



**MMS VENTURES BERHAD**  
Registration No. 200401008621 (647125-P)  
(Incorporated in Malaysia)

## **ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

### **1 OVERVIEW**

The Group is committed to conduct its business in an ethical and upstanding manner. The Group's Code of Conduct sets out our core principles in this regard. This Anti-Bribery & Anti-Corruption Policy (hereinafter referred to as "this Policy") elaborates those principles.

This Policy demonstrates the Group's commitment to full compliance by its employees and any third party who associates with the Group, with the Malaysian Anti-Corruption Commission (MACC) Act 2009 and the MACC (Amendment) Act 2018 and any other local anti-bribery or anti-corruption laws that may be applicable.

### **2 PURPOSE**

The purpose of this Policy is to:

- a) set out the Group's responsibilities and the responsibilities of those working for or with the Group in observing and upholding the Group's position on bribery and corruption;
- b) ensure that the Group has adequate procedures in place to prevent and detect corrupt practices in relation to its business activities;
- c) provide information and guidance to those working for or with the Group on how to recognise and deal with potential bribery and corruption issues; and
- d) protect the Group against any possible penalties and repercussions resulting from acts of bribery and corruption or any acts associated with such practice.

### **3 SCOPE**

This policy applies to any bribery or corruption, or suspected bribery or corruption, involving the Board of Directors and all employees working for the Group at all job levels (the "Employees") as well as customers, consultants, vendors, contractors and/or any other parties with a business relationship with the Group (the "Associated Third Parties").

Any investigative activity required will be conducted without regards to the suspected wrongdoer's length of service, position/title, or relationship with the Group.

## **4 DEFINITIONS**

Bribery means the offering, giving, receiving, or soliciting of any item of value to influence the actions of an official, or other person, in charge of a public or legal duty.

Corruption is a form of dishonesty or criminal offense undertaken by a person or organisation entrusted with a position of authority, to acquire illicit benefit or abuse power for one's private gain.

## **5 GIFTS, CONTRIBUTION, HOSPITALITY, ENTERTAINMENT AND OTHER BUSINESS COURTESIES**

- 5.1 The Group encourages the use of good judgement, discretion and moderation when giving or accepting gifts or entertainment. All benefits (including gifts, entertainment and/or favours) must be:
- a) reasonable in value;
  - b) infrequent in nature;
  - c) transparent and open;
  - d) not given to influence or obtain an unfair advantage; and
  - e) respectful and customary
- 5.2 As a general rule, the Employees are to refrain from offering or receiving any gifts, benefits and/or entertainment from a third party or stakeholder of the Company in the course of their duties except if it is made from gestures that are construed to be legitimate contribution and provided that the gifts, benefits and/or entertainment are presented in good faith, which may be directly or indirectly offered as a result of the employee's position or performance of duties with the Group or for cultivating good business relationship.
- 5.3 All Employees shall exercise proper care and judgement in respect of giving or receiving any gifts, benefits and/or entertainment on a case-by-case basis. He or she must evaluate the impact of their actions prior to giving or accepting these as it may put them in an obligated or compromised position which could affect business judgement.
- 5.4 The Group does not condone any event that relates to:
- a) giving or offering a bribe or anything which may be viewed as a bribe to a Government officer, agent or representative to facilitate or expedite an action or a routine procedure;
  - b) giving or offering a payment, loan, reward, gift, entertainment or favour to any third party with the expectation or hope that a business advantage will be received;
  - c) receiving or requesting for gifts, payment, benefits or anything which may be viewed as bribe from a third party knowing or suspecting it is offered with the expectation that it will obtain a business advantage for them; or
  - d) engaging in any activity that might lead to a breach of this Policy.

## **6 CHARITABLE CONTRIBUTIONS, DONATIONS AND SPONSORSHIPS**

- 6.1 In line with its corporate social responsibility, the Group sponsors or participates in projects benefitting the community and donates to charitable organisations and society at large. However, any charitable sponsorships or contributions to these organisations should not be related to or made to win, or influence a business deal or decision.
- 6.2 No such donations should be made without the prior consent of the Chief Executive Officer of the Group. The Group will ensure that the recipient of any charitable contribution or sponsorship is a legitimate registered charity, and that the donations or sponsorship were used or expensed in an appropriate manner. The recipient will be required to provide an official receipt for the contribution with information about what purpose the funds will be used for.

## **7 POLITICAL DONATIONS AND CONTRIBUTION**

- 7.1 The Group, its directors and employees are not permitted to make any charitable donations or contributions to any political parties or their candidates or parties associated with or connected to political parties in the name of MMSV. In the event that any of our directors or employees participate in such activity, he or she will be deemed to be acting in their personal capacity as citizen and not on behalf of MMSV.

## **8 FACILITATION PAYMENTS AND KICKBACKS**

- 8.1 The Group strictly disallows the use of Facilitation Payments or Kickbacks of any kind in its business. All directors and employees must avoid or decline any activity that may lead to, or suggest, that a Facilitation Payment or Kickback will be made or accepted. Any request for payment of such nature should be notified or raised via the channel as outlined in the Whistle-blowing Policy.

## **9 RECORD KEEPING**

- 9.1 All financial records are kept with appropriate internal controls in place to facilitate documentary evidence for any payments to, and/or receipt from third/external parties.
- 9.2 All claims in relation to gifts or entertainment made to third parties must be submitted in accordance with the Group's expense policy and/or other applicable disbursement policy.
- 9.3 All records and documents in relation to dealings with third parties.

## **10 REPORTING PROCEDURE**

- 10.1 The Group has put in place the Whistle-blowing Policy to provide an avenue which serves as a confidential platform for the Employees and Associated Third Parties to disclose any acts of corruption and/or bribery in a confidential manner that protects the whistle-blower from any risk or reprisals.
- 10.2 The Group supports anyone who raises his/hers concerns in good faith, either anonymously or otherwise, and that person should not fear any reprisal/retaliation regardless of the outcome.

## **11 SANCTION FOR NON-COMPLIANCE**

- 11.1 The Group regards acts of bribery and corruption as serious matters and will apply penalties in the event of non-compliance to this Policy. Any non-compliance involving the Employees may lead to disciplinary action which could result in termination of employment.
- 11.2 The Group reserves its right to terminate contractual relationships with any Associated Third Parties in the event of a breach to this Policy.

## **12 TRAINING AND COMMUNICATION**

- 12.1 This Policy will be communicated to all Employees of the Group and made publicly available through its website to all Associated Third Parties. Training or awareness programs will also be provided.
- 12.2 New employees in the Group will be introduced to this Policy as part of the orientation training.

## **13 REVIEW AND MONITORING**

- 13.1 Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

## **14 EMPLOYEE DECLARATION**

- 14.1 All Directors and Employees shall certify in writing that they have read, understood and will abide by this Policy. A copy of this declaration shall be documented and retained by the Human Resources Department for the duration of the personnel's employment. This declaration will be renewed annually.

## **15 REVIEW OF THE POLICY**

- 15.1 The Board will monitor compliance with this Policy and review this Policy regularly to ensure that it continues to remain relevant and appropriate.

(Policy reviewed and updated at BOD Meeting held on 17 November 2023)