

SOUTHERN STEEL BERHAD Anti-Bribery and Corruption Policy

Why do we have this Policy?

Southern Steel Berhad and its subsidiaries (“**SSB Group**”) commit to conducting business ethically in compliance with the Malaysian Anti-Corruption Commission Act 2009 and all applicable anti-bribery and corruption laws of every country in which SSB Group operates.

The Board of Directors and Management of SSB Group give top priority to the implementation, enforcement and continual improvement of SSB Group’s anti-bribery management system. To assist the Board and Management, a Compliance Function is or will be established to oversee the design and effective implementation of SSB Group’s anti-bribery management system.

SSB Group does not condone any form of bribery and corruption. This Anti-Bribery and Corruption Policy (“**ABC Policy**”), which must be read in conjunction with the Hong Leong Manufacturing Group Code of Conduct and Ethics, serves to provide guidance on how to prevent, deal with and combat bribery and corrupt activities and issues that may arise in the course of business.

Who does this Policy apply to?

This ABC Policy applies to all employees, directors (executive and non-executive) and any person who performs services for or on behalf of SSB Group, which includes contractors, subcontractors, consultants, suppliers, agents, intermediaries and representatives of SSB Group (collectively, “**Applicable Persons**”).

What must you NOT do?

Anti-bribery and corruption laws make it illegal for any person to:

- (a) give, promise or offer to give to any person, whether for the benefit of that person or of another person; or
- (b) solicit, receive or agree to receive for himself or for any other person,

any gratification as an inducement or reward to do or forbear from doing anything in respect of any matter or transaction, whether actual, proposed or likely to take place.

Accordingly, you shall not at any time:

- carry out, offer, promise or agree to give *anything of value directly or indirectly* in order to obtain or retain any personal or business advantage.
- request for or accept *anything of value* that might influence your objectivity in carrying out your employment/business.

“Things of value” that could be perceived as bribery or corruption can take many forms (including monetary, services or in kind).

As described above, the laws on anti-bribery and corruption are very wide. For example, Mr. X is an employee in the Sales Department of one of the SSB Group companies and is charged with an offence for offering to make or making improper payments to an official.

- *Carried out, offered, promised or agreed.* Mr. X will be held liable if he carried out such improper payments, or merely offered, promised or agreed to make such payment even though such payment was subsequently not made; it is enough that the payment was offered.
- *Directly or indirectly.* Mr. X will also be held liable regardless of whether the improper payment was made by him directly to the official or indirectly through a third-party agent.

The above is only an example to emphasise that a mere offer or a bribe made through a third-party is sufficient to constitute a breach of the anti-bribery and corruption laws. There is no difference whether the bribery or corrupt activity is carried out within or from Malaysia, or otherwise.

What are the penalties?

Engagement in any bribery or corrupt practices or activities will result in severe negative consequences. The Applicable Person may face disciplinary actions by the employers and prosecutions by the relevant authorities which may include fines and imprisonment up to 20 years.

What else should you do?

All Applicable Persons are responsible for refraining from and preventing any instance of bribery or corruption, and for reporting any concern or suspicion so that SSB Group can identify the risks and conduct investigations as may be necessary. To the extent permitted by law, you will be protected from adverse employment action and where feasible, from disclosure of your identity, provided your report is made in good faith, even if you are genuinely mistaken in the concerns you raise.

Reports of any concern or suspicion may be made to the Head of Internal Audit or Head of Human Resources:

Head of Internal Audit
Level 31, Menara Hong Leong
No. 6, Jalan Damanlela
Bukit Damansara
50490 Kuala Lumpur, Malaysia
Email: TehBoonAng@hlmg.com.my

or

Head of Human Resources
Level 31, Menara Hong Leong
No. 6, Jalan Damanlela
Bukit Damansara
50490 Kuala Lumpur, Malaysia
Email: LalitaAbdullah@hlmg.com.my

If you have any doubt, you should contact the Head of Internal Audit or Head of Human Resources immediately.

An electronic version of this ABC Policy is available at www.southsteel.com.
