independent third party at least once every three (3) years to obtain assurance that the Company is operating in compliance with its policies and procedures applicable to bribery;
 - e) monitor the compliance of personnel of any anti-corruption policies and procedures to ensure their understanding and deference with the Company's stance when performing their respective roles and functions; and
 - f) enforce the ABMS through disciplinary proceedings and action against personnel found to be in defiance of the ABMS.
- 3) The results of reviews and audits in the BRA Report shall be reported to the CEO and Top Management and then as the Landmarks ABMS Report to the Board of Directors for consideration and implementation of the recommendations.
- 4) ABMS Audit Plan
Landmarks' ABMS audit plan will be developed in due course.

PRINCIPLE V: TRAINING AND COMMUNICATION

5.1 Landmarks' ABMS Training Policy

- 1) The Company shall conduct adequate training to ensure all personnel exposed to bribery risks are made aware of Landmarks' policies and procedures set out in the policies of its ABMS.
- 2) Where relevant, training may also be provided for such business associates to minimise the Company's exposure to bribery risk such as agents, intermediaries and others acting on behalf of the Company.

- 3) Vendor/supplier/contractors procuring goods and services to the Company may also receive training if deemed appropriate.
- 4) Training for personnel considered to be in high-risk positions should be done at least once every twelve (12) months, with a record kept of training provided and attendance. Training should be tailored to the role and include examples of likely bribery scenarios.

5.2 Landmarks' ABMS Training Matrix Template

ADEQUATE PROCEDURES TRAINING & AWARENESS PROGRAMME						
No.	Program	Title	Content	Duration	Date	Venue
1	Briefing for Directors and Top Management	Briefing on Corruption, Anti-Money laundering, Company law compliance and Adequate Procedures	<p>Background: corporate liability generally and director's/top management parallel liability</p> <p>Results of bribery risk assessment (Risk matrix)</p> <p>Summary of all main polices listed in Adequate Procedures section 4.3</p> <p>Review, monitoring & enforcement plan</p> <p>Training & communication plan</p>	1 1/2 - 3 hours	By 31 st December 2020	Malaysia/ Singapore/ Indonesia
2	Conduct workshops for a) introductory awareness for all Depts b) specifically for high risk departments: Procurement, Sales & Marketing / Government liaison staff	Briefing on Corruption, Anti-Money laundering, Company law compliance and Adequate Procedures	<p>Background: corporate liability & employee level parallel liability</p> <p>Summary of relevant polices: Anti-corruption policy; conflicts of interest; gifts, entertainment etc; facilitation payments; reporting channel.</p> <p>Scenarios / role playing: how might this affect your department?</p> <p>Specific measures for high risk Depts</p>	2 - 4 hours	By 31 st December 2020	Malaysia/ Singapore/ Indonesia
		Procurement & Contract	Background: corporate liability	2-4 hours	By 31 st December	Malaysia/ Singapore/

ADEQUATE PROCEDURES TRAINING & AWARENESS PROGRAMME						
No.	Program	Title	Content	Duration	Date	Venue
		Management	Summary of relevant polices: Anti-corruption policy; conflicts of interest; gifts, entertainment etc; facilitation payments; reporting channel. Scenario: how might this affect your department?		2020	Indonesia
3	Conduct general staff awareness training	Briefing on Adequate Procedures and Code of Ethics & Conduct	Background: corporate liability Summary of polices listed in Adequate Procedures section 4.3 Scenario for discussion	1 hour	By 31 st December 2020	Malaysia/ Singapore/ Indonesia
		Briefing on Adequate Procedures and Code of Ethics & Conduct				
4	Optional: conduct briefing for business associates (suppliers / vendors)	Briefing on Landmarks' ABMS	Vendor briefing as and when opportunity arises.	N/A	N/A	N/A

5.3 ABMS Communications Policy

- 1) The CEO/ABAC Officer will ensure that communications are frequently conducted both internally and externally to widely disseminate Landmarks' ABMS.
- 2) Communications will include information on key policies and procedures, including anti-corruption policy; conflicts of interest; gifts, entertainment etc; facilitation payments and reporting channel.
- 3) Communication channels may include personal briefings, email, Internet/intranet, web-based video conferencing tool (Zoom), face-to-face briefings, phone calls etc.

5.4 Landmarks' ABMS Communications Programme

Objective: To raise awareness on Landmarks' ABMS

- 1) General understanding and awareness on integrity and Landmarks' ABMS;
- 2) More detailed information on specific items; and

3) Where to obtain further help and information.

No.	SUBJECT	MEANS	ATTENDEES	BY	TIMING	LANGUAGES
1	The importance of integrity for Landmarks, with information on its ABMS - message from Top Management - why ABMS is needed, - our Code of Ethics & Conduct - what it will do for Landmarks - main policies - location of documentation (policies & procedures) - implications for participating in bribery - where to obtain help and further information	Team Briefings Email blasts Online Information (Zoom / Internet) Printed materials Vendor communications	Internal & external parties	CEO/A BAC Officer	At launch of ABMS	English Bahasa Malaysia Bahasa Indonesia Chinese
2	Bulletin updates - updates on policies and procedures - incidents in the news - case studies	Email blast Team Briefings Information Centre (Zoom / Internet)	Internal parties	CEO/A BAC Officer	6 months after launch of programme	English Bahasa Malaysia Bahasa Indonesia Chinese
3	Briefing for contractors and vendors Includes: - Guidelines on gifts & hospitality - Information on whistleblowing	Email blast Information Centre (Zoom / Internet)	Contractors/ suppliers / vendors, Strategic Business Partners	CEO/A BAC Officer	Vendor briefing As and when opportunity arises	English Bahasa Malaysia Bahasa Indonesia Chinese