



Plantations

BOUSTEAD PLANTATIONS BERHAD^{1245-M}
(A member of Boustead Group)

**GIFT, ENTERTAINMENT, HOSPITALITY
AND OTHER SIMILAR BENEFITS**

POLICY

NOVEMBER 2020

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1.0 INTRODUCTION

- 1.1 BPLANT is committed towards ensuring the highest standards of integrity, accountability and professionalism in the conduct of its businesses to protect and preserve BPLANT's interests and reputation. This is consistent with Boustead Group's core values of RESPECT, INTEGRITY, TEAMWORK and EXCELLENCE.
- 1.2 BPLANT personnel are required to exercise proper judgement in accepting and providing gifts, entertainment, hospitality and other similar benefits and act consistent with the general principles set out below:
 - 1.2.1 Uphold high standards of integrity;
 - 1.2.2 Exercise reasonable care and proper judgement;
 - 1.2.3 Avoid conflicts of interest;
 - 1.2.4 Refrain from misuse of position, title or any authority associates with BPLANT for personal gain; and
 - 1.2.5 Comply with applicable laws, regulations and BPLANT policies and procedures.
- 1.3 Directors and employees should comply with the law if a law contradicts with the policy as set forth in this policy. In any event the provision in this Policy contradicts with the law in their jurisdiction, directors and employees should consult with Compliance & Risk Management Unit. Nonetheless, if a local custom contradicts with this Policy, directors and employees are required to comply with this Policy.

2.0 PURPOSE

This Gift, Entertainment, Hospitality and Other Similar Benefits Policy ("policy") is designed to:

- 2.1 Uphold the culture of integrity and to prevent conflict of interest between BPLANT personnel and business associates involved in business dealings.
- 2.2 Promote transparency in all aspects of business dealings and to establish guidelines for the acceptance, providing and documentation of gifts, entertainment, hospitality and other similar benefits by BPLANT personnel and its business associates.

3.0 SCOPE

- 3.1 This policy shall be applied to all directors and employees of BPLANT.

3.2 BPLANT also expects that its business associates, agents and others who performing work or services for or on behalf of BPLANT will comply with this policy in relevant part when performing such work or services.

4.0 ABBREVIATION & DEFINITION

4.1 Abbreviation

BPLANT	Boustead Plantations Berhad Group
HOD	Head of Department
HRAD	Human Resource and Administration Department
GRC	Gifts Receiving Committee

4.2 Definition

Agents	any person engaged / contracted to act on behalf of BPLANT.
Board	Board of Directors
BPLANT	<p>Group of Companies under Boustead Plantations Berhad comprises of:</p> <ol style="list-style-type: none"> 1. Boustead Plantations Berhad 2. Boustead Solandra Sdn. Bhd. 3. Boustead Rimba Nilai Sdn. Bhd. 4. Boustead Telok Sengat Sdn. Bhd. 5. Boustead Eldred Sdn. Bhd. 6. Boustead Emastulin Sdn. Bhd. 7. Boustead Gradient Sdn. Bhd. 8. Boustead Pelita Kanowit Sdn. Bhd. 9. Boustead Pelita Kanowit Oil Mill Sdn. Bhd. 10. Boustead Pelita Tinjar Sdn. Bhd. 11. Boustead Agency and Consultancy Services Sdn. Bhd. 12. Boustead Trunkline Sdn. Bhd. 13. Boustead Estates Agency Sdn. Bhd. 14. Bounty Crop Sdn. Bhd. 15. Boustead Life Sciences and Research Sdn. Bhd.
Business Associates	any supplier of services or materials, client, customer, contractor, sub-contractor, consultant, professional advisor, lessor of space or goods, tenant, licensor, licensee or partner of BPLANT.

Charitable contributions	are given to for-profit organizations, a collection or for a campaign.
Donations	are given to non-profit organizations, or for charitable causes.
Due diligence	verifying the identity of the recipient; assuring appropriateness of the charity that BPLANT will be involved with; ensuring the cause is in line with BPLANT purposes.
Employee(s)	any person who is in the employment of BPLANT including but not limited to executives, non-executives, secretaries and secondees.
Entertainment	participation at any social events, sporting events, functions, meals or other occasions (whether they include a business purpose or not and received or provided) in connection with PLANT.
External parties	any individual who may be directly or indirectly involved with BPLANT.
Family	employee's spouse(s), children, parents, step-parents, siblings, step-siblings, grandparents, grandchildren, in-laws, uncles, aunts, nieces, nephews as well as other persons who are members of the family.
Gifts	any token of appreciation and gratitude, gift vouchers, cash, physical gifts or other items of value, to and from people who may have, or who may facilitate the creation of a business relationship with BPLANT.
Gift Receiving Committee	comprise of the following members: <ol style="list-style-type: none"> 1. Financial Controller 2. Head of HRAD 3. Head of Compliance & Contracts Management
Hospitality	any travel and accommodation received or provided by people who may have, or who may facilitate the creation of a business relationship with BPLANT.
Nominal value	something small, a gesture, or business courtesies.

Personnel	directors, officers, employees, temporary staff or workers and volunteers.
Public Officials	candidates for public office, officials of any political party, and officials of state-owned enterprises other than BPLANT.
Sponsorship	Act of supporting an event, activity, person, or organization financially or through the provision of products or services.

5.0 GIFTS

5.1 Receiving Gifts

5.1.1 The Group has adopted a no gift policy, whereby, **subject only to certain exceptions** as per Section 4.2.2 and 4.2.3 of Boustead Code of Ethics and Conduct, employees and directors, family members or agents acting for or on behalf of employees, directors or their family members are prohibited from, directly or indirectly, receiving or providing gifts.

5.1.2 Gift-giving and receiving practices may vary among cultures, therefore in some circumstances, it would be unreasonable to refuse or return a gift hence employees are to practice good business sense and integrity when receiving gifts.

5.1.3 As a general rule, BPLANT personnel are allowed to accept the following gifts provided that the gifts do not exceed monetary threshold of RM200 (based on honest perceived value of the gifts' market price at the time the gifts are received), not too frequent (e.g. six times annually) and will not influence any decision-making process or being a reward for making certain decisions:

5.1.3.1 Occasional business meals;

5.1.3.2 Company souvenirs of nominal value e.g. calendars, pens, notepads, diaries;

5.1.3.3 Promotional business items;

5.1.3.4 Reasonable entertainment such as accompanying a business associate to a local cultural or sporting event;

5.1.3.5 Non-cash gifts presented to employees attending social functions such as signing ceremonies and corporate visits;

- 5.1.3.6 Gifts presented to employees during weddings, Hari Raya, Chinese New Year, Deepavali, Christmas or other cultural & religious festive and occasions; and
- 5.1.3.7 Customary gifts as non-acceptance may cause offense to the organisation or country involved.
- 5.1.4 Gifts which are not as set out in para no. 5.1.3 of this Policy must be politely returned with reference to this Policy.
- 5.1.5 Acceptance of gifts on behalf of BPLANT is permitted only in certain situations where the rejection of a gift might offend and may sever BPLANT's business relationship with business associates and external parties.
- 5.1.6 For the gifts received with value exceeding the monetary threshold of RM200, the following shall be performed:
 - 5.1.6.1 BPLANT personnel shall declare the gifts to their respective HOD.
 - 5.1.6.2 The respective HOD shall update HRAD on gifts received by completing the Gifts and Benefits Declaration Form as per **Appendix A**.
 - 5.1.6.3 Thereafter, HRAD shall apprise to GRC for recommendation and action to be taken on the gifts received.
 - 5.1.6.4 The GRC shall considering the following actions when making a recommendation:
 - a) Accept the gifts i.e. permit it to be retained by the employee or becomes the company property;
 - b) Return the gifts with reference to this policy;
 - c) Donate the gift to charity; or
 - d) Share with other employees.
 - 5.1.6.5 Approval on the action taken shall be sought from the Chief Executive Officer.
- 5.1.7 Under no circumstances may a BPLANT personnel and their family/household members accept gifts in the form of cash or cash equivalent from parties that it conducts business with.

5.1.8 Gifts received at the company-to-company level (e.g. gifts exchanged between companies as part of an official company visit/courtesy call and similar occasions) shall be treated as company property.

5.1.9 The process flow for receiving and declaring of gifts is set out in **Appendix B**.

5.2 Providing Gifts

5.2.1 Generally, all directors and employees are not permitted to provide gifts in any form during their dealings with business associates and external parties, neither should they place themselves under any obligations which might influence, or be perceived to influence the judgement/decision while conducting their official duties.

5.2.2 However, certain exceptions are permitted as per the following:

5.2.2.1 Gifts are of nominal value i.e. not exceeding monetary threshold of RM200;

5.2.2.2 Exchange of gifts at a company-to-company level e.g. gifts exchanged between companies as part of an official company visit/courtesy call and similar occasions;

5.2.2.3 Gifts to external institutions or individuals in relation to BPLANT official functions, events and celebrations e.g. commemorative gifts or door gifts offered to all guests attending the event subject to para 5.2.1.1;

5.2.2.4 Gifts to personnel and/or their family members in relation to an internal or externally recognised BPLANT function, event and celebration e.g. in recognition of a personnel service to BPLANT subject to the value approved by the Management;

5.2.2.5 Token gifts subject to para 5.2.1.1 bearing BPLANT's logo e.g. diaries, calendar, pens, mugs or other small promotional items or that are given out equally to business associates and key stakeholders attending corporate BPLANT events or other similar events which are deemed part of BPLANT's brand building or promotional activities;

5.2.2.6 Gifts to external parties who have no business dealings with BPLANT e.g. monetary gifts or gifts in-kind to charitable organisations subject to para no. 9.0 of this policy.

5.2.2.7 Customary gifts (e.g. gifts during festive season) subject to para no. 5.2.1.1 on the following occasions and cultural and religious festivities such as follows:

- a) Hari Raya;
- b) Chinese New Year;
- c) Christmas;
- d) Deepavali;
- e) Congratulatory;
- f) Retirement; and
- g) Corporate events.

6.0 ENTERTAINMENT AND HOSPITALITY

6.1 Receiving Entertainment and Hospitality

6.1.1 As a general principle, BPLANT strictly prohibits its personnel from soliciting hospitality nor are they allowed to accept hospitality in any form due to concerns that acceptance of hospitality particularly from a repetitive source and/or where a considerable degree of hospitality is involved may expose the personnel and BPLANT to allegations of improper conduct.

6.1.2 Notwithstanding the above, occasional acceptance of an appropriate and moderate level of entertainment provided by external parties in the normal course of business is recognized as a lawful way of creating goodwill and enhancing business relationships therefore it is permissible.

6.1.3 However, proper care and judgement in determining the appropriateness of the entertainment provided by an external party is imperative in order to protect BPLANT's reputation from allegations of impropriety or undue influence.

6.1.4 BPLANT personnel must ensure that the corporate hospitality accepted from an external party is legitimate, modest and not lavish or excessive or extraordinary in nature.

6.1.5 As a general rule, BPLANT personnel are allowed to accept the following entertainment provided that the entertainment does not exceeding monetary threshold of RM200 at any one occasion, not too frequent (e.g. six times annually) and will not influence any

decision-making process or being a reward for making certain decisions:

6.1.5.1 Occasional meals for business purposes;

6.1.5.2 Attending local cultural events; and

6.1.5.3 Attending sporting events.

6.2 Providing Entertainment and Hospitality

6.2.1 BPLANT personnel are permitted to entertain business associate and/or external clients through reasonable and moderate acts in the context of business networking as well as a measure of goodwill towards the recipients guided by para no. 6.1.5 in this policy.

6.2.2 BPLANT personnel should be mindful when providing entertainment and must exercise proper care to protect the Company's reputation against any allegations of impropriety or the perception of bribery especially when the arrangements could influence or be perceived to influence the outcome of a business decision and are not reasonable and bona fide expenditures.

6.2.3 Providing or offering entertainment by BPLANT personnel to its agent or business associates in order to influence decisions for future benefits or outcome by either party is strictly prohibited.

6.2.4 BPLANT strictly prohibits its personnel and agents from providing hospitality in any form, in their dealings with external parties and business associates unless for legitimate business reasons.

7.0 PUBLIC OFFICIALS

7.1 The Government of Malaysia prohibits giving anything of value to Public Officials in order to obtain or retain business or to secure some other improper advantage precisely to avoid corruption or the impression of corruption as stipulated in Section No. 21 of the MACC Act 2009.

7.2 Providing gifts, entertainment and hospitality to Public Officials or their family/household members is generally considered a "red flag" situation in most jurisdictions.

7.3 BPLANT personnel must be aware of the prevailing laws and regulations to ensure compliance by conducting reasonable due diligence when dealing with local and foreign government officials in an effort to prevent violation of applicable laws and regulations.

8.0 POLITICAL CONTRIBUTION

- 8.1 BPLANT does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office.
- 8.2 BPLANT funds, services, property, facilities or personnel time cannot be used to make any direct or indirect political contributions on behalf of BPLANT without approval from the Board.
- 8.3 Any appearance of making such contributions or expenditure to any political party, candidate or campaign shall be avoided by BPLANT personnel.
- 8.4 Charitable donations may not be used as a subterfuge for prohibited political payments.

9.0 CHARITABLE CONTRIBUTIONS, DONATIONS AND SPONSORSHIP

- 9.1 Contributions or donations made by BPLANT to community projects or charities shall be made in good faith and not be used as a subterfuge for bribery.
- 9.2 BPLANT may offer this to support the advancement of knowledge in language, science, healthcare, engineering, accounting, law or to support other socially beneficial purposes guided by para no. 10.0 in this policy.
- 9.3 BPLANT shall conduct due diligence to ensure that the recipients of any charitable contribution, donations or sponsorship are legitimate and not to be used as a means to cover up an undue payment or bribery.
- 9.4 All charitable contribution, donations or sponsorship shall be approved according to BPLANT's Limits of Authority.
- 9.5 The recipient of the charitable contributions and/or sponsorship shall provide documented evidence to acknowledge receipt of such contribution/sponsorship, accompanied by details on the intended purpose and use of the contribution/sponsorship.
- 9.6 In the event the recipient is unable to provide documented evidence to acknowledge receipt of the contributions/sponsorship, BPLANT shall provide documented evidence for acknowledgement by the recipient.

10.0 CORPORATE SOCIAL RESPONSIBILITY (CSR)

- 10.1 As part of a commitment to CSR and sustainable development, BPLANT generally provides such assistance in appropriate circumstances and in an appropriate manner.
- 10.2 Any proposed CSR must be carefully examined for legitimacy and not be made to improperly influence a business outcome.
- 10.3 The proposed CSR’s recipient must be a legitimate organisation and appropriate due diligence must be conducted in particular to ascertain whether any Public Officials are affiliated with the organisation.
- 10.4 Every CSR initiated shall be approved according to BPLANT’s Limits of Authority and any red flags must be resolved before committing any funds to the organisation.

11.0 REFERENCE

- 11.1 No Gift Policy of Boustead Holdings Berhad dated on 1st December 2019.

12.0 REVISION HISTORY

Revision No	Effective Date	SIM/SOP Ref No.	Reason of Revision
00	01/01/2021	CRM/03/GEH-00	New Policy

13.0 APPENDICES

- Appendix A Gifts and Benefits Declaration Form
- Appendix B Flowchart on Receiving and Declaring of Gifts

GIFTS AND BENEFITS DECLARATION FORM (PAGE 1 of 2)

Plantations

BOUSTEAD PLANTATIONS BERHAD 1245-M

(A member of Boustead Group)

GIFTS AND BENEFITS DECLARATION FORM

DETAILS OF GIFT(S) AND BENEFIT(S) RECEIPT		
Name		
Designation		
Department		
Company		
Date		
Contact	Telephone no.:	Email:
DETAILS OF DONOR		
Name and position of donor		
Name of organisation		
DETAILS OF GIFT(S) OR BENEFIT(S) RECEIVED:		
Date gift(s) or benefit(s) received:		
Description of the gift(s) or benefit(s)		
Nature and circumstance of gift(s) or benefit(s) received		
Estimated value of gift(s) or benefit(s)		
Please circle your answers:		
a) Was the gift(s) or benefit(s) offered during official duties?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
b) Was the gift(s) or benefit(s) offered related to tender, contracts or negotiations?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

GIFTS AND BENEFITS DECLARATION FORM (PAGE 2 of 2)

ACKNOWLEDGEMENT BY IMMEDIATE SUPERIOR / HOD		
Name		Signature:
Date		
VERIFICATION BY HRAD		
Name		Signature:
Date		
RECOMENDATION BY GIFTS RECEIVING COMMITTEE (GRC)		
Decision on Gift treatment	<input type="checkbox"/> Accept gift(s) or benefit(s) <input type="checkbox"/> Shared with <input type="checkbox"/> Return gift(s) or benefit(s) <input type="checkbox"/> Donate <input type="checkbox"/> Becomes company's property	
Name (Member 1)		Signature: Date:
Name (Member 2)		Signature: Date:
Name (Member 3)		Signature: Date:
APPROVAL BY CHIEF EXECUTIVE OFFICER (CEO)		
Name		
Signature		
Date		

FLOWCHART ON RECEIVING AND DECLARING OF GIFTS

