



Anti-Bribery and Anti-Corruption Policy

Version Date: Aug 2nd 2025

1. Purpose

This Anti-Bribery and Anti-Corruption Policy ("Policy") establishes the Company's zero-tolerance stance towards bribery and corruption, in line with the Malaysian Anti-Corruption Commission Act 2009 (MACC Act) and Section 17A on corporate liability.

2. Scope

This Policy applies to all employees, directors, contractors, agents, and any third parties acting on behalf of the Company, both in Malaysia and abroad.

3. Policy Statement

- **No Bribery:** All forms of bribery, kickbacks, and corrupt payments—whether made directly or indirectly—are strictly prohibited.
- **Gifts & Hospitality:** Only modest gifts and hospitality that do not influence business decisions may be accepted or offered, with prior written approval from Management.
- **Donations & Sponsorships:** Charitable donations and sponsorships must be transparent, documented, and not used as a channel for bribery.
- **Facilitation Payments:** The Company does not permit facilitation payments under any circumstances.

4. Responsibilities

- **Employees:** Must report any suspected bribery or corruption immediately and cooperate in any internal investigations.
- **Management:** Responsible for promoting awareness, conducting regular risk assessments, and ensuring compliance with this Policy.

5. Reporting & Whistleblowing

Employees are encouraged to report bribery concerns confidentially through the Whistleblowing Channel: corychew@hr2000.com.my / 03-56329094. Retaliation against whistleblowers is strictly prohibited.

6. Compliance & Consequences

Non-compliance may result in disciplinary action, including termination and legal action under Section 17A MACC Act, which holds companies liable for the corrupt acts of their employees and associates.

HR 2000 SDN BHD (475163-M)