



Anti-Bribery & Anti-Corruption Policy

Anti Bribery And Anti Corruption Policy

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POLICY STATEMENT

AbleGroup Berhad has adopted a zero-tolerance policy against all forms of bribery and corruption. AbleGroup Berhad and its subsidiaries are committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices. It is AbleGroup Berhad's policy to conduct all its business activities with honesty, integrity and the highest possible ethical standards and vigorously enforce its good business practices.

SCOPE AND APPLICABILITY

This Anti-Bribery and Anti-Corruption Policy (this Policy) applies to all AbleGroup Berhad Directors and Employees and Third Party i.e. contractors, vendors, suppliers, agents, consultants, business partners and any person associated with AbleGroup Berhad.

This Policy is not intended to be exhaustive and shall be read in conjunction with the existing framework of all applicable laws, rules and regulations as well as the Group's policies, which include, but are not limited to, the Malaysian Anti-Corruption Commission Act 2009 (including any amendment thereof), the Group's Whistleblowing Policy and the Group's Code of Conduct and Ethics.

Any arrangement our Group makes with a third party are subject to clear contractual terms including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

DEFINITION OF BRIBERY

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

A bribe refers to an inducement, payment, reward or advantage offered, promised or provided to any person in order to gain any commercial, contractual, regulatory or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

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Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively, or through a third party.

The provision or receipt of gratification is not an offense unless it is done corruptly.

WHAT IS ACCEPTABLE AND WHAT IS **NOT** ACCEPTABLE

- A. Gifts and hospitality
- B. Facilitation payments and kickbacks
- C. Charitable contribution. Charitable contribution is acceptable if the transaction is NOT corruptly conducted and/or go through proper approval internally.

(A) **Gifts And Hospitality**

Employees or members of their immediate families should not provide, solicit or accept cash or its equivalent, entertainment, favours, gifts or anything of substance to or from vendors, suppliers, customers or others that do business or trying to do business with AbleGroup Berhad. All businesses that AbleGroup Berhad deals with must be on an **arm's length basis**. Nothing should be accepted, nor should the employee have any outside involvement, that could impair, or give the appearance of impairing, an employee's ability to **perform duties to exercise business judgement in a fair and unbiased manner**.

Gifts

Gift means something that is given to another person including but not limited to cash, vouchers or any item (e.g. pens, hampers, concert tickets) having any cost or financial value, including food or beverages (e.g. supplier or sub-contractor sponsored meals and entertainments) as well as any items of value.

No gifts of any kind that are offered by vendors, suppliers, customers, potential vendors and suppliers or any other individual or organization, no matter the value, will be accepted by any employee or their family members, at any time, on or off the work premises.

Exemptions from this **No Gift Policy** are gifts such as t-shirts, pens, goodies bags including cards, thank you notes, certificates or other forms of thank you and recognition that employees obtain as members of the public at events such as seminars, conferences, training events etc that is offered equally to all

participants of the event, subject to limit of threshold, frequency and approval mandate.

Gifts of food that may arrive during the holidays, and at other times of the year when gift-giving is traditional, belong to the entire staff even if addressed to a single employee. Under no circumstances may an employee take a food gift home; food gifts must be shared with and distributed to all staff, with email notifications, during work hours, in a central, worksite location.

The giving or receiving gifts is **acceptable** under this Policy if all the following requirements are met:

- a) It is not made with the intention of influencing a Third Party to obtain / retain business or provide a business advantage or as in explicit or implicit exchange for favours / benefits.
- b) It is not made with the suggestion that a return favour is expected
- c) It is in compliance with laws and regulations
- d) It is given in the name of the company, not in an individual's name
- e) It is given openly, not secretly
- f) It does not include cash or cash equivalent (such as gift certificates or vouchers)
- g) It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift

Gift Declaration

ALL GIFTS besides the exemptions are required to be **declared** to Ms Tan Li Feng, appointed Risk Manager and we will keep a written record of the amount and reason for the hospitality or gifts accepted, all gifts and hospitality are subject to management review.

If there is any doubt against the type of gifts received, you should contact the appointed Risk Manager for clarification. To be on a safe side, do not accept any gifts will be the best way to eliminate the risks.

“ALWAYS ASK WHENEVER IN DOUBT”

Engaging in bribery or corrupt practices can have severe consequences. The Group will not hesitate to take all necessary disciplinary and legal actions in combating bribery and corruption.

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(B) Facilitation Payments And Kickbacks

AbleGroup Berhad does not make, and will not accept, facilitation payments or kickbacks of any kind. Facilitation payments are typically payments (sometimes known as grease payments) made to secure or speed up a deal or business decision. In return for a business favour/advantage, such payments are considered bribe to secure the award of a contract. All staff and business partners associated with AbleGroup Berhad should avoid any activity that might lead to Facility Payment or Kickback.

(C) Charitable Contributions

AbleGroup Berhad accepts and indeed encourages the act of donating to charities, whether through services, time, or direct financial contributions (cash or otherwise) and disclose all charitable contributions it makes. AbleGroup Berhad will ensure that all charitable donations made are legal and ethical under local laws and practices, and the donations are not offered/made without the notice of the Board of Directors. All employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery. For record keeping purposes, all declaration shall be kept in written form.

BUSINESS RELATIONSHIP / VENDOR / SUPPLIER

AbleGroup Berhad expects all Third Parties doing business with AbleGroup Berhad to approach issues of bribery and corruption in a manner that is consistent with the principles set out in this Policy. AbleGroup Berhad requires all Third Parties to cooperate and ensure compliance with these standards, to continue the business relationship.

In order to maintain the highest standard of integrity, AbleGroup Berhad will conduct the following to ensure Third Party shares that same standard and integrity:

- ~ Conduct simple due diligence inquiries to review the prospective business counterparties
- ~ All third parties are made aware of AbleGroup Berhad Anti-Bribery And Anti-Corruption Policy
- ~ Continue to be aware of and to periodically monitor third party performance and business practices to ensure ongoing compliance

All Business Relationship / Vendor / Supplier is required to sign off the Anti-Bribery, Anti-Corruption form in the fight against Anti-Bribery, Anti-Corruption and uphold greater Transparency (**Refer Appendix 1**) and to declare for consideration when there is a conflict of interest.

ABLEGROUP BERHAD'S STAFF RESPONSIBILITY

As a Director/Employee of AbleGroup Berhad, you must ensure that you read, understand and comply with the information contained within this policy, and attend any regular and relevant training that is conducted or other anti bribery and corruption information given.

All AbleGroup Berhad staff should comply with the following:

- 1) **Cannot** give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage;
- 2) **Cannot** give, promise to give, or offer payment to Third Party to ~~%~~facilitate+ or expedite a procedure;
- 3) **Cannot** accept payment from Third Party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- 4) **Cannot** accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided in return;
- 5) **Cannot** threaten or retaliate against another Employee who refuse to commit a bribery offence or who has raised concerns under this policy.

Zero tolerance stance shall be clearly communicated and adopted by all employees who are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. When an employee has reasonable ground to believe there are any instances of malpractice or improper conduct, he/she may report the matter to the following channel.

Risk Manager: dawsonlumwk@gmail.com

Acting Chief Operating Officer: lifeng.tan@ablegroup.com.my

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PROTECTION

If you refuse to accept or offer a bribe or you report a concern relating to the potential act of bribery and corruption, AbleGroup Berhad understands that you may feel worried about potential repercussions. AbleGroup Berhad supports anyone who raises concerns in good faith under this policy, even if the investigation finds that they were mistaken.

AbleGroup Berhad will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe to other corrupt activities or because they report a concern relating to bribery and corruption.

If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your superior or Risk Manager immediately.

MONITORING AND REVIEW

AbleGroup Berhad will establish and put in place appropriate performance measures and reporting systems to monitor performance against metrics and compliance with the relevant policies, procedures and controls.

Risk Manager will regularly monitor the effectiveness and the Board shall review the Policy at least once every three (3) years and to consider its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. This is stated by the Bursa Securities listing requirements.



Letter Of Commitment For Anti Bribery And Anti Corruption

I hereby declare that I understand the stated Policy and all its terms and conditions. I will ensure full compliance that I and/or any other personnel representing my company shall not give or offer a bribe to any individual in AbleGroup Berhad and its Group of Companies, as a bribe to obtain individual or business purpose advantage:

Name	
NRIC	
Company Name	
Company Registration Number	

If I or any personnel representing my company is found guilty of offering or giving bribes to any individual in AbleGroup Berhad, then I as the representative of my company hereby consent and agree to the following actions to be taken against the company:

1. Termination of contract/agreement and any other business relations
2. Disciplinary action in accordance with the Malaysian Anti-Corruption Act 2009

Yours Sincerely,

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Authorised Signatory

Name :

Designation :

Date :