

## SUSTAINABILITY REPORT



### RESPONSIBLE GOVERNANCE

Leon Fuat has implemented high-level policies to ensure that all of our business operations are conducted ethically. We established a governance framework, policies, management systems, and code of conduct that clearly define our ethical principles and expectations. This necessitates that our employees conduct themselves with professionalism, honesty, and integrity, and that we respect the human rights of every individual.

Contribution  
to the SDGs

16 PEACE, JUSTICE  
AND STRONG  
INSTITUTIONS



### UPHOLDING BUSINESS ETHICS AND PRIORITISING COMPLIANCE

As an essential component in steering the Group and maintaining a track record of performance in other aspects, these fundamental policies are constantly kept in place to promote ethical business, good conduct and transparency



Whistleblowing Policy



Anti-Bribery Policy

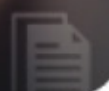
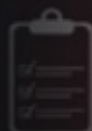
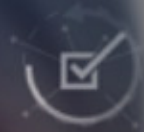


Code of Ethics and Conduct

Our policies are upheld by our very own Anti-Bribery Management System which encourages ethical corporate practices and creates action plans to resolve any identified infringements. Moreover, in terms of other compliance, Leon Fuat has demonstrated commitment to the following rules and regulations through internal documentation and assessments.

- Employment Act 1955
- Factories and Machinery Act 1967
- Income Tax Act 1967
- Environmental Quality Act 1974
- Capital Markets and Services Act 2007
- Companies Act 2016
- Minimum Wages Order 2018
- Main Market Listing Requirements
- Malaysian Code on Corporate Governance
- Occupational Safety and Health Act, 1994

COMPLIANCE



## Anti-Bribery Management System ("ABMS")

In FY2020, the Group established the ABMS, which aims to ensure the Group operates ethically and responsibly. This system uses the preventive measures approach to identify risks in our operations and organisational committee. As such, we have committed to adhering to the principles of the ABMS (MS ISO 37001). Further to this, ABMS is aligned with the Anti-Bribery Manual which thoroughly defines the scope of the management system.

The Group also established the Anti-Bribery Compliance Function ("ABCF"), whose roles and responsibilities comprise overseeing the implementation of ABMS, managing ABMS documentation and addressing bribery concerns.

### Document Controller

- Manages ABMS documentation
- Attends to bribery concerns raised and reports it to the Chief
- Provides guidance to personnel on ABMS and bribery related issues
- Investigates reports assigned by the Chief

### Chief of ABCF

- Oversees implementation of ABMS
- Reports ABMS performance to the Board
- Plans and reviews the Bribery Risk Assessments
- Appoints investigation team for any concerns raised

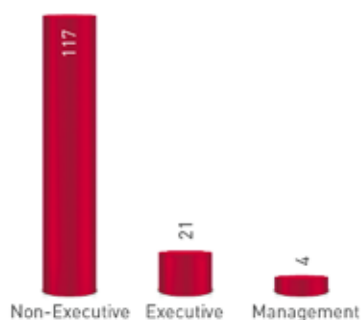
### Deputy Chief of ABCF

- Oversees implementation of ABMS
- Provides guidance on ABMS and bribery related issues
- Assists the Chief on ABMS related matters

### Members of ABCF

- Provides advice to personnel on ABMS and bribery related issues
- Attends to bribery concerns raised and reports it to the Chief
- Investigates reports assigned by the Chief

## Employees who Received Anti-Bribery Training by Employee Category in FY2022



## Bribery Prevention via Communications and Training

The policies and any amendments made to them are successfully conveyed to our staff members either through the employee handbook for LF Metal employees or during the orientation programme for new hires at the three (3) main subsidiaries. The policies are also publicly available on our corporate website. We ensure our employees from various employee categories have exposure to anti-bribery guidelines via training. For this reporting period, the anti-bribery training was attended by one hundred and seventeen (117) Non-Executive, twenty-one (21) Executive, and four (4) Management employees of LF Hardware and LF Metal which represented 40.1%, 34.4% and 11.1% respectively for each employee category of the aforesaid subsidiaries.

## SUSTAINABILITY REPORT

### Transparency of Our Reporting and Investigation Procedures

Leon Fuat observes the views of interested parties through a variety of channels and is committed to addressing any suspected unlawful or improper conduct within the Group. We have a grievance mechanism in place at all times. Any interested party can file a complaint by sending an email to the Group's designated personnel. Throughout the process, all reports filed in good faith will be treated with confidentiality. Whistleblowers are shielded from reprisal, and their identities are kept strictly confidential until prior authorisation to reveal them is obtained.

We have designated points of contact throughout our operations to manage any potential concerns that may arise.



**Audit Committee Chairman**  
**Senior Independent**  
**Non-Executive Director**  
**Chief of ABCF**



We have recorded zero incidents of whistleblowing or probable violations of conduct in FY2022.