

## DUE DILIGENCE POLICY

The Due Diligence Policy outlines the procedures for conducting the identification and assessment of any proposed transaction. The purpose of the Policy is to provide clear due diligence procedures prior to making any decision, adequate mitigation and prevention measures against potential corruption and to comply with the requirement of Adequate Procedure for Commercial Organization as required under section 17A of the Malaysian Anti-Corruption Commission (Amendment) Act 2018. The due diligence process shall be performed on any transactions, appointments and recruitments that may have a potentially significant business and financial impact as follows:

- Recruitment and appointment of personnel who will hold strategic positions.
- Recruitment and appointment of an employee who will hold positions that are exposed to more than a low risk of corruption including redeployment, promotion, and transfer.
- Selection and appointment of agents, contractors, suppliers, vendors, service providers, and consultants in any purchases, sales, and procurement processes.
- Entering a joint venture, partnership, or business associated with any company, organization, or individual.
- Appointment of agents and individuals who have official dealings with, or on behalf of JPB.

The due diligence shall be conducted taking into consideration the level of corruption risk as described in the detailed policy. Based on the due diligence results, the related division or department is responsible for evaluating, approving, or rejecting any transaction proposal to be escalated to the applicable committee for approval. Each decision must be documented for recording purposes and/or MS ISO 37001:2016 Anti-Bribery Management System verification.