

	PEMBINAAN MITRAJAYA SDN BHD	PMJ/ABMSM/SEC2/ ABMSP
ABMS Manual Section 2	ABMS Policy	Page: 1/2
ABMS POLICY Pembinaan Mitrajaya Sdn. Bhd. ("PMJSB") is committed to conduct its business in a fair, open, honest, legal, and ethical manner. The company practices high ethical standards of professionalism and with integrity in everything that we do. This Anti-Bribery Management Systems Policy ("ABMS") represents the PMJSB commitment in zero tolerance to all forms of bribery and corruption. As such, it provides a clear policy of the conduct which is expected of the PMJSB's personnel. The Directors of the PMJSB is committed to comply with the MACC Act 2009. Thus, this ABMS Policy sets out the PMJSB's overall position to strictly prohibit any acts of bribery and corruption, and requires all its personnel to observe and apply the PMJSB 3 core value of CCA (Change, Commitment & Accountability) in their day-to-day operations and business affairs for the interest and reputation of the PMJSB. The Board of Directors and PMJSB Top Management are committed to implementing controls and continuous improvement through PMJSB Anti-Bribery Management System PRINCIPAL ON ANTI-BRIBERY Conflict of Interest All personnel must ensure that personal interest and business affairs or other activities outside the PMJSB whether it benefits or their closely related person(s), i.e. relatives or closely associated, do not conflict or may appear to be compete or conflict with the interests of the PMJSB. All personnel shall declare their conflict of interest as soon as they are aware to their relevant heads of departments/business. Gift and Hospitality As a general normal business hospitality principle, personnel may accept or offer gifts and hospitality as long as it is infrequent, reasonable, and modest in value where there is no risk of improper influence on a decision and is a bone fide corporate social hospitality. Entertainment PMJSB allows appropriate business-related entertainment. Personnel are allowed to offer or accept entertainment/recreation of a moderate and reasonable value, which comes with proper justification, without the intention of influencing someone to act improperly, or as a reward for having acted improperly or in a position of conflict. Donation and Sponsorships, Including Political Contributions PMJSB allowed charitable donations and sponsorships including political contributions for legitimate reasons as permitted under applicable laws and regulations but subject to due diligence and the relevant management approval. Tender Process Any bidding process participated by any company under the PMJSB should be done in an appropriate and transparent manner according to the tender board procedures. Third Parties and Agencies All third parties, including without limitations to agents, consultants, contractors, subcontractors, supplier and joint venture partners should be aware of this ABMS Policy.		
Revision: 00	Effective Date: 13-10-2025	

	PEMBINAAN MITRAJAYA SDN BHD	PMJ/ABMSM/SEC2/ ABMSP
ABMS Manual Section 2	ABMS Policy	Page: 2/2
The PMJSB expects them to comply with the minimum standards and procedure relating to anti-bribery. PMJSB reserves the right to amend this policy from time to time. PEMBINAAN MITRAJAYA SDN BHD  BIBHUTI NATH JHA BOD Representative Date: 13-10-2025		
Revision: 00	Effective Date: 13-10-2025	

	PEMBINAAN MITRAJAYA SDN BHD	PMJ/ABMSM/SEC2/ COIP
ABMS Manual Section 2	Conflict of Interest Policy	Page: 1/1
CONFLICT OF INTEREST POLICY Conflict of Interest Policy is aimed to provide an avenue for all interested parties of the Pembinaan Mitrajaya Sdn. Bhd. ("PMJSB"), which refers to directors (both executive and non-executive), employee (e.g. permanent, fix-term contract, part-time and interns) and external parties (e.g. sub-contractor, partners, business associates and any third parties who may have a business relationship with the PMJSB who voluntarily come forward to report or disclosed information on any wrongdoing, malpractice, improper conduct (as defined under the Whistleblower Protection Act 2020) and corruption related activities. POLICY STATEMENT Conflicts of interest occur when a person's own interests either influence, have the potential to influence, or are perceived to influence their decision-making at PMJSB. PMJSB therefore defines conflicts of interest broadly: actual conflicts of interest (the person faces a real, existing conflict); potential conflicts of interest (the person is in or could be in a situation that may result in a conflict); and perceived conflicts of interest (the person is in or could be in a situation that may appear to be a conflict, even if this is not the case). All three types of conflict are a potential risk to the company, the person(s) involved, and any external party implicated such as a Business Associate. All actual, potential or perceived conflicts should therefore be declared and managed according to this policy. OBJECTIVE This policy explains the relevant principles and rules for preventing or managing conflicts of interest, and how such principles and rules are to be implemented. SCOPE This policy is applicable to PMJSB, the BOD and PMJSB Personnel. PMJSB will endeavor to ensure the appropriate Conflict of interest procedures are in place with the agreement of its business partners. PMJSB reserves the right to amend this policy from time to time PEMBINAAN MITRAJAYA SDN BHD  BIBHUTI NATH JHA BOD Representative Date: 13-10-2025		
Revision: 00	Effective Date: 13-10-2025	

	PEMBINAAN MITRAJAYA SDN BHD	PMJ/ABMSM/SEC2/GP
ABMS Manual Section 2	Gift Policy	Page: 1/1
GIFT POLICY Pembinaan Mitrajaya Sdn. Bhd. ("PMJSB") is committed to conducting our business to the highest standard of integrity and good governance. PMJSB has established the Gift Policy to ensure that PMJSB stringently comply with PMJSB Anti-Bribery Management System Policy in giving, receiving or accepting gift both within and outside of the work premises. PMJSB requires all its personnel to observe and apply the PMJSB 3 core value of CCA (Change, Commitment & Accountability) in their day-to-day operations and business affairs for the interest and reputation of the PMJSB. PMJSB Gift Policy require PMJSB to demonstrate the highest standard of ethics and conduct in all matters when dealing with third parties, to maintain ethical work and business relationships and to avoid any conflicts of interest or the appearance of a conflict of interest. PMJSB Gift Policy is to be read together with PMJSB Anti-Bribery Management Systems Policy and Whistleblowing Policy. Any violation of this Gift Policy shall constitute violation of the PMJSB Anti-Bribery Management Systems Policy. PMJSB reserves the right to amend this policy from time to time PEMBINAAN MITRAJAYA SDN BHD  BIBHUTI NATH JHA BOD Representative Date: 13-10-2025		
Revision: 00	Effective Date: 13-10-2025	

	PEMBINAAN MITRAJAYA SDN BHD	PMJ/ABMSM/SEC2/WP
ABMS Manual Section 2	Whistleblowing Policy	Page: 1/2
WHISTLEBLOWING POLICY Whistleblowing Policy is aimed to provide an avenue for all interested parties of the Pembinaan Mitrajaya Sdn. Bhd. ("PMJSB"), which refers to directors (both executive and non-executive), employee (e.g. permanent, fix-term contract, part-time and interns) and external parties (e.g. sub-contractor, partners, business associates and any third parties who may have a business relationship with the PMJSB who voluntarily come forward to report or disclosed information on any wrongdoing, malpractice, improper conduct (as defined under the Whistleblower Protection Act 2020) and corruption related activities. POLICY STATEMENT It is the PMJSB's policy that whistleblowing is pivotal aspect of accountability and transparency mechanism to encourage all interested parties to raise legitimate concerns in a responsible and effective manner about possible improprieties in matters and of financial reporting, compliance and other related malpractice at the earliest opportunity, without fear or relationship i.e. discrimination, harassment, penalized, victimization or vengeance. OBJECTIVE The policy is designed to: a. Ensure no whistleblower feel disadvantage in raising legitimate concerns. b. Provide a transparent, confidential and fair process for dealing with the legitimate concerns. c. Provide an avenue for interested parties to raise legitimate concerns which could include: I. Financial malpractice or impropriety or fraud; II. Failure to comply with legal and regulatory obligations; III. Malpractice of health and safety or to the environment and the cover-up of any of these in workplace; IV. Criminal activity, negligence, breach of contract and law; V. Bribery and corruption; VI. Improper conduct or unethical behavior; VII. Any other malpractice matters which might cause financial and/or non-financial loss to the PMJSB including demeaning the PMJSB's reputation. VIII. Concealment of any or a combination of the above. d. Ensure that interested parties can raise legitimate concerns without fear of retribution. The legitimate concerns raised may be investigated separately where it might lead to the invocation of other disciplinary procedure. All legitimate concerns raised will be treated fairly. DISCLOSURE CHANNELS AND PROCEDURE All disclosures (named/anonymous) are to be channeled in accordance with the procedures as provided under this policy.		
Revision: 00	Effective Date: 13-10-2025	

	PEMBINAAN MITRAJAYA SDN BHD	PMJ/ABMSM/SEC2/WP
ABMS Manual Section 2	Whistleblowing Policy	Page: 2/2
Company regulators: a. By email: whistleblow@mitrajaya.com.my b. By mail or hand-delivery with sealed enveloped marked “Strictly Private and Confidential” Integrity Governance Unit, Pembinaan Mitrajaya Sdn. Bhd., D-01-09, Blok D, Jalan Prima 5/1 Persiaran Prima Utama Taman Puchong Prima 47150 Puchong Selangor Darul Ehsan c. By telephone: 03-8060 9999 Ext. 249 (Head of IGU) d. By walk-in to the Integrity Governance Unit WHISTLEBLOWER PROTECTION The whistleblower who raises his/her concern under this Policy will not be at risk of losing his/her job or suffering any form of retribution as a result, provided that: i) the disclosure is made in good faith; ii) he/she reasonably believes that the information, and any allegations contained in it, are substantially true; and iii) he/she is not acting for personal gain. The making of false, frivolous or reckless allegations and the abuse of this whistleblowing mechanism is prohibited, and should it be found that a person had acted in such a manner, the following actions may be considered: i) As regards to the employee, disciplinary action shall be taken against the employee. ii) As regards to customers, suppliers, subcontractors or consultants, review of the continuing business relationship. PMJSB reserves the right to amend this policy from time to time PEMBINAAN MITRAJAYA SDN BHD  BIBHUTI NATH JHA BOD Representative Date: 13-10-2025		
Revision: 00	Effective Date: 13-10-2025	