

ANCOM NYLEX BERHAD [Registration No.: 196901000122 (8440-M)] (Incorporated in Malaysia)	Date of Revised Statement:	11/07/2024
	Last reviewed and approved by the Risk Management Committee:	18/07/2024
	Approved by the Board of Directors:	13/09/2024

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

1.0 INTRODUCTION

In this statement, Ancom Nylex Berhad means and includes its subsidiaries and related companies and shall hereafter be referred to as “Company”.

The Company shall conduct its business with integrity, respecting the laws, cultures, dignity and rights of individuals in all of the countries where it operates. All the Company’s Directors, Management and Employees are to act in accordance with the Company’s corporate values and ethics.

This Anti-Bribery and Anti-Corruption Policy (“Policy”) describes the Company’s commitments and requirements regarding ethical business practices and personal conduct. This Policy, which sets out the behaviour the Company expects of its Directors, Management and Employees of the Company and what the Company’s Directors, Management and Employees can expect from the Company, shall be applicable to all Directors, Management and Employees of the Company.

The Company’s business partners such as customers, suppliers and other contracting parties of the Company (“Business Partners”) shall adhere to the standards which are consistent with the Policy and the applicable laws in Malaysia.

2.0 THE COMPANY’S STANCE

The Company does not tolerate corruption and is firmly opposed to corruption in all its forms. The Company is committed to doing business in accordance with the highest ethical standards as it believes the success of an organization is built on the trust of its Directors, Management and Employees as well as its Business Partners and the general public and this is earned by demonstrating ethics and integrity in its business practices.

The Policy’s principles and rules which are outlined below apply to all the Company’s activities and business conducts to support the Company’s core values:

- a) The Company commits to carry out business fairly, honestly and openly;
- b) The Company does not tolerate corruption;
- c) The Company is committed to continual improvement of its anti-corruption management system; and
- d) The Company is obliged to comply with local and foreign bribery and corruption laws

3.0 BUSINESS ETHICS

The Company is committed to ensuring that its business is conducted according to ethical and legal standards in all respects. The Policy outlines the required standards of personal and corporate behaviour, reinforcing a strong ethical culture which runs through its organisation. The Company's three pillars of business ethics are:

- (i) Transparency;
- (ii) Accountability; and
- (iii) Fairness.

Honesty and integrity in communication are regarded as key in establishing the Company's reputation as a credible and trustworthy organisation. On this basis, the Company operates by communicating openly with all of its stakeholders whether they are shareholders, government departments or agencies, the local community, employees, customers or suppliers.

4.0 GIFTS AND HOSPITALITY

The Company does not allow gifts and hospitality where giving or accepting them could influence business decisions or enforcement of regulations, or cause others to perceive such influence. The Company does not expect gifts or hospitality from any of its business partners.

Gifts and hospitality may be accepted or offered when this is expected as common business courtesies. Gifts, hospitality or any financial or other advantage shall not be offered, promised, given to, or received from public officials unless this is subject to specific approval from the Company's Chief Integrity Officer ("CIO").

4.1 Gifts

Directors, Management and Employees may receive gifts of nominal value (RM1,000 or below on each occasion) provided they are products marked with company's logo; tokens of appreciation provided during company's event such as plaques; perishable items such as flowers or food items or festive gifts such as mandarin oranges, hampers or other similar items.

Gifts other than those listed above shall be politely declined or returned. Where the said gifts cannot be returned or when declining or returning the gifts may cause offence, the recipient shall accept the gifts and declare the gifts to the CIO. The CIO, after consulting the Group CEO, shall decide on the handling of the gifts, including but not limiting to distributing the gifts amongst the employees.

4.2 Hospitality

Hospitality, expenses, or other favours shall not be offered or received where it could be perceived to influence decision making in situations of contract negotiation, bidding, or award.

Directors, Management and Employees may only attend social events and entertainment connected with the Company's business with third parties that are considered modest and are relevant to maintain a business interest of the Company. Similarly, events hosted by the Company shall be modest and relevant to maintain a business interest.

Hospitality offered to or by a supplier or customer may be accepted when associated with a relevant business meeting and is normally provided to other business partners as a normal part of business.

The cost of hospitality must always be kept within reasonable limits and must not be accepted on a recurring basis.

Directors, Management and Employees must always ensure that travel, accommodation and other expenses for the individual representing the Company are paid by the Company.

The above principles apply in reverse direction, so that no person subject to this Policy may offer, participate in or pay for transactions, entertainment, gifts or favours that violate the above principles.

5.0 BRIBERY AND CORRUPTION

Directors, Management and Employees shall not offer, give, solicit or accept gratification in order to achieve business or personal advantages or engage in any transaction that can be construed as having contravened the anti-corruption laws.

The Company expressly prohibits any provision or offering or accepting of bribes and/or gratification of any variety to any person, whether private or public and it is strictly prohibited to offer or make facilitation payments.

Directors, Management and Employees should immediately report any suspected bribery or corruption to the CIO and shall cooperate fully with the CIO to provide necessary information for its onward investigation.

6.0 SPONSORING AND DONATIONS

The Company may utilise sponsorship to promote the Company and its business. All sponsoring relationships shall be strategic and aligned with the Company's values. There must be documented tangible benefits for the Company to be associated with any sponsorship, such as professional development, enhanced profiling etc.

There shall be no personal conflict involved in the decision to sponsor an organisation. In situations where a conflict-of-interest exists, the conflicted individual shall withdraw from any associated decision-making process.

Charitable donations or gifts to charitable organisations do not carry the same requirements for mutual benefit. All charitable donations must be approved in advance by the CIO.

All political donations shall not be permitted.

7.0 FACILITATION PAYMENT

Facilitation payments are payments aimed at expediting or securing the provision of products or services to which the Company is legally entitled.

Directors, Management and Employees must not (whether directly or indirectly through a third party) :

- (i) offer anything of value to influence the actions or decisions of any official, other person in public or legal duty, any person acting on behalf of its Business Partner, or any other third party, or
- (ii) otherwise obtain any improper advantage, in selling goods and services, conducting financial transactions or representing the Company's interests.

8.0 CONFLICT-OF-INTERESTS

Directors, Management and Employees shall not participate in any transactions or other business arrangements on behalf of the Company where they directly or indirectly have, or could reasonably be suspected to have, a personal interest, financial or otherwise, or that could otherwise reasonably be considered to harm the Company's reputation.

However, recognizing that these transactions do occur, any such conflict- of-interest that cannot reasonably be avoided, shall be made transparent and reported to the CIO in writing.

The CIO shall ensure that the conflicted individual is isolated from any operation, influence and/or decision-making process associated with the subject of the conflict.

The CIO shall report to the Audit Committee any incident on conflict- of-interest or potential conflict-of-interest situation and be satisfied with the measures taken to resolve, eliminate, or mitigate such conflicts.

9.0 PROCUREMENT PROCESS

The Company has processes in place and adheres to a system of internal controls for supplier (including service provider) selection. Supplier selection should never be based on receipt of a gift, hospitality or payment.

When supplier selection for the supply of goods and services is formal and structured and involves a tender process, it is most important that the Company maintains documentation supporting the Company's internal control.

The tender process must be conducted, assessed and monitored by an independent committee selected by the Company.

Any competition for the relevant contract must be conducted in response to the tender. No party should be entitled to any unfair advantage of a separate, prior, close-door

negotiation for the contract where a bidding process is open to all qualified bidders and where the sealed bids are in the open for scrutiny.

Due diligence should be conducted against new suppliers in respect of any potential corruption prior to the signing of contract.

10.0 FINANCIAL TRANSACTION

Every financial transaction must be approved by an officer independent from the transaction.

All payments (whether by cheque or online remittance) must be signed by at least 2 signatories authorised by the Company.

11.0 DECLARATION OF COMPLIANCE

Directors, Management and Employees (including temporary personnel) will be requested on an annual basis to confirm by signing the Annual Statement of Compliance that they have read and understood the Policy, and that they, for the previous year, have conducted their tasks and responsibilities in accordance with the requirements set forth in the Policy.

Business Partners of the Company are expected to have ethical standards that are compatible with the Policy, and shall sign a letter of undertaking confirming compliance with the requirements in this Policy.

12.0 REPORTING/ NOTIFICATION OF BREACH

Directors, Management and Employees are required to report violations of laws, rules, regulations or the Policy to the CIO.

Reporting may be done through the whistle-blower channel via the Company's website at www.ancomnylex.com. The identity of the Directors, Management and Employees who have reported a violation shall be kept confidential and the Company will not allow retaliation against such Directors, Management and Employees.

Directors, Management and Employees are encouraged to talk to their respective superiors or the CIO and other appropriate personnel when in doubt about the best course of action in a particular situation.

Violations will be investigated by the Company or by a person or persons designated by the Company and appropriate action will be taken in the event of any violations of this Policy.

As certain principles set out in this Policy are derived from legal and regulatory duties in line with the laws of Malaysia, failure to comply with certain aspects of the Policy could subject the offender to criminal liability.

13.0 REVIEW AND PUBLICATION OF THE POLICY

The Board shall publish the Policy in the Company's website at *www.ancomnylex.com*. The Board shall also review the Policy annually and make necessary amendments to ensure that the Policy remains consistent with the Board's objectives, current regulatory requirements and governance best practice. Changes in the Policy shall be adopted by the Board with a resolution.