

AJINOMOTO (MALAYSIA) BERHAD

(Company No. 4295-W)
(Incorporated in Malaysia)

ANTI-CORRUPTION AND BRIBERY POLICY

AJINOMOTO (MALAYSIA) BERHAD recognises that integrity and trust are of utmost importance in sustaining AJINOMOTO (MALAYSIA) BERHAD business. AJINOMOTO (MALAYSIA) BERHAD has a zero tolerance policy with respect to giving or receiving gratification including but not limited to bribes and favours.

In line with good corporate governance practices, AJINOMOTO (MALAYSIA) BERHAD encourage its directors, employees and business associates (including but not limited to agents, representatives, suppliers, vendors and service providers) to commit to the highest possible standards of ethical, moral, and legal conduct. Consistent with this commitment, the policy aims to support good management practices and sound corporate governance practices within AJINOMOTO (MALAYSIA) BERHAD.

This policy aims to provide a structured guideline for its directors, employees and business associates (“associated person”) to elaborate upon those principles, providing guidance to employees concerning how to deal with improper solicitation, bribery and other corrupt activities and issues that may arise in the course of business. It is also intended to apply to every director (executive and non-executive) except as otherwise stated in this Policy and Guidelines.

This Policy & Guidelines are not intended to provide definitive answers to all questions regarding bribery and corruption. Rather, the Policy & Guidelines are intended to provide its directors, employees and business associates with a basic introduction to how AJINOMOTO (MALAYSIA) BERHAD combats bribery and corruption in furtherance of the Company’s commitment to lawful and ethical behavior at all times.

For the purpose of this policy, the wrongful activities or wrongdoings refers to any potential violations or concerns relating to any laws, rules, regulations, acts, ethics, integrity and business conduct, including any violations or concerns relating to malpractice, illegal, immoral, embezzlement and fraudulent activities which will affect the business and image of AJINOMOTO (MALAYSIA) BERHAD.

In compliance with the Malaysian Anti-Corruption Commission Act 2009 (including any amendment thereof), AJINOMOTO (MALAYSIA) BERHAD is committed to preventing bribery and corruption by adopting the principles of **T.R.U.S.T** as prescribed in “Guidelines on Adequate Procedures” issued by the Prime Minister’s Department pursuant to the Act.

Top level commitment

Top level management practices highest level of integrity and ethics and is responsible for ensuring full compliance and effective implementation of the anti-corruption and bribery programmes in managing key corruption risks.

Risk assessment

Corruption risk assessment is conducted periodically to identify, analyse, assess and prioritise internal and external corruption risks.

Undertake control measures

Appropriate controls and contingency measures are put in AJINOMOTO (MALAYSIA) BERHAD’s governance framework, processes and practices to address corruption risks that may arise.

Systematic review, monitoring and enforcement

Regular reviews are conducted to assess the effectiveness of AJINOMOTO (MALAYSIA) BERHAD’s anti-corruption programmes to ensure that it is operating as intended.

Training and communication

All officers, employees and business associates of AJINOMOTO (MALAYSIA) BERHAD are provided with appropriate training regarding anti-bribery and corruption compliance. AJINOMOTO (MALAYSIA) BERHAD expects all AJINOMOTO (MALAYSIA) BERHAD’s directors, employees and business associates to comply with all the above principles in the performance of their services for and on behalf of Ajinomoto (Malaysia) Berhad.

Date : 1 June 2020