



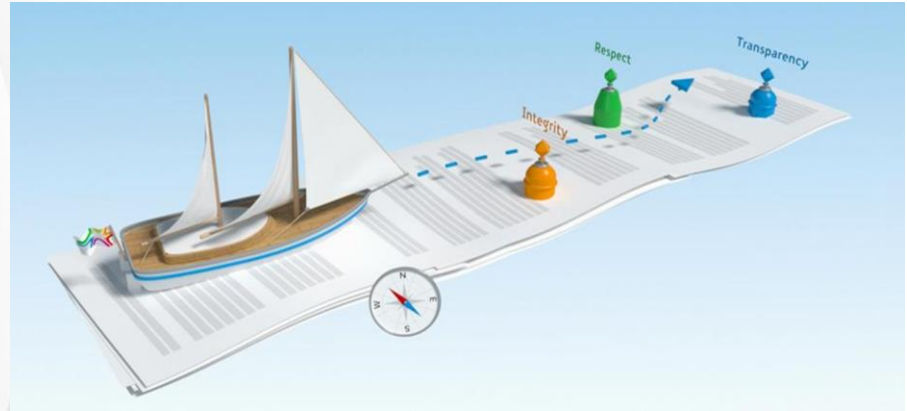
Dutch Lady Milk Industries Berhad's Compass Program

Katina Rahim | August 2021

Compass

for good business conduct

What is good business conduct?



All our employees and business partners do business with integrity, with respect, and in a transparent way



**Data
protection/
privacy**



**Prevention
of fraud**



**Doing honest
business**



**Fair
communication**



**Safety for
food and
people**



**Business
relations**



**Use of
company
resources**



**Rights of
employees
and human
rights**



**Protection of
confidential
information**



**Public
activities**



Sustainability



**Avoid conflicts
of interest**



**Fair
competition**



**Integrity of
(financial)
reporting**

Speak Up Procedure

What?

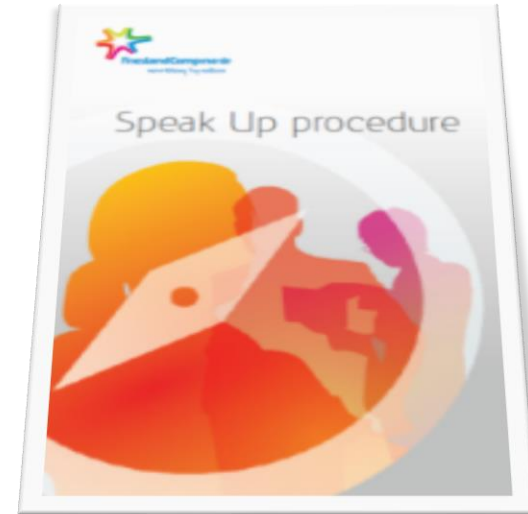
Procedure to raise questions or concerns about conduct that may not be in line with Compass

Why?

To help improve our company in **doing business the right way**

Who?

- all **employees** including temporary personnel
- other **stakeholders with a valid business interest** (suppliers, distributors)



How do we ensure good business conduct?

1. Business Conduct Programme

- Compass: a clear set of principles
- Speak Up: open culture without fear of retaliation
- Policies giving more guidance
- Communication to raise awareness
- Training & team discussions
- Good governance & handling of investigations
- Monitoring & reporting
- Internal controls & internal audits



How do we ensure good business conduct?



2. By bridging the gap

- Promoting **tone from the top**
- Stimulating **integrity ownership and leadership at all management levels**
- Encouraging an **open culture**, where people feel confident to discuss dilemmas and address issues
- Embedding Good Business Conduct in **minds, hearts and daily practice** of everyone working at Dutch Lady Milk Industries

How do we extend to our Suppliers?

- Our Business Partners are to conduct business in the manner set out in our Business Practices for Business Partners policy.
- Contractual requirement
- Briefings





MACC CORPORATE
LIABILITY PROVISION

Section 17A Malaysian Anti Corruption Commission Act 2009



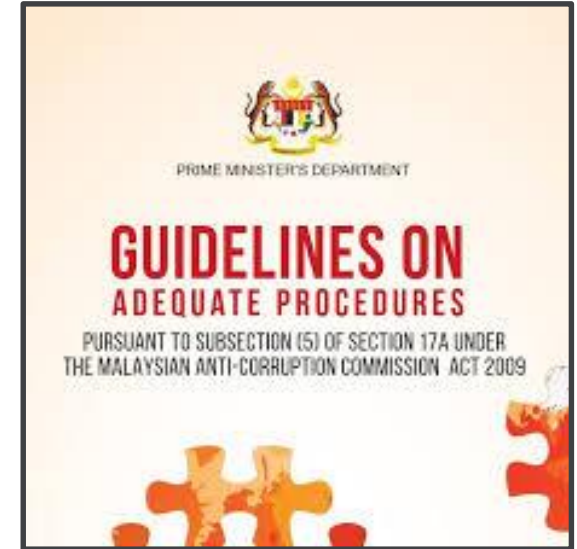
- Section 17A is an amendment to the MACC Act - introduced in 2018
- MACC has started enforcement of Section 17A on **1 June 2020**
- Section 17A(1) - A company will have committed a **CRIMINAL** offence if any person associated with the company (employees/agents) commits a corrupt act to obtain business advantage for the company.
- Penalties of at least **RM 1 million** and / or **imprisonment term of up to 20 years**

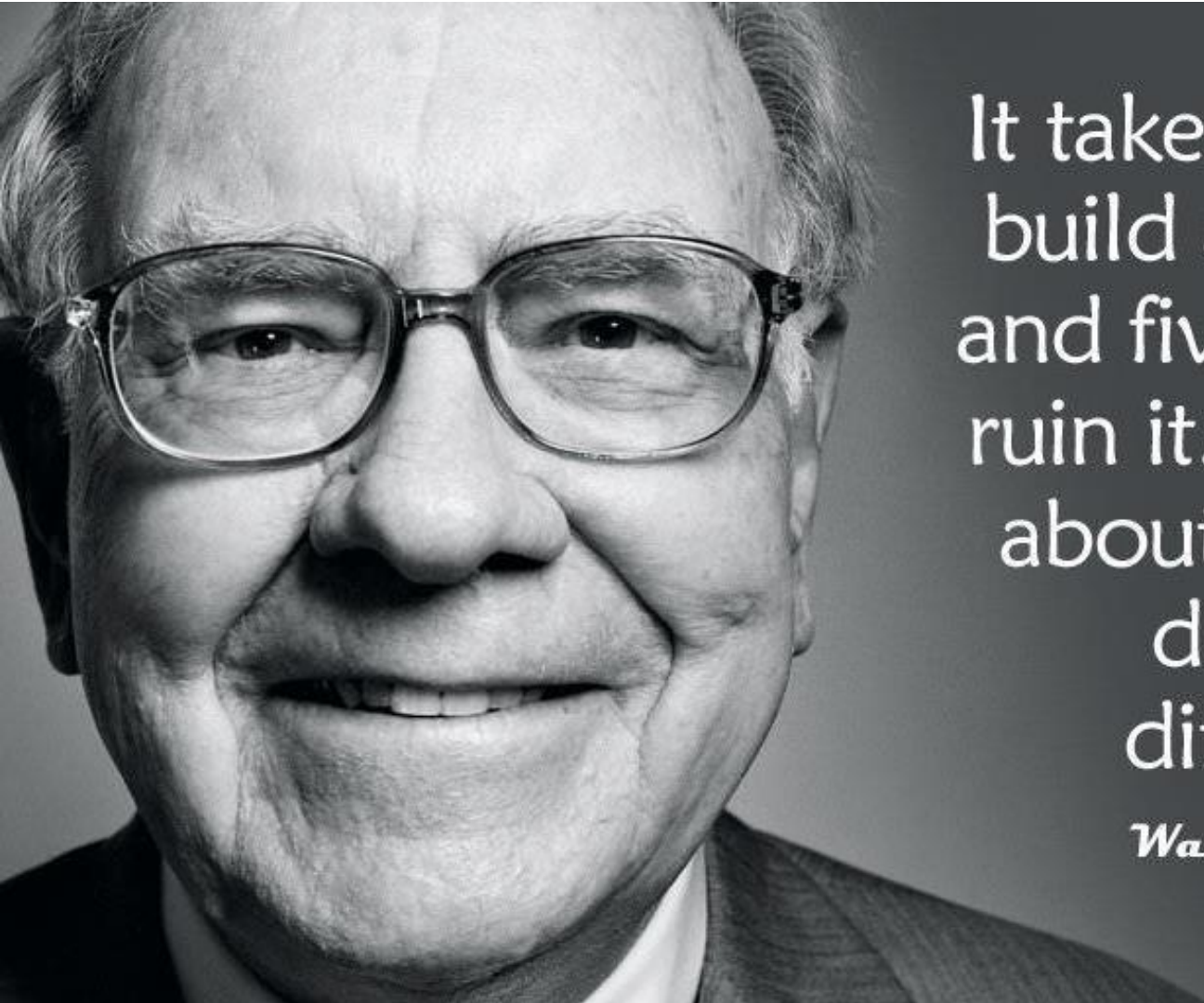


What Steps have we taken?



- MACC Corporate Liability Provision and Doing Honest Business trainings given to all employees and included in the Induction Training for all new employees
- Briefings given to all new agents following their appointment and undertakings sought
- Communications (email blasts, posters, led screen messages) will be used
- A refresher briefing/training to be held every 2 years





It takes 20 years to
build a reputation
and five minutes to
ruin it. If you think
about that, you'll
do things
differently.

Warren Buffett



THANK YOU