



TOYO INK GROUP BERHAD

ANTI-BIRBERY AND ANTI CORRUPTION POLICY

1. Introduction

The Group is committed to conduct our business to the highest level of integrity and ethical standards. The Group adopted a Zero-tolerance principle toward any act or forms of bribery and corruption and will comply with all the applicable laws and regulations in the countries where we do our businesses.

2. Objectives

The objective of the Anti-Bribery and Corruption Policy (“ABAC Policy”) is for the Group including all the subsidiaries and branches to comply with the laws and regulations in relation to bribery and corruption and to provide the guidance to all the employees of the Group, Directors, business Partners, Suppliers and any relevant Third Parties on how to recognise and deal with any bribery or corruption matters.

3. Scope and applicability

This policy applies to all Employees including the Directors of the Group, Business Partners, Suppliers and any relevant Third Parties of the Company engaged in business activities with the Group and all its subsidiaries without exception and without regard to local customs or laws. Where local custom or laws apply that are stricter than the provision of this policy, then the stricter rules shall apply.

The Group is bound by the laws in pursuant to Malaysian Anti-Corruption Commission (Amendment) Act 2018 and will comply with all applicable law including the Malaysian Anti-Corruption Commission Act 2009 and the Malaysian Anti-Corruption Commission (Amendment) Act 2018 or any amendments thereto in regard to our respective business operation in all the countries where the Company operates.

4. ABAC Compliance Function

The Group shall establish and maintain an anti-bribery and anti-corruption compliance function under the responsibility of Internal Audit Team for all the anti-bribery and anti-corruption compliance matters, including:-

- i) Oversee and assist in the implementation of the ABAC system which in compliance with ISO 37001 Anti-Bribery Management System
- ii) Provide the guidance to all employees, directors and Business Partners on implementation of ABAC policy; and
- iii) Constant monitoring, review and reporting on the performance of ABAC policy within the Group to the Board of Director.

The Group shall adequately and regularly review the competency and independence of the Internal Audit Team to perform the anti-bribery and anti-corruption compliance function.



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5. Gift, hospitality, donations and similar benefits

This policy does not prohibit normal and appropriate gift or hospitality (given or received) to or from Third Parties. However, there are certain general rules whereby the receiving and provision of gifts are for the following situations only:

- i) Exchange of gifts at the company-to-company level for example gifts exchanged between companies as part of an official company visit/courtesy call and thereafter said gift is treated as company property;
- ii) Gifts from company to external institutions or individuals concerning the company's official function, events and celebration, for example, commemorative gifts or door gifts offered to all guests attending the event;
- iii) Gifts from Company to employees and Directors and/or family members concerning an internally and externally recognized company function, event and celebration for example in the recognition of an employee(s)/director's service to the company;
- iv) Token gifts of nominal value normally bearing Company's logo or for example 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 company's brand-building or promotional activities;
- v) Gifts to external parties who have no business dealings with the Group for example monetary gifts or gifts-in-kind to charitable organizations
- vi) For any gifts exceeded RM 500 in cash as a reason from (a) to (e), the responsible person needs to justify the gifts under the discretion of the MD.

6. Monitoring and Review

The Group will put in place appropriate anti-bribery and anti-corruption compliance function to monitor performance against the compliance with the policies, procedures and control of the ABAC policy. The Group has established the Internal Audit Team which will assess the effectiveness on mitigating bribery / corruption risks within the Group by performing regular audit from time to time. All the results and assessment of the periodical review and audit performed and the results of assessment to be reported to the Board of Directors on regular basis.

This ABAC policy was last updated on 26 August 2020.