



ANTI-BRIBERY AND CORRUPTION POLICY

Purposes

It is the policy of the Company to conduct its business affairs in strict compliance with the letter and spirit of the law and to adhere to the highest principles of business ethics. As part of that, the Company takes zero-tolerance against all forms of bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships, wherever it operates, and implementing and enforcing effective bribery and corruption management systems to counter bribery and corruption.

Scope

Accordingly, all directors, officers, employees (whether permanent, contracted fixed term or temporary), business associates, stakeholders or any other person associated with or acting on behalf of the Company, wherever located (collectively referred to as "Representatives" in this policy) must avoid activities which are in conflict, or give the appearance of being in conflict, with these principles and with the interests of the Company.

Commitments

The Company is committed to implement a culture of continuous improvement of an Anti-Bribery and Corruption Management System (referred to in as "ABMS") in accordance with the Guidelines on Adequate Procedures issued pursuant to subsection five (5) of section 17A of the Malaysian Anti-Corruption Commission Act 2009 (Act 694) by:

1. Prohibiting bribery with No Gifts Policy

The Company upholds anti-bribery and corruption principles in all business dealings and interactions with external parties, including business associates, government agencies and stakeholders by:

- not giving or receiving bribes or improper advantages, either directly or through any third party;
- not giving or receiving facilitation payments or "kickbacks" of any kind; and
- not giving or receiving any gifts, entertainment, hospitality, travelling, donations and sponsorship or benefit that may improperly influence a decision or impair independence or judgement.

2. Observance of law and regulation

The Company conducts its business ethically and in compliance with all applicable laws, rules and regulations and the spirit of them against bribery and corruption practices in every country where it operates.

3. Creating a bribery-free business environment:

- to review and achieve the anti-bribery objectives;
- to ensure the Company's Representatives and organisations which the Company control comply with this policy and subjecting them who do not comply with this anti-bribery and corruption policy to disciplinary actions in accordance with Company policies, procedures and if warranted, legal action will be taken against them based on the applicable laws;
- to prevent conflicts of interest by dealing appropriately in situations where the Company's own interests could conflict with the Company's obligations or duties;
- to work only with business associates, organizations and people that conform to anti-bribery and corruption standards consistent with the Company;
- to encourage and enable person(s) both internal and external of the Company to report in good faith or on the basis of reasonable belief in confidence, without fear of reprisal any attempted, suspected and actual bribery and corruption, or any violation of or weakness in the Company's ABMS;
- to refrain from retaliation in any way against a person for making a complaint, testifying, assisting, or participating in any manner in an investigation or complaint proceedings. Retaliatory actions which are prohibited include intimidation, threats, coercion, or discrimination against any such individual;
- to establish, document, implement and continuously improve the Company ABMS to help prevent any breach of this policy, and to detect, report and deal with any breach which may occur; and
- to ensure the anti-bribery and corruption compliance function is adequately assigned to person(s) who have the appropriate competence, status, authority and independence and who have direct and prompt access to the Board of Directors (Governing Body) and Top Management for overseeing, providing advice and guidance to personnel, monitoring and reporting of the performance and actions acted upon by the Top Management and Board of Directors (Governing Body), continual improvement and others as appropriate of the ABMS in the Company.

Stance Against Bribery and Corruption

The Company regards bribery and corruption and acts of corruption as serious matters and will apply penalties in the event of non-compliance with this Policy. For the

Company's personnel, non-compliance may lead to disciplinary action, up to and including termination of employment and if warranted legal action will be taken against them in accordance with the enforcement legislations.

Responsibilities

Each Head of Department reporting to Top Management of the Company and the managers at every level is responsible for ensuring this Anti-Bribery and Corruption Policy and the updated revision is duly communicated and implemented, and that the employees within his/her area of responsibility and the business associates and other relevant stakeholders as appropriate have read, understood and follow this Policy. The employees and business associates and other relevant stakeholders as appropriate are individually responsible for reading, understanding and following this Policy.