



ANTI-BRIBERY AND CORRUPTION POLICY

1. INTRODUCTION

Our Company shall always maintain and uphold integrity and compliance with legal and regulatory requirements as part and parcel of its business operations. This is an unwavering commitment from the top, with our Board overseeing a governance structure designed to ensure that our Company's business activities are conducted safely and soundly and in line with the highest standards of professionalism and ethical standards whilst complying with all relevant legal and regulatory requirements.

Our Company requires our directors and all full-time, probationary, contract, temporary staff (herein referred to as "employees"), as well as any external parties with whom our Company has or plans to establish some form of the business relationship, including but not limited to clients, customers, outsourcing providers, consultants, suppliers, vendors, distributors, representatives, intermediaries, investors and joint venture partners (herein referred to as "Business Associates"), (hereinafter collectively referred to as "Relevant Persons") to be committed to acting professionally and with integrity in their business dealings.

Our Company shall take reasonable and appropriate measures to ensure that its businesses, employees and directors do not participate in corrupt activities for its advantage or benefit. This Anti-Bribery and Corruption Policy (the "Policy") sets out the parameters to prevent the occurrence of bribery and corrupt practices concerning the businesses of our Company. This Policy is supplemental to and shall be read in conjunction with the Code of Conduct of our Company.

2. DEFINITION OF BRIBERY AND CORRUPTION

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. A bribe is an inducement or reward offered, promised or provided to gain any commercial, contractual, regulatory or personal advantage and can take the form of gifts, loans, fees, rewards or other advantages. Corruption is the abuse of entrusted power for private gain.

3. OBJECTIVE

The objective of the Policy is to provide information and guidance to the Relevant Persons on standards of behaviour to which they must adhere and how to recognise as well as deal with bribery and corruption.

The Policy is not intended to be exhaustive, and there may be additional obligations that the directors and employees are expected to adhere to or comply with when performing their duties. The directors and employees shall always observe and ensure compliance with all applicable laws, rules and regulations to which they are bound to observe in the performance of their duties.



The Policy shall be maintained and regularly updated by our Company's Head of Human Resources as part of our Company's overall Employment Guide and Code of Conduct and are available on our Company's website. Any amendments to the Policy shall be subject to approval by our Board of Directors of our Company. It is the collective duty of all parties to review and thoroughly understand the Policy carefully.

4. APPLICABILITY

The Policy shall apply to all Relevant Persons of our Company. Our Company adopts a zero-tolerance policy against any form of bribery and corruption and all other illegal or unethical behaviour. Each employee shall have a duty to read and understand the Policy. Violation of any of the Policy's provisions may result in disciplinary action, including termination of employment.

If a director requires further clarification on the Policy, the director may liaise with our Company CEO/Company COO, whereas for an employee, the employee may refer or highlight any concerns to his/her immediate superior or the Head of Human Resources. Business Associates may liaise with our Company COO for further clarification on the Policy.

5. GUIDANCE ON COMMON FORMS OF BRIBERY AND CORRUPTION (N1)

5.1. Gifts and Hospitality

This Policy does not prohibit normal business hospitality, so long as it is reasonable, not more than RM2,000, modest and bona fide corporate hospitality.

Some examples of acceptable gifts and/or benefits are as follows:

- a) token gifts offered in business situations or to all participants and attendees, for example, work-related seminars, conferences, trade and business events;
- b) gifts presented at work-related conferences, seminars and/or business events;
- c) gifts given in gratitude for hosting business events, conferences and/or seminars;
- d) refreshments or meals during meetings or as participants of work-related conferences and/or seminars; and
- e) meals for business purposes.

As a general principle, directors and employees shall not accept or give a gift to a third party if it is made to influence the third party to obtain or retain business or in exchange for favours or benefits. In addition, lavish or unreasonable gifts or hospitality should not be accepted as such gifts or hospitality may be perceived or interpreted as attempts by the directors or employees to obtain or receive favourable business treatment for personal benefits.

Directors and employees shall also be mindful in giving or receiving gifts or hospitality as it could be perceived as a way of improperly influencing the decision-making of the recipient. Hence, the intention behind the gifts or hospitality should always be considered.



5.2. Facilitation Payments To Officer of Public Body

Facilitation payments are unofficial payments or other advantages made to secure or expedite the performance of a routine action by an officer of a public body. All directors or employees shall not promise or offer, or agree to give or offer, facilitation payments to an officer of any public body.

However, circumstances could arise where the directors or employees have no alternative but to make a facilitation payment to protect themselves from injury, loss of life or liberty. Any request for facilitation payment under such circumstances should be reported immediately to the superior or Head of Human Resources.

5.3. Political Contribution

Subject to any prevailing law that governs political contribution, our Company may make contributions to political parties or candidates. All political contributions require approval from our Board of Directors. Our Company shall keep the records of all political contributions for seven (7) years from the end of the last financial year.

5.4. Charitable Contribution

Charitable support and donations are acceptable (and indeed encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, all directors and employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. No donation can be offered or made on behalf of our Company without the prior approval of our Board of Directors. Our Company shall keep the records of all charitable contributions for seven (7) years from the end of the last financial year.

6. RECORD-KEEPING

Proper and complete records must be maintained for seven (7) years from the end of the last financial year of all payments made to third parties in the usual course of business as these would serve as evidence that such payments were bona fide and not linked to corrupt and/or unethical conduct. All accounts, invoices, documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with accuracy and completeness.

Employees shall declare all hospitality or gifts accepted or offered and submit details to the person in charge whom our Company COO assigns for recording into a register subject to internal audit review. Employees must also ensure that all expense claims relating to hospitality, gifts or expenses incurred to third parties are approved by our Company COO and must be specifically recorded the reason for such expenditure.



7. COMPLIANCE WITH THE LAW

Our Company shall comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions within which our Company operates. Relevant Persons are expected to understand and comply with the Malaysian Anti-Corruption Commission Act 2009 (including any amendment thereof). Our Company reserves the right to report any actions or activities suspected of being criminal in nature to the police or other relevant.

8. DUE DILIGENT OF BUSINESS ASSOCIATES

All Business Associates should be made aware of this Policy before entering into any formalised relationships, and the arrangements with them shall be subject to clear contractual terms, including specific provisions requiring them to comply with minimum standards and procedures relating to bribery and corruption. An undertaking/acknowledgement from Business Associates on the requirement to comply with this Policy shall be obtained for every agreement/arrangement entered with the Business Associates.

Our Company shall conduct adequate background checks on the person or entity with a document verification process before entering into any formalised relationships. If suspicion of bribery and corruption arises in the dealings with any Business Associate, our Company shall seek an alternative provider of the services/goods as soon as practicable. If our Company is not satisfied with full compliance with the Policy, further due diligence shall be undertaken with regards to any Business Associate intending to act on our Company's behalf. Records of the due diligence undertaken on potential Business Associates shall be maintained for seven (7) years from the end of the last financial year.

9. REPORTING OF VIOLATIONS OF THE POLICY

Relevant Persons who know of, or suspect, a violation of the Policy are encouraged to whistle blow or report the concerns through the mechanism set out under our Company's Whistleblowing Policy. No individual will be discriminated against or suffer any kind of retaliation for raising genuine concerns or reporting in good faith on violations or suspected violations of the Policy. Our Company shall take all reasonable steps to protect the confidentiality of the identity of a whistle-blower to the extent reasonably practicable and shall adhere to any statutory requirements in force. At the appropriate time, the whistle-blower making the disclosures may need to come forward as a witness.

Our Board will commission an outsourced internal auditor at least once every three (3) years to carry out a corruption risk assessment to identify, analyse, assess and prioritise the internal and external corruption risks of our Company. The reviews should form the basis of any efforts to improve the existing anti-corruption controls in our Company.

Our Company shall ensure that the results of any audit, risk assessment reviews, control measures and performance are reported to all top-level management, including the full Board of Directors, and acted upon.



10. REVIEW OF THE POLICY

Our Board of our Company shall monitor compliance with the Policy and review the Policy regularly to ensure that it continues to remain relevant and appropriate at all times.