



# **IJM Corporation Berhad Group**

## **Dawn Raid Policy – for Corruption Related Matters**

(in the event of raid by the Malaysian Anti-Corruption Commission)

<b>Title: Dawn Raid Policy</b>		
<b>Effective Date: 20 April 2020</b>	<b>Version: 1.1</b>	<b>Last Updated: 20 April 2020</b>
<b>Content Owner: Compliance Officer</b>		



## 1. Introduction

- 1.1 IJM Group means IJM Corporation Berhad ("**IJM**") and its subsidiaries (collectively referred to as the "**Company**") are committed to conducting its business in a legal and professional manner, with the highest standard of integrity and ethics. The Company practices a zero-tolerance approach against all forms of bribery and corruption, and upholds all applicable laws in relation to anti-bribery and corruption.
- 1.2 This Dawn Raid Policy ("**Policy**") outlines the approach of the Company in dealing with dawn raids, in relation to corruption related matters in the event of raids by the Malaysian Anti-Corruption Commission. This Policy should be read together with the Company's various policies & guidelines, including the ABCS Manual and its corresponding policies. In the event that this Policy conflicts with other policies in the Company, then the most stringent provision shall apply.
- 1.3 If you have any queries, please do not hesitate to contact:
- a. Compliance Officer ("CO")
- Tel: 603-79858140  
Email: [nmazilawati@ijm.com](mailto:nmazilawati@ijm.com)
- Or
- Fax: 603-79521200  
Email: [ijmwb@ijm.com](mailto:ijmwb@ijm.com)

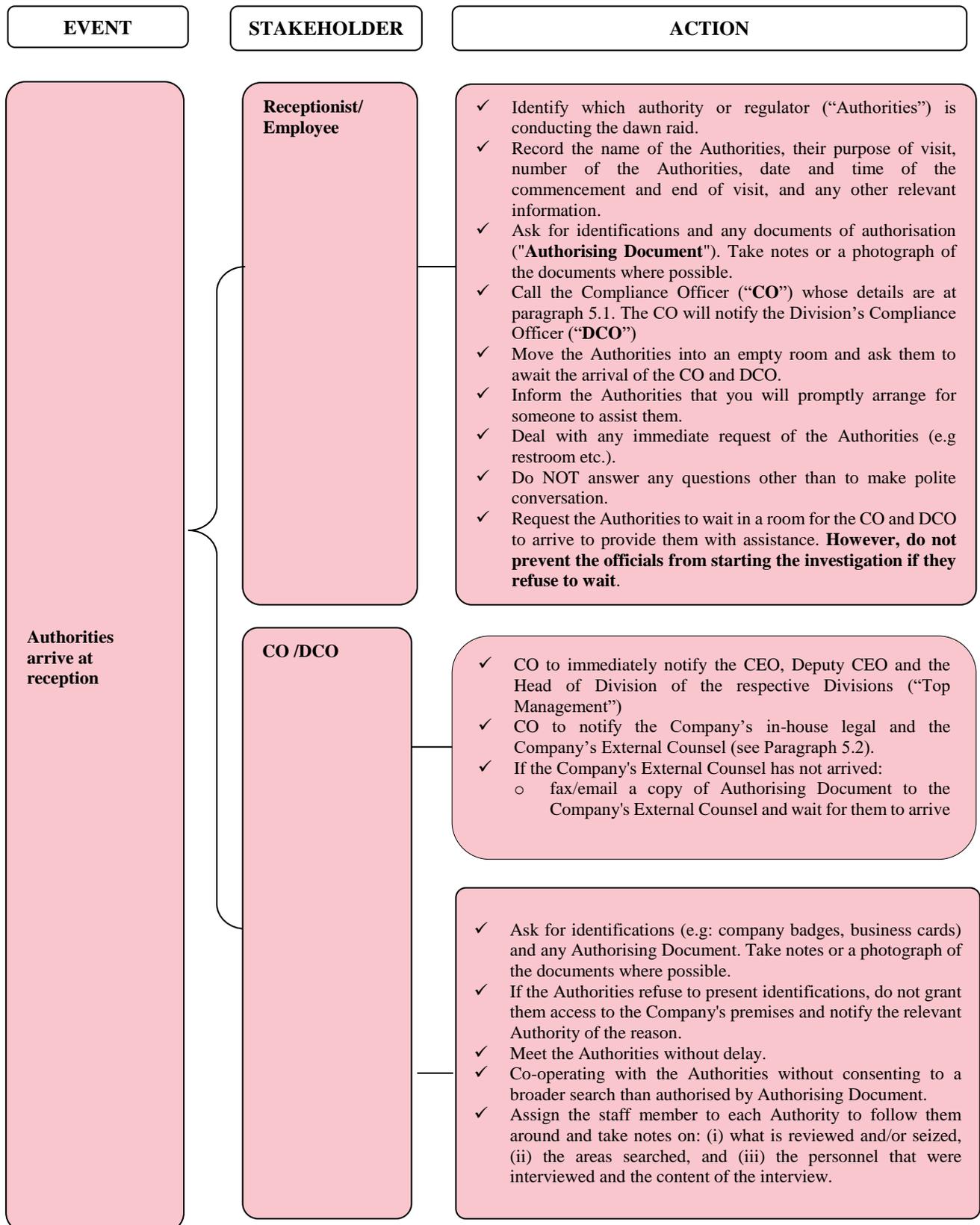
## 2. What is a "Dawn Raid"?

A "dawn raid" is an unannounced, surprise visit (usually first thing in the morning) by the Malaysian Anti-Corruption Commission. The purpose for their visit is to seize and obtain certain items or documents that are relevant to their investigation.

## 3. Compliance with this Policy

- 3.1 The Dawn Raid Flow Chart in paragraph 4 breaks down a dawn raid into different events ("**Event**") and sets out the various actions and responsibilities of the relevant stakeholders in a particular Event.
- 3.2 All employees must comply with the Policy and are expected to cooperate fully with the officials as instructed by the CO and as set out in this Policy.
- 3.3 Any violation of this Policy will result in disciplinary action as applicable.
- 3.4 Any or all violations to this Policy will be reported to the General Manager – Human Resource Department.

#### 4. Dawn Raid Flow Chart for Corruption Related Matters



EVENT	STAKEHOLDER	ACTION
<p><b>Authorities want to seal premises / office / filing cabinet</b></p>	<p><b>CO / DCO / Employees</b></p>	<ul style="list-style-type: none"> <li>✓ Co-operate with these requests where practicable.</li> <li>✓ Where compliance with the Authorities is not practicable, discuss an alternative arrangement with the Top Management.</li> <li>✓ Co-operate and comply with the same if the Authorities insist on their requests.</li> </ul>
<p><b>Authorities want access to documents</b></p>	<p><b>CO / DCO / Employees</b></p>	<ul style="list-style-type: none"> <li>✓ Keep a record of the documents that have been inspected, copied, or taken away.</li> <li>✓ Do NOT volunteer documents or information that is not requested.</li> <li>✓ The Authorities may request to inspect or copy documents that are legally privileged. The Company's in-house Legal Dept should be consulted. If not, observe the general rule in the Policy.</li> <li>✓ Immediately notify the Authorities if there are any legally privileged documents.</li> <li>✓ Show Authorities only enough to make clear that the document is privileged.</li> <li>✓ If there is a question about the relevance of documents, those documents should be set aside before the inspection and refer them to the External Counsel.</li> <li>✓ Do NOT allow the Authorities to:               <ul style="list-style-type: none"> <li>○ review any legally privileged or personal documents. Inform External Counsel immediately.</li> <li>○ inspect or seize documents for which they do not have authority.</li> </ul> </li> </ul>
<p><b>Authorities ask questions about documents or their whereabouts</b></p>	<p><b>CO / DCO / Employees</b></p>	<ul style="list-style-type: none"> <li>✓</li> <li>✓ Answer the question, but do not offer information which has not been asked for.</li> <li>✓ Take notes of questions asked and the answers given.</li> </ul>
<p><b>Authorities have technological requests</b></p>	<p><b>CO / DCO / IS Department</b></p>	<ul style="list-style-type: none"> <li>✓ Ensure that all technological requests are cleared by the Head of IS Department, e.g.: (i) request for access codes/ password; or (ii) review/seize/copy relevant business materials.</li> <li>✓ Take detailed notes of all such technological requests, e.g. the name of the Authority and the request.</li> <li>✓ If the Authorities copy documents from computer without reviewing them, the device on which such documents are copied should be sealed and signed by the Top Management and the Authorities.</li> </ul>

EVENT	STAKEHOLDER	ACTION
<p><b>Authorities want to search employees' private premises</b></p>	<p><b>Employees</b></p>	<ul style="list-style-type: none"> <li>✓ Check for relevant Authorising Documents and Official Identification of the Authorities.</li> <li>✓ Inform Top Management and External Counsel and request for the Authorities to wait for them before commencing the raid</li> <li>✓ Co-operate with the Authorities and ensure actions comply with Authorising Documents</li> </ul>
<p><b>Authorities want to make on the spot interview/questioning</b></p>	<p><b>CO / DCO</b></p>	<ul style="list-style-type: none"> <li>✓ Do not provide false or misleading information.</li> <li>✓ Limit answers to the scope of the question; objective facts; and/or your own actual knowledge.</li> </ul>
	<p><b>Employees</b></p>	<ul style="list-style-type: none"> <li>✓ Employees are not obliged to answer questions not within the Authorising Document.</li> <li>✓ Employees who do not have knowledge of underlying facts should decline, delay or postpone the interview and refer to CO.</li> <li>✓ Only state facts that are true to the employee's own actual knowledge.</li> <li>✓ Note down in writing and communicate the content of interview to CO.</li> </ul>
<p><b>Authorities about to leave</b></p>	<p><b>CO / DCO</b></p>	<ul style="list-style-type: none"> <li>✓ Request and ensure that CO has a detailed list of all documents/items that have been seized or copied by the Authorities and annex such list to the Report.</li> </ul>
<p><b>After the investigation</b></p>	<p><b>CO / Top Management / Legal Department</b></p>	<ul style="list-style-type: none"> <li>✓ Brief the Company's Top Management on the conduct of the Dawn Raid and the proceedings, the anticipated actions against the Company or its affiliates.</li> <li>✓ Keep a file of all documents and correspondence relating to Dawn Raid and the proceedings at the office and clearly mark such file as privileged documents.</li> <li>✓ CO to liaise with the Legal Department to discuss the Dawn Raid and any possible objections with the External Counsel and provide the External Counsel with all necessary documents and information.</li> </ul>



## 5. Key Contacts

### 5.1 Compliance Officer (“CO”)

NAME	PHONE	EMAIL
Normazilawati Bt Madzlan	603-79858142	nmazilawati@ijm.com

### 5.2 External Counsel

Firm: Wong & Partners

ORDER	NAME	POSITION	PHONE	EMAIL
<b>Primary Contact</b>	Chew Kherk Ying	Partner	03-22987933 012-23343612	<a href="mailto:KherkYing.Chew@wongpartners.com">KherkYing.Chew@wongpartners.com</a>
<b>Secondary Contact</b>	Eddie Chuah	Partner	03-22987939 012-3209170	<a href="mailto:Eddie.Chuah@wongpartners.com">Eddie.Chuah@wongpartners.com</a>