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1.0 Introduction


- 1.1 The Board of Directors (“Board”) of Stratus Global Holdings Berhad (the “Company” or “STRATUS”) and its subsidiaries (collectively, the “Group”) has established and adopted this Anti-Bribery and Anti-Corruption Policy (“Policy”) for internal and external parties working for and on behalf of the Group in upholding the Group’s stance against bribery and corruption.
- 1.2 This Policy is not intended to provide definitive solutions regarding bribery and corruption. Rather, it is intended to provide basic principles, guidelines and requirements on how to deal with bribery and corrupt practices that may arise in the day-to-day business operations within the Group. This policy is drafted based on the Guidelines on Adequate Procedures pursuant to subsection (5) of section 17A under the Malaysian Anti-Corruption Commission (“MACC”) Act 2009, vide the MACC (Amendment) Act 2018, which focuses on the five (5) key principles as below:
- Principle I : Top Level Commitment;
- Principle II : Risk Assessment;
- Principle III : Undertake Control Measures;
- Principle IV : Systematic Review, Monitoring and Enforcement; and
- Principle V : Training and Communication.
- 1.3 This Policy, which may be amended from time-to-time, is approved by the Board. Should there be any conflicts between this Policy and applicable laws, the law shall prevail.

2.0 Purpose

- 2.1 The objective of this Policy is to:
- 2.1.1 Set out the responsibilities of the Group and the responsibilities of those working for or with the Group in observing and upholding the Group’s approach towards all forms of bribery and corruption, and ensure compliance with applicable laws, regulations, policies and procedures.
- 2.1.2 Ensure that the Group has adequate procedures in place to prevent and detect bribery and corruption;
- 2.1.3 Provide information and guidance to those working for or with the Group on how to recognise and deal with potential bribery and corruption issues; and
- 2.1.4 Protect the Group against the possible penalties and repercussions resulting from acts of bribery and corruption or being associated with such behaviour.

3.0 Scope

- 3.1 This Policy is applicable to all entities within STRATUS Group of Companies.
- 3.2 This Policy is applicable to the following parties:
- 3.2.1 Board members including all independent or non-independent directors and alternate directors of the Group (collectively, the “Directors”).
- 3.2.2 Senior Management, managers and employees, who are employed full time, part-time, on probation, contractually or temporarily by the Group (collectively, the “Employees”).
- 3.2.3 Suppliers, contractors, agents, consultants, outsourced personnel, distributors, advisers, government and public bodies including their advisors, representatives and officials, as well as any other person associated with or acting on behalf of the Group (collectively, the “Business Partners”).

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4.0 Definition

For the purpose of this Policy, the terms listed below represent its respective definitions and shall exclude food and drinks, fruits, flowers and approved sponsorship, donation and contribution to the Group official events:

4.1 **“Bribe”** or **“Gratification”** as defined in MACC Act 2009 and MACC (Amendment) Act 2018 refers to:

- a) Money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
- b) Any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- c) Any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- d) Any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- e) Any forbearance to demand any money or money’s worth or valuable thing;
- f) Any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and
- g) Any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the item 4.1(a) to 4.1(f).

4.2 **“Bribery”** refers to the act of corruptly authorising, providing, agreeing to provide, promising, offering, soliciting, requesting, accepting or agreeing to accept any bribe or gratification, whether directly or indirectly, with the intention to induce or reward a person to act or refrain from acting in relation to that person’s duties, action or decision.

4.3 **“Corruption”** refers to abuse of power for personal gain or advantage for the Group.

4.4 **“CSR”** or **“Corporate Social Responsibility”** refers to the activity or effort undertaken to achieve sustainable development through provision of social economic or environmental benefits to the community.

4.5 **“Donation”** refers to voluntary contribution in the form of monetary or non-monetary gifts to a fund or cause for which no return service or payment is expected or made typically to a non-profit organisation, or charitable cause.

4.6 **“Entertainment”** refers to the benefit of attending conferences, concerts, sports events, recreational or leisure activities, including accommodation or travel in connection with or for the purpose of facilitating such events or activities. Entertainment may be provided with or without payment, whether in cash or in kind, and is typically offered to promote or facilitate trade, business activities and/or transactions.


4.7 **“Facilitation Payment”** refers to inducements or incentives provided to secure or expedite the performance of a routine action that an individual is ordinarily obliged to perform. These are usually unofficial, improper and small sums of payments paid to speed up routine administrative processes such as licenses, permits or visas.

4.8 **“Family Members”** means spouse, parent, siblings, child (including adopted or stepchild), grandparents, grandchildren, in-laws, nephews, nieces, uncles or aunts.

4.9 **“Gift”** refers to any form of monetary or non-monetary benefits such as goods, services, cash or cash equivalents, club membership, rewards, facilities, hampers, jewellery and decorative items provided to or accepted by Directors, Employees and Business Partners, or their family members on his or her behalf.

4.10 **“Hospitality”** refers to friendly, generous and considerate care provided to or accepted from third party in conjunction with legitimate business meetings, conferences or events, which may include meals or refreshments.

4.11 **“Kickbacks”** refers to any form of payment intended as compensation for favourable treatment or other improper services. This includes the return of a sum already paid or due as a reward for awarding of furthering business.

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4.12 **“Public Official”** refers to:

- a) Any person holding a legislative, administrative or judicial office of a country, government, state, province or municipality, whether appointed or elected;
- b) Any person exercising a public function for a country, government, state, province or municipality, including for a government agency, board, commission, corporation, or other body or authority;
- c) Any official or agent of a public international organisation; or
- d) Any political party or official of a political party or a candidate for public office.

4.13 **“Sponsorship”** refers to provision of monetary or non-monetary support to a third party or an external organisation primarily in exchange for advertising, marketing and promotional opportunities (e.g. to an event, a sports team, a charity organisation, etc.).

4.14 **“Travel”** refers to any form of transportation provided for a legitimate business trip, including incidental benefits such as meals, accommodation, airport transfers, taxi and ride-hailing fees.


5.0 Responsibilities

- 5.1 The Board and Senior Management are having the ultimate oversight responsibility for the implementation of this Policy and effectiveness of the Group’s corruption risk management framework. They are responsible for allocating sufficient resources for the Group’s anti-bribery and anti-corruption compliance programme. Periodic updates and reports on material issue should be presented to the Board.
- 5.2 Managers and supervisors of all levels have additional responsibilities under this Policy and are held to a higher standard of compliance. They are required to create and maintain an open environment that is comfortable for employees to ask questions, raise concerns and report misconduct.
- 5.3 Directors and Employees shall familiarise themselves with this Policy and all relevant procedures, and exercise professional judgment at all times.
- 5.4 Directors and Employees are responsible to assist Business Partners in understanding and complying with this Policy, and the relevant procedures.
- 5.5 Directors, Employees and Business Partners are responsible to raise questions when there is uncertainty regarding any part of this Policy and the relevant procedures and shall immediately report any concerns or violations of this Policy and applicable laws.

PRINCIPLE I: TOP LEVEL COMMITMENT

6.0 Anti-Bribery and Anti-Corruption Policy

- 6.1 The Group adopts a strict policy towards all forms of bribery and corruption, which may also include acts of extortion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.
- 6.2 The Group is committed to:
 - a) The highest standards of transparency, integrity and ethics in all business dealings and all jurisdictions in which the Group operates;
 - b) Never offering bribes, whether directly or indirectly, to gain a business advantage;
 - c) Never accepting bribes, whether directly or indirectly, to gain business advantage;
 - d) Implement and enforce effective system to counter bribery and corruption; and
 - e) Full and consistent support to anti-corruption program.


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- 6.3 The Group takes the upholding of its anti-bribery and anti-corruption stances seriously and expects the same from all its internal and external stakeholders.
- 6.4 All individuals to whom this Policy applies have a responsibility to comply with this Policy and have a duty to disclose violation of this Policy without fear of victimisation via the whistleblowing channel as outlined in the Group's Whistleblowing Policy and Procedures.
- 6.5 The Group treats any violation of this Policy seriously and will undertake necessary actions, including but not limited to, review of employment or appointment, disciplinary actions, dismissal, and reporting to the authorities, consistent with the relevant laws and regulations.
- 6.6 To address the risk of bribery and corruption, the Group have taken the following steps:
- Implementation and enforcement of this Policy;
 - Perform regular corruption risk assessment on the Group's operations and review any findings;
 - Take steps to implement training programmes for all individuals operating in areas of the organisation that are identified as high risk; and
 - Regular review and update to this Policy (at least once every 3 years or as needed).

7.0 Gift, Entertainment, Hospitality and Travel

- 7.1 The Group strictly prohibits its Directors, Employees and Business Partners from the provision or acceptance of gifts (including in cash or in kind), entertainment, hospitality and travel to/from third parties and stakeholders on the Group, which may be viewed as a bribe or with the intention to:
- Secure or award an improper business advantage;
 - Facilitate, expedite, or reward any action or procedure;
 - Solicit business and favours; and
 - Influence business decisions.
- 7.2 Directors, Employees and Business Partners shall not provide, agree to provide, promise, offer, solicit, request, accept or agree to accept, whether directly or indirectly, any gifts, entertainment, hospitality and travel that will give rise to a conflict of interest situation or create the appearance of conflict of interest, which may adversely affect the Group's reputation.
- 7.3 Only in very limited, rare and defined cases it is permissible for Directors, Employees and Business Partners to provide or accept gifts, entertainment, hospitality and travel. All gifts, entertainment, hospitality and travel must be guided by the following principles:

Principle	Description
a) Appropriate and reasonable in value	Not excessive or of such value that it could be seen as overly generous, designed to influence a business decision, putting undue pressure on the recipient, or creating the impression of a relationship of dependency. It must be appropriate to the official designation of the giver and the recipient of the benefit.
b) Infrequent in nature	The level of gifts, entertainment, hospitality and/or travel given to and/or received from a particular person/party must be appropriate in terms of its frequency and the occasion (for example, limited to festive seasons applicable to the recipient and corporate-related events of the recipient). Overly regular or frequent gifts, entertainment, hospitality and/or travel could be interpreted as overly generous or as a means to bypass controls set in relation to the value/threshold of benefits.

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c) Bona fide benefit	Given and received with the right intentions, which is to build goodwill or show appreciation, not as a way of persuading the recipient, to influence a business decision, or to obtain favourable treatment.
d) Transparent and open	All gifts, entertainment, hospitality and travel (both given and received) shall be carried out in an open and transparent manner. It must be appropriately documented and reported in accordance with procedures sets out in this Policy.
e) Appropriate in timing, circumstances and permitted by relevant laws and policies	<p>Given and received at the appropriate time and not designed to influence contract negotiations or decisions by the recipient on awarding projects or other commercial matters.</p> <p>All gifts, entertainment, hospitality and travel (both given and received) should adhere with applicable internal policies of the giver and the recipient, in line with prevailing public opinion, permitted by local or foreign law and regulations.</p> <p>Common Courtesy is polite, basic and modest. gifts, entertainment, hospitality and travel received or offered should not exceed common courtesy and should not raise a conflict of interest.</p>

- 7.4 Even in the above exceptional circumstances, Directors, Employees and Business Partners are expected to always exercise proper care and judgement in respect of provision and acceptance of gifts, entertainment, hospitality and travel.
- 7.5 Directors, Employees and Business Partners who intent to provide or accept any gift, entertainment, hospitality or travel shall strictly comply with the procedures outlined in the **Group’s Gift, Entertainment, Hospitality and Travel Policy** and submit a declaration and obtain prior approval using **Gift, Entertainment, Hospitality and Travel Declaration Form**, whenever required.
- 7.6 This prohibition of providing and receiving gifts, entertainment, hospitality and travel extends to family members and any other persons connected to the Directors, Employees or Business Partners.

Refer to the Group’s **Gift, Entertainment, Hospitality and Travel Policy** for detailed procedures on how provision or acceptance of gift, entertainment, hospitality and travel, shall be authorised, processed, and recorded.

8.0 Anti-Money Laundering, Counter Financing of Terrorism and Counter Proliferation Financing (“AML/CFT/CPF”)

- 8.1 The Group strongly objects to all practices related to money laundering, including dealing in the proceeds of criminal activities, terrorism financing and proliferation financing. As a general rule, reasonable degree of due diligence must be conducted to understand the business and background of any prospective Business Partner to determine the origin and destination of money, property and services.
- 8.2 Directors and Employees are strictly prohibited from all forms of involvement in money laundering, terrorism financing and proliferation financing activities, which include, but not limited to the following:
- Structuring transactions to evade reporting requirement;
 - Requests for payment amounts that differ from the milestones stated in the contract;
 - Payment made in currencies that differs from that stated in the contract;
 - Mode of payment used is outside the course of normal business practice; and
 - Payments to or from parties that are not the contracting parties.
- 8.3 Directors and Employees shall immediately report any suspected money laundering, terrorism financing or proliferation financing activities to the CEO/ Audit Committee Chairman/ Sustainability and Risk Management Committee Chairman, who shall act independently and as the central reference point within the Group for all

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AML/CFT/CPF matters, for reviewing and reporting the suspicious transactions to Bank Negara Malaysia and relevant authorities, where appropriate.

- 8.4 Directors and Employees shall adhere to and understand the AML/CFT/CPF measures set out in the Group's **Anti-Money Laundering Policy**, to prevent the risks of the Group's businesses from being used as a conduit for money laundering, terrorism financing and proliferation financing activities.

Refer to the Group's **Anti-Money Laundering Policy** for detailed procedures on how money laundering, terrorism financing and proliferation financing, shall be managed, reported, and recorded.


9.0 Corporate Social Responsibility ("CSR"), Donation and Sponsorship

- 9.1 The Group prohibits the use of CSR, donations and sponsorships with an intention to influence business decisions or was otherwise intended or given with the expectation of gaining any advantage, or which may adversely affect the Group's reputation.
- 9.2 The Group shall only offer CSR, donations and sponsorships in situations where:
- It is permissible under applicable laws and regulations;
 - Compatible with the Group's values;
 - Legitimate in nature;
 - Made in an open and transparent manner, and
 - Reasonable in value and frequency.
- 9.3 The Group shall avoid situations where actual or perceived conflicts of interests could arise. Additional care must be taken when making contributions to charities or sponsored organisations that may have links to Public Officials or their family members, as this could be seen as an act to influence the official's decision in gaining benefit to the Group
- 9.4 The Group shall perform due diligence on the recipient to prevent contributing to the following parties:
- Political party or any organisation related to politics;
 - Organisation which may be engaged in terrorism, money laundering or other criminal activities;
 - Organisation that is declared bankrupt or blacklisted by any financial institutions;
 - Organisation which may be involved in fraud, embezzlement or scam; and
 - Organisation related to gambling, alcohol and tobacco.
- 9.5 Directors, Employees and Business Partners who intend to provide any CSR, donations and sponsorships on behalf of the Group shall submit the CSR, Donation and Sponsorship Form and Due Diligence Questionnaire for CSR, Donation and Sponsorship, and obtain prior approval in accordance with the approval limit.
- 9.6 Refer to the Group's **CSR, Donation and Sponsorship Policy** for detailed procedures on how provision of CSR, donation and sponsorship, shall be authorised, processed, and recorded.

PRINCIPLE II: RISK ASSESSMENT

10.0 Corruption Risk Assessment

- 10.1 Corruption risk assessment should form the basis of the Group's anti-corruption efforts.
- 10.2 The Group is committed to conduct corruption risk assessment across all businesses within the Group at least on an annual basis with intermittent assessments as and when necessary (i.e., when there is a change in law or circumstance of the business), to identify, analyse, assess and prioritise the internal and external corruption risks faced by the Group.

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- 10.3 Based on the assessment, Senior Management shall formulate appropriate and adequate processes, systems and controls to mitigate and address the corruption risks faced by the Group. All anti-corruption measures or programmes must be communicated to the Board for review and approval.
- 10.4 The Board shall review periodical reports from Management and/or Internal Audit Function on the effectiveness and efficiency of the existing internal control procedures and processes in place to manage the specific corruption risks that the Group is exposed to.
- 10.5 The Board, through its Audit Committee, Sustainability and Risk Management Committee, and the Senior Management shall from time to time, assess the need for additional measures to be implemented for all individuals operating in areas with high potential for exposure to corruption risk (e.g., procurement).

PRINCIPLE III: UNDERTAKE CONTROL MEASURES

11.0 Dealings with Public Officials


- 11.1 The Group strives to build transparent and fair relationship with all government agencies and Public Officials. Appropriate action must be taken to comply with the applicable laws and regulations as well as the Group’s relevant policies and procedures.
- 11.2 Caution must be exercised when dealing with Public Officials as the laws of bribery and corruption in some countries are more stringent and provides for stricter punishments.
- 11.3 Directors, Employees and Business Partners are strictly prohibited from offering or providing any form of gifts, entertainment, hospitality or travel to Public Officials, regardless of purpose and amount.

12.0 Facilitation Payment and Kickbacks

- 12.1 Directors, Employees and Business Partners are prohibited from, directly or indirectly, provide or accept facilitation payments (commonly known as “grease payment”) or kickbacks to any local or foreign Public Officials with the intent to gain any form of advantage. Directors, Employees and Business Partners must avoid any activity that might lead to the provision or acceptance of facilitation payments or kickbacks.
- 12.2 If Directors, Employees and Business Partners encounter a demand for facilitation payments or kickbacks, they should report the situation to their immediate manager/supervisor without delay, who will then ensure that the Chief Executive Officer (“CEO”) is informed at the earliest possible opportunity.
- 12.3 In very exceptional circumstances, where it is unavoidable – such as when demands for facilitation payments or kickbacks are made in form of extortion or threats, putting one’s life, freedom or health at risk – a payment can be made. Any such payments must immediately be brought to the attention of CEO and reported to the relevant authorities.
- 12.4 Any individual with any suspicious, concerns or queries regarding a payment made on behalf of the Group or improper business practices, he or she should raise these by reporting to the Group via the whistleblowing channel as outlined in the Group’s **Whistleblowing Policy and Procedures**.

13.0 Procurement Process

- 13.1 In line with the Group’s commitment to fight corruption, the Group expects all Business Partners acting on behalf the Group to uphold high ethical standards and refrain from bribery and corruption.
- 13.2 Appropriate due diligence shall be conducted to individuals or third parties to ensure the business and background of the potential Business Partners are free from bribery elements or conflict of interest prior to procurement process.
- 13.3 It is mandatory for all active Business Partners to understand and acknowledge the Group’s **Code of Conduct and Ethics, Anti-Bribery and Anti-Corruption Policy, Gift, Entertainment, Hospitality and Travel Policy**, as well as **CSR, Donation and Sponsorship Policy**.

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- 13.4 In relation to selection of suppliers, the Group has a robust procurement policy and processes in place and adheres to the system of internal controls. Supplier selection should never be influenced by the acceptance of gifts, entertainment, hospitality, travel or any other benefits.
- 13.5 When supplier selection involves a formal, structured invitation for the supply of goods and services (commonly known as a “tender”), it is essential that the Group maintains documentation supporting its internal controls.
- 13.6 A tender process involves inviting external parties to submit proposals, with the understanding that competition for the relevant contract must be conducted transparently. No parties should have the unfair advantage of separate, prior, close-door negotiations. The bidding process should be open to all qualified bidders, with sealed bids being scrutinised and evaluated based on price and quality.


14.0 Political Contribution

- 14.1 Directors, Employees or Business Partners are not permitted, under any circumstances, to make contributions (in cash or in kind) in respect of any political activities, including donations to political candidates, political officials, political parties or political fund organisations on behalf of the Group. In kind contributions could include participation in political campaigns during paid working hours and/or the use of administrative support, facilities, equipment and supplies.
- 14.2 Directors, Employees or Business Partners remain entitled to participate in the political process in their individual capacity and not as a representative of the Group. Any decision to do so is entirely personal and voluntary and is a private matter. Directors, Employees or Business Partners will not be reimbursed by the Group directly or indirectly for their personal contributions or expenses.
- 14.3 When engaged in political activities, all Directors, Employees or Business Partners are expected to do so as private individuals, and at all times must make it clear that their views and actions are their own, and not those of the Group.
- 14.4 Directors, Employees or Business Partners must not use their position within the Group to coerce or pressure other Directors, Employees or Business Partners to make contributions to or support or oppose any political candidates, political officials, or political parties.

PRINCIPLE IV: SYSTEMATIC REVIEW, MONITORING AND ENFORCEMENT

15.0 Reporting of Violations

- 15.1 The Group encourages openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. Any of the following individuals can make a report:
- Directors of the Group;
 - Employees of the Group; and
 - Stakeholders of the Group who are natural persons and not being incorporated or unincorporated bodies, including members of the public.
- 15.2 The Group ensures that all cases of suspected bribery are dealt with consistently. No one shall suffer any detrimental treatment or retaliation for reporting concerns or possible violation of this Policy in good faith, or as a result of refusing to take part in corruption.
- 15.3 Directors, Employees and Business Partners are required to immediately report any concerns or violations of this Policy to their immediate manager/supervisor, CEO or Audit Committee Chairman, as the case may be.
- 15.4 However, where any individual who feels uncomfortable in raising their concern in this manner, wish to remain anonymous or unsatisfied with the response received, the concern can be raised using the procedures provided for in the Group’s **Whistleblowing Policy and Procedures**.
- 15.5 The Group has established a proper channel for whistleblowing as specified below. All disclosures pursuant to this Policy are to be made to any of the Designated Officers:

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Level of disclosure	Designated Officer	
Disclosure against all levels of staff up to the rank of Senior Management and Directors	Admin & Legal Manager Email:whistleblowing@stratusauto.com Mail: Stratus Global Holdings Berhad Phase 4, Plot 73-C, Lintang Bayan Lepas, Bayan Lepas Industrial Park, 11900 Bayan Lepas, Pulau Pinang (Strictly Confidential)	
Disclosure against Senior Management and Directors	Independent Non-Executive Chairman Name: Fazrin Azwar Bin Dato' Hj. Md. Nor Email: chairman@stratusauto.com	Audit Committee Chairman Name: Teh Su-Ching
	Mail: Chairman of Stratus Global Holdings Berhad 57-G, Persiaran Bayan Indah, Bayan Bay, Sungai Nibong, 11900 Penang, Malaysia. (Strictly Confidential)	

15.6 To ensure the highest level of independence and to avoid any impression of internal vetting, for email sent to charman@stratusauto.com, the Group's dedicated whistleblowing email channel is configured with automated settings that directly forward all incoming reports to both the Chairman of the Board and the Audit Committee Chairman.

16.0 Enforcement and Consequences of a Breach


16.1 Breach of this Policy by any Directors, Employees and Business Partners will be regarded as serious misconduct and will be subjected to disciplinary action, which may include termination of employment or contract.

16.2 In addition to breaching this Policy, Directors, Employees and Business Partners may be exposed to personal liability or criminal liability at law if they engaged in any act of bribery and corruption that are illegal and will be dealt with according to applicable local laws.

17.0 Record keeping

17.1 The Group must maintain proper and complete financial records and documentations of all transactions, ensuring that appropriate internal controls are in place to evidence, substantiate and justify that business reason for making and receiving payments to/ from third parties. This also serves as evidence that all transactions are bona fide and not made with corrupt or unethical intent. No accounts should be kept "off-book" to facilitate or conceal improper payments. All records shall be maintained for a minimum record retention (e.g., 7 years or as required by law).

17.2 Directors, Employees or Business Partners must ensure all expenses claims relating to gifts, entertainment, hospitality, travel made to third parties are submitted in accordance with the Group's reimbursement procedures and specifically record the reason for such expenditure.

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PRINCIPLE V: TRAINING AND COMMUNICATION

18.0 Communication

- 18.1 This Policy together with all relevant procedures will be made available on the Group's Intranet.
- 18.2 Dissemination of this Policy for new Directors and Employees will be carried out at the time of induction. The Human Resources Department is responsible to brief all new Directors and Employees on anti-corruption laws and on how to implement and comply with this Policy, and the relevant procedures.
- 18.3 The Group's approach to corruption and bribery must be communicated to all Business Partners at the outset of business relationship with them and as appropriate thereafter. Wherever possible, all Business Partners should be sent a copy of this Policy at the outset of the business relationship or shall always refer to this Policy published on the Group's website.

19.0 Training

- 19.1 The Group will on a continuing basis provide specific and regular updates on the latest anti-corruption and bribery laws, best practices and requirements of this Policy.
- 19.2 On annual basis, the Human Resources Department shall conduct training programmes for all Directors and Employees to ensure compliance to this Policy and the requirements of MACC Act. The training content shall include, but not limited to the following:
- a) How to identify "red flags" situation that may arise in the course of performing daily responsibilities;
 - b) How to report a suspected activity;
 - c) The role of each Director and Employee in the Group's effort to combat bribery and corruption;
 - d) Disciplinary consequences (including civil and criminal penalties) for non-compliance with this Policy and the applicable laws such as MACC Act.
- 19.3 Post-training assessment shall be conducted to identify gaps in Directors and Employees' comprehension of anti-corruption matters and the areas needed for additional clarification or training.

20.0 Review and Amendment to this Policy

- 20.1 This Policy and its relevant procedures will be reviewed, at least once every three (3) years and updated as and when necessary, i.e. when the current management system is found to be inadequate or when there is a change in laws and regulations, environment or circumstances in which the Group operates.
- 20.2 Any revision or amendment to this Policy shall first be presented to the Board for approval. Upon the Board's approval, the said revision or amendment shall form part of this Policy.
- 20.3 Briefing or training shall be provided to communicate the duly revised or amended Policy to Directors and Employees. The duly revised or amended Policy shall also be notified to other relevant stakeholders accordingly and disclosed on the Group's website.

Reviewed and approved by the Board on 28 November 2025.

