



ANTI-CORRUPTION COMMITMENT STATEMENT

INTRODUCTION AND OVERVIEW

InNature Berhad and its subsidiaries (“InNature” or “Group”) hold a zero tolerance stance on corruption, bribery and related unscrupulous conduct.

While we have specific policies which provide a comprehensive system and approach to address all forms of corruption within the organisation and including its supply chain, this commitment statement provides an overview of the key aspects of InNature’s approach towards achieving and maintaining corrupt-free operations.

ANTI-BRIBERY AND CORRUPTION POLICY

In accordance to the introduction of Section 17A of the Malaysian Anti-Corruption Commission (“MACC”) Act and to support the government in combating corruption and promote integrity, the Group has developed its Anti-Corruption and Bribery (“ABC”) policy to elaborate its principles and guidelines against any bribery and corruption activities which may arise in the course of business.

The scope of what constitutes as corrupt acts or activities is elaborated in the ABC policy. Also included in the policy are the various types of action that may be taken depending on the nature and the severity of the case. Possible actions include warnings, fines, dismissals, legal action and if necessary, reporting to the regulatory authorities for enforcement action.

This ABC policy is applicable to the Board of Directors, Senior Management, employees as well as external stakeholders, including customers and the Group’s supply chain. In June 2020, an official memorandum was issued to the Group’s employees and senior management to communicate the implementation of the ABC policy. The ABC policy is also published on InNature corporate website to emphasise the Group’s zero tolerance stance against corruption activities. The full ABC policy can be found here: <https://innature.com.my/corporate-governance/>.

The Board, Senior Management and employees are required to not participate in any forms of corruption; to not give or accept any forms of bribery or to solicit favours or gratification in exchange for any form of contracts or benefits. In addition, all parties are also required to report any incidences of corruption to the Group, notably via the Speak Out channels provided.

To externally communicate the Group’s stance, anti-corruption clauses are included in the Ethical Trade Policy & Supplier Code of Conduct (“Supplier Code of Conduct”) and purchase orders issued to vendors. Suppliers who accepted the purchase order shall be deemed as having affirmed their acknowledgement and willingness to abide by the ABC policy.

SPEAK OUT MECHANISM (WHISTLE-BLOWING)

InNature has also developed its Speak Out mechanism which is integrated in its Code of Conduct and Business Ethics (“Code”) and ABC policy. Any potential corruption or bribery activity, such as soliciting / receiving gratification, offering / giving gratification, intending to deceive or using office or position for gratification may be reported through the Speak Out channels provided.

Unless otherwise required by the law, the identity of the informant shall remain confidential and the informant who made a report or disclosure in good faith will not be penalised in the event that after an investigation, the report is found to be mistaken. Both the Code and ABC policy can be found here: <https://innature.com.my/corporate-governance/>.

The Speak Out channel comes under the purview of the Audit and Risk Management Committee (“ARMC”). The ARMC is responsible for reviewing all reports. Since 2020, the Audit and Risk Management Committee's and Board's quarterly meetings have included the discussion of cases submitted through the Speak Out channel (when applicable).

ANTI-CORRUPTION COMMUNICATION AND TRAINING

The zero anti-corruption stance is cascaded throughout the Group to ensure strict compliance to ABC policy. All employees received anti-corruption training during their induction into the Group to ensure they comprehend the types of action which may be perceived as involvement in corruption and or bribery activity.

CONDUCT OF EMPLOYEES

The Group has implemented a Code of Conduct and Business Ethics (the "Code") outlining the anticipated standards of conduct for InNature directors and employees. The Code includes the following provisions:

- Whistle-blowing (known as “Speak Out” for the Group);
- Conflict of interest;
- Bribery and corruption;
- Accepting / providing gifts, benefits and courtesies;
- Confidential and proprietary information;
- Money laundering;
- Antitrust / competition law;
- Equal opportunity and non-discrimination at workplace; and
- Sustainable development.

In 2020, the Group implemented its first annual declaration of conflict of interest, requiring each employee to declare any conflict of interest within a set timeframe. The Human Resource Department retains the declaration for record-keeping purposes.

DISCLOSURE

The Group had not made any political contribution thus far and none of the employees have been reported, disciplined or dismissed due to non-compliance with InNature's ABC policy.

The Group also has not been fined nor involved in any litigation in relation to corruption and bribery.

GOING FORWARD

InNature intends to further strengthen its anti-corruption approach. This includes assessing its operations to identify if there are any business areas that may be at higher risks to corruption, and further raising awareness amongst employees through anti-corruption talks and briefings.

The Group recognises the importance of keeping our Anti-Corruption Policy up to date and evolving by implementing the best anti-corruption practices. The Audit and Risk Management Committee will periodically evaluate and review all relevant policies, and any necessary amendments and changes made will be under the approval of the Board.

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