

PARKWOOD HOLDINGS 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>1. Top Level Commitment</p> <hr/> <p>2. Risk Assessment</p> <hr/> <p>3. Undertake Control Measures</p> <hr/> <p>4. Systematic Review & Enforcement</p> <hr/> <p>5. Training and Communication</p> | <ul style="list-style-type: none"> ▪ To create awareness among the staff on anti-bribery policy and practices within the Organisation (1,5) ▪ To ensure all applicable anti-bribery legal and other requirements are implemented within the Organisation (3,4) ▪ The anti-bribery risk assessment is undertaken on a periodic basis to identify, evaluate, monitor and manage existing and potential bribery risks (2) ▪ To encourage whistle-blowing through implementation of an effective whistle-blowing programme within the Organisation (3,4) ▪ To record, investigate, control, correct, prevent, reduce undesired effects and review effectiveness of actions taken on reported cases involving bribery (3,4) ▪ 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) | 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"> ▪ 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) ▪ 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) | 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.