

Anti-Bribery & Corruption Policy

1. Introduction

Hexagon Synergy (M) Sdn. Bhd. ("the Company") is committed to conducting business with integrity, transparency, and accountability. This Anti-Bribery & Corruption (ABC) Policy reinforces company's zero-tolerance stance towards bribery and corruption, ensuring compliance with the Malaysian Anti-Corruption Commission Act 2009 (MACC Act 2009) and other relevant laws. Compliance to the Policy is mandatory and will be monitored with a principle-based approach.

2. Objectives of the Policy

This policy aims to:

- a) Clearly define bribery and corruption.
- b) Provide guidelines for identifying and managing bribery and corruption risks.
- c) Establish procedures for reporting violations.
- d) Ensure compliance with applicable anti-corruption laws and regulations.

3. Scope of the Policy

This policy applies to all directors, managers, employees, and any third parties acting on behalf of Hexagon Synergy (M) Sdn. Bhd.

4. Definitions

- a) **Bribery**: any action which would be considered as an offence of giving or receiving 'gratification' under MACC Act 2009.
- b) **Corruption**: the act of giving or receiving of any gratification or reward in the form of cash or in-kind of high value for performing a task in relation to his/her job description.
- c) **Gratification**: As defined in Section 3 of the MACC Act 2009, "gratification" means—
 - i. money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description

whether movable or immovable, financial benefit, or any other similar advantage;

- ii. any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- iii. any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- iv. any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- v. any forbearance to demand any money or money's worth or valuable thing;
- vi. any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and
- vii. any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (i) to (vi).

5. Policy Statements

- a) **Prohibition of Bribery and Corruption:** The Company strictly prohibits all forms of bribery and corruption, whether direct or indirect, in all business dealings and relationships. Employees must not participate in any corrupt activity, such as extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.
- b) **Gifts, Hospitality, and Entertainment:** Employees must avoid giving or receiving gifts, hospitality, or entertainment that could influence business decisions or impair independence. Any exceptions require prior approval from the immediate supervisor or head of department.
- c) **Facilitation Payments:** The Company prohibits facilitation payments, which are unofficial payments made to secure or expedite routine governmental actions. Employees are expected to notify their immediate superior when encountered with any requests for a facilitation payment.
- d) **Donations and Sponsorships:** Charitable donations and sponsorships must not be used as a means to conceal bribery. All such activities require prior approval from the executive director(s) and must be transparent and in accordance with the Company's policies.

- e) **Dealing with Public Officials:** Extra caution must be exercised when dealing with public officials to avoid actions that could be perceived as attempts to influence official decisions.

6. Responsibilities of Employees and Third Party

- a) Employees must read, understand, and comply with this policy. They are required to avoid any activities that could lead to, or imply, a breach of this policy.
- b) Managers and Supervisors hold additional responsibilities to create and maintain an open environment for employees to ask questions, raise concerns, and report misconduct. They must ensure that their teams understand and comply with this policy.
- c) All third parties acting on behalf of the Company are expected to comply with this policy. Appropriate due diligence should be conducted before engaging any third parties.

7. Conflict of interest

Conflicts of interest arise in situations where there is a personal interest that might be considered to interfere with that person's objectivity when performing duties or exercising judgement on behalf of the company. Employees should avoid or deal appropriately with situations in which personal interest could conflict obligations or duties. Employees must not use their position, official working hours, company resources and assets for personal gain or to the company's disadvantage.

8. Record Keeping

All financial records and supporting documents must be maintained with accuracy and completeness to evidence the Company's transactions and compliance with this policy.

9. Training and Communication

The Company will provide regular training to employees to ensure understanding and compliance with this policy. This policy will be communicated to all employees and relevant third parties. Human Resources shall maintain all records of trainings for all employees.

10. Reporting Violations

Employees and third parties are encouraged to report any suspected violations of this policy through immediate superior for employee, and whistleblower@hexagonsgroup.com for third party, respectively. Reports will be handled confidentially, and there will be no retaliation against individuals making reports in good faith.

11. Compliance and Review

Compliance with this policy will be monitored regularly. The policy will be reviewed at least once every three years to ensure its effectiveness and relevance. Non-compliance may result in disciplinary action, including termination of employment or contracts.