



HUMAN RESOURCES DEPT POLICY

Title: Anti-Bribery and Corruption Policy

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1.0 PURPOSE

This policy is aimed at protecting the integrity, transparency, impartiality and accountability throughout SLGC Berhad (“the Company”) and its subsidiaries’ (“SLGC Group” or “the Group”) operations. The Anti-Bribery & Anti-Corruption Policy (“ABAC Policy” or “the Policy”) provides structured compliance guidelines to prevent, detect and correct acts of fraud, bribery and corruption.

2.0 SCOPE

Applies to all employees throughout SLGC Group including suppliers, vendors, contractors, consultants, partners, visitors and other parties engaged by the Group both internally and externally.

3.0 Overview

- 3.1. The Group is committed to conducting its business based on principles of fairness, honesty, openness, decency, integrity and respect.
- 3.2. The Group is focused on fostering a business environment with high standards of integrity in all its conduct as well as business practices and adopts a zero-tolerance policy against all forms of bribery and corruption to achieve a higher level of professionalism in reaching corporate governance and social responsibility.
- 3.3. The ABAC Policy will serve as the core of the Group’s compliance guidelines. It is put in place to prevent, detect and correct acts of fraud, bribery, corruption and other acts defined in this Policy.
- 3.4. The Policy requires compliance with all applicable laws and regulations on bribery and corruption, i.e., 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”).

4.0 Responsibilities

4.1. Board of Directors

- 4.1.1. Responsible for approving of this Policy , including any amendments to the Policy, and overseeing the efficacy of this Policy's implementation.
- 4.1.2. Enforcement of this Policy and set the tone from the top.

4.2. Heads of Department

- 4.2.1. Set a precedent for ABAC's compliance and eventually monitor bribery and corruption concerns.
- 4.2.2. Responsible for the assurance of compliance with the Policy and relevant anti-corruption legislation by business associates, third parties, and/or external parties.

4.3. Head of Human Resource Department

- 4.3.1. Responsible for the design, implementation, monitoring, and management of ABAC's framework and activities.

4.4. Middle management / Supervisory role

- 4.4.1. Responsible for informing all workers about the ABAC Policy and its obligations.
- 4.4.2. Responsible for ensuring the Group's Code of Ethics and Conduct, ABAC Policy and requirements are communicated to business associates, third parties, and/or external parties.

5.0. Anti-Bribery & Anti-Corruption

- 5.1. The Group adopts zero tolerance and strictly prohibits all forms of corruption, including bribery, all forms of corruption including passive corruption, embezzlement, theft, fraud, extortion, favoritism and nepotism, money laundering, creating and exploiting conflicting interests and improper political contributions.
- 5.2. Bribery can be also associated in the form of promises, offers or providing "anything of value" (cash, material, property or in similar values proposition) whether directly or indirectly, with the intention to induce or reward a person to act or tolerant from acting in respect of any matter or transaction (actual or proposed or likely to take place) or performance of that person's duty.
- 5.3. Employees shall not participate in activities mentioned above including offering, giving or receiving any item of value to unlawfully influence the decisions or actions of

a person in a position of trust within an organisation, either to benefit the Group or the persons involved in the transaction, whether directly or indirectly.

5.4. It is prohibited to provide any contracts, employment positions (hiring or promotions) or business opportunities to third parties (directly or indirectly) without going through the appropriate channel within the Group.

5.5. The Group shall not penalise an employee in any form or other adverse consequences for refusing to participate in any activities that are against this policy even if such refusal may result in the Group losing business or experiencing a delay in business operations.

6.0. Conflict of Interest

6.1. A conflict of interest in the Group varies in many situations under different contexts.

6.2. In an overall perspective, conflict of interest occurs when an individuals' personal interests, family, relationships, political, or social issues may impair their judgement, decisions, or actions at work.

6.3. The use of position, the Group's property or the offering of the Group's contracts is strictly prohibited from being associated with a personal gain or interest of the employee.

6.4. To avoid a conflict-of-interest situation from occurring, all employees are required to take decisions in the best interest of the Group and not allow personal interests to influence business choices made on behalf of the Group.

6.5. Employees that encounter a conflict-of-interest situation while performing their duty are required to officially report or declare it to their Head of Department to avoid any misunderstanding and seek proper resolution.

7.0. Gifts, Entertainment and Hospitality

7.1. Although the act of receiving gifts, favors and other sorts of hospitality is understandable and is an act commonly accepted as a gesture of good nature and in building a good relationship, it is strictly prohibited to give or receive any gift (in cash, in kinds or in any forms or material) to and from anyone.

7.2. The civility exchanged between stakeholders covered in this policy are:

- 7.2.1. Gifts include any type of gifts, whether material or monetary, including personal gifts.
 - 7.2.2. Entertainment such as invitations to social, cultural or sporting events.
 - 7.2.3. Hospitality such as meals, drinks, as well as lodging and travel expenses.
- 7.3. As such it's highly important to adhere to the below clauses.
 - 7.3.1. Employees are not permitted to accept or offer, or approve anybody to accept or offer gifts, entertainment, or hospitality to influence their business decision.
 - 7.3.2. Employees are not permitted to accept or offer any gifts, entertainment, or hospitality to improperly influence a government/public official.
 - 7.3.3. In situations that compel the employee to accept any gifts, entertainment and hospitality, the employee must declare it to the Human Resource Department for official record keeping. The records will be necessary during compliance and risk assessment audits.

8.0. Charitable Donation & Sponsorship

- 8.1. Donations for charitable causes and sponsorship are widely supported as part of the Group's Corporate Social Responsibilities (CSR) direction.
- 8.2. It is highly important for an employee which may be handling this portfolio in the Group to vet through the organisation or event in which the fund will be provided to a cause that properly benefits them and the program to be legitimate.
- 8.3. Any sort of donation and sponsorship must be provided through the right channel and approved by the Human Resource ("HR") Director or the Managing Director with no personal, political, unethical intention or favoritism associated. All such donations and sponsorship must be able to be disclosed publicly throughout the Group.

9.0. Facilitation Payment

- 9.1. The Group is strictly prohibits facilitation payment made by both external third parties to the Group or by the Company's personnel towards external third-party stakeholders in order to further expedite or secure any business transactions.

- 9.2. If any circumstances require any facilitation payment, the employee is required to immediately report it to their respective department head or the HR Director.
- 9.3. Under due circumstances such as an imminent threat such as loss of life, or liberty, a facilitation payment may be permitted. When such payment is made, the employee must disclose it immediately to the Group

10.0. Violations

- 10.1. Should any violations of this policy take place, the Group shall take steps to prevent a repetition of any violations. This may include.
- 10.1.1. Institute strong disciplinary actions and/or legal actions.
 - 10.1.2. Build additional mechanisms to prevent future occurrences.
 - 10.1.3. Ensure all employees affected (including those who may unknowingly be involved) are put through rigorous training on the conditions of this policy.
 - 10.1.4. Notify the relevant regulatory authorities of any identified acts or incidents that have been proven beyond a reasonable doubt.
 - 10.1.5. Provide full cooperation with relevant authorities.

11.0. Point of Contact

- 11.1. Violations of this policy, whether actual or potential, shall be reported directly to the Group or via the compliance channel or in writing to the internal compliance team.
- 11.2. All information provided will be treated anonymously. Employees and third parties such as suppliers, their employees or customers, are free to report any violations at any time.

12.0. Making a report

- 12.1. The Group presumes that whistleblowers will act in good faith and will not make false accusations when reporting violations of this policy by the Group's employees or other parties.
- 12.2. Any person may report allegations of suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the

Group, the Group's customers, shareholders, employees, investors or the public at large.

- 12.3. Whistleblowers are encouraged to lodge the report in a timely way and also to ensure there is a timely response from the Group on the same.
- 12.4. Acts of misconduct may be disclosed in writing using the Whistleblower Report Form (Appendix I) which can be downloaded from the website at <https://slgconstruction.com.my/> and/or sent via any one of the channels stated in the Whistleblowing Policy.
- 12.5. Although the whistleblower is not expected to prove the truth of an allegation, he/she needs to demonstrate to the person contacted that there are sufficient grounds for concern. Adequate information will assist greatly in the investigation.
- 12.6. Individuals are encouraged to self-identify, though it is not a requirement.

13.0. Investigation Management

- 13.1. Any report received by a director, the Company officials, or employee should be forwarded immediately to the HR department.
- 13.2. Should a report involve or involve the senior leadership team, he/she shall promptly recuse himself from the investigation and inform the Managing Director of the Company in writing. The Managing Director of the Company under assistance of HR Department may thereafter promptly appoint impartial attorneys to investigate the report. Those attorneys will investigate the report and report their conclusion to the HR Department consistent with the Whistleblowing Policy.
- 13.3. The investigation team shall carry out the investigation in a very transparent way while maintaining confidentiality so as not to endanger the whistleblower.
- 13.4. Upon completion of investigation, appropriate course of action will be recommended to the Audit and Risk Management Committee ("**ARMC**") of the Company for their deliberation.
- 13.5. The Group may or may not respond to the whistleblower and shall be done on a case-to-case basis subject to the nature of the complaint raised.

14.0. Protection of Whistleblower

14.1. Consistent with the policies of the Group, the Group will not retaliate or attempt to retaliate, and will not tolerate any retaliation or attempted retaliation by any other person or group, directly or indirectly, against anyone who, in good faith, makes a report or provides assistance to Management or any other persons or group, including any governmental, regulatory or law enforcement body, investigating or otherwise helping to resolve a report.

15.0. The Group reserves the right to amend this policy from time to time and shall notify all employees when such an amendment has been made and has been approved by the Management.

16.0. This Policy should be read in conjunction with SLGC Group various policies/procedures/guidelines/manuals/Group's Code of Ethics and Conduct, as amended from time to time. Should there be a translation of this Policy into other languages, the English version of this Policy shall be authoritative in the event of any dispute or confusion.