



**PUTRAJAYA LEISURES & SERVICES GROUP SDN BHD
SUMMARY OF POLICIES BASED ON:**

***ANTI-CORRUPTION & ANTI-BRIBERY POLICY
&
WHISTLEBLOWER POLICY***

Approved at PULSE Group's 109th Board of Directors Meeting
on 29th August 2024

Confirmed by:

A handwritten signature in black ink, consisting of a large, stylized loop followed by a horizontal line that ends in a small hook.

Encik Mahmad Anuar Bin Othman
Group Chief Executive

PULSE GROUP SDN BHD

Anti-Bribery and Anti-Corruption Policy

1. PURPOSE

This policy outlines the responsibilities of PULSE Group Sdn Bhd and its subsidiaries (PULSE Group) in preventing bribery and corruption. It provides guidance on identifying and addressing related issues.

2. DEFINITIONS

Bribery: Any value given or received to influence someone's decision for business advantage.

Corruption: Any form of misuse of power for personal gain, whether related to government, business, or other matters.

Facilitation Payments: Informal payments to expedite routine processes or actions.

Kickbacks: Return of a portion of money already paid or owed as a reward for awarding of furthering business

3. PRINCIPLES

PULSE Group is committed to honesty and ethics and has zero tolerance for bribery and corruption. This includes compliance with laws, including the Malaysian Anti-Corruption Commission Act (MACC) 2009, and implement the severe penalties for bribery.

4. SCOPE

This policy applies to all individuals and entities or stakeholders associated with PULSE Group, including Board Members, employees, contractors, suppliers, and third parties.

5. DONATIONS AND POLITICAL CONTRIBUTIONS

PULSE Group does not make charitable or political contributions. Personal contributions by employees are allowed but may not be claimed by the Company.

6. PROCUREMENT PROCESS

The procurement process is transparent and based on the Procurement Policy. Supplier selection is not based on received hospitality.

7. RESPONSIBILITIES

Any violation is taken seriously and can lead to disciplinary action. The Board oversees compliance, and all employees must adhere to this policy.

8. RECORD KEEPING

Financial records must be transparently reported and have accurate and complete supporting documents. No off-the-book accounts to conceal improper payments.

9. PROTECTION OF WHISTLEBLOWER

PULSE Group encourages employees who report information (whistleblowers) or reject bribery, protecting them from possible repercussions.

10. TRAINING AND COMMUNICATION

Regular training on anti-bribery and anti-corruption measures will be provided for employees at high risk of bribery. PULSE Group adopts a zero-tolerance approach to bribery and corruption, which must be communicated to employees, suppliers, contractors, agents, business partners, and all relevant stakeholders.

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11. MONITORING AND REVIEW

All employees and staff must ensure adherence to this policy. Internal control systems and procedures will be regularly audited to ensure their effectiveness in countering bribery and corruption.

12. POSSIBLE RED FLAGS

Examples of red flags for bribery or corruption include:

Bribery

- A third party requests payment to “overlook” potential legal violations.

Corruption

- Receiving an invoice from a third party that appears non-standard or customized.

Facilitation Payments

- A third party requests an unexpected additional fee to facilitate a business/service.

Kickbacks

- A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or service provisions.

Note: For detailed information and other examples, please refer to the Company’s Anti-Bribery and Anti-Corruption Policy and Whistleblower Policy.

Whistleblower Policy

1. PURPOSE

The main purpose of this Whistleblower Policy is to provide guidelines for employees, the Board of Directors, Management, and other stakeholders, and to demonstrate PULSE Group's commitment to reporting illegal conduct or misconduct through the provided channels without fear of victimization, harassment, or discriminatory treatment, which ensures that reported matters are properly investigated.

2. SCOPE

This policy applies to all employees, the Board of Directors, contractors, consultants, and other stakeholders, to encourage transparency in reporting misconduct.

3. DEFINITIONS

- **Whistleblower:** An individual who discloses or reports the wrongdoing
- **Whistleblowing:** This occurs when individuals and/or stakeholders report misconduct as outlined in the policy.

4. POLICY

This policy encourages all stakeholders to report any misconduct openly and honestly. Such reports will be dealt with confidentially. Whistleblowers are encouraged to identify themselves and provide their contact information to facilitate further investigation. Anonymous disclosures may not be entertained to prevent invalid reports, poison letters, exploitation, and victimization. However, any Board Members have the right to open an investigation (through a committee or appointed individuals) for reports received under anonymity.

5. IMPROPER CONDUCT

In addition to those specifically defined in the acts, regulations, procedures, and established policies, the following are considered "Improper Conduct" under this Policy, are bribery or kickbacks, corruption, fraud, breach of laws, policies, procedures, financial reporting improprieties, and situations that pose a threat to health, safety, individuals, and the environment.

6. COMMUNICATION CHANNELS



Whistleblowers should report to the Internal Compliance Officer (ICO) through either, 1) Online Reporting Platform; or 2) Email: whistleblower@pulsegroup.com.my
The ICO will report to the Investigation Committee, depending on the suitability of the received report.

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If the report is related to the ICO or Integrity Department, the whistleblower can channel directly to the Group Chief Executive (GCE) or any PULSE Group Board Member.

7. REQUIRED EVIDENCE

Whistleblowers must report misconduct in writing and provide information about the type of activity or misconduct, the individuals involved when the incident occurred, and who was affected.

Whistleblowers must have first-hand knowledge or information of the facts.

8. CONFIDENTIALITY AND PROTECTION FOR WHISTLEBLOWERS

- PULSE Group guarantees confidentiality and protection from retaliation if disclosures are made in good faith.
- The whistleblowers will be protected by the Group from any reprisal as a direct consequence of the disclosure.
- The whistleblower's identity will be protected and kept confidential unless legally required otherwise.
- The identity of the whistleblower and involved parties may be revealed to appointed investigators.
- False or malicious allegations are subject to disciplinary action.

9. PROCEDURES

- The designated committee conducts fair and thorough investigations, ensuring the legitimacy of disclosures, directing further actions, and determining who should conduct the investigation, whether involving external expertise, management, or the Human Resources Manager.
- The Investigation Committee must ensure the disclosure is fair and unbiased.
- The designated committee must maintain all investigation documents, including interviews, to complete the investigation.

10. REPORTING

The Investigation Committee will present the investigation outcome to the GCE and/or the Board of Directors. A register of misconduct reports related to this policy will be included as a permanent agenda in PULSE Group's Board meetings.

11. ACTION SUBSEQUENT TO REPORT

Next, if the GCE and/or the Board of Directors are satisfied with the investigation results, they shall direct further action. Management and/or Group HR are responsible for implementing subsequent actions.

If the misconduct involves members of the Board, the respective Board shall be abstained or excluded from the Meeting.

12. POLICY REVIEW

Board Members may modify and amend the policy from time to time, especially to comply with law and regulation, and/or to meet the Group changes.

Effective policy changes must be communicated to employees in writing or electronically.

Note: For detailed information and other examples, please refer to the Company's Anti-Bribery and Anti-Corruption Policy and Whistleblower Policy.