

RIVERVIEW RUBBER ESTATES, BERHAD

Anti-Bribery and Corruption Policy

1.1 OBJECTIVE

The Company recognises that involvement in bribery or gratification by any employees will adversely affect the image and reputation of the Company and hence there is a clear need to create a corporate culture of good corporate governance free of bribery and other forms of corruption.

The objective of this Policy is to

- set out the responsibilities of Riverview, and of those working for Riverview, in observing and upholding Riverview's position on bribery and corruption; and
- provide information and guidance to those working for Riverview on how to recognise and deal with bribery and corruption issues.

1.2 SCOPE

This policy applies to all Directors and employees of Riverview including third parties working with Riverview.

In this Policy "third party" means any individual or organisation who comes into contact with at work, and includes actual and potential customers, suppliers, distributors, business contacts, agents, advisers, consultants, subcontractors and joint ventures partners.

1.3 PRINCIPLES

In pursuing our business objectives, we believe that honesty and integrity provide the best foundations for our company, which is committed to the highest standards of ethical and moral practice. Integrity is a commitment to always doing what is right and preventing wrong-doing when we encounter it. Commitment comes from the top down, with our Directors taking responsibility for implementing these policies.

Our Company is guided by a spirit of honesty and integrity. It upholds these values and strives to instil them both in our own company culture and in our relationship with stakeholders, customers, employees, vendors and external communities.

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1.3 PRINCIPLES (CONT'D.)

We are committed to:

- Fair, honest & transparent conduct of business
- Never offering bribes, whether directly or indirectly, to gain a business advantage
- Never accepting bribes, whether directly or indirectly, to gain business advantage
- Full & consistent support to zero corruption program

Riverview pledges to conduct business that is always free from corruption and in accordance with Anti-Corruption Principles for Corporations in Malaysia.

All third parties are expected to work with Riverview by applying the highest ethical standards in its business relationships and also adopted appropriate anti-corruption and bribery compliance programme in place.

To address these risks, Riverview have taken the following steps: -

- Implement an anti-bribery and corruption policy;
- Perform regular corruption risk assessment on operations and review findings;
- Take steps to implement training programs for all individual operating in areas of the organisation that are identified as high risk; and
- Regular review and update to this Anti-Bribery and Corruption Policy.

1.4 BRIBERY AND GRATIFICATION

A “bribe” or a “gratification” as defined in Malaysian Anti-Corruption Commission Act 2009 is:

- money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
- any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- any forbearance to demand any money or money’s worth or valuable thing;

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1.4 BRIBERY AND GRATIFICATION (CONT'D.)

- any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and
- any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).

No one shall perform any unfair advantage on anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice.

All shall not offer, give, solicit or accept any bribes in order to achieve any business or personal advantage by engaging in transactions that contravene any applicable anti-bribery laws.

All are expected to promptly report any suspicious transactions that may indicate bribery. The Group or the individual involved may be subject to disciplinary action as well as potential criminal liability for violation.

1.5 CORRUPTION

Corruption is the act of giving or receiving of any gratification or reward in the form of cash or in-kind of high value for performing a task in relation to his / her job description.

All shall maintain a straightforward and clear-cut relationship with suppliers and / or business partners and abide by all reasonable contractual agreements and obligations.

All shall demonstrate independence and avoid any relationship; financial or otherwise, with suppliers that could be unfairly influencing their judgment.

Should an employee find him / herself in a position where required to deal with a related party on behalf of the company, he / she should declare to their respective superior immediately.

All shall ensure the awarding of company's contracts are strictly based on price and suitability with competitive quote comparison.

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1.6 APPLICATION TO THE POLICY

This Policy is not intended to prohibit hospitality practices which are proportionate, properly recorded and lawful in the jurisdiction where they are carried out. Practices that are aimed at establishing / strengthening relationships with suppliers and customers and promoting the Company products and services, must be carried out in moderation, be transparent and not place any expectation on the recipient to reciprocate either by performing, or failing to perform, any other task in return.

The Company makes no distinction between facilitation payments (small payments, sometimes known as “grease” payments) and bribes. Both are expressly prohibited, even if the payment is small or totally acceptable according to local custom and tradition.

1.7 EMPLOYEE RESPONSIBILITY

Every employees shall adhere to this policy and exercise good judgement at all time.

- Familiarise and comply with our policy and other applicable policies
- Help Third Parties understand the practically of our policy
- Raise questions and voice concern if you are aware of any suspected violation of laws or internal policies.

Each person within Riverview has a duty to speak out against suspected acts of bribery or corrupt practices. Everyone has a responsibility to help prevent, detect and report instances of suspected bribery and wrongdoing.

1.8 REPORTING OF POLICY VIOLATIONS

The Company believes that it is essential to create an environment in which everyone feels that they can raise any matters of genuine concern without fear of disciplinary action being taken against them or fear of reprisal. Riverview practices an open-door policy and encourages all employees to share concerns and suggestions in an appropriate manner.

We will ensure that all cases of suspected bribery are dealt with consistently and whether or not an investigation shows bribery exists, there will be no retaliation against or adverse consequences for the person reporting the possible case of bribery in good faith. Further, no employee will suffer any retaliation or adverse consequences for refusing to pay a bribe.

All reports of bribery or corrupt practices can be made through Whistleblowing channels stated in Riverview’s whistleblowing policy.