ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. INTRODUCTION

1.1 This Anti-Bribery and Anti-Corruption Policy ("ABAC Policy or Policy") of Plus Three Consultants (Malaysia) Sdn Bhd ("Company") sets out the policy statements and other relevant parameters as approved by the Company against any bribery and corrupt practices by the directors and c-suite executives ("Directors") and employees ("Employees") of the Company, as well as persons performing services directly for or on behalf of the Company ("Service Providers").

2. PURPOSE AND SCOPE

2.1 This Policy is aimed at protecting the integrity, transparency, legality, impartiality and accountability throughout the Company's operations. The ABAC Policy provides compliance guidelines to prevent, detect and correct act(s) of bribery and/or corruption.

2.2 This Policy applies to all Employees and Directors throughout the Company, including the Service Providers engaged by the Company both internally and externally.

3. POLICY STATEMENTS

3.1 The Company is committed to conducting its business based on principles of fairness, honesty, openness, decency, integrity, lawfulness and respect.

3.2 The Company is focused on fostering a business environment with high standards of integrity in all its conduct as well as business practices and adopts a zero-tolerance policy against all forms of bribery and corruption to achieve a high level of professionalism and reaching its corporate governance and social responsibilities.

3.3 Although the Policy serves as internal compliance guidelines, it is still not exhaustive as everyone is required to comply with all the applicable laws and regulations on anti-bribery and anti-corruption,

4. COMPLIANCE

4.1 All Directors, Employees and Service Providers are strictly prohibited from getting involved in any form of bribery or corrupt act, whether by the person himself/herself, or jointly involved with any other person to: -

(a) corruptly solicit or receive, or agree to receive for himself/herself or for any other person; or
(b) corruptly give, agree to give, promise or offer to any person whether for the benefit of that person or of another person;

any gratification as an inducement to, or a reward for, or with the intent to secure or otherwise on the account of: -

(i) any person or officer doing or omitting to do anything in respect of any matter or transaction, actual or proposed or likely to take place; or

(ii) any unethical business or advantage for the Company.

4.2 Any person who has been evidently found in violation of any of this ABAC Policy and/or has been convicted in or charged with an offence due to such acts of bribery and/or corruption, shall be subject to the appropriate remedial action, including but not limited to termination of contract with the Company, and recovery of debts or losses suffered by the Company, whether directly or indirectly, as a result of bribery and/or corruption.

4.3 The term 'gratification' used in this Policy has the same meaning given to the definition as described in the Malaysian Anti-Corruption Commission ("MACC") Act 2009 is as follows: -

(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 preceding paragraphs (a) to (f);

5. GUIDANCE ON COMMON FORMS OF BRIBERY AND CORRUPTION

5.1 The Company adopts zero tolerance policy and strictly prohibits all forms of corruption, including bribery, passive corruption, embezzlement, theft, fraud, extortion, favouritism and nepotism, money laundering, creating and exploiting conflict of interest and/or improper political contributions.

5.2 Bribery can be also associated in the form of a promise, offer or providing anything of value (cash, material, property or in similar value proposition) whether directly or indirectly, with the intention to induce or reward a person to act or omit from acting in respect of any matter or transaction (actual or proposed or likely to take place) or performance of that person's duty.

5.3 The Employees, Directors and/or Service Providers shall not participate in activities, such as offering, proposing, giving or receiving any item of value in an attempt to unlawfully or unfairly influence the decisions or actions of a person in a position of trust within an organisation, either to unlawfully benefit the Company or the persons involved in the transaction, whether directly or indirectly.

5.4 It is prohibited to provide any contracts, employment or business opportunities to third parties (directly or indirectly) without going through the appropriate lawful or fair selection channel within the Company.

5.5 The Company shall not penalise any person in any form or other adverse consequences for refusing to participate in any activities that are against this Policy even if such refusal may result in the Company losing business or business opportunity, or experiencing a delay in business operations.

6. CONFLICT OF INTEREST

6.1 A conflict of interest in the Company varies in many situations under different contexts. In an overall perspective, conflict of interest occurs when the individuals' personal interests, family, relationships, political, or social issues may impair their judgement, decisions, or actions at work.

6.2 To avoid a conflict-of-interest situation from occurring, everyone is required to take a decision in the best interest of the Company or Company's clients and must not allow personal interests to influence business choices or decisions made on behalf of the Company or Company's client.

6.3 Where the Company is engaged or proposed to be engaged in dispute resolution proceedings, the Directors and/or Service Providers shall ensure that neither the Company nor the Company's clients are placed in a conflict-of-interest situation, unless such conflict is expressly accepted by the Company's clients.

6.3 Anyone who has encountered any actual, potential or perceived conflict-of-interest situation while performing his/her duty, is required to report it to a Director who has no such conflict, to avoid any misunderstanding and/or to seek proper resolution.

7. GIFTS, ENTERTAINMENT AND HOSPITALITY

7.1 Although the act of giving or receiving gifts, entertainment and/or other sorts of hospitality is understandable and is an act commonly accepted as a gesture of good nature and in building a good relationship, it should be avoided if possible. Nevertheless, any gratification which is lavish, expensive or disproportionate in nature, is strictly prohibited.

7.2 The Employees, Directors and/or Service Providers are not permitted to accept or offer gift, entertainment, or hospitality to influence their business decision or improperly influence a government/public official or Company's client.

7.3 In a situation which compels a person to accept any gift, entertainment and hospitality, then such incident has to be recorded for compliance or risk assessment audit purpose.

8. DONATIONS AND SPONSORSHIPS

8.1 Bona fide donations for charitable or lawful causes and sponsorships are part of the Company's corporate social responsibilities' direction. However, it is vital for the relevant Employee or Director to reasonably check the organisation or event in which the fund should be provided to a cause that properly or lawfully benefits them.

8.2 Any sort of donation and/or sponsorship must be provided through the right channel and approved by a Director with no personal, political, unethical intention or favouritism associated with, and such donation and/or sponsorship should be able to be disclosed publicly.

9. FACILITATION PAYMENT

9.1 The Company strictly prohibits any proposal, offer or acceptance of any facilitation payment to or from any external party or stakeholder in order to further expedite or secure any business transactions.

9.2 If any situation which requires any facilitation payment, the person is required to immediately report the incident to the Company.

9.3 Under undue circumstances, such as an imminent threat on loss of life or liberty, a facilitation payment may be permitted. When such payment is made, the person shall report such incident to the Company or the appropriate authority in an appropriate time.

10. COMMISSIONS AND INCENTIVES

10.1 The giving of commissions and/or incentives in the ordinary course of business is not generally prohibited, so long as they are bona fide and commercially driven considerations, with no intent to disguise any act of bribery or corruption or kickback.

11. SERVICE PROVIDERS

11.1 All Service Providers shall be made aware of this ABAC Policy. Whenever commercially possible, the Service Providers shall be required to declare their awareness and undertake to comply with this ABAC Policy.

12. RECORD-KEEPING

12.1 Proper and complete records of the Company's business activities (including payments for gifts, entertainment, sponsorships, donations and charitable contributions) shall be kept and maintained for a reasonable period of time, subject to the prevailing laws and regulations on records keeping.

13. WHISTLE BLOWING AND INVESTIGATION FRAMEWORK

13.1 A robust framework for whistle blowing and reporting on any form of improper conduct, wrongdoing, bribery, corruption, fraud and/or abuse by any Director or Employee as well as any Service Provider, shall be put in place to allow such improper act(s) to be reported via the appropriate channels, whilst protecting the identity of the person reporting, in order to deter, prevent and uncover such improper act(s).

13.2 Any reported incident shall be carefully investigated with supporting evidence before any disciplinary action can be taken against the person of the alleged improper act(s).

14. COMMUNICATION AND TRAINING

14.1 The Company shall arrange for adequate awareness trainings and refresher courses for all relevant personnel on a regular basis to ensure they continue to have clear understanding and awareness of the risks and continuously carry out their duties with high level of integrity and ethical standards.

15. REVIEW OF POLICY

15.1 This ABAC Policy shall be reviewed from time to time as required.

Approved by:

Chief Executive Officer
Date: 2 April 2025