



## **Anti-Bribery & Anti-Corruption Policy**

Pan-International Wire & Cable (M) Sdn. Bhd. ("PIW") is committed to ensure high standards of corporate governance, business integrity and accountability in conduct of its business and operations. The policy is applicable to PIW.

### **PURPOSE**

This Anti Bribery and Corruption Policy is to ensure that employees understand their responsibilities in compliance for anti-bribery and corruption within PIW.

### **SCOPE**

This policy shall apply to all directors, managers and employees.

### **DEFINITION**

Bribery means offering, giving or promising an improper benefit, directly or indirectly, with the intention of influencing or rewarding the behavior of someone to obtain or retain an advantage.

### **GIFTS, HOSPITALITY AND ENTERTAINMENT**

PIW prohibits the corrupt use of gifts, hospitality and entertainment directly or indirectly to influence business decisions, gain an unfair advantage or to retain business. Employees are strictly prohibited from soliciting gifts, hospitality and entertainment from any third party.

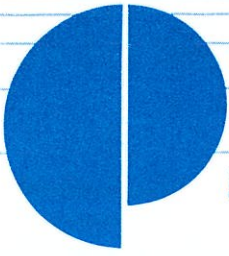
### **GIFTS**

In line with the "No Gift" policy, employees are generally prohibited from accepting or offering gifts to any third party. Employees may only accept or offer gifts to any third party in the limited exceptions where there is no conflict of interest in accepting or offering the gift and the gift is:

- i. Corporate gift (with corporate logo), worth not more than RM200 and is equally offered to all person from the same category.
- ii. Perishable item (e.g. fruits, festive cookies or delicacies offered during festive seasons).
- iii. Employees must declare and report the receipt or giving of a gift to Human Resource department.

In respect of such gift, the Human Resource Personnel must determine whether to:

- a. Donate the gift to charity
- b. Allow the gift to be fairly distributed or shared among the employees



PIW employees shall never receive or offer gift to customers, suppliers or other business partners with the following:

- i. Cash or cash equivalent including vouchers, coupons
- ii. Given as a bribe, payoff or kickback (to get or keep business)
- iii. Form of services or other non-cash benefits (e.g. employment, contract of services)

#### HOSPITALITY AND ENTERTAINMENT

Hospitality refers to the considerate care of guests by an organization, which may include meals, transportation or entertainment. The hospitality is provided as an act of appreciation to its stakeholders in general, to facilitate networking to strengthen business relationships or to promote understanding for future partnerships or collaborations.

The value of the corporate hospitality is modest and proportionate to the occasion. Employees are not allowed to accept entertainment from third parties except in the form of meals or hospitality as stated above.

The value of the meal is reasonable and appropriate in the context of the business occasion. In this respect, the value of not more than RM200 per person will be considered reasonable. The offer or acceptance of meals with the same party shall not be more than 3 times a year.

#### TRAVEL

PIW does not allow third party to sponsor the travel expenses of any employee or PIW itself to sponsor the travel expenses of any third party, except the following criteria are met:

- i. Obtained an official invitation from third party
- ii. Reviewed and approved by the superior
- iii. Disclosed under company policy

#### THIRD PARTIES

PIW expects all third parties including suppliers, vendors, contractors and service providers performing work or services for or on behalf of the Company to share our commitment to against corruption by complying with all policies/ SOP in relation to the Anti-Bribery and Corruption and all applicable laws.



**Pan-International Wire & Cable (Malaysia) Sdn. Bhd. (178247-M)**  
廣宇電線(馬來西亞)股份有限公司

## EMPLOYEES

PIW upholds the principles of workforce diversity, equal opportunity and non-discrimination in all aspects of employment.

- i. During the course of employment, all employees shall:  
Comply with all policies/ SOP in relation to the Anti-Bribery and Corruption.
- ii. Sign a Corruption Free Pledge to confirm their commitment to uphold the Company's anti-bribery policy and comply with anti-bribery laws.
- iii. Declare any actual or potential conflict of interest.

## VIOLATION

All employees must refrain from any acts of bribery which takes the form of offering, promising, giving, demanding or receiving anything of value to anyone in the form of bribes, kickback or any other improper gratification to improperly influence the outcome of any transaction, whether it is for their own personal benefit or for the benefit of the organization.

Any employee of PIW that breaches any of the anti-bribery and corruption policy may fall within the scope of serious misconduct and may be subjected to disciplinary action, including termination of employment and criminal prosecution.

## WHISTLE BLOWING POLICY

Refer to <https://pieib.com.my/whistle-blowing-policy/>