



SURE-REACH GROUP
ANTI-BRIBERY & CORRUPTION POLICY

January 2021

1. INTRODUCTION

1.1. BACKGROUND

- 1.1.1 The Group is committed to institute policies to support the Group's business operations and assist its Employees to understand their obligations in upholding corporate integrity and the Group's reputation.
- 1.1.2 The Group does not condone any act of bribery and corruption which are criminal acts in nature as well as indictable offences.

1.2 OBJECTIVE

- 1.2.1 The group is committed to conducting its business in accordance with all applicable laws, rules and regulations and ethical standards.
- 1.2.2 The purpose of this policy is to reiterate commitment to compliance by the Sure-Reach Group of companies, its officers, directors and employees to the Malaysian Anti-Corruption Commission (MACC) Act 2009 and similar Acts in relation to countering bribery and corruption.
- 1.2.3 It is essential that the Group is seen as an organization that does not tolerate bribery and corruption involving its employees, suppliers, contractors and agents to fight against dishonest claims, breaches of trust, kickbacks, embezzlement, unfair favours and any other forms of bribery and corruption that are non-exhaustive.

1.3 SCOPE

- 1.3.1 All employees shall understand, adopt and adhere to the contents of the Group Anti-Bribery and Corruption Policy.
- 1.3.2 All employees shall observe the relevant rules and regulation in relation to anti-bribery and corruption that governs business and day-to-day operations of the Group.

1.4 APPLICATION

- 1.4.1 This policy is applicable to all entities within the Group, subsidiaries and branches.

1.5 APPROVAL

- 1.5.1 This policy shall be adhered to at all times by the Group's Employees. Any amendments to the Policy must be approved by EXCO.

2. GOVERNING PRINCIPLES AND POLICY STATEMENTS

2.1 ZERO TOLERANCE FOR BRIBERY AND CORRUPTION

The Group has zero tolerance on bribery and corruption, in line with its core values and the Group Whistleblowing Policy.

- 2.1.1 Employees are to stay away from bribery and corruption, never offer, promise or give anything of value in order to influence someone's professional objectivity or to reward any act for their own benefit or the Group. Employees are never to request or accept anything of value that might influence one's objective in doing their job.
- 2.1.2 The Group may be held accountable not only for acts of bribery or corruption by its employees but by those acting for and on behalf of the Group. When using Third parties for legitimate reasons, it is crucial to ensure that such Third parties apply the same standards as those that the Group uses itself.

- 2.1.3 The general rule is the any gift, entertainment, hospitality is paid out of Group funds only in good faith and must be in reasonable amount. Always ask yourself before making such offers, whether what you are considering to do could be viewed as having a wrongful purpose. If yes, you must not proceed.

2.2 REPORTING ACTUAL OR POTENTIAL VIOLATIONS

All employees must report any request for an improper payment, or any indication that a person might be making corrupt payments or that a person has an inclination or plan to violate Anti-Bribery laws, immediately to the approved formal channels and avenues provided by the Group.

- 2.2.1 Employees have a obligation to promptly report any information or knowledge of any hidden fund or asset, of any false or artificial entry in the books and records of the Group, or any payment that bypass the Group's internal financial controls immediately to the approved formal channels and avenues as provided by the Group.

2.3 SPONSORSHIP, DONATION AND CONTRIBUTION

The Group and its employees are prohibited from political contributions and donations or bribes with intentions to induce a party to engage in improper conducts.

- 2.3.1 Political contributions or donations and support of any political parties or candidates are prohibited.
- 2.3.2 Charitable donations made with the intention to induce a party to engage in improper or unlawful conduct are considered as bribes and are prohibited.
- 2.3.3 Contributions to any public local or international non-governmental organizations are only allowed with the prior written approval of EXCO.

2.4 GIFTS, HOSPITALITY AND ENTERTAINMENT

Employees are prohibited from accepting or giving gifts, hospitality and entertainment with intentions to engage or involve in any acts of soliciting or offering gratification or favour of any description.

- 2.4.1 Providing or receiving reasonable gifts, hospitality and entertainment is often an appropriate way to reflect esteem or gratitude or to build stronger business relationship. Nonetheless, gift, hospitality and entertainment require careful consideration to ensure they are consistent with the law and the Group standards.
- 2.4.2 When employees are in doubt of promising or receiving any gift, hospitality and entertainment, they are to consult with their respective Head of Department and/or EXCO.

2.5 EXTORTION AND REQUEST TO CARRY OUT IMPROPER PAYMENT ACTIVITY

The Group and its employees must resist extortion and all other demands for improper payments made under duress.

2.5.1 In exceptional circumstances if payment must be made in order to secure personal health or safety, such payment must be accounted for by Head of Human Resource or EXCO.

2.5.2 No employees should ever engage in improper payment activity because instructed to do so by their Head of Department or manager or co-worker.

2.6 PENALTY

2.6.1 Any employee who breaches the policy will be liable to stern disciplinary actions, including dismissal.