

IJM GROUP

Dawn Raid Policy – for Corruption Related Matters

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

Title: Dawn Raid Policy				
Effective Date: 20 April 2020	Version: 1.2	Updated: 20 April 2020		
	Version: 2.0	Revised: 17 November 2022		
Content Owner: Compliance Officer				



1) Introduction

- i) 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 practises a zero-tolerance approach against all forms of bribery and corruption, and upholds all applicable laws in relation to anti-bribery and corruption.
- ii) 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.
- iii) If you have any queries, please do not hesitate to contact:
- a. Chief Compliance Officer ("CCO")

Tel: 603-79858201 Email: siewyc@ijm.com

Or

b. Fax: 603-79521200 Email: 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

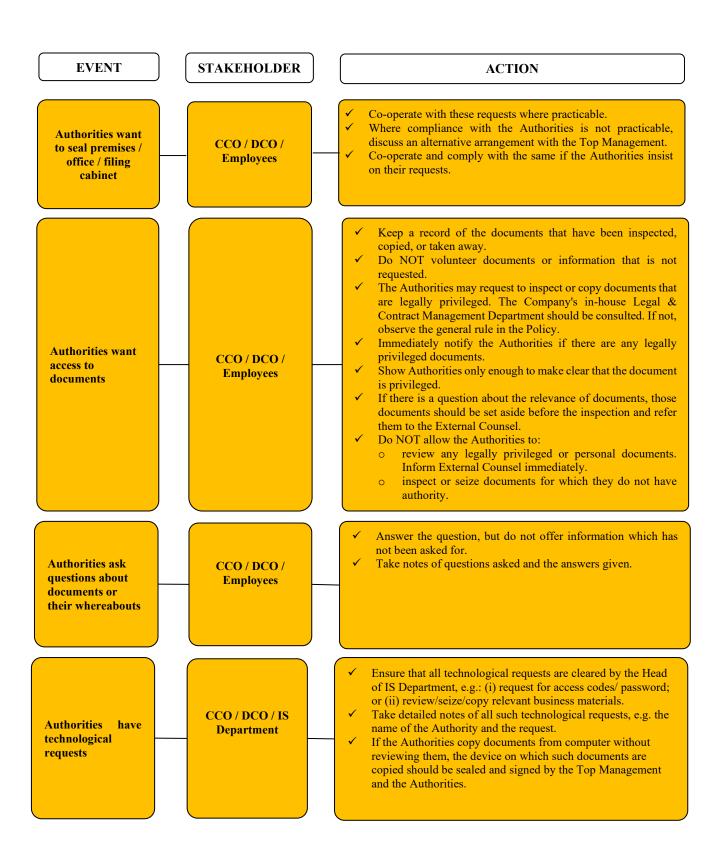
- i) The Dawn Raid Flow Chart in paragraph 4 breaks down a dawn raid into different events ("Event") and sets out the various actions and responsibilities of the relevant stakeholders in a particular Event.
- ii) All employees must comply with the Policy and are expected to cooperate fully with the officials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



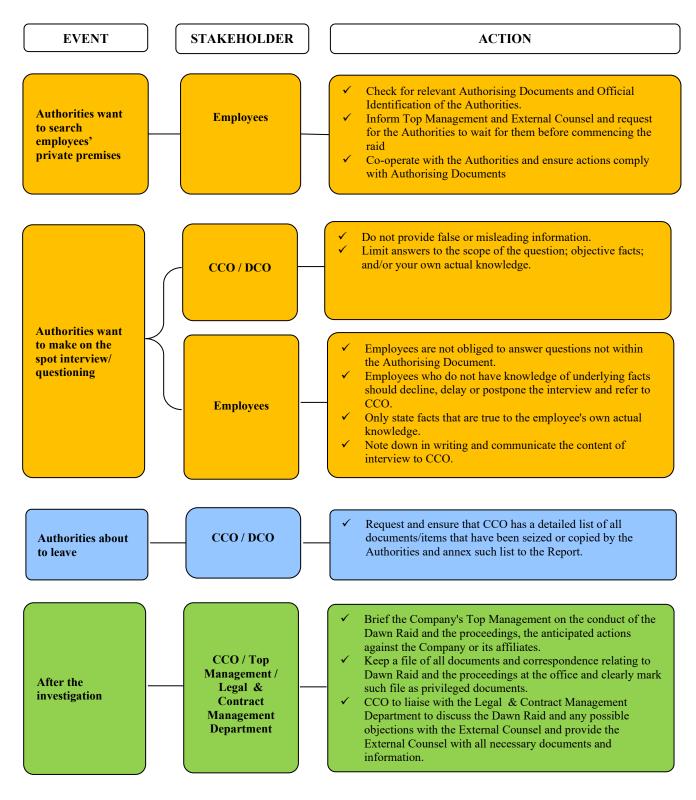
4) Dawn Raid Flow Chart for Corruption Related Matters

EVENT	STAKEHOLDER	ACTION
	Receptionist/ Employee	 ✓ Identify which authority or regulator ("Authorities") is conducting the dawn raid. ✓ Record the name of the Authorities, their purpose of visit, number of the Authorities, date and time of the commencement and end of visit, and any other relevant information. ✓ Ask for identifications and any documents of authorisation ("Authorising Document"). Take notes or a photograph of the documents where possible. ✓ Call the Chief Compliance Officer ("CCO") whose details are at paragraph 5.1. The CCO will notify the Division's Compliance Officer ("DCO") ✓ Move the Authorities into an empty room and ask them to await the arrival of the CCO and DCO. ✓ Inform the Authorities that you will promptly arrange for someone to assist them. ✓ Deal with any immediate request of the Authorities (e.g restroom etc.). ✓ Do NOT answer any questions other than to make polite conversation. ✓ Request the Authorities to wait in a room for the CO and DCO to arrive to provide them with assistance. However, do not prevent the officials from starting the investigation if they refuse to wait.
Authorities arrive at reception	CCO/DCO	 ✓ CCO to immediately notify the CEO & Managing Director, Deputy CEO & Deputy Managing Director and the Head of Division of the respective Divisions ("Top Management") ✓ CCO to notify the Company's in-house legal and the Company's External Counsel (see Paragraph 5.2). ✓ If the Company's External Counsel has not arrived: fax/email a copy of Authorising Document to the Company's External Counsel and wait for them to arrive ✓ Ask for identifications (e.g. company badges, business cards) and any Authorising Document. Take notes or a photograph of the documents where possible. ✓ If the Authorities refuse to present identifications, do not grant them access to the Company's premises and notify the relevant Authority of the reason. ✓ Meet the Authorities without delay. ✓ Co-operating with the Authorities without consenting to a broader search than authorised by Authorising Document. ✓ Assign the staff member to each Authority to follow them around and take notes on: (i) what is reviewed and/or seized, (ii) the areas searched, and (iii) the personnel that were interviewed and the content of the interview.











5) Key Contacts

5.1 Chief Compliance Officer ("CCO")

NAME	PHONE	EMAIL
Siew Yee Ching	603-79858201	siewyc@ijm.com

5.2 External Counsel

Firm: Wong & Partners

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