ANTI-BRIBERY AND ANTI-CORRUPTION POLICY
# SUBUR TIASA HOLDINGS BERHAD
## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

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1. INTRODUCTION

Subur Tiasa Holdings Berhad and its subsidiaries ("the Group") are committed to conducting business dealings with integrity and accountability. The Group has adopted a zero tolerance approach towards all forms of bribery and corruption.

2. OBJECTIVE

The objective of this Policy is to promote good business conduct that embraces integrity and accountability in the Group.

This policy aims to:

a) Outline policies, procedures and guidelines in compliance with anti-bribery and corruption laws
b) Highlight specific compliance requirements relating to these prohibitions.
c) Promote good corporate governance.

3. SCOPE & DEFINITION

This policy applies to all Directors, Employees and its associates i.e. third parties engaged by and representing or acting on behalf of Subur Tiasa Holdings Berhad Group.

The following definitions are included in this policy:

a) Bribery is the act of offering, giving, promising, asking, agreeing, receiving, accepting or soliciting something of value or of an advantage so as to induce or influence an action or decision.

b) Corruption is defined as any action which would be considered as an offence of giving or receiving ‘gratification’ under Malaysian Anti-Corruption Commission Act 2009 and its 2018 amendment ("MACCA").

i. Gratification’ is defined in the MACCA to mean the following:

ii. 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;

iii. any office, dignity, employment, contract of employment or services and agreement to give employment or render services in any capacity;

iv. any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;

v. any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;

vi. any forbearance to demand any money or money’s worth or valuable thing;
vii. 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

viii. any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (i) to (vii).

In addition, corruption may also include acts of extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.

4. ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

   a) All forms of bribery and corruption are prohibited.
   b) Bribery may take the form of exchange of money, goods, services, property, privilege, employment position or preferential treatment. Employees shall not therefore, whether directly or indirectly, offer, give, receive or solicit any item of value, in the attempt to illicitly influence the decisions or actions of a person in a position of trust within an organisation, either for the intended benefit of the Group or the persons involved in the transaction.
   c) Employees must not participate in any corrupt activity, such as extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.
   d) This Policy applies equally to its business dealings with commercial (‘private sector’) and government (‘public sector’) entities, and includes interactions with their directors, employees, agents and other appointed representatives at all levels.
   e) The Group recognises the value of integrity in its Employees and Directors. The Group’s recruitment, training, performance evaluation, remuneration, recognition and promotion for all Employees, shall be designed to recognise integrity.
   f) The Group awards contracts and employee positions purely based on merits. The Group does not offer employment to prospective Employees in return for previous favour/in exchange of improper favour.

5. GIFTS, ENTERTAINMENT, HOSPITALITY, DONATION AND SPONSORSHIP

   a) As a general rule, the Group discourages its employees and Directors from giving or accepting gifts, entertainment or other benefits which would in any way influence any business decision or as an explicit or implicit exchange for favours or benefits. However, this policy does not prohibit the normal business hospitality, so long as it is in compliance with local laws, reasonable, appropriate and bona fide corporate hospitality, and if its purpose is to improve our company image, present our products and services, or to establish cordial relations.
   b) The Group recognizes that entertainment, gifting and acceptance of gifts may be a legitimate custom or practice in business relationships.
   c) The general guidelines subscribed by the Group concerning gifts, entertainment, hospitality, donation and sponsorship are to accord with the thresholds duly approved by the Group.
6. FACILITATION PAYMENTS

a) The Group adopts a strict stance that disallows facilitation payments.

b) Employees are expected to notify their immediate superior when encountered with any requests for a facilitation payment.

7. REPORTING OF POLICY VIOLATIONS

Employees who encounter actual or suspected violations of this Policy are required to report their concerns. Each Employee has a responsibility to ensure that suspected-bribery and corruption incidents are reported promptly. The Group encourages openness and support anyone who raises genuine concerns in good faith under this Policy and the Whistleblowing Policy.

8. NON-COMPLIANCE AND SANCTIONS FOR NON-COMPLIANCE

a) The Group regards bribery and corruption as a serious matter. Non-compliance shall be dealt with according to the Group’s disciplinary measures including termination of employment. Further legal action may also be taken in the event that the Group’s interests have been impacted as a result of non-compliance.

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

c) Where notification to the relevant regulatory authorities have been done, the Group shall provide full co-operation to the said regulatory authorities, including further action that such regulatory authority may decide to take against convicted Employees.

9. MONITORING AND REVIEW

a) The Group is committed to continually monitor the adequacy and operating effectiveness of this Policy, review its implementation on a regular basis, including assessing its suitability, adequacy and effectiveness and improving its policies and procedures relating to anti-bribery and anti-corruption.

b) Internal control systems and procedures designed to prevent bribery and corrupt gratification are subject to regular audits to ensure that they are effective in practice.

c) This Policy will be reviewed, amended if necessary and appropriate, and approved by the Board of Directors so as to improve its effectiveness.