



INTERCONTINENTAL SPECIALTY FATS SDN. BHD. (62068-U)

A member of The Nisshin OilliO Group, Ltd., Japan

Anti-Bribery and Corruption Policy

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TERMS AND DEFINITIONS

Term	Definition
Bribery	Refers to the offering, promising, giving or accepting of an advantage as an inducement for an action, which is illegal, unethical or a breach of trust.
Business partner	<p>Any individual or entity that purchases products and services from or performs a business activity for or provides services, goods or deliverable to ISF. These typically include, but are not limited to, arrangements within:</p> <ul style="list-style-type: none"> i) General service providers; ii) Information technology service and business process providers; iii) Human resources, recruiters, employment agencies and payroll services providers; iv) Contractors/ sub-contractors; v) Agents and brokers; vi) Joint venture partners; vii) Freight forwarders; viii) Utility service providers; ix) Outsourced service providers; x) Professionals such as lawyers, accountants, consultants, actuaries, tax advisors, and auditors; and xi) Other intermediaries.
Close personal relationship	<p>Refers to close associate, such as:</p> <ul style="list-style-type: none"> i) Extended family members, such as relatives (biological and non-biological relationship); ii) Financially dependent individuals; and iii) Close friends
Competent function	Refers to Risk Management Department.
Corruption	Refers to the abuse of entrusted power for private gain.
Entertainment	Includes meals, drinks, sporting events (including golfing) and tickets to cultural events etc. normally with third party. Meals and entertainment during business trip are included. Travel and accommodation are excluded.

Term	Definition
External stakeholder	Third parties and business partners.
Facilitation payment	Any payments made to secure or expedite the performance of a routine or necessary action.
Family members	Any child, stepchild, grandchild, parent, stepparent, grandparent, spouse, former spouse, sibling, niece, nephew, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law (including adoptive relationships) of the individual.
Gifts	<p>Item(s) of financial value that is given to or received from external stakeholders with the appointed representatives of the organisation giving and accepting the gifts, which includes promotional business merchandise.</p> <p>The gifts must not be in the form of cash, loans, kickbacks or any other equivalent advantages.</p>
Internal stakeholder ("Employee" or "Employees")	An employee of ISF, or any person who is under the employment of ISF. This includes directors, expatriates, non-executive staff (clerks, supervisors, and operators), secondees, interns, and individuals on direct hire.
Promotional business merchandise	Refers to gifts that normally include products branded with a logo and distributed at nominal value to promote a brand, corporate identity, or event (e.g. diaries, table calendar, pen, angpau packets and other corporate gifts).
Third party	Any consultants, contractors, services providers, vendors and business partners of the Company, including government officials that the Company is dealing with.
Top management	Refers to C-Suite Level i.e., Chief Executive Officer ("CEO"), Chief Technology Officer ("CTO") and Chief Marketing Officer ("CMO").
Travel and accommodation	Refers to flight tickets and hotel accommodation (whether it is associated with business meeting, conference or event).

1.0 INTRODUCTION

Intercontinental Specialty Fats Sdn Bhd (“ISF” or hereinafter referred to as the “Company”) promotes and upholds high standard of integrity in all our business interactions. ISF prohibits all forms of corruption, extortion, and embezzlement.

In this Anti-Bribery and Corruption (“ABC”) Policy (hereinafter referred to as the “Policy”), ISF sets out the responsibilities and obligations of the internal and external stakeholders of the Company to counter bribery and corruption. This is to ensure that our internal and external stakeholders comply with the applicable laws and regulations and high standards of integrity.

1.1 Objectives

This Policy shall serve as the Company’s formal commitment to conduct business professionally, legally, transparently, and in a fair manner. The objectives of this policy are as follows:

- i. Set out ISF’s principles on ABC effort to maintain the integrity and ethics in conducting business affairs.
- ii. Establish controls to mitigate risk of any potential corrupt practices within the workplaces
- iii. Promote anti-bribery and anti-corruption awareness to both internal and external stakeholders of ISF.

1.2 Scope and Applicability

This Policy is applicable to all internal and external stakeholders of ISF.

1.3 Other Policies, Guidelines, Law and Regulations

The Policy supersedes the previous policy on “No Gift Policy” and “Policy and Procedural Guidelines on the ISF No Gift Policy”. This Policy is to be complied together with other policies, guidelines, laws and regulations but not limited to the following:

- i. Malaysia Anti-Corruption Commission Act (“MACC”) (January 2009) and its amendments in 2018

- ii. Guidelines on Adequate Procedures pursuant to subsection (5) of Section 17A under MACC
- iii. Whistleblowing Protection Act 2010
- iv. ISF Whistleblowing Policy
- v. ISF Supplier Code of Conduct
- vi. Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (AMLA)

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2.0 GUIDING PRINCIPLES

The Policy adopts the following guiding principles:

2.1 Top-Level Commitment

The top management shall ensure that the Company is in compliance with all applicable anti-bribery and anti-corruption laws and regulatory requirements. This includes setting the tone within the Company with top management overseeing the overall implementation of the ABC programme.

2.2 Risk Assessment

The Company shall conduct corruption risk assessment once every three (3) years or as and when necessary (e.g. due to new regulatory development or expansion of business), whichever is earlier to ensure the result of assessment remains relevant. The Company shall utilise the results of corruption risk assessment to help identify control measure required to mitigate the corruption risk exposure of the Company.

2.3 Control Measure

The Company shall establish the appropriate controls and procedures to minimise the risk of corruption and ensure the effectiveness of the implementation of ABC.

The Company shall include clear, practical, and proportionate ABC related Policies and Procedures to mitigate the corruption risk exposure of the Company.

The Company shall conduct appropriate due diligence on both internal and external stakeholders prior to establishing any formal relationship with the Company.

The Company shall promote the use of readily available whistleblowing channel for its internal and external stakeholders to raise concerns in relation to or suspected corruption incidents or deficiencies in the Company's ABC programme.

2.4 Review and Monitoring

The Company shall monitor the effectiveness of ABC implementation, including the ongoing reviews of this Policy and shall conduct periodic evaluations to assess the performance, efficiency and effectiveness of the ABC programme.

The Company shall conduct independent assurance review at least once every three (3) years to obtain assurance that the Company is operating in compliance with the applicable laws and regulations related to corruption.

2.5 Training and Communication

The Company shall provide adequate and appropriate ABC training and communication, including the dissemination of this Policy to its internal and external stakeholders to ensure thorough understanding of the Company's ABC position, especially in relation to their role within or outside the Company.

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3.0 ROLES AND RESPONSIBILITIES

The roles and responsibilities of the key stakeholders in ensuring a robust ABC culture in ISF are described as below:

3.1 Top management

- i. Promote a strong culture of integrity and ethics with consistent application of this Policy within the Company.
- ii. Assign competent person and/or function to be responsible for the Company's ABC programme.
- iii. Establish, maintain, periodically review and approve the Company's ABC programme.
- iv. Oversee overall implementation of the ABC programme.
- v. Encourage use of reporting channel as part of Company's efforts to eradicate corruption.

3.2 Competent Person/ Competent Function

- i. Ensure applicability and relevance of the existing corruption risk assessment.
- ii. Put in place adequate controls and procedures to mitigate residual corruption risk.
- iii. Develop and maintain ABC related Policies and Procedures, including Whistleblowing Policy and Procedure.
- iv. Establish and review key considerations or criteria to conduct due diligence on all relevant internal and external stakeholders prior to entering a formal relationship with the Company.
- v. Develop and disseminate ABC training and communications to all relevant internal and external stakeholders where relevant, to communicate and increase awareness of the Company's ABC position.
- vi. Ensure periodic review and monitoring of the overall ABC programme, including the Whistleblowing process.
- vii. Report to top management periodically or as and when it is required (depending on the severity and importance of the matters) on the progress of overall ABC programme, including any incidents of real or suspected non-compliance or inadequacies of the ABC programme.

3.3 Internal Stakeholders

- i. Be aware, understand and comply with this Policy.
- ii. Avoid putting themselves or the Company in a position where gift, entertainment and others affect their business judgement or could be perceived to affect the outcome of the business transactions.
- iii. Communicate to all relevant internal and external stakeholders of the requirement of this Policy and request for understanding and adherence to the Policy.
- iv. Attend all mandatory ABC related training conducted by the Company.
- v. Promptly report any real and/or suspected ABC related misconducts or violations to this Policy through the readily available whistleblowing channels.

3.4 External stakeholders

- i. Be aware, understand and comply with this Policy.
- ii. Promptly report any real and/or suspected ABC related misconducts or violations to this Policy through readily available whistleblowing channels at ISF.

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4.0 POLICY

4.1 General Policy Statement

The below sets out the Company ABC's statement:

- i. The Company strictly prohibits the giving, receiving or promising bribe or facilitation payments in return for business advantage or favourable treatment.
- ii. The Company is committed to implementing and enforcing the ABC program to combat bribery and corruption as well as ensuring the effectiveness of the ABC program through consistent monitoring and review.
- iii. It is the responsibility of all Company internal and external stakeholders to report any real and/or suspected individual who is engaged in conduct that is prohibited by this Policy.
- iv. Failure to comply with this Policy and/or applicable laws and regulations may result in disciplinary action, including termination of employment or contract and/or referral to the appropriate law enforcement authorities.

4.2 Gifts, Entertainment, Travel and Accommodation ("GETA")

- i. The Company's personnel are prohibited from receiving or requesting GETA from any external stakeholders. GETA given by external stakeholders to employee's family members or to persons with close personal relationship with the employee is also construed as a violation.
- ii. Any giving or receiving of GETA must fulfil the following conditions:
 - a. Must be offered to or received from external parties in conjunction with legitimate business meetings, conferences or events;
 - b. Must not appear to have any bribery/corruption intent involved;
 - c. Must not result in constituting business advantage or favourable treatment;
 - d. Must not appear to be of conflict of interest; and
 - e. Must be done transparently, where it must be approved, reporting and recorded in accordance with GETA Procedures.
- iii. The Company only allows GETA provided to or received from external stakeholders in certain situations, which is deemed to be customary or appropriate, such as:
 - a. Gifts on official business, including

- Souvenirs for visitors (including foreign visitors from group companies)
 - Token of appreciation to the presenter, speaker for Company's events;
 - Other appropriate business-related gifts.
- b. Entertainment, Travel and Accommodation, which are subject to approval by the Division Head and CEO according to the GETA Procedures; and

4.3 Sponsorship and Donation

The Company shall perform appropriate **due diligence** before providing sponsorships or making donations to any entity, regardless of its value. Due diligence must be conducted to ensure that sponsorship or donation is not an indirect way of conferring a personal benefit on a government official or related person to the government official.

The Company may provide sponsorships or donations under acceptable circumstances stipulated in the GETA Procedures. However, all sponsorships or donations shall be made directly to the official entity and not via intermediary party or individual(s).

The Company shall not make donations, whether in cash or in kind, in support of any political parties, candidates or campaigns, to avoid the perception of attempting to gain improper business advantage.

The Company shall not accept sponsorship and donations from third parties as this can be perceived as an attempt to gain improper business advantage.

4.4 Interaction with Government Officials and Facilitation Payments

The Company shall not have any interactions with either or foreign government officials that may influence a business decision and/or secure an improper advantage.

Any facilitation payments made to government officials to expedite the performance of a routine governmental action is strictly prohibited. Example of facilitation payments may be, but not limited to the following:

- i. Obtaining permits and licenses, certification, health and safety, fire regulations and inspection from government officials;
- ii. Obtaining release of goods from custom;
- iii. Processing a visa application; or
- iv. Seeking entry at the immigration desk

4.5 Anti-Money Laundering

The Company prohibits practices related to money laundering, including dealing in the proceeds of criminal activities.

Money laundering entails placing illegal funds into legitimate financial systems to disguise the origins of money obtained through criminal activities or to support criminal endeavours, including financing terrorism.

To avoid violation of Anti-Money Laundering Act (AMLA), ISF personnel are encouraged to conduct due diligence on planned and ongoing relationship with business associates and third parties. This involves understanding their business background, as well as the origins and destinations of funds and payments.

ISF personnel shall report any irregularities of fund source and suspicion of transactions to their immediate superior or through Whistleblowing channel.

4.6 Conflict of Interest

Conflict of interest occurs when there is personal interest that could be considered to have potential interference with objectivity in performing duties or exercising judgment on behalf of the Company.

Where a conflict of interest arises, it must be disclosed upfront to the Top Management so that the Top Management is aware of such situation and appropriate procedures shall be taken to manage the situation.

4.7 Due Diligence

The Company shall conduct appropriate due diligence on all existing and prospective external stakeholders prior to entering into any formal business or employment relationships with the Company.

The results of due diligence performed must go through the relevant approval process, appropriately stored and readily available for review.

4.8 Potential Red Flags and Whistleblowing

The Company encourages all internal and external stakeholders to report any actual and/or suspected ABC related misconducts or violations to this Policy. The examples of potential red flags may be, but not limited to the following:

- i. conflict of interest existed, and it is not reported to the Company;

- ii. buying unnecessary or inappropriate goods and services;
- iii. unclear and questionable invoices (e.g. buying goods or services at an unreasonable price);
- iv. continued acceptance of poorer quality despite poor performance evaluation and complaints
- v. received with regards to the supplier/contractor;
- vi. incomplete supporting documents on travel and accommodation expenses spent;
- vii. improper business practices conducted by internal and/or external stakeholder;
- viii. improper payment schedule requested by external stakeholders;
- ix. improper payment method requested by external stakeholders; or
- x. unusual generous gifts offered by external stakeholders.

The Company stakeholders may report via the following channels:

i. Web-form

Whistleblowing may be done online via a webform found on the [ISF website](#).

ii. Post

The whistleblower shall submit the complaint in a sealed envelope, clearly marked "**private and confidential**" and posted to the Company's main office at the following address with the following recipient name:

ATTN: Head of General Affairs; or Head of Risk Management

Address:

Intercontinental Specialty Fats Sdn Bhd
Lot 1, Lebuah Sultan Hishamuddin 2
Kawasan 20, Bandar Sultan Suleiman,
42000 Pelabuhan Klang
Selangor Darul Ehsan.

iii. E-mail

Please send the email to the following address:

Recipient's e-mail address: hotline@isfdkl.com.my

Please refer to the **Whistleblowing Policy** for further details.

4.9 Record Management

The Company shall keep all records for at least seven (7) years and have appropriate internal controls in place to evidence the business reason for making payments to both internal and external stakeholders of the Company.

Expense claims relating to GETA, sponsorship, donation or any expenses incurred to external stakeholders shall be submitted in accordance with the required format with reason for the expenditure.

All written records of GETA, sponsorship and donation accepted or offered will be subjected to review.

The Company prohibits any account that is kept "off book" to facilitate or conceal improper payments.

All documentation (including gift activity report form, invoices, receipts and whistleblowing report) shall be:

- i. readily available, suitable for use, where and when it is needed; and
- ii. adequately protected from loss of confidentiality and improper use of such information.

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