

ANTI-BRIBERY AND CORRUPTION POLICY

1. PURPOSE

The purpose of this document is to provide an overview on Strateq code of conduct to prevent acts of bribery and corruption, in compliance with anti-bribery and anti-corruption laws. The aim of this provision is to foster growth of a business environment that is free of corruption, and to encourage Strateq to take the reasonable and proportionate measures to ensure its businesses do not participate in corrupt activities for its advantage or benefit. These measures should take the form of policies and procedures, with training, communication, and enforcement to ensure they are effective. This policy is in line with the subsection (5) of section 17A of the Malaysian Anti-Corruption Commission Act 2009 (Act 694) (“MACC Act 2009”), as stated in the Malaysian Anti-Corruption Commission (Amendment) Act 2018 (“MACC Amendment Act 2018”).

2. SCOPE

This policy applies to employees, contractors, consultants, temporaries, and other workers including all personnel that are affiliated with Strateq. This policy also should be used as guidance by stakeholders, business partners or any individual / organization that deals with Strateq employees / facilities.

3. DEFINITION

What is Bribery and Corruption

Bribery refers to the interpretation of ‘gratification’ under Section 3, Act 694. It is the act of offering/ promising/ giving or requesting/ agree to accept/ receiving something of value or of an advantage so to induce or influence an action or decision. Failing to prevent bribery is a corporate offence.

Corruption is the abuse of entrusted power for private gain. Corruption under the Malaysian Anti-Corruption Commission Act 2009 (Act 694) means giving or offering, receiving, or soliciting or agree to receiving or soliciting gratification directly or indirectly as an incentive or reward to perform or not to perform a task related with official duties. Any person who knows and fails to report a corruption is an offence under MACC Act 2009.

4. POLICIES

- 4.1 Employee **must not** engage in any form of bribery or corruption including giving, offering, or receiving considerations and benefits from a current or potential customer, competitor, supplier, or service provider which has the potential to influence a person's business decision.
- 4.2 All forms of bribery and corruption are **prohibited**. Strateq will not tolerate any act of bribery or corruption. Any breach of this policy or local law could result in disciplinary action being taken and ultimately could result in dismissal and or legal action based on Malaysian Anti-Corruption laws.

5. WHAT IS NOT ACCEPTABLE?

Bribes can take many forms, some examples, and consideration/ benefits as below:

- *Offering a bribe* to customer to secure or win a contract.
- *Receiving a bribe* from vendor in return awarding the project to them.
- *Agree to accept a bribe* and in exchange to provide details of customers.

Benefits	Example
Money	Cash equivalent
Gift	Unreasonable gift value, reward, entertainment, hospitality
Kickbacks	Commission on a certain percentage from the contract amount
Wage, Bonus	Unwarranted change to current wage and bonus
Favours, Services	Uncompensated use of company services or facilities, or anything else of value
Political contributions	Allocate Asset/ Funds to political parties

6. WHAT IS ACCEPTABLE?

Donations and Sponsorship

In very limited instances, where permitted by local law and regulation and Strateq's Management approval, the company may contribute towards organisation and entities that have direct business activities, such as contribution for lucky draw for an organisation event. Any request, approval and payment for such contribution must be documented in writing and properly recorded.

7. ROLES AND RESPONSIBILITIES OF STRATEQ EMPLOYEES AND HOW TO RAISE A CONCERN

7.1 In an effort to curb any space and opportunity for corruption, Strateq employees should take necessary actions as follows:

- i) *DO NOT SOLICIT*: Strateq employees are prohibited from soliciting or receiving any forms of gratification.
- ii) *REFUSE*: Strateq employees should refuse any offer of gratification.
- iii) *REPORT*: Employees shall at the earliest opportunity lodge a report on any corruption activities to the Compliance department and/or Malaysia Anti-Corruption Commission (MACC)

7.2 Strateq encourages openness and is committed to ensure that employees can speak up with confidence if they have any concerns or need to ask for help. Employee are encouraged to report in confidence to:

Strateq_Whistleblower@strateggroup.com as soon as possible if it is believed or suspected that a conflict with this policy has occurred, or may occur in the future, even if they are a victim of these unlawful activity.

Or write anonymously to Strateq Group Managing Director by using the Whistleblower Report Form.

8. REFERENCE

- Guidelines On Adequate Procedures. Pursuant To Subsection (5) Of Section 17A Under the Malaysian Anti-Corruption Commission Act 2009
- Malaysian Anti-Corruption Commission Act 2009 (Act 694)
- Whistleblower Policy