

ANTI-BRIBERY AND CORRUPTION (ABC) POLICY

1. POLICY BRIEF AND PURPOSE

To enforce the SRKK Group's Code of Conduct and Business Ethics to ensure that employees understand their responsibilities in compliance with SRKK Group's zero tolerance for bribery and corruption within the organization.

2. SCOPE

The policy applies to all staff of SRKK Group in dealing with external parties in the context of commercial.

3. POLICY STATEMENT

SRKK Group firmly supports the national anti-bribery and anti-corruption effort by establishing and upholding good corporate governance and continuously inculcating good ethical business practices among its directors, employees, service provider and other business partners. In line with this commitment, all members of the Board of Directors, staff and related parties must uphold the highest standard of integrity and accountability in discharging their duties and to ensure that all activities, offer, or services are conducted in compliance with this Policy and all other applicable legal and regulatory requirement on anti-bribery and anti-corruption.

4. GIFTS AND ENTERTAINMENT

4.1. Gifts

The acceptance of gifts under inappropriate circumstances may also amount to Bribery and/or a criminal act. Accepting gifts may be a crime under the MACCA, which provides that a person shall be guilty of an offence if he corruptly receives or gives a Gratification (whether in the form of cash, employment, business opportunities, favours or otherwise) as an inducement or reward to a person to do or not to do any act. To avoid the reality, the appearance that business judgement may be improperly influenced or compromised and to protect the staff from any perception of improper conduct or conflicts of interest, employees should observe the following guidelines when deciding whether to accept gifts.

- a) Gifts valued at Ringgit Malaysia RM500.00 and above, regardless an individual item or accumulated in value, are expected to be declared.
- b) Where circumstances make it impossible, difficult, or impractical to reject gift or where the rejection of the gift may affect the relationship with the customers or business associates (other than cash or cash equivalent) or rejecting them is deemed as offensive given the local custom, you may accept the gift(s). If accepted, it is deemed to have been accepted on behalf of the Company and become the property of the Company. The use of the gift is to be determined by the Human Resource department.
- c) Consumables like food gifts and hampers at nominal value will not need to be declared but instead be shared within the company staff.

4.2 Entertainment

The employee should obtain approval from his or her supervisor for business entertainment extended to the employee. As a guide, business meals are acceptable. The following need not be declared:

- a) Annual dinner/ gala dinner/ cocktail events which are also attended by employees or other companies / organizations.

- b) Working lunches and other meals including those following / preceding official meetings, and invitations to official opening ceremonies / seminars and business entertainment that might compromise the employee's ability to or appear to hinder his or her duties in a professional manner should not be accepted.

If there are doubts as to whether business entertainment might create the appearance of any conflict or impropriety, these situations can be referred to Human Resource or to department head. Business entertainment valued at Ringgit Malaysia RM500.00 and above, is expected to be declared. If the staff receive or provide entertainment when on an official business overseas trip, this should be treated in the same manner as entertainment received locally and incurred in accordance with the Expense Reimbursement clause in the Employee Handbook.

4.3 Procedure

Gifts and business entertainment valued at Ringgit Malaysia RM 500.00 and above (individually or in total value) are expected to be declared. Employees are required to declare and fill in the Gifts and Entertainment Form. The Gifts and Entertainment Form is to be endorsed by the department head. The form and the gift are to be submitted to the Human Resource department. The form is to be kept and filed by Human Resource department. The access path for Gifts and Entertainment Form can be found in Employee Handbook.

5. FACILITATION PAYMENTS

Facilitation payments (also known as grease payments) are payments made for certain government services or to accelerate certain government processes that is otherwise legally entitled by the person without making any payments. Employees should ensure that these facilitation payments are not paid.

6. DONATIONS AND SPONSORSHIPS

SRKK Group is permitted to provide donation or sponsorship provided it comply with following:

- a) ensure such contribution is allowed by applicable laws.
- b) obtain all necessary authorisation (where required).
- c) be made to well established entities having an adequate organizational structure to guarantee proper administration of the funds; and
- d) not to be used to cover up an illegal payment or bribery.

It should never be paid in exchange for any business implications to the Company, whether it is to obtain a business, or to obtain some form of advantage of the business of SRKK Group. The Company must ensure that such contribution is recorded in the Company's books and/or records properly. SRKK Group shall not make political contribution from the Company's resources to any political party, political candidate, or political campaign. In the event where SRKK Group is to make a political contribution, the prior approval from the Board must be obtained.

7. TENDER PROCESS

Any tender processes participated by any company under SRKK Group must be done in a transparent manner in the bidding process.

8. FINANCIAL CONTROLS

8.1. Third Parties and Agencies

- a) SRKK Group requires that all employees conduct the requisite due diligence of third parties that SRKK

Group contracts with or hires to carry out any external functions on behalf of the Company, which includes without limitation to agents, consultants, contractors, subcontractors, resellers, customs brokers, business contacts, professional advisors, joint venture partners and any other parties supplying goods and services to SRKK Group (collectively referred to as "Other Applicable Person(s)").

- b) Where reimbursements are paid to Other Applicable Persons, employees of SRKK Group are to ensure that such payments made are for proper reimbursements and not for reimbursements that can be tied to giving any form of gratification for improper purposes.
- c) SRKK Group has zero tolerance of Other Applicable Persons who do not conduct themselves in accordance with the principles of the ABC Policy where it brings disrepute or legal implications to SRKK Group. Any non-compliance with the principles of the ABC Policy by Other Applicable Persons may lead to the review and/or termination of any agreement with such parties.

8.2 Record Keeping and Training

- a) All employees of SRKK Group are required to complete and undertake all relevant documentation and processes particularly where it relates to anti-bribery and corruption initiatives.
- b) Any failure to do so will impact the individual employee's performance review and, where it is a severe non-compliance, an employee may be subject to further disciplinary action/s. Where the facts and circumstances require, repeated failure to undertake proper record keeping or undergoing compulsory trainings may warrant the dismissal of an employee from the SRKK Group.

9. WHISTLE-BLOWING AND REPORTING CHANNEL

SRKK Group is committed to a high standard of compliance with accounting, financial reporting, internal controls, corporate governance and auditing requirements and any legislation relating thereto.

A Group Whistleblowing Policy is created to encourage employees to raise concerns, in confidence about possible irregularities while being protected from reprisals or victimisation for whistleblowing in good faith.

A whistle blower may also report on any suspected and/or real corruption incidents or inadequacies to the following designated recipient via secured reporting channels:

SRKK Sdn Bhd

No. 15-1, Port Tech Tower,
Jalan Tiara 3/ KU01, Bandar Baru Klang,
41150 Klang, Selangor
Malaysia
Tel: +603-3000 6698
E-mail: legal@srkk.com

Each Employee has a responsibility to ensure that suspected bribery and corruption incidents are reported promptly. Reports made in good faith, either anonymously or otherwise, shall be addressed in a timely manner and without incurring fear of reprisal or victimization regardless of the outcome of any investigation.

10. DISCIPLINARY ACTION FOR NON-COMPLIANCE

Cases of misconduct or gross misconduct will be dealt with according to internal procedure. The procedure is designed to ensure that all staff are dealt with fairly. However, it does not form part of the contract of employment or otherwise have contractual effect. SRKK Group regards bribery and corruption as a serious matter. Non-compliance may lead to disciplinary action, up to and including termination of employment depending on the severity of the situation, the Company may decide at its sole discretion.

SRKK Group shall notify the relevant regulatory authority if any identified bribery or corruption incidents have been proven beyond reasonable doubt.

Further legal action may also be taken if the SRKK Group interests have been harmed as a result of non-compliance.

Additional:

1. Whistleblowing policy
2. Expense's declaration form
3. Customer acknowledgement form