

ANTI-BRIBERY, ANTI-CORRUPTION & ANTI-MONEY LAUNDERING POLICY

Mapo Industries Sendirian Berhad (“**the Company**”) has policies and procedures in place through which it aims to ensure that: -

- a. Its employees and those who provide services/sales to it, to act in accordance with the highest standards of ethical conduct; and
- b. The Company and its employees only conduct business with persons who are engaged in legitimate business activities and who use funds from (or disclose as) legitimate sources.

An outline of the Company’s Anti-Bribery, Anti-Corruption and Anti-Money Laundering Policy and procedures thereof (“**this Policy**”) is set out below: -

A. Compliance with this Policy

Strict compliance with the requirements of this Policy is mandatory for all employees of the Company and if required by the terms of their engagement with the Company, those provide services to or deal with the Company including but not limited to agents, vendors, suppliers, representatives, contractors and sub-contractors acting on behalf of the Company while performing their official or contractual duties (“**Service Providers**”).

A copy of this Policy shall be provided to all employees and Service Providers when they are first engaged. Any questions on this Policy should be directed to the Legal Manager.

This Policy is not intended to prescribe definitive answers to all questions regarding bribery, corruption and money laundering but rather a basic guidelines. All employees are required to use their own judgement in upholding good work and business ethics at all times since this Policy may not precisely cover all circumstances related to bribery, corruption and money laundering.

It is also pertinent to highlight that that no employee and/or Service Providers shall be reprimanded or any kinds of adverse consequences as a result of abiding to this Policy and/or other applicable laws.

B. Bribery, Corruption & Money Laundering

All employees and Service Providers are **STRICTLY PROHIBITED** from engaging or participating in any form of bribery, corruption and money laundering including but not limited to facilitation payment be it to/from a public official and/or private individual including its directors, employees, agents, representatives, nominee, proxy whomsoever in order to obtain business relationship and/or to keep existing business or otherwise to secure any improper advantage for the Company.

C. Gift & Hospitality

No form of any gift and/or hospitality shall be given and/or taken/received by any employee and/or the Service Providers in exchange for a business benefit or any improper business advantage. Nor should it be given and/or taken/received if it is intended to influence or could be perceived as influencing a business decision by the recipient.

All employees are required to disclose that they have reported all benefits given and/or taken/received (subject to approval and limits allowed by the Company), if any.

All gifts and hospitality given and/or received shall be declared and recorded with the Company.

D. Due Diligence

Before the Company enters into contractual relations of any kind with any third party, the Company shall assess the risk of that third party committing acts of bribery, corruption and money laundering on its behalf and to conduct an appropriate level of due diligence on that third party.

A due diligence process must be followed by the Company prior to entering into a contractual relationship with a third party. Through the due diligence process, the Company shall try to: -

- a. Ensure that the third party engaged in legitimate businesses. The aim is to minimise any risk that the Company may engage with a third party who involves

in money laundering and/or other illicit activities and/or facilitate or used to facilitate such activities; and

- b. Ensure that the Company does not have any dealings with a third party that would result in the Company's coming into disrepute.

E. Training

All employees shall receive training about the threats posed by bribery, corruption and money laundering in general and the risks faced by the industry. The training shall cover various ways in which the Company is addressing those risks.

More advanced training shall be provided to certain employees which is tailored to the specific risks associated with their particular roles.

The Company shall also encourage the Service Providers to conduct their own bribery, corruption and money laundering prevention training.

F. Speak Up Procedures & Protection

Any suspected violation of this Policy shall be immediately brought to the attention of the Company where the Board and/or Management of the Company shall take any steps which deemed necessary including conducting an internal investigation.

G. Compliance Committee

Any issues that may arise in relation to this Policy shall initially be discussed amongst the Company's directors and Management.

H. Annual Review

The Company shall conduct an annual review in order to determine whether this Policy is fully understood and is being complied with and properly implemented. It shall be presented to the Company's directors or Audit Committee.

More frequent reviews may be conducted if material issues of non-compliance have arisen or there are indications that this Policy has not been fully understood and/or implemented.



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Dato' Heng Hong Him
Managing Director
Mapo Industries Sendirian Berhad
[Registration No. 197301002825 (16271-K)]

IMPORTANT: *Non-compliance of this Policy is an offence under the Malaysian Anti-Corruption Commission Act 2009 (“the Act”) and other relevant and applicable laws. Any person who is found guilty of an offence under the Act shall on conviction be fined or imprisoned or both. Thus, any employee or third parties shall indemnify and keep the Company indemnified against all claims, demands, proceedings, liabilities and costs including legal expenses arising as a result of any non-compliance of this Policy.*