

## AMALGAMATED INDUSTRIAL STEEL BERHAD

### ANTI-BRIBERY MANAGEMENT SYSTEM OBJECTIVES YEAR 2020

No	Objectives	Target	Timeline	Adequate Procedures Principles (TRUST)	Actions To Achieve	Responsibility/ Coordinating department
1	Non-involvement in bribery related activities.	Zero case	From date of implementation of ABMS to end of the year	<p><b>1. T</b>op Level Commitment</p> <hr/> <p><b>2. R</b>isk Assessment</p> <hr/> <p><b>3. U</b>ndertake Control Measures</p> <hr/> <p><b>4. S</b>ystematic Review &amp; Enforcement</p> <hr/> <p><b>5. T</b>raining and Communication</p>	<ul style="list-style-type: none"> <li>▪ To create awareness among the staff on anti-bribery policy and practices within the Organisation (1,5)</li> <li>▪ To ensure all applicable anti-bribery legal and other requirements are implemented within the Organisation (3,4)</li> <li>▪ The anti-bribery risk assessment is undertaken on a periodic basis to identify, evaluate, monitor and manage existing and potential bribery risks (2)</li> <li>▪ To encourage whistle-blowing through implementation of an effective whistle-blowing programme within the Organisation (3,4)</li> <li>▪ To record, investigate, control, correct, prevent, reduce undesired effects and review effectiveness of actions taken on reported cases involving bribery (3,4)</li> <li>▪ An internal audit function to undertake periodic internal audit assignments related to bribery including making appropriate recommendations to the Governing Body, Top Management and/or anti-bribery compliance function on improvements to the Anti-Bribery Management System (1,4)</li> </ul>	Anti-bribery compliance function

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2	Staff awareness of anti-bribery related topics through trainings/ inductions/ awareness programmes.	i. Complete briefing to all employees prior to implementation of the ABMS  1 topic / year	May to Dec 2020		<ul style="list-style-type: none"> <li>▪ To include anti-bribery related topics into yearly training plan. Besides structured training programmes, other programmes may include townhall meetings, staff briefings, e-learning modules etc (5)</li> <li>▪ To actively support and encourage staff to attend anti-bribery courses and/or other relevant training programmes to update themselves on the latest developments (5)</li> </ul>	HR Department

Note 1

The above Objectives are to be reviewed by the anti-bribery compliance function on an annually basis on 1 January of the calendar year.

Note 2

Where these Objectives are applied by a company together with its subsidiaries (or together with its joint ventures and associates), there is no requirement for these objectives to be applied individually by all the entities.