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|  | BERSATU GROUP OF COMPANIES         | Doc. No.       | BG-SM-MR-21 |
|                                                                                  |                                    | Rev. No.       | 1           |
|                                                                                  | Anti-Bribery and Corruption Policy | Effective Date | 12 Sep 25   |

BERSATU GROUP OF COMPANIES is committed to conducting business with integrity, transparency, and the highest ethical standards. We strictly prohibit any form of bribery or corrupt practices in line with the Malaysian Anti-Corruption Commission Act 2009 (MACC Act), the UK Bribery Act 2010, and the U.S. Foreign Corrupt Practices Act (FCPA).

### 1. Zero Tolerance on Bribery and Corruption

All employees, directors, contractors, vendors, and representatives of BERSATU must not, directly or indirectly:

- a) Offer, promise, give, or authorize any form of bribe or improper payment (cash or otherwise) to any person or entity, whether public or private, for the purpose of obtaining or retaining business or any undue advantage.
- b) Solicit, receive, or agree to receive bribes or improper benefits from any party.
- c) Facilitate or overlook corrupt practices committed by others.

This applies to all business dealings, whether in Malaysia or internationally, and includes interactions with government officials, customers, partners, vendors, and any other third parties.

### 2. Gifts and Entertainment

BERSATU acknowledges that gifts and entertainment can build goodwill in business relationships. However, they must never be used to improperly influence decisions or gain unfair advantage.

Acceptable gifts and entertainment must:

- a) Be modest, infrequent, and reasonable in value.
- b) Be transparent and properly recorded in the company's records.
- c) Not be offered or received during active business negotiations or tenders.

Prohibited items include:

- a) Cash or cash equivalents (e.g., gift cards, vouchers).
- b) Lavish or frequent entertainment.
- c) Gifts given with the expectation of favourable treatment.

All gifts or entertainment offered or received must be declared to HR or the Compliance Officer for review when in doubt.

### 3. Political Contributions and Charitable Donations

BERSATU does not make political contributions, whether in cash or in kind, to any political party, candidate, or campaign.

Charitable donations must be made in good faith and not as a subterfuge for bribery. All such contributions must be pre-approved by senior management and documented.

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#### 4. Due Diligence and Third Parties

We must conduct appropriate due diligence on third-party representatives, agents, vendors, or joint venture partners to ensure they share our anti-bribery values.

Third parties acting on behalf of BERSATU must contractually agree to comply with anti-bribery laws.

#### 5. Retaliation and Whistleblower Protection

BERSATU strictly prohibits any form of retaliation against individuals who report, in good faith, concerns or suspicions regarding bribery, corruption, or unethical conduct.

- a) Reports may be made anonymously through designated internal channels.
- b) All reports will be treated confidentially and investigated promptly.
- c) Retaliation against whistleblowers will result in disciplinary action, up to and including termination.

#### 6. Responsibilities and Reporting

All employees are responsible for preventing, detecting, and reporting bribery or corrupt practices. Suspected violations must be reported to your immediate supervisor, the HR Department, or via our whistleblower channel.

Any employee found to have violated this policy will face disciplinary action, which may include termination and legal consequences.

#### 7. Training & Awareness

Regular training on integrity, ethics, and anti-bribery practices will be provided to ensure employees and relevant stakeholders understand and comply with this policy.

#### 8. Management Responsibilities

The company's top management is responsible for ensuring the effective implementation of this policy and embedding a culture of integrity across all business operations.

#### 9. Review & Closing

This policy will be reviewed on yearly basis to ensure it remains relevant, effective, and aligned with applicable laws and best practices.

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KUMPULAN SYARIKAT BERSATU komited untuk menjalankan perniagaan dengan integriti, ketelusan, dan piawaian etika tertinggi. Kami mengharamkan sebarang bentuk rasuah atau amalan korup selaras dengan Akta Suruhanjaya Pencegahan Rasuah Malaysia 2009 (Akta SPRM), UK Bribery Act 2010, dan U.S. Foreign Corrupt Practices Act (FCPA).

## 1. Toleransi Sifar terhadap Rasuah dan Korupsi

Semua pekerja, pengarah, kontraktor, pembekal, dan wakil BERSATU tidak dibenarkan secara langsung atau tidak langsung untuk:

- a) Menawarkan, menjanjikan, memberi, atau membenarkan sebarang bentuk rasuah atau bayaran tidak wajar (tunai atau selainnya) kepada mana-mana individu atau entiti, sama ada awam atau swasta, bagi tujuan mendapatkan atau mengekalkan perniagaan atau sebarang kelebihan yang tidak wajar.
- b) Meminta, menerima, atau bersetuju untuk menerima rasuah atau manfaat tidak wajar daripada mana-mana pihak.
- c) Memudahkan atau membiarkan amalan korupsi yang dilakukan oleh pihak lain.

Perkara ini terpakai untuk semua urusan perniagaan, sama ada di Malaysia atau antarabangsa, termasuk interaksi dengan pegawai kerajaan, pelanggan, rakan kongsi, pembekal, dan mana-mana pihak ketiga.

## 2. Hadiah dan Hiburan

BERSATU mengiktiraf bahawa hadiah dan hiburan boleh membina hubungan baik dalam perniagaan. Namun, ia tidak boleh digunakan untuk mempengaruhi keputusan secara tidak wajar atau memperoleh kelebihan yang tidak adil.

Hadiah dan hiburan yang dibenarkan mestilah:

- a) Bersederhana, jarang, dan berpatutan nilainya.
- b) Telus dan direkodkan dengan betul dalam rekod syarikat.
- c) Tidak ditawarkan atau diterima semasa rundingan perniagaan atau tender sedang dijalankan.

Item yang dilarang termasuk:

- a) Tunai atau setara tunai (contohnya kad hadiah, baucar).
- b) Hiburan mewah atau kerap.
- c) Hadiah yang diberikan dengan harapan mendapat layanan istimewa.

Semua hadiah atau hiburan yang ditawarkan atau diterima mesti diisytiharkan kepada Jabatan Sumber Manusia atau Pegawai Pematuhan untuk semakan jika ada keraguan.

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### 3. Sumbangan Politik dan Derma Kebajikan

BERSATU tidak membuat sumbangan politik, sama ada dalam bentuk tunai atau barang, kepada mana-mana parti politik, calon, atau kempen.

Derma kebajikan mesti dibuat dengan niat baik dan bukan sebagai helah untuk rasuah. Semua sumbangan sebegini mesti mendapat kelulusan awal daripada pengurusan atasan dan didokumentasikan.

### 4. Ketelitian Wajar dan Pihak Ketiga

Kami mesti menjalankan ketelitian wajar terhadap wakil pihak ketiga, ejen, pembekal, atau rakan usaha sama bagi memastikan mereka berkongsi nilai anti-rasuah kami.

Pihak ketiga yang bertindak bagi pihak BERSATU mesti bersetuju secara kontrak untuk mematuhi undang-undang anti-rasuah.

### 5. Perlindungan Pelapor dan Larangan Tindakan Balas

BERSATU mengharamkan sebarang bentuk tindakan balas terhadap individu yang melaporkan, dengan niat baik, kebimbangan atau syak wasangka berkaitan rasuah, korupsi, atau kelakuan tidak beretika.

- a) Laporan boleh dibuat secara anonim melalui saluran dalaman yang ditetapkan.
- b) Semua laporan akan dirahsiakan dan disiasat dengan segera.
- c) Tindakan balas terhadap pelapor akan mengakibatkan tindakan tatatertib, termasuk pemecatan.

### 6. Tanggungjawab dan Pelaporan

Semua pekerja bertanggungjawab untuk mencegah, mengesan, dan melaporkan amalan rasuah atau korupsi. Sebarang pelanggaran yang disyaki mesti dilaporkan kepada penyelia terus, Jabatan Sumber Manusia, atau melalui saluran pelapor kami.

Mana-mana pekerja yang didapati melanggar polisi ini akan dikenakan tindakan tatatertib, termasuk pemecatan dan tindakan undang-undang.

### 7. Latihan & Kesedaran

Latihan berkala berhubung integriti, etika, dan anti-rasuah akan diberikan bagi memastikan semua pekerja dan pihak berkepentingan memahami serta mematuhi polisi ini.

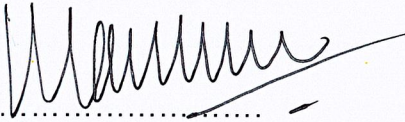
### 8. Tanggungjawab Pengurusan

Pengurusan tertinggi syarikat bertanggungjawab memastikan pelaksanaan berkesan polisi ini serta membudayakan nilai integriti dalam semua operasi syarikat.

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## 9. Penutup

Polisi ini akan disemak setiap tahun bagi memastikan ia kekal relevan, berkesan, dan selaras dengan undang-undang serta amalan terbaik.



MARCUS LEONG  
Chief Operating Officer