

HUMAN RESOURCES POLICY & PROCEDURE

POLICY NUMBER	PAGE 1	DATE
HR-CR-01	OF 2	1 st July 2024
ISSUED BY	APPROVED BY	
Head of People & Human Resources	Chief Operating Officer	
SUBJECT	DISTRIBUTION	
Anti-Corruption Policy	Human Resources	

ANTI CORRUPTION POLICY

Objectives:

PEOPLElogy Group is committed to conducting its business with honesty, integrity, and transparency. We recognize that corruption undermines trust, fairness, and the rule of law, and poses serious risks to our reputation, operations, and stakeholders. This policy sets forth our commitment to preventing corruption in all its forms and complying with the Malaysian Anti-Corruption Commission Act 2009 and other relevant laws and regulations.

This policy applies to all directors, officers, employees, contractors, consultants, agents, and any other individuals or entities acting on behalf of PEOPLElogy Group ("covered individuals").

Policy Statement:

PEOPLElogy Group prohibits all forms of corruption, including bribery, extortion, embezzlement, fraud, collusion, and any other unlawful conduct intended to obtain or retain business or personal gain. Covered individuals are prohibited from engaging in, facilitating, or tolerating any corrupt activity, whether directly or indirectly, in connection with PEOPLElogy Group's business activities.

Compliance with Laws and Regulations:

Covered individuals are required to comply with all applicable anti-corruption laws and regulations, including but not limited to the Malaysian Anti-Corruption Commission Act 2009, and to adhere to ethical standards of conduct at all times.

Prohibited Activities:

The following activities are strictly prohibited:

- Offering, giving, promising, or authorizing bribes, kickbacks, or other improper payments to any person or entity, including public officials or private individuals, for any purpose.
- Soliciting, receiving, or accepting bribes, kickbacks, or other improper payments from any person or entity, in exchange for any business advantage or favorable treatment.
- Engaging in any form of corrupt activity, including but not limited to extortion, embezzlement, money laundering, or any other unlawful conduct intended to obtain or retain business or personal gain.

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Gifts, Entertainment, and Hospitality:

Reasonable and proportionate gifts, entertainment, or hospitality may be offered or accepted in accordance with applicable laws and regulations and PEOPLElogy Group 's policies and procedures. However, gifts, entertainment, or hospitality should never be offered or accepted if they could create a conflict of interest or influence business decisions.

Reporting Procedures:

Covered individuals are encouraged to report any suspected or actual instances of corruption promptly to Human Resource Department. Reports will be investigated promptly and confidentially, and appropriate disciplinary action will be taken against individuals found to have violated this policy.

Training and Awareness:

PEOPLElogy Group will provide appropriate training and awareness programs to ensure that covered individuals understand their obligations under this policy and are equipped to recognize and prevent corruption.

Compliance Monitoring:

PEOPLElogy Group will monitor compliance with this policy through regular audits, reviews, and assessments to identify any areas of non-compliance and implement corrective actions as necessary.

Compliance with the Policy:

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment, as well as legal consequences, including fines, penalties, and criminal prosecution.

Review and Updates:

This policy will be reviewed periodically to ensure its effectiveness and compliance with applicable laws and regulations, and updates will be made as necessary.