



PETRA

PETRA ENERGY BHD

**ANTI-BRIBERY MANAGEMENT
SYSTEM MANUAL**



ANTI-BRIBERY MANAGEMENT SYSTEM MANUAL

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1.0 INTRODUCTION OF ANTI-BRIBERY MANUAL

1.1. PURPOSE

Petra Energy Berhad (PEB) and all its Subsidiaries practices the Malaysian Standard for Anti-Bribery Management System (ABMS) which specifies the requirements and provides guidance for the establishment, implementation, maintenance, review and improvement of such system. The system can be deployed on a stand-alone basis or be integrated into an overall management system. This document addresses the following areas of concern in relation to the organisation's activities:

- Bribery in the public, private and not-for-profit sectors;
- Bribery in the organisation;
- Bribery by the organisation's personnel acting on the organisation's behalf or for its benefit;
- Bribery by the organisation's Business Associates acting on the organisation's behalf or for its benefit;
- Bribery of the organisation;
- Bribery of the organisation's Personnel in relation to the organisation's activities;
- Bribery of the organisation's Business Associates in relation to the organisation's activities;
- Direct and indirect bribery (e.g., bribery offered or accepted through or by a third party)

This Manual sets out requirements and provide guidance for a management system designed to help PEB to prevent, detect and respond to bribery and comply with anti-bribery laws, and voluntary commitments applicable to its activities.

This Manual provides an overall policy and outline the Anti-Bribery Management System that has been established by PEB. The Manual can be used either internally within PEB for operational application, or externally by customer or certification bodies as their primary needs for verification of a documented procedures that meet the requirements of the ISO 37001:2016 Standard.



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1.2. SCOPE

This policy is applicable to PEB and its Subsidiaries, its Board of Directors, the respective Board of Subsidiaries and their respective directors, officers and employees ("PEB Group").

Joint-venture companies or co-venture and associated companies in which PEB is non-controlling are required to adopt these or similar principles which reasonably adequate. External services/goods providers and Business Associates are also expected to comply with this policy in relation to all work conducted with PEB, or on PEB's behalf.

Below is the list of PEB Group, its business addresses and business activities: -

No.	Company/Office	Address	Activities
1	Petra Energy Berhad	Suite 13.02, Level 13, Menara OBYU, No. 4, Jalan PJU 8.8A, Bandar Damansara Perdana, 47820 Petaling Jaya, Selangor Darul Ehsan	Provision of Project Management Services which includes Engineering, Procurement, Pre-Fabrication, Hook Up, Commissioning and Major Maintenance Services for oil and gas industries. Provision of Maintenance and Services for oil and gas support equipment such as Cranes, Watermaker, Static and Rotating equipment. Provision of Marine Support Vessels (Accommodation Work Barge, Accommodation Work Boat and Anchor Handling and Tug Services) for the oil and gas industries. Provision of Marine Support Vessels (Accommodation Work Barge, Accommodation Work Boat and Anchor Handling and Tug Services) for



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No.	Company/Office	Address	Activities
			<p>the oil and gas industries. (Logistic and Warehousing Yard)</p> <p>Provision of Development and Production of Marginal or Small Oil and Gas Field and Operation, Maintenance and Production Enhancement Services.</p>
2	Petra Resources Sdn Bhd – Kuala Lumpur Project Office	Suite 13.02, Level 13, Menara OBYU, No. 4, Jalan PJU 8/8A, Bandar Damansara Perdana, 47820 Petaling Jaya, Selangor Darul Ehsan.	Provision of Project Management Services which includes Engineering, Procurement, Pre-Fabrication, Hook Up, Commissioning and Major Maintenance Services for oil and gas industries.
3	Petra Resources Sdn Bhd – Miri Project Office	Lot 651, H.S. Chin Building, Lorong 2, Krokop 2, 98000 Miri, Sarawak	Provision of Project Management Services which includes Engineering, Procurement, Pre-Fabrication, Hook Up, Commissioning and Major Maintenance Services for oil and gas industries.
4	Petra Resources Sdn Bhd – Kota Kinabalu Project Office	Lot 1-3, 2-3,3-3, 4-3, Second Floor, Lintas Platinum, Kampung Nosob, 88300 Penampang, Sabah	Provision of Project Management Services which includes Engineering, Procurement, Pre-Fabrication, Hook Up, Commissioning and Major Maintenance Services for oil and gas industries.
5	Petra Resources Sdn Bhd – Petra Fabrication Yard (PFY) Labuan	Lot 205312634, SK1, Jalan Ranche-Ranche, Labuan F.T, 87025 Malaysia	Provision of Project Management Services which includes Engineering, Procurement, Pre-Fabrication,



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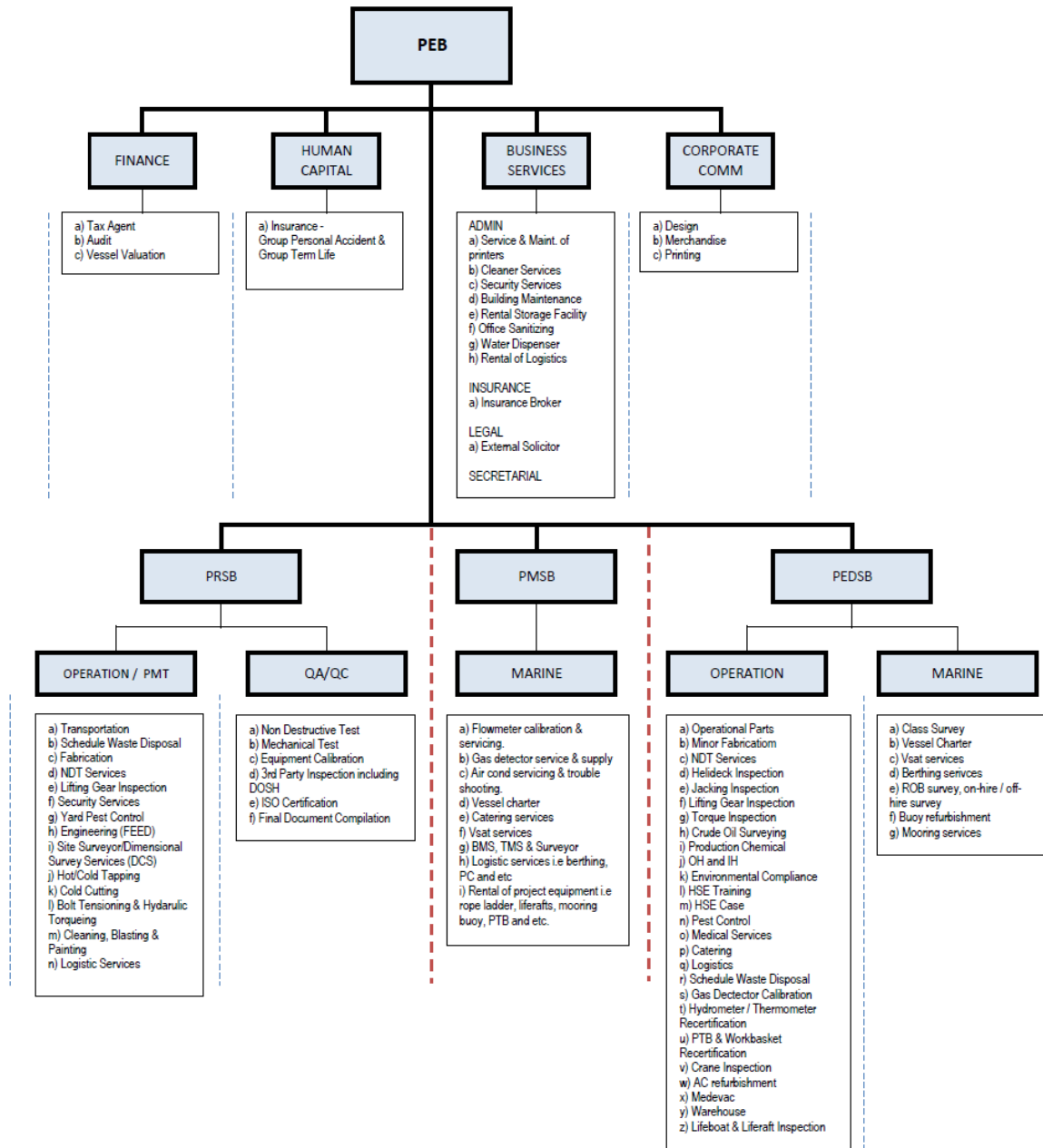
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No.	Company/Office	Address	Activities
			Hook Up, Commissioning and Major Maintenance Services for oil and gas industries.
6	Petra Resources Sdn Bhd – Petra Secondary Yard (PSY) Labuan	Lot 10832 & Lot 205314290, Kampung Sungai Keling, Jalan Kinabenua, 87000 Labuan F.T, Malaysia	Provision of Project Management Services which includes Engineering, Procurement, Pre-Fabrication, Hook Up, Commissioning and Major Maintenance Services for oil and gas industries.
7	Petra Resources Sdn Bhd – Piasau Project Office	Lot 2000, Piasau Industrial Estate, Miri, 98000 Sarawak	Provision of Maintenance and Services for oil and gas support equipment such as Cranes, Watermaker, Static and Rotating equipment.
8	Petra Marine Sdn Bhd – Miri Project Office	Lot 651, H.S. Chin Building, Lorong 2, Krokop 2, 98000 Miri, Sarawak	Provision of Marine Support Vessels (Accommodation Work Barge, Accommodation Work Boat and Anchor Handling and Tug Services) for the oil and gas industries.
9	Petra Marine Sdn Bhd - Labuan	10775, Lot 10832, Jalan Kinabenua, Kampung Sungai Keling, 87000 Labuan F.T, Malaysia	Provision of Marine Support Vessels (Accommodation Work Barge, Accommodation Work Boat and Anchor Handling and Tug Services) for the oil and gas industries. (Logistic and Warehousing Yard)
10	Petra Energy Development Sdn Bhd – Kuala Lumpur Project Office	Suite 13.02, Level 13, Menara OBYU, No. 4, Jalan PJU 8/8A, Bandar Damansara Perdana, 47820 Petaling Jaya, Selangor Darul Ehsan.	Provision of Development and Production of Marginal or Small Oil and Gas Field and Operation, Maintenance and Production Enhancement Services.

Below is the list of outsourced activities under PEB Group:-





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2. MANUAL CONTROL, TERMINOLOGIES, ABBREVIATIONS AND DEFINITIONS

2.1. DOCUMENT CONTROL

The Appointed Custodian of the manual on behalf of Group CEO is the Head of Compliance Department. All inquiries and requests for revisions relating to the manual should be addressed to the appointed custodian.

2.2. TERMINOLOGIES, ABBREVIATIONS AND DEFINITIONS

Terminology Abbreviation	Definition
ABAC Policy Statement	Petra's Anti-Bribery and Anti-Corruption Policy Statement
ABMS	ISO 37001:2016 Anti-Bribery Management System.
Adequate Procedures	Anti-Bribery & Anti-Corruption procedures that need to be in place as stated in the Malaysian Anti-Corruption Commission (MACC)'s Ministerial Guidelines issued by the Minister in the Prime Minister's Office.
Appointed Custodian	Shall refer to the Head of Compliance Department.
Bribery and Corruption	<p>Any action which would be considered as an offence of giving or receiving 'Gratification' under the Malaysian Anti-Corruption Commission Act 2009 (MACCA) including any amendments and any re-enactment thereof. In practice, this means offering, promising to give, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person who is in a position of trust within an organisation.</p> <p>Gratification in this context shall include the following;</p> <p>(a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property, being property of any description whether movable or immovable, financial benefit, or any other similar advantage;</p> <p>(b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;</p>



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Terminology Abbreviation	/ Definition
	<p>(c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;</p> <p>(d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;</p> <p>(e) any forbearance to demand any money or money's worth or valuable thing;</p> <p>(f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and</p> <p>(g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).</p>
BOD	Petra Energy Berhad's Board of Directors
BRMC	Petra Energy Berhad's Board Risk Management Committee.
Business Associates	An external party with whom PEB has, or plans to establish, any form of business relationship. This may include clients, customers, joint ventures, consortium, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors.
Conflict of Interest	A situation in which a person is in a position to derive personal benefit from actions or decisions made in their official capacity
Donation and Sponsorship	Charitable contributions and sponsorship payments made to support the community. Examples include sponsorship of educational events, supporting Non-Governmental Organisation (NGO)s, and other social causes;
Group CEO	PEB's Group Chief Executive Officer.
GLOA	PEB's Group Limits of Authority.



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Terminology Abbreviation	Definition
HOD	Head of Department.
Hospitality	The considerate care of guests, which may include refreshments, accommodation and entertainment at a restaurant, hotel, club, resort, convention, concert, sporting event or other venue such as Company's offices, with or without the personal presence of the host. Provision of travel may also be included, as may other services such as provision of guides, attendants and escorts; use of facilities such as a spa, golf course or ski resort with equipment included.
IO	Integrity Officer.
ISO	International Organization For Standardization
IU	Integrity Unit.
PEB/PETRA	Petra Energy Berhad and its Group of Companies.
Personnel/Employee	Directors and members of the board including subsidiaries and all individuals directly contracted to the Company on an employment basis, including permanent and temporary employees. The directors refer herein shall include the definition in the Section 2 of the Companies Act 2016
PO/SO	Purchase Order / Service Order
Senior Management	Senior Management of PEB Group, consists of:- 1) Head Business Unit 2) Head Corporate Unit 3) Head of Department
SOP	Standard Operating Procedure
Subsidiary/ Subsidiaries	Shall refer to Section 4 of the Company Act 2016. Any company or other entity that directly or indirectly through one or more intermediary, controls or is controlled by or is under common control with a Party. "Control" means ownership of more than fifty percent (50%) of the voting stock



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Terminology Abbreviation	Definition
	of the controlled company or the direct or indirect right to determine its actions by contract or otherwise.
Third Party	Person(s) or party(ies) who is not PEB's Business Associates and not a party to a contract or a transaction with PEB Group. The third party has no legal rights in the matter, unless the contract was made between PEB and the third party for both or either's party benefit.
Top Management	Top Management of PEB Group, consists of:- <ol style="list-style-type: none">1) Group Chief Executive Officer2) Executive Directors

3. ORGANISATION BACKGROUND

3.1. VISION

PEB's vision is to be a Sustainable Energy Company.

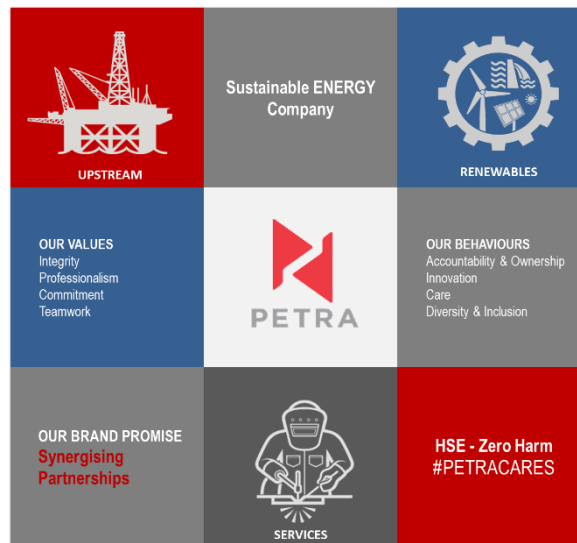
3.2. MISSION

The PETRA brand promise is Synergising Partnerships

At PETRA, we believe our competitive edge lies in the synergies formed with our stakeholders; clients, business partners and vendors, shareholders, employees and the investment community. Partnerships that have helped us grow over the years and synergies that will strengthen our resilience in the industry.

3.3. STRATEGIC GOALS

The Group is on a 5-year Transformation Journey (2019 – 2024), the Transformation Roadmap aims to create a more diversified and robust PETRA with three major business segments i.e. Services, Upstream and Renewables, as depicted in the graphic illustration below, supported by our Values and desired behaviours with HSE as a cornerstone of the Group’s operations. .



3.4. ORGANISATIONAL CHART (*Attachment 2*)

4. CONTEXT OF THE ORGANISATION

4.1. UNDERSTANDING THE ORGANISATION AND ITS CONTEXT

PEB has committed to implement ABMS in all its strategic objectives, business processes and management of external and internal issues. These issues will include, without limitation the following factors:-

- a) The size, structure and delegated decision-making authority of the organisation;
- b) The locations and sectors in which the organisation operates or anticipates operating;
- c) The nature, scale and complexity of the organisation’s activities and operations;



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- d) The organisation's business model;
- e) The entities over which the organisation has control and entities which exercise control over the organisation;
- f) The organisation's Business Associates;
- g) The nature and extent of interactions with public officials;
- h) Applicable statutory, regulatory, contractual and professional obligations and duties.

Related documented information :-

1	Attachment 1	Internal & External issues
2	Attachment 2	Organisational chart for PEB Group and Subsidiaries

4.2. UNDERSTANDING THE NEEDS AND EXPECTATIONS OF STAKEHOLDERS

- a) PEB stakeholders' engagement activities are an integral part of the sustainable business strategies. Within its operating environment, PEB had identified the key stakeholders and engages with them to ensure that the stakeholders understand the Group's commitment towards anti-bribery/anti-corruption and its related initiatives or activities.
- b) PEB will proactively identify and seek out stakeholders in the business endeavour and take these key stakeholders into consideration in the design and implementation of PEB anti-bribery/anti-corruption initiatives/activities.
- c) It is critical to align the stakeholders' interests with the ABAC Policy. The alignment is being carried out through a "methodology" that identified actions required to engage with stakeholders..
- d) The engagement shall include:
 - i. communicating our commitment and policy with regards to anti-bribery/anti-corruption
 - ii. understanding the stakeholders' expectations, interests, concerns and culture
 - iii. understanding the Business Associates' existing anti-bribery/anti-corruption programs
 - iv. requiring stakeholders' cooperation to ensure the continuous effective



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- implementation of the Group's anti-bribery management system e.g. constructive feedback to improve our system
- v. With Business Associates, have mutual understanding on the approach to communicate suspicious incidences and potential actions to be taken
 - vi. for key new venture or project, explore the possibility of having a joint session to renew commitment/pledge to anti-bribery/anti-corruption

Where appropriate and necessary, the outcome of stakeholders' engagement can be addressed by way of improving our existing Anti-Bribery and Anti-Corruption Policy, Manual and its related activities.

Related documented information :-

1	Attachment 3	Needs and expectations of the stakeholders
2	Attachment 4	List of Applicable Laws

4.3. DETERMINING THE SCOPE OF THE ANTI-BRIBERY MANAGEMENT SYSTEM

By considering the internal and external issues and their requirements; and identifying the needs and expectations of the stakeholders; and the result of the Bribery Risk Assessment, the scopes shall cover all processes and businesses within the PEB Group that includes but not limited to the following:

- a) Integrated brownfield maintenance and engineering project management;
- b) Development and production of oil and gas;
- c) Marine fleet management;
- d) Yard operations (fabrication work and asset management);
- e) All other businesses that may or may not generate direct or indirect income to the Group.

PEB is committed to look into its processes and businesses in terms of bribery, from time to time.



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4.4. ANTI-BRIBERY MANAGEMENT SYSTEM

PEB shall establish, document, implement, maintain and continuously review and improve an anti-bribery management system, including the processes needed and their interactions, in accordance with the requirements of this manual and ABAC Policy Statement.

The ABMS shall contain measures designed to identify and evaluate the risk of and to prevent, detect and respond to bribery.

Related documented information:-

1	Attachment 5	PEB's Process mapping
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4.5. BRIBERY RISK ASSESSMENT

PEB shall periodically undertake to perform bribery risk assessment in identifying, assessing, and mitigating the bribery risk.

PEB has established a standard risk register format suitable for Bribery Risk Assessment which includes the treatment of bribery risk as stated in Clause 6.1 of the standard.

Related documented information :-

1	PEB's Corruption Risk Register
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5. LEADERSHIP

5.1. LEADERSHIP AND COMMITMENT

5.1.1 GOVERNING BODY

The Governing Body of PEB and its Subsidiaries for Anti-Bribery and Anti-Corruption program is the BOD of PEB. Every Subsidiary shall be represented by at least one (1) of its board of director in the Governing Body.

The Governing Body shall be responsible as a supervisory that has the oversight responsibilities with regards to ABMS. The Governing Body shall be made known about the content and the operation of the ABMS and to exercise reasonable oversight with respect to the adequacy, effectiveness and implementation of the ABMS by PEB and its Subsidiaries



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The Governing Body shall demonstrate leadership and commitment with respect to the ABMS and shall be:

- a) The approving authority of the ABAC Policy Statement;
- b) Ensuring that PEB's strategy and ABAC Policy Statement are aligned;
- c) At planned intervals, receive and review information about the content and operation of PEB's ABMS;
- d) Ensuring that adequate resources are allocated and assigned for effective operation of the ABMS;
- e) Exercising reasonable oversight over the implementation of the Adequate Procedures and its effectiveness.

5.1.2 Board Risk Management Committee (BRMC)

BRMC is a committee formed within the BOD of PEB i.e. the Governing Body. The BOD of PEB entrusted BRMC to assist the BOD on all matters related to Anti-Bribery and Anti-Corruption and report to the BOD. This includes but not limited to the following:

- a) Regularly update the BOD of PEB regarding the performance of the ABMS.
- b) Representing the BOD of PEB in attending to the Management Review (refer to Clause 9) process.
- c) Review all ABAC related policies, manual and procedures (and includes any amendments and any revision thereof) prior to recommending to the BOD for approval.
- d) Review the adequacy of the resources allocated and assigned for effective operation of the ABMS and advise the BOD.
- e) On behalf of the BOD, receive and review all reports submitted by Compliance Department.

5.1.3 TOP MANAGEMENT

Top Management with the support by Compliance Department shall be deemed to have demonstrated their leadership and commitment with respect to the ABMS by:

- a) Ensuring that the ABMS, including policy and objectives, is established, implemented, maintained and reviewed to adequately address the organisation's bribery risks;
- b) Ensuring the integration of the ABMS requirements into the organisation's processes;
- c) Deploying adequate and appropriate resources for the effective operation of the ABMS;
- d) Communicating internally and externally for the effective operation of the ABMS policies;
- e) Communicating internally and externally the importance of effective anti-bribery management and of conforming to the ABMS requirements;
- f) Ensuring that the ABMS is appropriately designed to achieve its objective;
- g) Directing and supporting Personnel and Business Associates to contribute to the effectiveness of the ABMS;
- h) Promoting an appropriate anti-bribery culture within the organisation by signing the Integrity Pact;
- i) Promoting continual improvement;
- j) Supporting other relevant management roles to demonstrate their leadership in preventing and detecting Bribery as it applies to their areas of responsibility;
- k) Encouraging the use of reporting procedures for suspected and actual Bribery;
- l) Ensuring that no party, whether individual or organization, will suffer retaliation, discrimination or disciplinary action for reports made in good faith;
- m) At planned intervals, reporting to the Governing Body on the content and operation of the ABMS and of allegations of serious or systematic bribery.



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Related documented information: -

1	Minutes of Meeting regarding implementation of ABAC program
2	Organisational chart
3	Integrity Pact

5.2. ANTI-BRIBERY POLICY

5.2.1 PEB is committed not to engage in Bribery and Corruption by: -

- Working together to create a bribe-free business environment and achieving its anti-bribery and anti-corruption objectives;
- Supporting anti-bribery and anti-corruption principles for Malaysian companies in business dealings and interactions with Business Associates and government agencies;
- Complying with laws and regulations relating to the fight against Bribery and Corruption;
- Establishing anti-bribery and anti-corruption control system and implement continual improvements;
- Promoting the values of transparency and good corporate governance;
- Setting up an independent function responsible for anti-bribery and anti-corruption compliance in the organisation;

5.2.2 Employees who do not comply with this ABAC Policy Statement shall be subjected to disciplinary actions in accordance with PEB's policies, procedures, directives and guidelines and if warranted, legal action based on the applicable laws.

Related documented information:-

1	Attachment 6	PEB's ABAC Policy Statement
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5.3. ORGANISATIONAL ROLES, RESPONSIBILITIES AND AUTHORITIES

5.3.1 ROLES AND RESPONSIBILITIES

Top management shall have overall responsibility for the implementation of, and compliance with, the anti-bribery management system, as described in 5.1.2.

Top management shall ensure that the responsibilities and authorities for relevant roles are assigned and communicated within and throughout every level of the organization.

Senior Management shall be responsible for requiring that the anti-bribery management system requirements are applied and complied with in their department or function.

The Governing Body, Top Management and all other personnel shall be responsible for understanding, complying with and applying the anti-bribery management system requirements, as they relate to their role in the organization.

5.3.2 ANTI-BRIBERY COMPLIANCE FUNCTION

Top Management shall assign to an anti-bribery compliance function the responsibility and authority for: -

- a) Overseeing the design and implementation by the organization of the anti-bribery management system;
- b) Providing advice and guidance to personnel on the anti-bribery management system and issues relating to bribery;
- c) Ensuring that the anti-bribery management system conforms to the requirement of this document; and
- d) Reporting on the performance of the anti-bribery management system to the Governing Body and Top Management and other compliance functions, as appropriate.

The anti-bribery compliance function shall be adequately resourced and assigned to person(s) who have appropriate competence, status, authority and independence.

The anti-bribery compliance function shall have direct and prompt access to the Governing Body and Top Management in the event that any issue or concern needs to be raised in relation to bribery or the anti-bribery management system.



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Top Management can assign some or all of the anti-bribery compliance function to persons external to the organization. If it does, Top Management shall ensure that specific personnel have responsibility for, and authority over, those externally assigned parts of the function.

Related documented information:-

1	Attachment 6	PEB's ABAC policy Statement
2	Attachment 7	Organisational chart of Compliance Department including responsibilities for each function including the Terms of Reference

5.3.3 DELEGATED DECISION MAKING

PEB has established the Group Limits of Authority (GLOA) document that identifies the authorities for the making of decisions which includes consideration in ensuring the lowest risk of bribery. PEB shall, from time to time, review the decision-making process and ensure that the established level of authority of the decision maker is appropriate and free of actual or potential Conflicts of Interest.

All these processes are to be reviewed periodically by the Top Management as part of its role and responsibility, for implementation and compliance in line with the PEB's ABMS. However, delegation of decision making does not exempt the Top Management or the Governing Body of their duties and responsibilities as described in Clause 5.1.1, Clause 5.1.2 and Clause 5.3.1, nor does it necessarily transfer potential legal responsibilities to the delegated Personnel.

Related documented information :-

1	PEB's Group Limits of Authority
2	PEB's Employee Handbook



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6. PLANNING

6.1. ACTIONS TO ADDRESS RISKS AND OPPORTUNITIES

When planning for the ABMS, PEB shall consider the bribery risks before taking actions or making any decision within the Management System, as well as when implementing or improving the management system. Bribery risks and opportunities for improvement are managed in accordance to PEB Group's Risk Management Framework. The documents were developed to outline the policy, procedure and framework for risk assessment and treatment process to be adopted across PEB.

6.2. ANTI-BRIBERY OBJECTIVES AND PLANNING TO ACHIEVE THEM

The Anti-Bribery objectives will be monitored with appropriate provision of resources and PEB has assigned Compliance Department in order for the plan to achieve its intended result. The Anti-Bribery Objectives will be subjected under ABAC internal audit and reviewed in the management review meeting for continual improvement. PEB has outline their respective objectives which are:

- a) Consistent with ABAC Policy Statement;
- b) Measurable;
- c) Taking into account applicable factors referred to in Clause 4.1, the requirements referred to in Clause 4.2 and the bribery risks identified in Clause 4.5;
- d) Achievable;
- e) Monitored;
- f) Communicated;
- g) Updated.

Documented information on ABMS objectives shall be retained.

To ensure the ABMS achieves its objectives, PEB has determined:

- i. Method of ABMS;
- ii. Resources required for the implementation of the ABMS;
- iii. The Compliance Department and ABAC Function;
- iv. Result of the whistleblowing will be evaluated, investigated and reported;



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- v. Authority of Governing Body to impose sanctions or penalties.

Related documented information:-

1	PEB's ABAC Program Dashboard
2	PEB's Corruption Risk Register
3	PEB's ABAC Policy Statement
4	PEB's ABMS Objective

7. SUPPORT

7.1. RESOURCES

PEB has determined and provided the resources needed for establishment, implementation, maintenance and continual improvement of the ABMS:

a) Compliance Department

Assigning internal Compliance Department and IO to ensure the ABMS can be functioning effectively.

b) Physical Resources

The adequate and sufficient physical resources for the Compliance Department to function effectively.

c) Financial Resources

There should be a sufficient budget, including in the anti-bribery compliance function, for the anti-bribery management system to function effectively.

7.2. COMPETENCE

- 7.2.1 PEB has determined the necessary competence of person(s) doing work under its control that affects its anti-bribery performance and ensured that these persons are competent on the basis of appropriate education, training, or experience. PEB shall take actions to acquire and maintain the necessary competence, and evaluate the effectiveness of the actions taken and retain appropriate documented information as evidence of competence.



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7.2.2 EMPLOYMENT PROCESS

- (i) In relation to all its Personnel, PEB has established and implemented recruitment procedure which ensures that PEB maintains a high level of integrity and confidentiality.

PEB shall provide consistent approach in handling all confidential information, documents and data to ensure PEB's continuous efforts to maintain a high level of professionalism and integrity in its day-to-day management and business undertakings.

Adherence to PEB's values and desired behaviour will create and promote an environment of mutual trust, consideration for fellow Employees and responsible behaviour. Hence personal integrity, honesty, discipline, commitment to act in PEB's best interest and in accordance with the Employee Handbook.

PEB is serious about being an ethical organisation. Violation of the Code of Ethic will not be tolerated and will result in appropriate disciplinary action being taken including terminating the service of the Employee concerned.

Each employee has a duty to read and understand the Employee Handbook; and promptly report suspected violations and concerns about any situation that could violate the Employee Handbook and PEB's policies.

- (ii) PEB has also taken initiative to enhance the employment process by conducting due diligence during recruitment, promotion and transfer of employee to high bribery risk area. Group Human Capital of PEB is the administrator of remuneration and benefits which includes base salary, statutory and other deductions, overtime, annual increment, salary adjustment, bonus payment and salary payment upon resignation. Monthly salary will be paid to all employees in accordance with their Letter of Appointment, subject to further revisions or increment approved by PEB.

Payment of bonus shall be at the sole discretion of Senior Management and shall be based on the Company's financial performance, the Employee's performance rating and any other factors that PEB deems appropriate.

Details of reward management is available under Group Human Capital.



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Related documented information:-

1	PEB Employee Handbook
2	Due Diligence Policy
3	Reward Management Procedure

7.3. AWARENESS AND TRAINING

PEB shall provide adequate and appropriate anti-bribery awareness and training to personnel. Such training shall address the following issues, as appropriate, taking into account the results of the anti-bribery risk assessment (refer Clause 4.5):

- a) PEB's anti-bribery policy, procedures and anti-bribery management system, and their duty to comply;
- b) The bribery risk and the damage to them and the organisation which can result from bribery;
- c) The circumstances in which bribery can occur in relation to their duties, and how to recognise these circumstances;
- d) How to recognise and respond to solicitations or offer of bribes;
- e) How they can help prevent and avoid bribery and recognise key bribery risk indicators;
- f) Their contribution to the effectiveness of the anti-bribery management system, including the benefits of improved anti-bribery performance and of reporting suspected bribery;
- g) The implications and potential consequences of not conforming with the anti-bribery management system requirements;
- h) How and to whom they are able to report any concerns (refer Clause 8.9);
- i) Information on available training and resources.

Personnel shall be provided with anti-bribery awareness and training on regular basis (at planned intervals determined by PEB), as appropriate to their roles, the risks of bribery to which they are exposed, and any changing circumstances. The awareness and training programmes shall be periodically updated as necessary to reflect relevant new information.

Taking into account the bribery risks identified (refer Clause 4.5), PEB shall also implement procedures addressing anti-bribery awareness and training for Business Associates acting on its behalf or for its benefit, and which could pose more than a low bribery risk to PEB. These



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procedures shall identify the Business Associates for which such awareness and training is necessary, its content, and the means by which the training shall be provided.

PEB shall retain documented information on the training procedures, the content of the training, and when and to whom it was provided.

Related documented information :-

1	Training Modules
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7.4. COMMUNICATION

7.4.1 PEB shall determine the internal and external communications relevant to the anti-bribery management system including:

- a) on what it will communicate;
- b) when to communicate;
- c) with whom to communicate;
- d) how to communicate;
- e) who will communicate;
- f) the languages in which to communicate.

7.4.2 The anti-bribery policy shall be made available to all organisation's personnel and Business Associates, be communicated directly to both personnel and Business Associates who pose more than a low risk of bribery, and shall be published through the organisation's internal and external communication channels, as appropriate.

Related documented information:-

1	Medium for communication, meetings, awareness (overall communication)
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7.5. DOCUMENTED INFORMATION

7.5.1 GENERAL

PEB's anti-bribery management system shall include: -

- a) Receipt of anti-bribery policy by personnel;
- b) Provision of anti-bribery policy to Business Associates who pose more than a low risk of bribery;
- c) The policies, procedures and controls of the anti-bribery management system;
- d) Bribery risk assessment results (refer Clause 4.5);
- e) Anti-bribery training provided (refer Clause 7.3);
- f) Due diligence carried out (refer Clause 8.2);
- g) The measures taken to implement the anti-bribery management system;
- h) Approvals and records of gifts, hospitality, donations and similar benefits given and received (refer Clause 8.9)
- i) The actions and outcomes of concerns raised in relations to:
 - i. Any weakness of the anti-bribery management system;
 - ii. Incidents of attempted, suspected or actual bribery;
- j) The results of monitoring, investigating or auditing carried out by PEB or third parties.

7.5.2 CREATING AND UPDATING

When creating and updating documented information the organisation shall ensure appropriate:

- a) Identification and description (e.g. a title, date, author, or reference number);
- b) Format (e.g. language, software versions, graphics) and media (e.g. paper, electronic);
- c) Review and approval for suitability and adequacy.



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7.5.3 CONTROL OF DOCUMENTED INFORMATION

PEB has established proper procedures to control all documented information for operational services. All documents shall be available, protected, distributed, stored and preserved, retained and disposed as per requirement.

Related documented information:-

1	PEB's Control of Quality Record
2	PEB's Control of Document Procedure

8. OPERATION

8.1. OPERATIONAL PLANNING AND CONTROL

PEB plan, implement, review and control the process needed to meet the requirement of ABMS and to implement actions determined in the risk register.

PEB control planned changes and review the consequences of unintended changes, taking action to mitigate any adverse effects as necessary. PEB shall ensure that outsourced processes are controlled and supervised.

Related documented information :-

1	PEB's Group Corruption Risk Register
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8.2. DUE DILIGENCE

Where PEB's Corruption Risk Register, as conducted in Clause 4.5 herein has assessed a more than low bribery risk in relation to:

- a) Specific categories of transactions, projects or activities;
- b) Planned or on-going relationships with specific categories of Business Associates, or
- c) Specific categories of Personnel in certain positions;

PEB has assessed the nature and extent of the bribery risk in relation to specific transactions, project, activities, Business Associates and Personnel falling within those categories. This assessment has included any due diligence necessary to obtain sufficient information to assess the bribery risks. The due diligence shall be updated at a defined frequency, so that changes and new information can be properly be taken into account.



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Related documented information :-

1	PEB's ABAC Policy Statement, Employee Handbook & any related procedures
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8.3. FINANCIAL CONTROLS

PEB has implemented financial controls that manage bribery risks using management systems and processes currently in place. PEB shall manage its financial transaction properly and record these transactions accurately, completely and in a timely manner. PEB has adopted GLOA as an essential aspect of the corporate governance framework of the organisation and has been incorporated into the Group's Financial Reporting system.

Related documented information :-

1	PEB's Group Limits of Authority
2	PEB's Group Finance procedures

8.4. NON-FINANCIAL CONTROLS

Non-financial controls are the management systems and processes implemented by PEB to help to ensure that the procurement, operational, commercial and other non-financial aspects of its activities are being properly managed and reduce the bribery risks, for example but not limited to the following controls

- i. Using approved Business Associates that have undergone a pre-qualification process;
- ii. Assessing the necessity and legitimacy of the services provided by Business Associates (e.g. whether services were properly carried out, payment made are reasonable and proportionate, etc)
- iii. Awarding contracts where possible and reasonable based on fair and transparent competitive tender/procurement process;
- iv. Requiring more than 1 person in the evaluation and approval process, signing of the contract;
- v. Placing a higher level of management oversight on potentially high bribery risk transactions;
- vi. Protecting the confidentiality of the tender/procurement process by restricting the access to information;



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- vii. Providing appropriate tools and templates to assists Personnel (e.g. practical guidance, checklists, etc.)

Related documented information :-

1	Refer to list of SOP - List of operations procedures
2	Integrity Pact

8.5. IMPLEMENTATION OF ANTI-BRIBERY CONTROLS BY BUSINESS ASSOCIATES.

Any PEB's Business Associates shall have their own anti-bribery initiatives or shall follow PEB anti-bribery initiatives to ensure that anti-bribery objectives are met.

Related documented information :-

1	PEB's PO/SO Terms and Conditions as per the Supply Chain Management Policy
2	PEB's Service Agreement
3	PEB's ABAC Policy Statement

8.6. IMPLEMENTATION OF ANTI-BRIBERY CONTROLS BY ASSOCIATED COMPANY

PEB shall ensure that every Associated Company to adopt these or any similar principles which are reasonably adequate to their own anti-bribery initiatives or shall follow PEB anti-bribery initiatives to ensure that anti-bribery objectives are met.

8.7. IMPLEMENTATION OF ANTI-BRIBERY CONTROLS IN DEALINGS WITH PUBLIC BODY

PEB shall ensure that every Subsidiaries and its BOD, BOD Subsidiaries, Personnel, Associated Companies, Business Associates is prohibited to offer or attempt to offer any form of gratification to Public Body with the intent to gain an improper advantage.

Employee must refuse Public Body's request for a bribe. Employee shall not be penalized for refusing to engage in corrupt activities, even if such a refusal results in a loss of business.

Employees are obliged to report any request for bribe by public official to the IO immediately without delay and if situation does not permit, as soon as practicable. The relevant notifications to the IO too shall be treated in strict confidence.



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Related documented information :-

1	PEB's Whistleblowing Policy
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8.8. ANTI-BRIBERY COMMITMENTS

For business associates which pose more than a low bribery risk, the organization shall implement procedures which require that, as far as practicable:

- a) business associates commit to preventing bribery by, on behalf of, or for the benefit of the business associate in connection with the relevant transaction, project, activity, or relationship;
- b) the organization is able to terminate the relationship with the business associate in the event of bribery by, on behalf of, or for the benefit of the business associate in connection with the relevant transaction, project, activity, or relationship.

Where it is not practicable to meet the requirements of a) or b) above, this shall be a factor taken into account in evaluating the bribery risk of the relationship with this business associate (see 4.5 and 8.2) and the way in which the organization manages such risks (see 8.3, 8.4 and 8.5, PEB is committed to obtain commitment in relation with Business Associates to prevent Bribery by, on behalf of, or for the benefits in connection with relevant transaction, project, activity or relationship. PEB is also able to terminate the relationship in the event of Bribery.

Related documented information :-

1	PEB's PO/SO Terms and Conditions as per the Supply Change Management Policy
2	Agreements and Integrity Pact – commitment with Business Associates on anti-bribery

8.9. GIFTS, HOSPITALITY, DONATIONS AND SIMILAR BENEFITS

PEB shall prevent the offer, provision of acceptance of gifts, entertainment, travel, sponsorship and donations where the offering, provision or acceptance is or could reasonably be perceived as Bribery.

PEB is also preventing from offering gifts, entertainment, travel, sponsorship and donations without getting prior approvals from relevant authorized Personnel as per GLOA or other established exceptions.

Under no circumstance should the PEB make contribution to any political party or an election campaign with the intent to obtain favour or benefit from the said political party.



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Where political contribution is being made, it must be made with NO expectation or promise return of favor and the contribution must be accurately accounted in the book of the Group. Neither should political contribution be made to influence a decision to award contract, renewal of contract or better treatment.

Mode of payment for Political Contributions must NOT in cash but with method that has audit trail e.g. via cheque or wire transfer and MUST BE duly supported by original receipts.

Related documented information :-

1	PEB's Employee Handbook
2	Sponsorship and Donations Policy

8.10. MANAGING INADEQUACY OF ANTI-BRIBERY CONTROLS

If the due diligence (Clause 8.2) conducted on specific transaction, project, activity or relationship with a Business Associate establishes that the bribery risks cannot be managed by existing anti-bribery controls, and the organisation cannot or does not wish to implement additional or enhances anti-bribery control or take other appropriate steps to manage the relevant bribery risks, whereas PEB shall:

- In an existing and on-going transaction, project, activity or relationship, take the appropriate steps to eliminate or prevent the bribery risks and to terminate, discontinue, suspend or withdraw from it as soon as practicable;
- In a proposed new transaction, project, activity or relationships, to postpone and take appropriate steps to eliminate or prevent the bribery risks or decline to proceed with it.

Related documented information: -

1	PEB's Corruption Risk Register
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8.11. RAISING CONCERNS

PEB shall:

- a) Encourage and enable any individual or organization to report in good faith or on the basis of a reasonable belief attempted, suspected and actual Bribery, or any violation of or weakness in the ABMS manual;
- b) Except to the extent required to progress an investigation, require that the treats reports confidentially, so as to protect the identity of the reporter and of others involved or referenced in the report;
- c) Allow anonymous reporting;
- d) Prohibit retaliation, and protect those making reports from retaliation, after they have in good faith, or on the basis of a reasonable belief, raised or reported a concern about attempted, actual or suspected bribery or violation of the ABMS Manual; and
- e) Enable Personnel to receive advice from an appropriate person on what to do if faced with a concern or situation which could involve bribery.

The organization shall ensure that all personnel are aware of the reporting procedures and are able to use them, and are aware of their rights and protections under the procedures.

Related documented information :-

1	PEB's Whistleblowing Policy
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8.12. INVESTIGATING AND DEALING WITH BRIBERY

PEB will follow the following principles in the investigation:

- a) Requires assessment and, where appropriate, investigation of any bribery, or violation of the ABMS, which is reported, detected or reasonably suspected.
- b) Requires appropriate action in the event that the investigation reveals any Bribery, or violation of the ABMS;
- c) Empower and enable investigators;
- d) Requires co-operation in the investigation by Personnel.;
- e) Requires that the status and results of the investigation are reported to BRMC;



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- f) Requires that the investigation is carried out confidentially and that the outputs of the investigation are made confidential.

The investigation shall be carried out by Integrity Unit as per the Section A18 of the ISO 37001 Standard.

Related documented information:-

1	PEB's Whistleblowing Policy
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9. PERFORMANCE EVALUATION

9.1. MONITORING, MEASUREMENT, ANALYSIS AND EVALUATION

PEB is responsible to conduct surveys and analysing the results of the surveys to determine the effectiveness of training and Anti-Bribery Plan. Simple statistical techniques shall be used to analyse data collected from the surveys. Based on the feedback received, IU shall take appropriate actions to improvise areas which was rated low or unsatisfactory. Results of the survey shall be included and reported to the Board Meeting on an annual basis.

PEB shall retain appropriate documented information as evidence of the methods and results. PEB also shall evaluate the anti-bribery performance and the effectiveness and efficiency of the ABMS. The monitoring may include the following area:-

- a) Effectiveness of training;
- b) Effectiveness of controls, for example by sample testing outputs;
- c) Effectiveness of allocation of responsibilities for meeting anti-bribery management system requirements;
- d) Effectiveness in addressing compliance failures previously identified;
- e) Instances where internal audit are not performed as scheduled.

Monitoring of compliance performance may include, for example, the following areas:

- i. Non-compliance and "near-misses" (an incident without adverse effect);
- ii. Instances where anti-bribery requirement are not met;
- iii. Instances where objectives are not achieved;
- iv. The status of culture of compliance.



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9.2. INTERNAL AUDIT

PEB shall conduct internal audits at annual intervals to ensure that the ABMS conforms to the planned requirements and effectively implemented and maintained. The scope of the audit includes the following objectives:

- a) To ensure compliance to Anti-Bribery & Anti-Corruption Policy Statement and other related policies such as PEB's Employee Handbook.
- b) To ensure compliance to Petra's ABMS Manual.

The audit shall be conducted by internal auditors that are trained with ABMS. The audit also shall be conducted in accordance with established procedure and the audit report is to be issued to the respective HOD. The audit shall be reasonable, proportionate and risk based which consist of reviewing the procedures, controls and systems for:

- a) Bribery and suspected Bribery;
- b) Violation of ABMS requirements;
- c) Failure of Business Associates to conform to the applicable PEB's ABMS requirements;
- d) Weaknesses in, or opportunities for improvement to the ABMS.

PEB shall ensure that no auditor is auditing his or her own area of work. PEB shall retain the audit programme and audit results as evidence of documented information.

HOD are responsible for the area being audited and they shall ensure that timely corrections and corrective actions are taken for any non- conformances detected during audits. Follow-up audits shall be undertaken to verify and record on the implementation and effectiveness of corrective actions taken.

9.3. MANAGEMENT REVIEW

9.3.1 TOP MANAGEMENT REVIEW

Top Management shall review the organisation's ABMS, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness.

The Top Management review shall include consideration of:

- a) The status of actions from previous management reviews;
- b) Changes in external and internal issues that are relevant to the ABMS;



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- c) Information on the performance of ABMS, including trends in:
 - i. Nonconformities and corrective actions;
 - ii. Monitoring and measurement results;
 - iii. Audit results;
 - iv. Report of Bribery;
 - v. Investigations;
 - vi. The nature and extent of the bribery risks faced by the organisation.
- d) Effectiveness of actions taken to address bribery risks;
- e) Opportunities for continual improvement of the ABMS.

9.3.2 MANAGEMENT REVIEWS OUTPUT

The outputs of the Top Management review shall include decisions related to continual improvement opportunities and any need for changes to the ABMS.

A summary of the results of the Top Management review shall be reported to the Governing Body .

The organisation shall retain documented information as evidence of the results of Top Management reviews.

9.3.3 GOVERNING BODY REVIEW

The Governing Body, shall undertake periodic reviews of the ABMS based on information provided by Top Management and the Anti-Bribery Compliance Department and any other information that the Governing Body requests or obtains.

PEB shall retain summary documented information as evidence of the results of Governing Body reviews.



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9.4. REVIEW BY ANTI-BRIBERY COMPLIANCE DEPARTMENT

The Anti-Bribery Compliance Department shall assess on a continual basis whether the anti-bribery management system is: -

- a) Adequate to manage effectively the bribery risks faced by the organisation;
- b) Being effectively implemented.

The Anti-Bribery Compliance Department shall report at planned intervals, and on an *ad hoc* basis, as appropriate, to the Governing Body and Top Management, or to a suitable committee of the Governing Body or Top Management, on the adequacy and implementation of the ABMS, including the results of investigations and audits.

10. IMPROVEMENT

10.1 NONCONFORMITY AND CORRECTIVE ACTION

Depending on the effects of the nonconformities encountered, PEB takes appropriate corrections or corrective actions by eliminating their causes, in order to prevent recurrence and to create permanent solutions. The corrective actions shall be appropriate to the effects of the nonconformities encountered.

PEB has established the Corrective Action Procedure to define the requirements for:

- a) Reviewing nonconformities;
- b) Determining the causes of nonconformities;
- c) Evaluating the need for actions to ensure that nonconformities do not recur;
- d) Determining and implementing action needed;
- e) Updating risks and opportunities if necessary;
- f) Records of the results of action taken, and;
- g) Reviewing the effectiveness of the corrective action taken.

Enhancements of the ABMS as a result of measures taken in reaction to any nonconformity and corrective action resulting from continual improvements should be carried out under the same approach



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10.2 CONTINUAL IMPROVEMENT

PEB shall continually assess and improve the suitability, adequacy and effectiveness of the ABMS. When PEB determines the need for changes to the ABMS, such changes according to Clause 2.1, should be carried out in a planned manner by considering the following:

- a) the purpose of the changes and their potential consequences;
- b) the integrity of the anti-bribery management system;
- c) the availability of resources;
- d) the allocation or reallocation of responsibilities and authority;
- e) the rate, extent and timeframe of implementing the changes.