

PET WORLD INTERNATIONAL GROUP OF COMPANIES

ANTI-BRIBERY & ANTI-CORRUPTION POLICY (“ABAC Policy”)

Pet World International Sdn Bhd and its group of companies (“PWI”) is committed to Section 17A Malaysian Anti-Corruption Commission Act 2009 (“MACC Act”), to conduct its business in an ethical and upstanding manner. PWI and their employees are required to observe and adhere strictly to the following Anti-Bribery & Anti-Corruption Policy: -

General Policy: -

1. PWI are committed to observing the Section 17A MACC Act laws and regulations which govern the countries in which PWI operates.
2. The **new Section 17A Malaysian Anti-Corruption Commission (Amendment) Act 2018**, that is introduced into the MACC Act effective 1 June 2020.

Under this section, a **commercial organization** is liable *when a ‘person associated with the commercial organization’*: corruptly gives, agrees to give, promises or offers to any person any gratification whether for the benefit of that person or another person with intent to obtain or retain business for the commercial organization; or to obtain or retain an advantage in the conduct of business for the commercial organization.

3. PWI practices “**ZERO-TOLERANCE**” to acts of bribery and corruption, either directly or indirectly, by persons associated with PWI; including: -
 - 3.1 PWI’s employees (the “Employees”); and
 - 3.2 Agents, consultants, representatives, distributors, contractors, suppliers, joint venture partners and any other person(s) associated with PWI (collectively “Business Associates”).
4. PWI shall stand guided by the adequate procedures principles: T.R.U.S.T. consisting of the key principles with the acronym as set out below which is stipulated in further detail in the “Guidelines on Adequate Procedures” issued by the Prime Minister’s Department of Malaysia pursuant to the Subsection(5) of Section 17A under the MACC Act available at <http://giacc.jpm.gov.my/wp-content/uploads/2019/01/Eng-Garis-Panduan-Tatacara-Mencukupi.pdf>.

“T” stands for Top Level Commitment;

“R” stands for Risk Assessment;

“U” stands for Undertake Control Measures;

“S” stands for Systematic Review, Monitoring and Enforcement; and

“T” stands for Training and Communication.

Action by PWI

1. To put in place suitable and appropriate channels of communications to ensure that:-
 - 1.1 Employees and Business Associates are given access to report any suspicions acts or incidents of bribery and/or corruption that they may be aware of without fear;
 - 1.2 Sensitive information pertaining to incidents and acts of bribery and corruption is handled properly and appropriately.

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Action by Employees

All Employees shall:

1. Carry out PWI's business dealings and transactions fairly, professionally, ethically, honestly and with integrity.
2. Report any suspicious, acts or incidents of bribery and/or corruption that they may be aware of.
3. Not at any time or in any manner, make bribes in order to retain, secure or obtain any commercial, contractual, personal or business advantage.
4. Not at any time or in any manner, accept bribes or unofficial payments.
5. Not permit any third party to accept bribes or unofficial payments on his behalf.

This Anti-Bribery and Anti-Corruption Policy was adopted by the Board of Pet World International Sdn Bhd.

(Last revised on 18 January 2021)