

**GRAND CENTRAL ENTERPRISES BHD**  
**Registration No. 198401019138 (131696-V)**  
**(Incorporated in Malaysia)**

**ANTI-CORRUPTION AND BRIBERY POLICY**

**1. Purpose and Applicability**

The purpose is to set forth Grand Central Enterprises Bhd (“the Company”) and its subsidiaries (“the Group”) policy on our legal and ethical responsibilities to prevent the occurrence of corruption and bribery practice in relation to the business.

**2. Policy Statement**

It is our policy (“Policy”):

- 2.1 to conduct all our business in an honest and ethical manner. We take zero-tolerance approach to bribery and corruption and are committed to act professionally, fairly and with integrity in all business dealings and relationships and enforcing effective systems to counter bribery.
- 2.2 to ensure its businesses and any related transactions do not participate in any form of bribery and corruption for its advantages and benefits.

**3. Objective**

This policy is set to provide information and guidance to all employees including permanent, probationary, contract and temporary staff and Directors of the Group.

**4. Responsibility**

- 4.1 It is not acceptable for employees to offer or provide, directly or through any intermediaries, any bribe, gift, reward, entertainment, consideration, favour of any other advantage, whether material or immaterial are strictly prohibited. Gifts or entertainment may only be presented to a third party only in the situation that it is consistent with the customary business practice, business meetings, conferences or events hosted, supported or sponsored by the Group and that gifts or entertainment are humble in value and cannot be interpreted as inducements to trade. Guidance from the Management must be sought if there is any doubt regarding this issue.
- 4.2 Employees must never pay, offer, solicit or receive bribes of any forms including facilitation payments. If the situation arises, the immediate department head or the manager of the respective hotel should be notified immediately.
- 4.3 In respect of political contributions, funds or resources of the Group must not be used to make any direct or indirect political contributions on behalf of the Group without approval from the Board of Directors. Any appearance of making such contributions or expenditure to any political party, candidate or campaign, must also be avoided.
- 4.4 Donations in the form of charity may be permissible depending on the circumstances but should be made directly to well-established official entity(s) and be able to be disclosed publicly when required to.

## **5. Report Observed Violations of Policy**

Employees should report any cases of wrongdoing or violation of the Policy based on the Whistle Blowing Policy.

## **6. Policy Compliance**

The Group takes its obligations to comply with all applicable law including the Malaysian Anti-Corruption Commission Act 2009 and the Malaysian Anti-Corruption Commission (Amendment) Act 2018 or any amendments thereto seriously. Violations of this Policy will lead to disciplinary action including termination of employment.

## **7. Records**

All records should be filed properly with accuracy and completeness for payments made to third parties in the ordinary course of business which is prove as evidence that such payments are not linked to corrupt and/or unethical purposes.

All expenses claim from employees incurred to third parties should be approved by the Head of Department and specifically recorded the reason for such expenses.

## **8. Review**

The Board of Directors will monitor compliance and review the Policy to assess the effectiveness and relevance annually.