

ENFRASYS GROUP

Policy

ANTI-BRIBERY & ANTI-CORRUPTION (ABAC) POLICY & GUIDELINES

Document No : ENFRASYS/ABMS/P02

Effective Date : 20 January 2026

Revision : 03

Distribution:

Person Associated and Business Associates of ENFRASYS Group.

Summary of Changes:

- Revised wording and format to enhance clarity, readability, and accessibility for employees across all levels and functions.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES					
Document No	:	ENFRASYS/ABMS/P02	Rev	:	03
Effective Date	:	20 January 2026			

PURPOSE

This Policy elaborates on those principles and provides guidance to ENFRASYS' Person Associated and Business Associates on how to deal with improper solicitation, bribery and other corrupt activities and issues that may arise during business.

The Policy is not intended to provide definitive answers to all questions regarding bribery and corruption. Rather, they are intended to provide all person-associated and business associates with a basic introduction to how **ENFRASYS** always combat bribery and corruption in furtherance of the group's commitment to lawful and ethical behavior. Some of the guidelines are designed to prevent situations in which bribery and corrupt practices may take root.

SCOPE

The Policy is generally applicable to **ENFRASYS'** person-associated and business associates, as defined in "1.3 Application", acting on behalf of **ENFRASYS**, unless otherwise stated in the specific policies referred to in this Policy.

RESPONSIBILITY

Refer to 4.0 Responsibilities

DEFINITION

Refer to 2.0 Definitions and Abbreviations

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES					
Document No	:	ENFRASYS/ABMS/P02	Rev	:	03
Effective Date	:	20 January 2026			

ATTACHMENT

- Attachment 1** - Integrity Declaration Form for Employees
- Attachment 2** - Integrity Declaration Form for Business Associates
- Attachment 3** - Due Diligence Checklist for Business Associates
- Attachment 4** - Due Diligence Checklist for Employees
- Attachment 5** - Provision/ Receipt of Gifts/ Hospitality/ Donation/ Sponsorship Form
- Attachment 6** - Provision/ Receipt of Entertainment
- Attachment 7** - Gifts, Entertainment, Hospitality, Donation & Sponsorship Register
- Attachment 8** - Conflict of Interest Declaration Form for Employees
- Attachment 9** - Conflict of Interest Declaration Form for Business Associates

ASSOCIATED DOCUMENTS

1. Anti-Bribery and Anti-Corruption Manual ENFRASYS/ABMS/P01
2. Whistleblowing Policy ENFRASYS/ABMS/P04

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

TABLE OF CONTENTS

1.0 INTRODUCTION 1

1.1 OVERVIEW 1

1.2 OBJECTIVES 2

1.3 APPLICATION 2

2.0 DEFINITIONS AND ABBREVIATIONS..... 3

3.0 BRIBERY AND CORRUPTION OFFENCES 9

4.0 RESPONSIBILITIES 16

5.0 COMPLIANCE..... 21

5.1 BUSINESS ETHICS..... 21

6.0 DUE DILIGENCE 23

6.1 DEFINITION OF HIGH RISK 23

6.1.1 HIGH RISK OF EMPLOYEES..... 23

6.1.2 HIGH RISK OF BUSINESS ASSOCIATES 24

6.2 DONATION AND SPONSORSHIP 24

6.3 DUE DILIGENCE PROCESS 26

6.4 DUE DILIGENCE OUTCOME AND FINDINGS 27

6.5 DUE DILIGENCE APPROVALS 28

6.6 VALIDITY OF DUE DILIGENCE 29

6.7 DOCUMENTATION..... 29

7.0 FACILITATION PAYMENT 30

iii

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

8.0 GIFT, ENTERTAINMENT AND HOSPITALITY 31

8.1 GIFT, ENTERTAINMENT AND HOSPITALITY POLICY 31

8.2 ALLOWABLE GIFTS 32

8.3 GIVING GIFTS 33

8.4 ACCEPTING GIFTS 34

8.5 ALLOWABLE ENTERTAINMENT 35

8.6 PROVIDING ENTERTAINMENT 36

8.7 ACCEPTING ENTERTAINMENT 37

8.8 ALLOWABLE HOSPITALITY 37

8.9 PROVIDING HOSPITALITY 38

8.10 ACCEPTING HOSPITALITY 38

8.11 EXCEPTION TO THE GIFTS, ENTERTAINMENT, HOSPITAL POLICY 39

8.12 REPORTING AND RECORDING 39

9.0 DONATION AND SPONSORSHIP 40

9.1 DONATION AND SPONSORSHIP POLICY 40

9.2 CHARITABLE AND SOCIAL DONATION 42

9.3 POLITICAL DONATIONS 43

9.4 SPONSORSHIPS 44

9.5 REPORTING AND RECORDING 45

10.0 FINANCIAL AND NON-FINANCIAL CONTROLS 46

10.1 FINANCIAL CONTROLS 46

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES					
Document No	:	ENFRASYS/ABMS/P02	Rev	:	03
Effective Date	:	20 January 2026			

10.2 NON-FINANCIAL CONTROLS 47

11.0 COMMUNICATION AND TRAINING 48

11.1 INTERNAL STAKEHOLDERS 48

11.2 EXTERNAL STAKEHOLDERS 49

12.0 WHISTLEBLOWING 51

13.0 CONFLICT OF INTEREST 52

13.1 TYPES OF CONFLICT 52

13.1.1 OTHER BUSINESS INTEREST 52

13.1.2 OTHER EMPLOYEMENT 53

13.1.3 CORPORATE DIRECTORSHIP 53

13.1.4 TRADING IN “ANYTHING IN VALUE” 54

13.1.5 PERSONAL OR PRIVATE RELATIONSHIP 54

13.2 DISCLOSING CONFLICTS 55

13.3 REMEDIAL ACTION 56

14.0 RECORD KEEPING 57

14.1 ACCESS CONTROL 57

14.2 DOCUMENT CONDITION AND PRESERVATION 57

15.0 CLARIFICATIONS 58

16.0 ACKNOWLEDGEMENT AND ACCEPTANCE 58

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES					
Document No	:	ENFRASYS/ABMS/P02	Rev	:	03
Effective Date	:	20 January 2026			

1.0 INTRODUCTION

1.1 OVERVIEW

ENFRASYS is committed to conducting its business professionally, ethically, and with integrity, and in full compliance with all applicable laws of Malaysia relating to bribery and corruption.

ENFRASYS adopts a **zero-tolerance approach** towards all forms of bribery and corruption, whether direct or indirect, regardless of value, location, or business context.

As part of the Anti-Bribery and Anti-Corruption Management System, **ENFRASYS** has established this Anti-Bribery and Anti-Corruption Policy and Guidelines (hereinafter referred to as the **“Policy”**). This Policy is aligned with, but not limited to, the following laws, regulations, and guidelines;

- Malaysia Anti-Corruption Commission Act 2009 (Act 694);
- Malaysian Anti-Corruption Commission (Amendment) Act 2018 (Act A1567);
- Prime Minister’s Department Guidelines **“T.R.U.S.T”** on Adequate Procedures On “Pursuant to Subsection of Section 17A (5) of Malaysia Anti-Corruption Commission Act 2009;
- Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (Act 613);
- Penal Code Act (Act 574);
- Company Act (Act 777);
- Whistleblower Protection Act 2010 (Act 711);
- **ENFRASYS**’s Anti-Bribery Management System.
- Corporate and relevant stakeholders (if any).

This Policy sets out overall policies, procedures and guidelines of **ENFRASYS** on all forms of bribery and corruption designed to prevent, detect and respond to bribery and corruption, and comply with applicable anti-bribery and corruption laws.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

In the event of any ambiguity or inconsistency in this Policy, clarification should be sought from the **Legal & Compliance Department**. Where there is any conflict between this Policy and applicable laws, the **law shall prevail**.

This Policy shall be subject to **periodic review** and approval by the **Board of Directors of ENFRASYS**.

1.2 OBJECTIVES

The objectives of this Policy are to safeguard **ENFRASYS**'s reputation and to protect Persons Associated with **ENFRASYS** by providing **clear and unambiguous guidance** to prevent involvement in bribery or corruption, or exposure to allegations thereof.

This Policy defines the **expected standards of behavior and conducts** for Persons Associated with **ENFRASYS** when dealing with bribery and corruption risks in the course of day-to-day business operations and activities.

1.3 APPLICATION

This Policy applies to the following stakeholders involved in the conduct of **ENFRASYS**'s business operations and activities, unless otherwise stated in specific sections of this Policy:

- **Persons Associated** - Refer to directors, partners or employees of the commercial organization or persons who perform services for or on behalf of the commercial organization such as (but not limited to) agents, consultants or brokers;
- **Business Associates** - Refer to an external party with whom the organization has, or intends to establish, a business relationship. This includes, but is not limited to, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, sub-contractors, suppliers, vendors, advisors, agents, distributors, representatives, intermediaries, investors, public officials, party officials, politicians, and any person or body

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES					
Document No	:	ENFRASYS/ABMS/P02	Rev	:	03
Effective Date	:	20 January 2026			

performing services for or on behalf of the organization. It is important to note that clients and customers are excluded from this definition, as they are considered recipients of the organization’s services or products rather than entities acting on behalf of or in partnership with the organization.

2.0 DEFINITIONS AND ABBREVIATIONS

• ABAC	: Anti-Bribery and Anti-Corruption
• ABMS	: Anti-Bribery Management System
• Agent	: Shall have the same meaning as defined by MACC Act 2009, i.e.: Any person employed by or acting for another, and includes an officer of a public body or an officer serving in or under any public body, a trustee, an administrator or executor of the estate of a deceased person, a subcontractor, and any person employed by or acting for such trustee, administrator or executor, or subcontractor;
• Bribery	: Shall have the same meaning as defined by ISO 37001:2016, i.e.: Offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non- financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person’s duties. : It may also be defined as the act of corruptly giving, agreeing to give, authorizing, promising, offering, soliciting, receiving, or agreeing to receive any gratification , whether directly or indirectly.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

• Board of Directors	:	Refers to a panel of individuals elected by organization's shareholder(s) to represent their interests
• Business Associate	:	Refer to an external party with whom the organization has, or intends to establish, a business relationship. This includes, but is not limited to, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, sub-contractors, suppliers, vendors, advisors, agents, distributors, representatives, intermediaries, investors, public officials, party officials, politicians, and any person or body performing services for or on behalf of the organization. It is important to note that clients and customers are excluded from this definition, as they are considered recipients of the organization's services or products rather than entities acting on behalf of or in partnership with the organization.
• Code of Business Conduct	:	Refers to ENFRASYS' Anti-Bribery and Anti-Corruption Policy applicable to all Business Associates of ENFRASYS
• Commercial Organization	:	Refer to a company incorporated under the Companies Act 2016 [Act 777] and carries on a business in Malaysia or elsewhere
• Conflict of Interest	:	Refers to situation where business, financial, family, political or personal interests could interfere with the judgement of persons carrying out their duties for the organization.
• Customer	:	Refers to any individual or entity that receives the organization's products or services, either through a transactional purchase or a professional engagement. This includes both retail consumers and service clients, regardless of the nature, scope or duration of the relationship.
• Hospitality	:	Refer to any entertainment offered or received by organization for its persons associated, business

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

	associates and other stakeholders in the manner that complete expenses are borne by the organization
• Corruption	: Shall have the same meaning as defined by MACC Act 2009, i.e.: 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
• Donation	: Refers to the gratification given out by organization for charity, humanitarian aid or to support local community welfare, whether in-kind or by way of financial contribution
• Employee	: Refers to any person who is in the employment with organization, including but not limited to executives, nonexecutives, full-time, contract, part time, temporary employees or those serving internships
• ENFRASYS	: Consist of : Enfrasys Consulting Sdn Bhd and Enfrasys Solutions Sdn Bhd
• Entertainment	: Refer to entertainment offered or received by organization’s employees or directors to/ from third parties with food and drink, or in other forms of entertainment, in the manner that the expenses to be borne by the organization
• Facilitation Payment	: Shall have the same meaning as defined by ISO 37001:2016 A.2.2.1, i.e.: An illegal or unofficial payment made in return for services that the payer is legally entitled to receive without making such payment. It is normally a relatively minor payment made to a public official or person with a certifying/ approval function to secure or expedite the performance of a routine or necessary action. Is a small bribe, also known as “grease payment” or a

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	: ENFRASYS/ABMS/P02	Rev	: 03
Effective Date	: 20 January 2026		

	“speed payment”.
• Gift	: Refers to something is given voluntarily as token of appreciation or respect, without requiring payment in return.
• Governing Body	: Shall have the same meaning as defined by ISO 37001:2016, i.e.: A group or body that has the ultimate responsibility and authority for an organization’s activities, governance and policies and to which top management reports and by which top management is held accountable
• Gratification	: Shall have the same meaning as defined by MACC Act 2009, i.e.: <ul style="list-style-type: none"> (a) 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; (b) Any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity; (c) Any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part; (d) Any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage. (e) Any forbearance to demand any money or money’s worth or valuable thing; (f) Any other service or favor of any description, including protection from any penalty or disability incurred or apprehended or from any

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	: ENFRASYS/ABMS/P02	Rev	: 03
Effective Date	: 20 January 2026		

	<p>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</p> <p>(g) Any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).</p> <p>Giving and receiving gratification with corrupt intent, to induce or reward the improper performance or refrain from performing of recipient’s duties, to obtain or retain business advantage, is considered has committed bribery or corruption offence.</p>
<ul style="list-style-type: none"> • ISO 	<p>: International Organization for Standardization, is a worldwide federation of national standards bodies.</p>
<ul style="list-style-type: none"> • ISO 37001:2016 	<p>: Is an International Standard established by the ISO specifying generic requirements for establishing, implementing, maintaining, reviewing and continuously improving anti-bribery management system</p>
<ul style="list-style-type: none"> • Limit of Authority 	<p>: Refers to the approved document(s) stipulating the approving authority and authority limits allowed for the board of directors and top management of the organization</p>
<ul style="list-style-type: none"> • MACC 	<p>: Malaysian Anti-Corruption Commission</p>
<ul style="list-style-type: none"> • Person associated/ Associated person with a commercial organization 	<p>: Refer to directors, partners or employees of the commercial organization or persons who perform services for or on behalf of the commercial organization such as (but not limited to) agents, consultants or brokers</p>

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

<ul style="list-style-type: none"> Political Official 	: Refers to, political officer, a member and person or body which performs services for or on behalf of a political party
<ul style="list-style-type: none"> Public Official 	: Refers to any appointed or elected official, officer, or employee who works at the expense of taxpayers or the government or state owned, controlled or funded companies, or any person working in specific functions or industries who are defined or regulated as a government official by local law.
<ul style="list-style-type: none"> RMP 	: Royal Malaysia Police
<ul style="list-style-type: none"> Sponsorship 	: Refers to support, either financially or by way of product and/ or services for an event or activity organized by a profit/ non-profit organizations, local communities, government departments or agencies, primarily aimed at raising awareness of organization profile
<ul style="list-style-type: none"> Stakeholder 	: Shall have the same meaning as defined by ISO 37001:2016, i.e.: Person or organization that can affect, be affected by, or perceive themselves to be affected by a decision or activity
<ul style="list-style-type: none"> Top Management 	: Shall have the same meaning as defined by ISO 37001:2016, i.e.: A person or group of people who directs and controls an organization at the highest level. The top management of ENFRASYS is referred to the position of Group Chief Executive Officer, Group Chief Operating Officer, Group Chief Financial Officer, Chief Executive Officer, Chief Financial Officer, and other Head of Departments
<ul style="list-style-type: none"> Whistleblower 	: Refers to a person (internal or external party) raising or reporting concerns of wrongful activities or wrongdoings as defined in organization’s Whistleblowing Policy

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	: ENFRASYS/ABMS/P02	Rev	: 03
Effective Date	: 20 January 2026		

3.0 BRIBERY AND CORRUPTION OFFENCES

The following outlines the classifications of bribery and corruption offences, together with the corresponding penalties, as prescribed under the **Malaysian Anti-Corruption Commission Act 2009 (MACC Act)**. These provisions apply where a commercial organization and/or its employees are found to have committed or been involved in such offences:

Bribery and Corruption Offences	Penalties
<p>Sections 16 MACC Act, Offence of accepting gratification (Personal Liability);</p> <p>Any person who by himself, or by or in conjunction with any other person;</p> <p>(a) corruptly solicits or receives or agrees to receive for himself or for any other person; or</p> <p>(b) corruptly gives promises or offers to any person whether for the benefit of that person or of another person, any gratification as an inducement to or a reward for, or otherwise on account of;</p> <ul style="list-style-type: none"> • any person doing or forbearing to do anything in respect of any matter or transaction, actual or proposed or likely to take place; or • any officer of a public body doing or forbearing to do anything in respect of any matter or transaction, actual or proposed or likely to take place, in which the public body is concerned, commits an offence. 	<p>Section 24 (1), MACC Act, Penalty for offences under sections 16, 17, 18, 20, 21, 22 and 23 (Personal Liability):</p> <p>Any person who commits an offence under sections 16, 17, 20, 21, 22 and 23 on conviction be liable to;</p> <p>(a) imprisonment for a term not exceeding twenty years; and</p> <p>(b) a fine of not less than five times the sum or value of the gratification, which is the subject matter of the offence, where such gratification is capable of being valued or is of a pecuniary nature, or ten thousand ringgits, whichever is the higher.</p>

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	: ENFRASYS/ABMS/P02	Rev	: 03
Effective Date	: 20 January 2026		

<p>Section 17 MACC Act, Offence of giving or accepting gratification by agent (Personal Liability);</p> <p>A person commits an offence if:</p> <p>(a) being an agent, he corruptly accepts or obtains, or agrees to accept or attempts to obtain, from any person, for himself or for any other person, any gratification as an inducement or a reward for doing or forbearing to do, or for having done or forborne to do, any act in relation to his principal's affairs or business, or for showing or forbearing to show favor or disfavor to any person in relation to his principal's affairs or business; or</p> <p>(b) the corruptly gives or agrees to give or offers any gratification to any agent as an inducement or a reward for doing or forbearing to do, or for having done or forborne to do any act in relation to his principal's affairs or business, or for showing or forbearing to show favor or disfavor to any person in relation to his principal's affairs or business</p>	<p>Section 24 (1), MACC Act, Penalty for offences under sections 16, 17, 18, 20, 21, 22 and 23 (Personal Liability):</p> <p>Any person who commits an offence under sections 16, 17, 20, 21, 22 and 23 on conviction be liable to;</p> <p>(a) imprisonment for a term not exceeding twenty years; and</p> <p>(b) a fine of not less than five times the sum or value of the gratification, which is the subject matter of the offence, where such gratification is capable of being valued or is of a pecuniary nature, or ten thousand ringgits, whichever is the higher.</p>
<p>Section 18 MACC Act, Offence of intending to deceive principal by agent (Personal Liability);</p> <p>A person commits an offence if he gives to an agent, or being an agent, he uses with intent to deceive his principal, any receipt, account</p>	<p>Section 24 (2), MACC Act, Penalty for offences under sections 16, 17, 18, 20, 21, 22 and 23 (Personal Liability):</p> <p>Any person who commits an offence under section 18 shall on conviction be liable to;</p> <p>(a) imprisonment for a term not exceeding</p>

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	: ENFRASYS/ABMS/P02	Rev	: 03
Effective Date	: 20 January 2026		

<p>or other document in respect of which the principal is interested, and which he has reason to believe contains any statement which is false or erroneous or defective in any material particular, and is intended to mislead the principal.</p>	<p>twenty years; and</p> <p>(b) a fine of not less than five times the sum or value of the false or erroneous or defective material particularly, where such false or erroneous or defective material is capable of being valued, or of a pecuniary nature, or ten thousand ringgits, whichever is the higher.</p>
<p>Section 21 MACC Act, Bribery of officer of public body (Personal Liability);</p> <p>Any person who offers to an officer of any public body, or being an officer of any public body solicits or accepts, any gratification as an inducement or a reward for –</p> <p>(a) the officer voting or abstaining from voting at any meeting of the public body in favor of or against any measure, resolution or question submitted to the public body;</p> <p>(b) the officer performing or abstaining from performing or aiding in procuring, expediting, delaying, hindering or preventing the performance of, any official act;</p> <p>(c) the officer aiding in procuring or preventing the passing of any vote or the granting of any contract or advantage in favor of any person; or</p> <p>(d) the officer showing or forbearing to show any favor or disfavor in his capacity as such officer,</p>	<p>Section 24 (1), MACC Act, Penalty for offences under sections 16, 17, 18, 20, 21, 22 and 23 (Personal Liability):</p> <p>Any person who commits an offence under section 16, 17, 20, 21, 22 and 23 on conviction be liable to;</p> <p>(a) imprisonment for a term not exceeding twenty years; and</p> <p>(b) a fine of not less than five times the sum or value of the gratification, which is the subject matter of the offence, where such gratification is capable of being valued or is of a pecuniary nature, or ten thousand ringgits, whichever is the higher.</p>

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

<p>Commits an offence, notwithstanding that the officer did not have the power, right or opportunity to do, show or forbear, or accepted the gratification without intending so to do, show or forbear, or did not in fact so do, show or forbear, or that the inducement or reward was not in relation to the affairs of the public body.</p>	
<p>Section 25 (1) MACC, Duty to report bribery transactions (Personal Liability);</p> <p>Any person to whom any gratification is given, promised, or offered, in contravention of any provision of this Act shall report such gift, promise or offer together with the name, if known, of the person who gave, promised or offered such gratification to him to the nearest officer of the Commission or police officer.</p>	<p>Section 25 (2) MACC, Duty to report bribery transactions (Personal Liability);</p> <p>Any person who fails to comply with subsection (1) commits an offence and shall on conviction be liable to a fine not exceeding one hundred thousand ringgit or to imprisonment for a term not exceeding ten years or to both.</p>
<p>Section 25 (3) MACC, Duty to report bribery transactions (Personal Liability);</p> <p>Any person from whom any gratification has been solicited or obtained, or an attempt has been made to obtain such gratification, in contravention of any provision of this Act shall at the earliest opportunity thereafter report such soliciting or obtaining of, or attempt to obtain, the gratification together with the full and true description and if known, the name of the person who</p>	<p>Section 25 (4) MACC, Duty to report bribery transactions (Personal Liability);</p> <p>Any person who fails, without reasonable excuse, to comply with subsection (3) commits an offence and shall on conviction be liable to a fine not exceeding ten thousand ringgit or to imprisonment for a term not exceeding two years or to both.</p>

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	: ENFRASYS/ABMS/P02	Rev	: 03
Effective Date	: 20 January 2026		

<p>solicited, or obtained, or attempted to obtain, the gratification from him to the nearest officer of the Commission or police officer</p>	
<p>Section 28 (1) MACC, Attempts, preparations, abetments and criminal conspiracies punishable as offence (Personal Liability);</p> <p>Any person who:</p> <p>(a) attempts to commit any offence under this Act;</p> <p>(b) does any act preparatory to or in furtherance of the commission of any offence under this Act; or</p> <p>(c) abets or is engaged in a criminal conspiracy to commit any offence under this Act</p>	<p>Section 28 (1) MACC, Attempts, preparations, abetments and criminal conspiracies punishable as offence (Personal Liability);</p> <p>Any person commits such offence and on conviction be liable to punishment provided for such offence.</p> <p>Section 28 (2);</p> <p>Any provision of this Act which contains a reference to an offence under any specific provision of this Act shall be read as a reference to an offence under subsection (1) in relation to the offence under that specific provision.</p> <p>Section 28 (3);</p> <p>Paragraph (1)(a) shall not apply where an attempt to do any act is expressly made an offence under this Act, and paragraph (1)(c) shall not apply to the case of an abetment of an offence as provided for under section 164 of the Penal Code.</p>
<p>Section 17A (1) MACC Act, Offence by commercial organization (Corporate Liability);</p>	<p>Section 17A (2) MACC Act, Offence by commercial organization (Corporate Liability);</p>

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

<p>A commercial organization commits an offence if a person associated with the commercial organization corruptly gives, agrees to give, promises or offers to any person any gratification whether for the benefit of that person or another person with intent :</p> <p>(a) to obtain or retain business for the commercial organization; or</p> <p>(b) to obtain or retain an advantage in the conduct of business for the commercial organization.</p>	<p>Any commercial organization on conviction liable to a fine of not less than ten times the sum or value of the gratification, which is the subject matter of the offence, where such gratification is capable of being valued or is of pecuniary nature, or one million ringgits, whichever is the higher, or to imprisonment for a term not exceeding twenty years or to both.</p>
<p>Section 17A (3) MACC Act, Offence by commercial organization (Personal Liability);</p> <p>When an offence is committed by a commercial organization, a person:</p> <p>(a) who is its director, controller, officer or partner; or</p> <p>(b) who is concerned in the management of its affairs, at the time of the commission of the offence, is deemed to have committed that offence unless that person proves that the offence was committed without his consent or connivance and that he exercised due diligence to prevent the commission of the offence as he ought to have exercised, having regard to the nature of his function in that capacity and to</p>	<p>Section 24 (1), MACC Act, Penalty for offences under sections 16, 17, 18, 20, 21, 22 and 23 (Personal Liability):</p> <p>Any person who commits an offence under sections 16, 17, 20, 21, 22 and 23 on conviction be liable to;</p> <p>(a) imprisonment for a term not exceeding twenty years; and</p> <p>(b) a fine of not less than five times the sum or value of the gratification, which is the subject matter of the offence, where such gratification is capable of being valued or is of a pecuniary nature, or ten thousand ringgits, whichever is the higher.</p>

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES					
Document No	:	ENFRASYS/ABMS/P02	Rev	:	03
Effective Date	:	20 January 2026			

the circumstances.	
--------------------	--

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	: ENFRASYS/ABMS/P02	Rev	: 03
Effective Date	: 20 January 2026		

4.0 RESPONSIBILITIES

All Person Associated with **ENFRASYS** are responsible for the implementation of the Anti-Bribery Management System (ABMS) whereby it is crucial for everyone to understand and apply them within their roles and responsibilities in a compliant and ethical manner.

Roles	Key Responsibilities
<p>a. Governing Body <i>(Board of Directors)</i></p>	<p>i. Endorses the Organization’s Commitment</p> <ul style="list-style-type: none"> - Affirms ENFRASYS’s zero-tolerance stance against bribery and corruption and ensures ethical business conduct across all operations. <p>ii. Approves the ABMS</p> <ul style="list-style-type: none"> • Reviews and approves the ABAC including its policies, objectives and guidelines ensuring alignment with ENFRASYS’s strategic direction and vision. <p>iii. Foster a Culture of Integrity</p> <ul style="list-style-type: none"> • Promotes a corporate culture that emphasizes awareness, understanding and compliance with anti-bribery laws and internal policies. <p>iv. Provides Oversight and Resources</p> <ul style="list-style-type: none"> • Maintain oversight of ABAC governance, ensure the provision of adequate resources, supports implementation of best practices and drive periodic reviews and continuous improvement of the ABAC program to ensure its effectiveness and relevance.
<p>b. Top Management <i>(Group Chief Executive Officer, Group Chief Operating Officer,</i></p>	<p>i. Strategic Direction and Oversight</p> <ul style="list-style-type: none"> • Develops and drives the strategic direction for the establishment, implementation, maintenance, and continual improvement of the ABMS, ensuring its

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	: ENFRASYS/ABMS/P02	Rev	: 03
Effective Date	: 20 January 2026		

<p><i>Group Chief Financial Officer, Chief Executive Officer, Chief Financial Officer, and other Head of Departments.)</i></p>	<p>policies and objectives meet stakeholder expectations and effectively manages bribery and corruption risks.</p> <p>ii. Operational Integration</p> <ul style="list-style-type: none"> • Ensuring the ABMS is embedded into daily operations across key functions such as human resources, procurement, and finance, strengthening internal controls to mitigate bribery and corruption risks. <p>iii. Resource Allocation</p> <ul style="list-style-type: none"> • Allocates sufficient resources and investments to support the effective implementation and sustainability of the ABMS, including its policies and objectives. <p>iv. Training and Awareness</p> <ul style="list-style-type: none"> • Provides ongoing training and awareness programs for all personnel and associated parties to reinforce the importance of compliance and effectiveness of anti-bribery and anti-corruption initiatives. <p>v. Internal and External Communication</p> <ul style="list-style-type: none"> • Regularly communicates the significance of the ABMS, both within the organization and to external stakeholders, reinforcing commitment to ethical conduct and compliance. <p>vi. Culture of Integrity</p> <ul style="list-style-type: none"> • Cultivates a culture of integrity and compliance throughout ENFRASYS by actively promoting ethical behavior and supporting personnel in contributing to the effectiveness of the ABMS.
--	---

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	: ENFRASYS/ABMS/P02	Rev	: 03
Effective Date	: 20 January 2026		

	<p>vii. Whistleblowing and Protection</p> <ul style="list-style-type: none"> Encourages reporting of suspected or actual bribery and corruption incidents through established whistleblowing channels, ensuring confidentiality and protection against retaliation or discrimination. <p>viii. Enforcement and Corrective Action</p> <ul style="list-style-type: none"> Takes decisive action against proven misconduct, including disciplinary measures, termination of employment or business relationships, and reporting criminal activities to relevant authorities such as MACC or RMP.
<p>c. Legal & Compliance Department</p>	<p>i. System Oversight and Implementation</p> <ul style="list-style-type: none"> Oversee the development and implementation of the ABMS, ensuring its policies and objectives comply with applicable laws, international standards, corporate requirements, and stakeholder expectations. <p>ii. Advisory and Guidance</p> <ul style="list-style-type: none"> Provides expert advice and guidance to all personnel and associated parties on matters related to the ABMS, including its policies, objectives, and supporting guidelines. <p>iii. Internal Controls Assurance</p> <ul style="list-style-type: none"> Ensures that internal controls are appropriately designed and implemented to effectively manage bribery and corruption risks. <p>iv. Audit Coordination</p> <ul style="list-style-type: none"> Coordinates periodic internal audits to evaluate the

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	: ENFRASYS/ABMS/P02	Rev	: 03
Effective Date	: 20 January 2026		

	<p>adequacy and operational effectiveness of ENFRASYS's anti-bribery and anti-corruption controls and processes.</p> <p>v. Performance Reporting</p> <ul style="list-style-type: none"> • Reports regularly to the Governing Body and Top Management on the performance and effectiveness of the ABMS. <p>vi. Corruption Risk Assessment</p> <ul style="list-style-type: none"> • Leads the review of ENFRASYS's Corruption Risk Assessment every three (3) years or as needed and presents findings and recommendations to the Governing Body and Top Management. <p>vii. Monitoring and Red Flag Detection</p> <ul style="list-style-type: none"> • Monitors all ABAC-related declarations and reports to identify potential red flags and recommends appropriate preventive measures. <p>viii. Escalation of Concerns</p> <ul style="list-style-type: none"> • Failure to comply with ABMS requirements may result in escalation to Top Management and the Governing Body. <p>ix. Whistleblowing Management</p> <ul style="list-style-type: none"> • Acts as an independent and trusted unit to manage whistleblowing reports, ensuring confidentiality and making recommendations for improvements to the ABMS.
<p>d. Employee</p>	<p>i. Compliance and Ethical Execution</p> <ul style="list-style-type: none"> • Carry out duties in accordance with the ABMS, upholding its policies and objectives with integrity and

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

	<p>in full compliance.</p> <p>ii. Integration into Daily Work</p> <ul style="list-style-type: none"> • Embed bribery and corruption controls into routine business activities • and processes to support a culture of ethical conduct. <p>iii. Reporting Misconduct</p> <ul style="list-style-type: none"> • Promptly report any suspected or actual incidents of bribery or corruption through ENFRASYS's established whistleblowing channels.
--	---

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

5.0 COMPLIANCE

- a. All Persons Associated and Business Associates of **ENFRASYS** are mandated to comply with the ABAC Policy. Non-compliance, especially actions that constitute offences under:
- i. **MACC Act 2009 (Act 694)** : which criminalizes acts such as giving or receiving gratification, abuse of position and failure to report bribery.
 - ii. **MACC Amendment Act 2018 (Act A1567)** : which introduces Section 17A, establishing corporate liability for corruption committed by Persons Associated with a commercial organization.
- b. Such misconduct is considered serious or wrong, and **ENFRASYS** reserves the right to:
- i. Take internal disciplinary action, including termination of employment or business arrangements without notice, following due inquiry.
 - ii. Report suspected criminal activities to MACC, RMP or other relevant authorities.

5.1 BUSINESS ETHICS

- a. **ENFRASYS** is committed to upholding the highest standards of professionalism, integrity and ethical conduct in all business dealings. All Persons Associated with **ENFRASYS**, including employees, contractors, consultants and Business Associates, are required to:
- i. Perform their duties ethically, professionally and in compliance with all applicable laws and regulations.
 - ii. Demonstrate integrity in all interactions and decisions related to **ENFRASYS**'s business operations.
- b. To support this commitment, **ENFRASYS** has established the following reference documents:
- i. **Employee Handbook** : Outlines **ENFRASYS**'s vision, mission and core values along with policies, rules, disciplinary and grievance procedures, employment-related regulations and employee benefits.
 - ii. **Code of Business Conduct** : Defines the principles, standards, and

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES					
Document No	:	ENFRASYS/ABMS/P02	Rev	:	03
Effective Date	:	20 January 2026			

ethical expectations applicable to all Persons Associated and Business Associates. This Code of Business Conduct serves as a foundational element of **ENFRASYS**'s ABAC compliance framework and is designed to prevent bribery and corruption offences.

- c. As part of **ENFRASYS**'s commitment to ethical business practices, all relevant parties are required to acknowledge their understanding and agreement to comply with the Employee Handbook and Code of Business Conduct by signing the following:
- i. **Employees** : Integrity Declaration Form for Employees.
 - ii. **Business Associates** : Integrity Declaration Form for Business Associates.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

6.0 DUE DILIGENCE

ENFRASYS is committed to conducting thorough due diligence on all Persons Associated and Business Associated to identify and assess any potential red flags that may indicate elevated risks related to integrity, bribery or corruption. This process is essential to ensure that individuals and entities engaged with ENFRASYS uphold the highest standards of ethical conduct.

6.1 DEFINITION OF HIGH RISK

6.1.1 HIGH RISK OF EMPLOYEES

- a. Due Diligence is particularly critical for individuals or roles identified as **high-risk**, based on their exposure to bribery and corruption risks. The following categories are defined as **high-risk** employees:

Function / Department	Focus Area
i. Company Secretary	Due Diligence is required prior to the appointment of any member of the Board of Directors.
ii. People, Culture and Corporate Services	Due diligence is required during the recruitment process for high-risk positions.

- b. Employees holding the following positions are considered **high-risk** due to their potential exposure to corruption risks:
- i. Appointment of Board of Directors
 - ii. C-Suite Executives Level
 - iii. Head of Department
 - iv. Employee in High-Risk Department including:
 - Business Development
 - Finance and Accounts

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

6.1.2 HIGH RISK OF BUSINESS ASSOCIATES

- a. **ENFRASYS** recognized the importance of conducting due diligence on Business Associates who may pose higher risk of bribery or corruption. This Policy outlines the criteria for identifying **high-risk** Business Associates and assigns responsibility for conducting due diligence to the relevant departments.

- b. Due diligence on **high-risk** Business Associates should be conducted by the following departments:
 - i. Procurement and Bid
 - ii. Partnership
 - iii. Marketing
 - iv. People, Culture and Corporate Services
 - v. Finance and Accounts

- c. A Business Associate shall be classified as **high-risk** for ABAC purposes if any of the following criteria are met:
 - i. Entities with no prior business engagement with **ENFRASYS** and newly introduced to the organization and must have a valid *Suruhanjaya Syarikat Malaysia (SSM)* Registration Number.
 - ii. Partner / Vendor / Supplier whose contribution to the project is valued at more than RM 40,000.00.
 - iii. External individuals whose position or relationship may expose **ENFRASYS** to a higher risk of bribery or corruption, including but not limited to public officials, agents, consultants, brokers, or connected persons.
 - iv. Any other stakeholder identified as “**high-risk**” by **ENFRASYS** based on internal risk assessments or other relevant risk factors.

Note: High-risk classification shall trigger enhanced due diligence, monitoring, and approval as defined in ENFRASYS's ABAC procedures.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

6.2 DONATION AND SPONSORSHIP

- a. **ENFRASYS** recognizes that donations and sponsorship may carry potential bribery and corruption risk. Therefore, all proposed donations or sponsorships must undergo appropriate due diligence to ensure transparency, legitimacy, and alignment with the **ENFRASYS**'s ethical standards.

- b. Marketing Department is responsible for conducting due diligence on all donation and sponsorship requests.

- c. Due diligence shall be conducted for any donation or sponsorship with a value exceeding **RM 1,000.00**. This process must include:
 - i. Verification of the recipient's legitimacy and background.
 - ii. Assessment of any potential conflict of interest or undue influence.
 - iii. Evaluation of the purpose and alignment with **ENFRASYS**'s Corporate Social Responsibility (CSR) objectives.
 - iv. Documentation of the approval process and justification for the contribution.

- d. No donation or sponsorship shall be approved if there is any suspicion that it may be used to obtain or retain business advantage, influence decision-making, or circumvent legal or ethical obligations.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

6.3 DUE DILIGENCE PROCESS

- a. **ENFRASYS** adopts a structured due diligence process to assess the integrity and risk level of Persons Associated and Business Associates. This process is designed to identify potential red flags and ensure appropriate ABAC controls are in place.

- b. Due diligence shall be conducted using a standardized checklist, which evaluates:
 - Background and reputation
 - Existing ABAC control measures
 - Relationship with interested parties
 - Financial standing and risk indicators

- c. The responses provided in the checklist will determine the subject’s overall due diligence rating and risk classification.

- d. Subjects identified as **high-risk** may be required to undergo additional ABAC measure which may include:
 - Submission of a Statutory Declaration.
 - Participation in ABAC -focused training sessions.
 - Completion of ABAC Policy Awareness Test.

- e. These enhanced controls are intended to mitigate risk and reinforce **ENFRASYS’s** commitment to ethical business practices.

- f. The Due Diligence Checklist for Employees shall be used to assess integrity risks during recruitment or internal role changes, particularly for **high-risk** positions.

- g. The Due Diligence Checklist for Business Associates shall be used to evaluate external parties prior to engagement, especially those classified as **high-risk**.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

6.4 DUE DILIGENCE OUTCOME AND FINDINGS

Any red flags identified during the due diligence process must be properly addressed and mitigated before a business relationship between **ENFRASYS** and the subject can be proceeded. **ENFRASYS** shall exercise sound judgement, based on the information and data obtained, to determine whether it is appropriate to proceed with the intended engagement.

ENFRASYS has established the following policies in relation to due diligence findings:

- a. **ENFRASYS** shall not engage with any individual, organization or entity that has been convicted of or is currently under prosecution for financial or commercial crimes, including fraud, bribery, money laundering or terrorism financing.
- b. **ENFRASYS** shall refrain from entering into any transaction, arrangement or contract that is non-compliant with applicable local laws and regulations.
- c. **ENFRASYS** shall not establish or continue business relationships with any individual, organization, or entity that during the due diligence process:
 - i. Knowingly provides false, inaccurate or misleading information; or
 - ii. Submits falsified or forged documents.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

6.5 DUE DILIGENCE APPROVALS

The outcome and clearance of due diligence checks shall follow the process outlined in the table below. Submissions must be completed using the Due Diligence Checklist for Business Associates (Attachment 3) and the Due Diligence Checklist for Employees (Attachment 4).

In cases where due diligence checks involve the **Group Chief Executive Officer** or individuals connected to the Group Chief Executive Officer, final approval shall rest with the **Board of Directors**.

No.	Focus Area	Conducted By	Verified By	Approved By
1.	Appointment of Board of Directors	Company Secretary	Legal & Compliance	Board of Directors
2.	Appointment of C-Suite Level	People, Culture and Corporate Services		Group Chief Executive Officer / Group Chief Financial Officer
3.	Appointment of Head of Department	People, Culture and Corporate Services		Head of People, Culture and Corporate Services
4.	Appointment of Employees for High-Risk Department(s)	People, Culture and Corporate Services		Chief Financial Officer
5.	Partner/ Vendor/Supplier	Procurement & Bid and Partnership		Group Chief Executive Officer
6.	Donation & Sponsorship	Marketing		

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

6.6 VALIDITY OF DUE DILIGENCE

- a. Due diligence assessments shall remain valid for a period of **two (2) years**. If a service, contract, or appointment is renewed within this period, re-evaluation is not required.
- b. For appointments of the Board of Directors and employees, the validity of due diligence shall correspond to their respective period of service.
- c. A re-evaluation is required for any renewal of service, contract, or appointment after the two-year validity period has expired.
- d. If new circumstances or information arise that may affect the integrity of an existing relationship, **ENFRASYS** shall reassess the situation to determine whether additional controls are necessary, including the possible termination of services.

6.7 DOCUMENTATION

All information and data obtained during the due diligence process including verbal communications, internet searches, and considerations arising from the outcome shall be documented and retained as records by the Legal & Compliance Department.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

7.0 FACILITATION PAYMENT

- a. Facilitation payment commonly referred to in Malaysia as “*Duit Kopi*” are illegal or unofficial payments or benefits given to secure or expedite the performance of routine or administrative tasks. Such payments constitute a form of bribery, regardless of the amount involved. Similarly, kickbacks are payments made in exchange for a business favor or advantage.
- b. **ENFRASYS** strictly prohibits facilitation payments and kickbacks of any kind, whether made directly or indirectly, on behalf of the **ENFRASYS**, even in cases where such practices may not be explicitly prohibited under local laws, customs or practices.
- c. Any request for a facilitation payment or kickback must be refused and immediately reported to the Head of Department or Legal & Compliance Department either verbally or through **ENFRASYS**’s Whistleblowing Channel.
- d. In rare circumstances, where there is a genuine threat to personal safety, life or liberty, a facilitation payment may be made. In such situations, the following steps must be taken:
 - i. Limit the payment amount to the minimum necessary;
 - ii. Request a receipt stating the amount paid and the reason for the payment;
 - iii. Document the details of the payment; and
 - iv. Report on the incident without delay to the Head of Department or Legal & Compliance Department.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

8.0 GIFT, ENTERTAINMENT AND HOSPITALITY

In business, giving or receiving gifts, entertainment, or hospitality is often customary to express goodwill, appreciation, or maintain business relationships. However, excessive or lavish offerings may be perceived as bribery or corruption, particularly if they could improperly influence business decisions.

As a general rule, **ENFRASYS** strictly prohibits giving or accepting gifts, entertainment, or hospitality where it could be construed as bribery or corruption.

8.1 GIFT, ENTERTAINMENT AND HOSPITALITY POLICY

Persons Associated with **ENFRASYS** shall avoid giving or accepting gifts, entertainment, or hospitality that may create or appear to create a **conflict of interest** or give rise to allegations of bribery or corruption.

When offering or receiving gifts, entertainment or hospitality, the following principles must always be observed:

a.	Genuine	Must be a bona fide act of appreciation, with no hidden intent to improperly influence decisions.
b.	No Obligation	Must not create any sense of obligation, expectation, or return of favor from the recipient.
c.	No Undue Influence	Must not be intended to, nor be seen as capable of influencing a business or regulatory decision or compromising professional integrity.
d.	Transparency	Must not be given or received in secret; purpose, approvals and value must be properly documented.
e.	Legality	Must comply with all applicable laws and regulations.
f.	According to Stakeholder Perception	Must be acceptable if made public and not

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

		viewed unfavorably by stakeholders.
g.	Proportionate	The value and nature must be reasonable and appropriate for the occasion.
h.	Compliance with Recipient's Rules	Must align with the recipient organization's policies or code of conduct on gifts, entertainment and hospitality.
i.	Infrequent	Must not be provided or accepted so frequently that it creates an impression of influence or favoritism.

8.2 ALLOWABLE GIFTS

Gifts are permitted only if they are reasonable, proportionate, and appropriate, and valued **below RM500 per occasion**, limited to the following categories:

a.	Corporate Gifts	Items branded with ENFRASYS name and/or logo such as thumb drives, table calendar, pens, notepads, t-shirts)
b.	Festive or Ceremonial Gifts	For specific occasions such as hampers, dates, <i>kuih raya</i> or mandarin oranges.
c.	Tokens of Appreciation	Presented during official events such as plaque, ornaments or door gifts.
d.	Perishable Items	Such as flowers, fruits or food items.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

8.3 GIVING GIFTS

No gifts may be given on behalf of **ENFRASYS** without prior written approval. All requests must be submitted in advance using the Provision/Receipt of Gifts, Hospitality, Donation, or Sponsorship Form (Attachment 5), in line with the limits and approval levels below:

No.	Receiver	Range /Limit	Category of Gifts	Approval Level
1.	Public Officials and others	Not more than RM 500	Allowable gifts	Group Chief Operating Officer
2.	VIPs / VVIPs who are not serving with the Government	More than RM 500 up to RM 1,000	Allowable gifts	
		More than RM 1,000	Other than allowable gifts	

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

8.4 ACCEPTING GIFTS

Recipients must declare and obtain approval for all gifts received within 5 working days by completing and submitting the Provision/Receipt of Gifts, Hospitality, Donation, or Sponsorship Form (Attachment 5) to the Legal & Compliance Department. Approval must be sought from the designated approval level as stated below:

Category of Gifts	Disposition of Gifts	Approval Level
Allowable gifts with value not more than RM 500.	<ul style="list-style-type: none"> Recipient keeps the gifts; or Share the gifts among recipient's department staff 	Group Chief Operating Officer
Allowable gifts with value more than RM 500.	<ul style="list-style-type: none"> Return the delivered gifts if not offending the giver; or Share the gifts among department staff; or Share among staff not involved in the business relationship with the giver. 	
Gifts other than allowable gifts with any value.	<ul style="list-style-type: none"> Return the delivered gifts if not offending the giver; or Share among staff not involved in the business relationship with the giver; or Donate the gifts to charity if the estimated value is more than RM1,000 per person per occasion. 	

If the Group Chief Operating Officer is offered gifts, approval shall be acquired from the Group Chief Executive Officer.

If the Group Chief Executive Officer is offered gifts, approval shall be acquired from the Board of Directors.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES					
Document No	:	ENFRASYS/ABMS/P02	Rev	:	03
Effective Date	:	20 January 2026			

8.5 ALLOWABLE ENTERTAINMENT

ENFRASYS recognize that reasonable and proportionate entertainment may be necessary to foster business rapport and maintain legitimate business relationships. Entertainment is permitted only under appropriate circumstances and must not create or be perceived to create undue influence conflict of interest or obligations.

a. Permitted modes of entertainment include:

- Business Lunch
- Business Dinners
- Business Hi-teas
- Business Breakfast

b. Prohibited modes of entertainment include but are not limited to:

- Clubbing
- Spa Treatments
- Karaoke
- Any entertainment that is excessive, inappropriate, or inconsistent with ENFRASYS' values and ethical standards.

c. The exchange of business courtesies among Top Management is recognized as customary and legitimate to create goodwill and strengthen business relationships. Such courtesies are allowed such as golfing.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

8.6 PROVIDING ENTERTAINMENT

The allowable nominal value limit per person per occasion shall follow the Limit of Authority and must always be reasonable, proportionate and appropriate to the business context in accordance with the roles and responsibilities of the persons involved. All request to provide entertainment on behalf of **ENFRASYS** must be:

- a. Pre-approved based on the relevant Limit of Authority; and
- b. Submitted in advance using the Provision/Receipt of Entertainment Form (Attachment 6) according to the approval level.

Approval Level for Providing Entertainment:

Category of Employees	Limit of Authority	Approval Level	
Management <ul style="list-style-type: none"> • Executive and above 	Business meal - Not more than RM100 per person per occasion.	Below 10 pax	Head of Department
		10 pax and above	Group Chief Financial Officer
Top Management <ul style="list-style-type: none"> • Head of Departments • Top Management 	Business meal - Not more than RM500 per person per occasion.	Group Chief Financial Officer	
	Golfing	Group Chief Financial Officer	

Entertainment that exceeds the nominal value allowed under the Limit of Authority or that falls outside the scope of “allowable entertainment” shall not be provided under any circumstances.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

8.7 ACCEPTING ENTERTAINMENT

Persons associated with **ENFRASYS** must declare any acceptance of Allowable Entertainment within **five (5) working days** of receipt. The declaration must be made by completing and submitting the Provision/Receipt of Entertainment Form (Attachment 6) to the Legal & Compliance Department for record and approval in line with the Limit of Authority limits.

8.8 ALLOWABLE HOSPITALITY

- a. **ENFRASYS** recognizes that the exchange of hospitality is customary and legitimate to network, foster goodwill, and strengthen business relationships.
- b. Hospitality generally refers to private functions, entertainment, or events that are paid for and organized by an organization, involving both internal and external parties (past, present, or prospective business associates) and, in some cases, the public at large, provided the purpose serves the benefit of the organization.
- c. Examples of corporate hospitality include, but are not limited to:
 - i. Sporting events;
 - ii. Gala dinners;
 - iii. Concerts;
 - iv. Activity-based events such as golf tournaments.
- d. All hospitality provided or accepted must be:
 - i. Reasonable, proportionate, and appropriate to the occasion;
 - ii. Pre-approved or declared in accordance with **ENFRASYS'** Limit of Authority and reporting requirements; and
 - iii. Free from any intention or perception of creating undue influence, conflict of interest, or obligation.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

8.9 PROVIDING HOSPITALITY

- a. The person-in-charge shall obtain from the respective departments the list of external parties to be invited for the upcoming hospitality event.
- b. Once the list of invites/guests is finalized, the person-in-charge shall complete and submit the Provision/Receipt of Gifts, Hospitality, Donation, or Sponsorship Form (Attachment 5) to the Legal & Compliance Department for review.
- c. The approval authority limit for providing hospitality as follows:

Range Limit	Approval Level
Not more than RM500 per person per occasion	Group Chief Financial Officer

- d. Upon receiving approval, the person-in-charge may proceed with event planning and execution, including extending official invitations to the identified external parties.
- e. No hospitality event shall be provided to any business associate who is:
 - i. Currently participating in bidding process;
 - ii. Undergoing a contract negotiation process; or
 - iii. Involved in a work-in-progress engagement with **ENFRASYS**, until at least three (3) months have elapsed from the official completion of such process or engagement.

8.10 ACCEPTING HOSPITALITY

When receiving an invitation from third parties, Persons Associated with **ENFRASYS** must obtain prior approval by completing and submitting the Provision/Receipt of Entertainment Form (Attachment 6) to the Legal & Compliance Department for record and approval in line with the Limit of Authority.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

8.11 EXCEPTION TO THE GIFTS, ENTERTAINMENT, HOSPITAL POLICY

While **ENFRASYS** generally adheres to a Gifts, Entertainment and Hospitality Policy, there are specific exceptions where giving or receiving gifts is strictly not allowed. These include:

- a. If the gift could influence or be perceived to influence any business decision (e.g., receiving a gift from a supplier involved in a pending purchasing decision);
- b. If the gift is in the form of cash or cash equivalents of any amount (e.g., gift certificates, shopping cards, vouchers that can be converted to cash, money orders, shares or other marketable instruments);
- c. If the gift is not aligned with customary and routine business practices;
- d. If the gift is excessive in value or given frequently;
- e. If the gift is inappropriate in nature;
- f. If the gift is given around the time of a pending business decision (except for standard working meals with appropriate preapproval);
- g. If the gift violates any applicable laws.

8.12 REPORTING AND RECORDING

- a. Records serve as evidence that gifts, entertainment and hospitality were not offered or accepted with corrupt or unethical intent. All accounts, invoices, documents and records must be prepared and maintained accurately and completely. All records and documentation must be retained by the Legal & Compliance Department. The documented information should include the following details:
 - i. Description of the gift, entertainment or hospitality;
 - ii. Actual value
 - iii. Purpose and occasion for which the gift, entertainment or hospitality was given or received;
 - iv. Name and organization of the giver or recipient.
- b. Please refer to the Gifts, Entertainment, Hospitality, Donation and Sponsorship Register (Attachment 7) for documentation.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

9.0 DONATION AND SPONSORSHIP

- a. It is common and legitimate practice for organizations to provide donations and sponsorships. Either in the form of monetary contributions or non-cash report.
- b. Donations are typically part of Corporate Social Responsibility (CSR) or Philanthropic initiatives, intended to support charitable, humanitarian or community causes. These are usually directed to non-profit organizations, including charitable and political entities, without any expectation of return or business advantage.
- c. Sponsorship on the other hand are strategic engagements where an organization provides financial or other support in exchange for brand visibility or association with events, programs or non-profit organizations. Sponsorships are often used as marketing tools to enhance brand reputation and public engagement.
- d. However, both donations and sponsorships must be handled with strict integrity. If such contributions are made excessively, improperly or with the intent to influence business decisions or gain undue advantage, they may be construed as bribery or corruption. This could expose **ENFRASYS** to legal liabilities including prosecution under Section 17A of the MACC Act and result in reputational damage.

9.1 DONATION AND SPONSORSHIP POLICY

- a. Donations and sponsorship must never be made under the following circumstances:
 - i. Where the contribution is not made in good faith, or it perceived to influence business decisions or outcomes.
 - ii. Where there is a conflict of interest or a perceived conflict of interest.
 - iii. With improper or corrupt intent including attempts to gain undue advantage.
 - iv. To or for the benefit of individuals, rather than legitimate organizations.
 - v. By any Person Associated with **ENFRASYS**, directly or indirectly in the course of employment to obtain personal advantage in a commercial transaction.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

- vi. In conjunction with, or related to, the negotiation of bids, tenders, or contracts.
 - vii. To interested parties, unless specific approval is obtained from the Board of Directors.
- b. Donations and sponsorships must:
- i. Be legal and compliant with all applicable laws and regulations.
 - ii. Be authorized internally and externally through proper channel.
 - iii. Be directed to structured and legitimate recipient organizations to ensure proper fund administration.
 - iv. Not be used to disguise bribery or undue payments.
 - v. Be accurately recorded in **ENFRASYS**'s accounting books and records.
- c. Examples of potential red flags include:
- i. Recipient organizations have affiliations with Public Official or their relatives.
 - ii. Contributions are made on behalf of Public Official.
 - iii. There is a perceived risk of improper advantage to **ENFRASYS**.
 - iv. The recipient or activity based in or originates from a high-risk country.
- d. Donations or sponsorships to foreign charities or beneficiaries must be verified to ensure they are not:
- i. Disguised illegal payments to Public Official.
 - ii. Used as a conduit for money laundering, terrorism financing or other illegal activities.
- e. When assessing requests, **ENFRASYS** shall consider:
- i. Due diligence on the recipient as per the Due Diligence criteria.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

- ii. Reasonableness of the amount, value and purposes.
 - iii. Whether the objectives align with **ENFRASYS**' values and ethical standards.
- f. All requests must be submitted using the Provision/Receipt of Gifts/Hospitality/Donation/Sponsorship Form (Attachment 5).
- g. Request must be supported by an official letter from the external party.
- h. Approval must be obtained prior to any contribution.
- i. Upon approval and disbursement, acknowledgement and proof of receipt must be collected and securely stored.
- j. No organization shall receive more than one donation or sponsorship per year.
- k. Approval levels:

Range Limit	Approval Level
Not more than RM 10,000 per occasion	Group Chief Financial Officer
More than RM 10,000 per occasion	Group Chief Executive Officer

9.2 CHARITABLE AND SOCIAL DONATION

ENFRASYS may make donations to support social and environmental causes, including but not limited to:

- a. **Disaster Relief** : Aid for victims for natural disasters such as floods, typhoons or landslides.
- b. **Education** : Support for educational initiatives, especially for disadvantaged or underprivileged students.
- c. **Health** : Promotion of health awareness and support during disease outbreaks or for general wellbeing.
- d. **Community Wellbeing** : Assistance to underprivileged, disabled or critically ill individuals, and promotion of national unity through education, sports and cultural events.
- e. **Environmental Preservation** : Support for initiatives that protect and preserve the environment.
- f. **Industry Development** : Contributions that support the growth of industries relevant to **ENFRASYS**'s business.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES					
Document No	:	ENFRASYS/ABMS/P02	Rev	:	03
Effective Date	:	20 January 2026			

9.3 POLITICAL DONATIONS

- a. Persons Associated with **ENFRASYS**, or its Business Associates, are strictly prohibited under any circumstances from making political donations whether in cash or in kind on behalf of **ENFRASYS**. In kind contributions include:
 - i. Participation in political campaigns during paid working hours.
 - ii. Use of **ENFRASYS**'s facilities, equipment, administrative support or supplies for political purposes.
- b. If any Persons Associated with **ENFRASYS** or its Business Associates has made or intends to make a political donation on behalf of **ENFRASYS**, the incident must be immediately reported via the Whistleblowing Channel.
- c. Notwithstanding the above prohibition, individual may:
 - i. Participate in political activities and make donations strictly in their personal capacity.
 - ii. Such actions must be voluntary, private and not linked to **ENFRASYS** in any form.
- d. Persons Associates with **ENFRASYS**, or its Business Associates shall not use their position:
 - i. Coerce, pressure or influence others to support or oppose any political candidate, official or party.
 - ii. Solicit political contributions from colleagues or subordinates.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

9.4 SPONSORSHIPS

- a. **ENFRASYS** may provide sponsorship to individuals or organizations, provided there is valid commercial justification, including but not limited to:
 - i. **Revenue Generation** : Direct or indirect financial benefits to **ENFRASYS**.
 - ii. **Brand and Reputation Enhancement** : Positive media coverage and improved public perception among target audiences.
 - iii. **Corporate Citizenship and Corporate Social Responsibility** : Promotion of **ENFRASYS**'s value through social responsibility initiatives.

- b. If Due Diligence reveals that the recipient is affiliated with public officers, public officials, political candidates or political parties, then the following must be fully and accurately disclosed:
 - i. The name and details of the affiliated public department, branch or political party.
 - ii. The nature and extent of control or ownership by the affiliate over the recipient organization.
 - iii. The key officers and directors of the affiliate.
 - iv. Any ongoing or contemplated transactions involving licenses, permits or approvals with the relevant public office or official.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

9.5 REPORTING AND RECORDING

- a. If any current or prospective Business Associate, Customer, Public Official, Donation or sponsorship recipient, political candidate or official party promises, offers or threatens any benefit in connection with a donation (charitable, social or political) or sponsorship request, the request must be denied immediately.

- b. The incident must be reported via the Whistleblowing Channel. Refer to the Whistleblowing Policy for detailed guidance.

- c. To ensure transparency and accountability:
 - i. All accounts, invoices, documents and records related to donations and sponsorships must be prepared and maintained with accuracy and completeness.
 - ii. These records serve as evidence that the contributions were made without corrupt or unethical intent.
 - iii. All documentation shall be retained by the Legal & Compliance Department.
 - iv. Refer to the Gifts, Entertainment, Hospitality, Donation & Sponsorship Register (Attachment 7) for tracking and audit purposes.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

10.0 FINANCIAL AND NON-FINANCIAL CONTROLS

To promote fair business practices and mitigate potential conflict of interest, **ENFRASYS** implements separation of duties for both financial and non-financial transactions. All transactions must be accurately recorded, and appropriate internal controls must be in place to serve as evidence for all payments and decisions made.

10.1 FINANCIAL CONTROLS

- a. Financial controls are designed to ensure that all financial transactions are:
 - i. Accurate, complete and timely.
 - ii. Approved through tiered levels of authority with higher levels required for larger or high-risk transactions.

- b. Cash is a common medium for bribery and corruption. Therefore:
 - i. Its use in daily operations is restricted unless absolutely necessary.
 - ii. Reimbursements are only made based on official receipts.
 - iii. All financial payments, especially cash transactions, must be clearly documented with a traceable audit trail.

- c. Large or abnormal claims must be reviewed to ensure they fall within agreed limits.
- d. All claims must be supported by complete documentation and necessary approvals.
- e. Under Section 18 of the MACC Act 2009, it is offence to intentionally deceive by submitting false claims or documents.
- f. **ENFRASYS** reserves the right to:
 - i. Take disciplinary action, including termination of employment.
 - ii. Report the offence to relevant enforcement agencies if deemed necessary.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES					
Document No	:	ENFRASYS/ABMS/P02	Rev	:	03
Effective Date	:	20 January 2026			

10.2 NON-FINANCIAL CONTROLS

- a. Non-financial controls are essential to ensure that procurement, operational and commercial activities are conducted ethically and transparently.
- b. Given the high corruption risk in procurement **ENFRASYS** adopts the following practices:
 - i. Contracts are awarded through a competitive bidding process involving at least three (3) bidders.
 - ii. The successful bidder is selected based on best fit to **ENFRASYS's** needs not personal relationships or influence.
- c. To prevent conflict of interest and abuse of authority:
 - i. Operational staff requesting goods or services must be separated from those conducting procurement or processing payments.
 - ii. This segregation ensures independent decision-making and reduces bribery risks.
- d. Multiple levels of review and approval must be in place to ensure compliance with internal controls.
- e. All actions must be strictly following the Limit of Authority documents.
- f. Any breach or deviation from these controls must be immediately reported to the Legal & Compliance Department.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

11.0 COMMUNICATION AND TRAINING

ENFRASYS is committed to raising awareness and educating its persons associated and business associates on the importance of complying with its stance on anti-bribery and corruption. This includes understanding the consequences of bribery and corruption offences for both the organization and individuals.

11.1 INTERNAL STAKEHOLDERS

a. Internal stakeholders (i.e., persons associated with **ENFRASYS**) represent the **ENFRASYS** in all business dealings and interactions with external stakeholders, carrying **ENFRASYS'** image and reputation. Therefore, appropriate and continuous communication and training on anti-bribery and corruption will be provided throughout their engagement with **ENFRASYS**, including but not limited to:

- Candidate interviews for employees and Board of Directors;
- Appointment of employees and Board of Directors;
- Open and transparent communication during employment regarding anti-bribery and corruption practices;
- Role-specific training and awareness programs based on corruption risk assessment;
- Anti-Bribery and Corruption Policy awareness tests for employees classified as “High Risk”;
- Awareness on securing and sharing company-related information, including consequences of breaching confidentiality;
- Integration of integrity and ethical conduct into annual performance appraisals and recognition programs;
- Disciplinary actions such as advising, counseling, reprimand/warning, or termination for breaching this, Policy;
- Mechanisms for raising concerns by internal stakeholders.

b. The Group Chief Executive Officer (GCEO) is responsible for ensuring that **ENFRASYS'** anti-bribery and corruption stance and measures are effectively communicated, understood, and adhered to by all persons associated.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

c. Communication and training for internal stakeholders shall be evidenced and documented, including but not limited to:

- Employment Appointment Letters or Contracts;
- **ENFRASYS** Employee Handbook;
- **ENFRASYS** Code of Business Conduct;
- **ENFRASYS** Anti-Bribery Management System;
- **ENFRASYS** Anti-Bribery and Corruption Policy and Guidelines;
- Background Declaration Forms;
- Reprimand / Warning / Notification Letters;
- Training Plans, Attendance Forms and Training Certificates;
- Training Course Materials.

11.2 EXTERNAL STAKEHOLDERS

- a. Any Person Associated with **ENFRASYS** who engages with Business Associate, donation recipients, or sponsorships beneficiaries represent **ENFRASYS** image, reputation and brand.
- b. Such interactions may expose **ENFRASYS** to corporate liability risks under Section 17A of the MACC Act 2009 (Amendment 2018).
- c. To mitigate the bribery risks, **ENFRASYS** incorporates continuous communication and training on its ABMS and ABAC Policy and Guidelines throughout stakeholder engagement. This includes:
 - i. Assessing Business Associates, donation recipients and sponsorship beneficiaries before engagement to identify bribery and corruption risks;
 - ii. Appointing and approving Business Associates, donation recipients and sponsorship beneficiaries through **ENFRASYS**'s established approval processes;
 - iii. Maintaining open and transparent communication during the

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

- engagement, including clear expectations on ethical conduct and compliance with ABAC requirements;
- iv. Providing appropriate training or awareness on ABMS and the ABAC Policy and Guidelines, considering the level of identified bribery and corruption risk;
 - v. Reviewing performance and recognizing ethical behavior and integrity in business dealings, where applicable;
 - vi. Taking appropriate action in the event of non-compliance, including advisory, warning, suspension or termination of the engagement; and
 - vii. Providing accessible channels for external stakeholders to raise concerns or report suspected bribery or corruption.
- d. The communication and training provided to Business Associates in relation to ENFRASYS’s anti-bribery and anti-corruption principles and control measures should be properly documented and maintained as evidence of compliance. Such documentation includes, but is not limited to, the following:
- i. Letters of appointment, contracts, or agreements with external parties;
 - ii. Acknowledgement of the Code of Business Conduct;
 - iii. ENFRASYS’s ABMS documentation;
 - iv. ENFRASYS’s ABAC Policy and Guidelines;
 - v. Background and integrity declaration forms;
 - vi. Reprimand, warning or notification letters issued for non-compliance, where applicable;
 - vii. Training plans, training attendance records and training certificates;
 - viii. ABAC messages communicated through ENFRASYS’s website, brochures and official email communications; and
 - ix. Training and awareness materials related to ABAC.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES					
Document No	:	ENFRASYS/ABMS/P02	Rev	:	03
Effective Date	:	20 January 2026			

12.0 WHISTLEBLOWING

- a. Any person including Directors, Employees, Third Parties, or members of the public who becomes aware of or suspects an ongoing or potential violation of this Policy is strongly encouraged to report the matter through the designated whistleblowing channel as outlined in the **ENFRASYS's** Whistleblowing Policy (ENFRASYS/ABMS/P04).

- b. All whistleblowers will be accorded confidentiality and protection when a disclosure is made in good faith and without malicious intent.

- c. **ENFRASYS** strictly prohibits retaliation, discrimination, or adverse action against any whistleblower who reports concerns in good faith.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

13.0 CONFLICT OF INTEREST

All Persons Associated with **ENFRASYS**, and its Business Associates should be alert to any business activity that competes or conflicts, or is perceived to compete or conflict, with the interest of the **ENFRASYS**.

13.1 TYPES OF CONFLICT

Conflict of interest may arise in various situations, including but not limited to the following:

13.1.1 OTHER BUSINESS INTEREST

Situations where an Employee's personal financial or business involvement may compete with, or conflict against, the **ENFRASYS**'s interest. Examples include:

- a. Making personal investments that create a conflict between the Employee's interest and the **ENFRASYS**'s interest.
- b. Failing to dedicate full effort to the **ENFRASYS**'s business during official working hours.
- c. Allowing external business activities conducted outside **ENFRASYS** working hours to interfere with the Employee's ability to perform duties effectively.
- d. Holding ownership or involvement (directly or indirectly, whether financial or otherwise) in entities with which the **ENFRASYS** currently does or intends to do business, including customers, partners, suppliers, contractors, regulators, and government agencies.
- e. Holding ownership or involvement (directly or indirectly, whether financial or otherwise) in entities that compete with the **ENFRASYS**'s business.
- f. Diverting business opportunities away from the **ENFRASYS**, causing potential or actual loss.
- g. Failing to disclose or report any interest in another business (direct or indirect, financial or otherwise) to the **ENFRASYS**.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

13.1.2 OTHER EMPLOYEMENT

Engaging in secondary employment or external work that may interfere with an Employee’s ability to perform their duties or create a divided loyalty. Example include:

- a. Being employed by or having an interest in another company (secondary, temporary, casual, or other) that conflicts directly with the Employee’s role, responsibilities, or **ENFRASYS’s** business, without first declaring the potential conflict and obtaining prior written approval from Management;
- b. Accepting any form of employment, contractual arrangement, or business activity with a third party without first obtaining written consent and approval from Management.

13.1.3 CORPORATE DIRECTORSHIP

Holding a directorship, advisory, or senior management role in another company that could compromise impartiality or create a conflict with the **ENFRASYS’s** business. Example include:

- a. Holding shares or equity in another company, firm, or business, or serving on a Board of Directors or committee, without declaring the potential conflict and obtaining prior written approval from Management.

Note: *Exceptions are permitted for directorships in public service or not-for-profit organizations (e.g., charitable, social, cultural, educational, or religious entities), provided such roles do not interfere with the Employee’s duties at **ENFRASYS**.*

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

13.1.4 TRADING IN “ANYTHING IN VALUE”

Engaging in buying, selling, or trading activities that exploit **ENFRASYS** information, assets, or position for personal gain. Examples include:

- a. Accepting or soliciting gifts, favors, or services that could improperly influence official duties;
- b. Offering, requesting, or accepting bribes or other improper financial advantages. Employees must not provide or receive anything of value to secure business or any form of advantage (financial or otherwise). “Anything of Value” includes, but is not limited to, cash, gifts, entertainment, charitable or political contributions, and offers of employment or internships for clients, government officials, or their associates;
- c. This prohibition applies to government officials, Employees of state-owned entities, clients, suppliers, and any party with whom **ENFRASYS** conducts or intends to conduct business;
- d. Accepting from any person or party with business dealings with **ENFRASYS**:
 - Any form of payment or gift;
 - Any favor that could create an obligation toward that person or party.

13.1.5 PERSONAL OR PRIVATE RELATIONSHIP

Close personal, family, or intimate relationships that may influence or appear to influence professional judgment or decision-making within the Company. Example include:

- a. Having a family member employed by **ENFRASYS** or Business Associate, Customer or holding ownership (directly or indirectly) in entities with which **ENFRASYS** currently does or intends to do business, or that operate in the same or similar industry.

Note: For this purpose, “family member” refers to:

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

- i. Spouse of the Employee;
- ii. Parents or parents-in-law of the Employee;
- iii. Children, children-in-law, or grandchildren of the Employee;
- iv. Siblings of the Employee;
- v. Nephews, nieces, uncles, or aunts of the Employee.

13.2 DISCLOSING CONFLICTS

- a. Determining whether an actual or potential conflict of interest exists depends on the specific facts and circumstances of each case. All Employees are required to disclose any actual or potential conflict of interest promptly by submitting a completed Conflict of Interest Declaration Form for Employees to the Legal & Compliance Department.
- b. Employees who are uncertain about whether a situation constitutes a conflict of interest are advised to seek clarification from the following before proceeding:
 - Their Head of Department
 - Legal & Compliance Department
 - People, Culture and Corporate Services
- c. If a conflicting activity has already commenced, the Employee must immediately cease the activity and disclose the matter without delay.
- d. For Business Associates must follow the Code of Business Conduct for Business Associates, including the conflict disclosure requirements as part of their engagement with **ENFRASYS**.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

13.3 REMEDIAL ACTION

- a. **ENFRASYS** reserves the right to take appropriate disciplinary action against any Employee found to be in breach of the **ENFRASYS**'s rules, regulations, policies, procedures or accepted practices whether explicitly stated or implied.

- b. All remedial actions shall be taken in accordance with applicable laws and recognized internal procedures. Depending on the severity and nature of the breach, **ENFRASYS** may implement one or more of the following measures:
 - i. **Recusal** : Requiring the Employee to abstain from any decision-making related to the conflict.
 - ii. **Non-Lobbying** : Prohibiting the Employee from advocating or lobbying for the entity or interest in conflict.
 - iii. **Conflict Removal** : Addressing the conflict via divestment of interest, reassignment, or resignation from the conflicting position.
 - iv. **Reporting to Authorities** : Referring the matter to relevant enforcement agencies if the breach involves potential criminal conduct.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES			
Document No	:	ENFRASYS/ABMS/P02	Rev : 03
Effective Date	:	20 January 2026	

14.0 RECORD KEEPING

ENFRASYS is committed to maintain accurate, secure and accessible records related to its ABAC program. All documents and records must be managed in accordance with internal controls to ensure integrity, confidentiality and traceability.

14.1 ACCESS CONTROL

- a. All ABAC related policies and procedures shall be stored in a secure location with restricted access to prevent unauthorized modifications.
- b. Documents classified as Highly Confidential shall be subject to enhanced security measures to limit access to unauthorized personnel only.
- c. Audit trails must be maintained to monitor historical access and changes to documents.
- d. The Legal & Compliance Department shall have overall responsibility for document control and record keeping of all ABAC related materials including this Policy and all associated documents.

14.2 DOCUMENT CONDITION AND PRESERVATION

- a. The Legal & Compliance Department shall periodically inspect the condition of stored documents and records to prevent damage, deterioration or loss.
- b. Records generated from ABAC procedures such as policy acknowledgments, due diligence checklist, conflict of interest declarations, anti-corruption statements, training records and gift registrars must be securely stored and backed up regularly.
- c. All records must be controlled to ensure they are adequately protected and readily retrievable when required.
- d. The respective Head of Department from which these records originate shall be responsible for the safekeeping and integrity of those records.

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES					
Document No	:	ENFRASYS/ABMS/P02	Rev	:	03
Effective Date	:	20 January 2026			

15.0 CLARIFICATIONS

For any clarification regarding this ABAC Policy, Employees should consult the Legal & Compliance Department. Additional queries or information requests may be submitted via email to legal@enfrasys.com.

16.0 ACKNOWLEDGEMENT AND ACCEPTANCE

All Employees must acknowledge and accept this ABAC Policy by signing the Integrity Declaration Form for Employees (Attachment 1).

ANTI-BRIBERY AND ANTI CORRUPTION POLICY AND GUIDELINES					
Document No	:	ENFRASYS/ABMS/P02	Rev	:	03
Effective Date	:	20 January 2026			

END OF DOCUMENT

Name ("I"):	
Designation:	

1. I agree to comply with all applicable laws, regulations, and company policies in the conduct of my duties at ENFRASYS Group (hereinafter referred to as "ENFRASYS").
2. I agree to abide by the terms and conditions of my employment with ENFRASYS, including but not limited to: -
 - any official contract, letter of offer, letter of appointment, engagement letter, or any other official document of similar effect; and
 - the Employee Code of Conduct and all relevant company policies and procedures, including the company's Anti-Bribery and Anti-Corruption Policy and Guidelines.
3. I agree to perform my duties in an ethical manner and shall not engage in any bribery, corruption, or improper conduct in the course of my role at ENFRASYS.
4. I understand that failure to comply with Items 1 to 3 above may result in ENFRASYS reviewing my employment status, which may lead to disciplinary action, dismissal, and/or reporting to the relevant authorities.
5. I declare that:
 - I **DO NOT** have any actual, potential, or perceived conflict of interest with ENFRASYS or any other stakeholders of the Company's business.
 - I **DO** have actual, potential, or perceived conflict(s) of interest, which have been fully disclosed in the Conflict of Interest Declaration Form.

(Tick whichever is applicable)

I agree to notify ENFRASYS, as soon as practicable, of any new, emerging, or changed actual, potential, or perceived conflict of interest that may arise.

6. I declare that:

- I declare that I have **NEVER** been convicted of any criminal offence, other than traffic offences (if any).
- I declare that I **HAVE** been convicted of criminal offence(s) (other than traffic offences), as detailed below.

(Tick whichever is applicable)

To provide a brief description of offences convicted (other than traffic offences):

I declare that all information provided in this Form is, to the best of my knowledge and belief, true, complete, and accurate.

I understand that if any information is found to be untrue, incomplete, or inaccurate, ENFRASYS reserves the right to review my employment or business relationship with the Company, which may result in disciplinary action, dismissal, cessation of business relationship, and/or reporting to the relevant authorities.

Name :

Designation :

Signature :

Date :

Name of Authorized Representative (“I”):	
Designation:	
Name of Organization Represented (the “Entity”)	
Company Registration Number	
Nature of Business Relationship with ENFRASYS	

1. The Entity declares that it agrees to comply with all applicable laws, regulations, and legal requirements in the conduct of its business or services in relation to the businesses and operations of ENFRASYS Group (hereinafter referred to as “ENFRASYS”).
2. The Entity declares that it agrees to abide by the terms and conditions governing its business relationship with ENFRASYS, with reference to: -
 - any official contract, letter of offer, letter of appointment, engagement letter, or any official document of similar effect; and
 - ENFRASYS’ Code of Business Conduct and relevant policies and procedures, including ENFRASYS’ Anti-Bribery and Corruption Policy and Guidelines.
3. The Entity declares that it agrees to conduct business in an ethical manner and shall not engage in any bribery, corruption, or improper conduct when doing business with, for, or on behalf of ENFRASYS.

4. The Entity acknowledges that if it fails to comply with any part of Items 1 to 3, ENFRASYS reserves the right to review and take appropriate action in relation to the business relationship, including contracts, appointments, or engagements, which may result in termination, cessation of business relationship, and/or reporting to the relevant authorities.

5. The Entity declare that:

- It **DOES NOT** have any actual, potential, or perceived conflict of interest with ENFRASYS or any other stakeholders of the Company's business.
- It **DOES** have actual, potential, or perceived conflict(s) of interest, which have been fully disclosed in the Conflict of Interest Declaration Form.

(Tick whichever is applicable)

The Entity agrees to notify ENFRASYS, as soon as practicable, of any new, emerging, or changed actual, potential, or perceived conflict of interest that may arise.

6. The Entity declares that:

- It has **NEVER** been convicted of any criminal offence, other than traffic offences (if any).

- It **HAS** been convicted of criminal offence(s) (other than traffic offences), as detailed below.

(Tick whichever is applicable)

To provide a brief description of offences convicted (other than traffic offences):

7. I/We confirm that I/We am/are duly authorised to make this declaration and to bind the Entity to the statements made in this Form.

The Entity declares that all information provided in this Form is, to the best of the authorised representative's knowledge and belief, true, complete, and accurate.

The Entity understands that if any information is found to be untrue, incomplete, or inaccurate, ENFRASYS reserves the right to review the business relationship, including but not limited to contracts, appointments, or engagements, which may result in termination, cessation of business relationship, and/or reporting to the relevant authorities.

Name :

Designation :

Signature :

Date :

Organization Stamp :

OBJECTIVE

Ascertain if a business partner or staff holding certain portfolio (ENTITY) has potential corruption risks or been involved in or has association with any past bribery or corruption activities.

CRITERIA

The following criteria are used on **ENTITY** to determine if a due diligence exercise is performed:

A. For Business Associates:

- i. Entities without any prior record of doing business with the Company
- ii. **Partner/Vendor/Supplier** where their contribution to the project is valued at > **RM 40,000.00**.
- iii. External persons who hold positions of influence which can potentially expose the Company to higher corruption risks such as public officials, agents, consultants, brokers or persons who are connected to them; or
- iv. Any other stakeholder the Company deems "High risk".

METHODOLOGY

The Due Diligence exercise involves asking **a set of 16 questions on ENTITY** which covers the following dimensions:

- 1. Background**
Examines if ENTITY is or has been associated with bribery or corruption activities.
- 2. Controls**
Determines the strength of the anti-bribery and anti-corruption systems practiced by ENTITY.
- 3. Relationship**
Identifies if ENTITY has any link to persons of interest who may have conflict with ENFRASYS.
- 4. Finances**
Does the ENTITY practise financial behaviour which is not normal and can raise red flags.

The responses to these questions will determine the result of ENTITY's Due Diligence.

DUE DILIGENCE ON *(entity name)* :

CONDUCTED BY:

Name : _____

Designation : _____

Department : _____

Date : _____

Signature

Instructions:

1. The result and any additional information collected from the Due Diligence exercise must be recorded in the attached Due Diligence Form.
2. Based on the responses, indicate if ENTITY is a potential corruption risk to ENFRASYS
3. This exercise must be conducted at least once for all business partners with which ENFRASYS has a business relationship.

DIMENSION	NO.	QUESTION	RESULT (√/X)	INFO (Y/N)
Background	1	Has a recent online search on ENTITY shown any adverse or negative news, reports or articles related to bribery and/or corruption?		
	2	Is ENTITY listed on the current MACC database of convicted corruption offenders?		
	3	Have checks with contacts or companies who may have knowledge or association with ENTITY revealed any adverse or negative news, reports or articles related to bribery and/or corruption?		
	4	Has ENTITY's responses been consistent with official records filed with regulators (e.g. Suruhanjaya Syarikat Malaysia, Bursa Malaysia etc.)?		
	5	Is ENTITY forthcoming in providing all information requested by ENFRASYS?		
Controls	6	Are there internal anti-bribery and anti-corruption policies and controls in place at ENTITY?		
	7	Are these policies and controls sufficiently practiced by both internal staff at ENTITY and extended to external parties who have a business relationship with ENTITY?		
	8	Does ENTITY have its own Due Diligence process and does this process extend to its external parties?		
	9	Has ENTITY had business dealings with third parties who have been involved in bribery and/or corruption?		
Relationship	10	Does ENTITY have any personal/professional relationship with key persons in ENFRASYS who can influence decisions in favour of ENTITY?		
	11	Does ENTITY have any personal/professional relationship with key public officials who may have been or are currently involved in ENFRASYS?		

		business?		
	12	Was ENTITY recommended by or suggested to ENFRASYS by a public official? If yes, identify the public official.		
Finances	13	Does ENTITY have a record of making large cash payments to unidentified parties for unclear reasons?		
	14	Does ENTITY have a record of making cash payments to unidentified parties on a regular basis?		
	15	Are the rates charged by ENTITY much higher than the industry average or exceed the true value of its services?		
	16	Does ENTITY frequently request for payments on an urgent basis or demand high commission rates?		

INTERNAL USE ONLY

Decision of Due Diligence exercise on ENTITY (choose only one of the following):

- A. **Passed** – recommend continuing business relationship/appointment

- B. **Passed with conditions** – recommend conducting periodic Due Diligence and/or company submitting regular declaration on anti-corruption

- C. **Pending** - on hold while awaiting additional information from ENTITY

- D. **Failed** – recommend not proceeding with/terminating business relationship/appointment

Additional Comments (if any - please use additional pages if necessary)

APPROVED BY

Name : _____

Designation : _____

Department : _____

Date : _____

Signature

OBJECTIVE

Ascertain if an EMPLOYEE holding a certain portfolio has potential corruption risks or has been involved in or associated with any past bribery or corruption activities.

METHODOLOGY

The Due Diligence exercise involves asking a set of questions about the EMPLOYEE, covering the following dimensions:

1. Background Check

Verify if the EMPLOYEE has any criminal records, financial irregularities, or negative references.

2. Conflict of Interest

Identify and detail any potential conflicts of interest the EMPLOYEE may have.

3. ABAC Policy Awareness

Confirm if the EMPLOYEE acknowledges the company's ABAC policy.

4. Gifts and Hospitality

Check if the EMPLOYEE has received any gifts or hospitality in the last 12 months and provide details.

5. Third-Party Interactions

Determine if the EMPLOYEE has had any interactions with government officials and describe them.

The responses to these questions will determine the result of EMPLOYEES'S Due Diligence.

DUE DILIGENCE ON:

CONDUCTED BY:

Name : _____

Designation : _____

Department : _____

Date : _____

Signature

Instructions:

1. The result and any additional information collected from the Due Diligence exercise must be recorded in the attached Due Diligence Form.
2. Based on the responses, indicate if EMPLOYEE is a potential corruption risk to ENFRASYS.
3. This exercise must be conducted at least once for all EMPLOYEEES holding key positions within ENFRASYS.

VERIFIED BY (LEGAL & COMPLIANCE):

Name : _____

Designation : _____

Department : _____

Date : _____

Signature

Section 1: Background Check

A. Criminal Record Check

Completed Pending Not Applicable

B. Financial Background Check

Completed Pending Not Applicable

C. Reference Check

Completed Pending Not Applicable

Section 2: Conflict of Interest

A. Disclosure of Potential Conflicts

No Yes (If yes, provide details below)

B. Details of Potential Conflicts

Section 3: ABAC Policy Awareness

A. ABAC Policy Awareness Completed

Yes (Date: _____)

No

Section 4: Gifts and Hospitality

A. Gifts Received in the Last 12 Months

Yes (If yes, provide details below)

No

B. Details of Gifts

C. Hospitality Received in the Last 12 Months

Yes (If yes, provide details below)

No

D. Details of Hospitality

Section 5: Third-Party Interactions

A. Interactions with Government Officials

Yes (If yes, provide details below)

No

B. Details of Interactions

Section 6: Declaration

I, _____, hereby declare that the information provided in this form is true and accurate to the best of my knowledge. I understand that any false information may result in disciplinary action.

Full Name: _____

Position: _____

Department: _____

Date of Hire: _____

Report To: _____

***To be filled by Authorised Approver**

Decision of Due Diligence exercise on EMPLOYEE (choose only one of the following):

- D. **Passed** – recommend continuing employment/appointment.
- E. **Passed with conditions** – recommend conducting periodic Due Diligence and/or employee submitting regular declaration on anti-corruption.
- F. **Pending** - on hold while awaiting additional information from EMPLOYEE.
- G. **Failed** – recommend not proceeding with/terminating employment/appointment.

Additional Comments (if any - please use additional pages if necessary)

APPROVED BY

Name : _____
Designation : _____
Department : _____
Date : _____
Signature : _____

PLEASE TICK (✓) THE FOLLOWING RELEVANT CATEGORIES APPLIED:

GIFTS		HOSPITALITY		DONATION		SPONSORSHIP	
-------	--	-------------	--	----------	--	-------------	--

DETAILS OF EMPLOYEE GIVING / RECEIVING OF GIFTS / HOSPITALITY / DONATION / SPONSORSHIP

TO BE FILLED IN BY RECEIVER / REQUESTOR			
Employee Name		Department / Business Unit	
Signature		Date	

*GIVING		* RECEIVING / BEING OFFERED	
Public Official	Yes / No	# Value / Estimated Value	
Description of the Gifts / Hospitality / Donation / Sponsorship			
# Details / Remarks			
Name of receivers / givers <i>(Please provide a list should the space provided not sufficient)</i>	Company	Designation	

*Please (✓) where relevant

Attach supporting documents where applicable.

APPROVAL

TO BE APPROVED BY GCEO / GCFO / GCOO				
(please refer to approval authority stated in our Anti-Bribery & Anti-Corruption (ABAC) Policy & Guidelines)				
Name				
Decision	Approve & Accept / Acknowledge		Decline & Return	Decline & Charity
Reason				
Signature		Date		

Note: ALL gifts and/or hospitality shall be approved in advance by **Authorized Signatories** as per the approved Policy.

FOR OFFICE USE	SERIAL NO.:	
-----------------------	--------------------	--

(The table below is applicable for gifts to be declined / returned to third party or for gifts to be distributed as charitable donation)

TO BE FILLED IN BY MARKETING & CORP.COMM. / EMPLOYEE			
Name of Charity Home /Organization			
Name		Position	
Signature		Date	

DETAILS OF EMPLOYEE GIVING / RECEIVING OF ENTERTAINMENT

TO BE FILLED IN BY RECEIVER / REQUESTOR			
Employee Name		Department / Business Unit	
Signature		Date	

*GIVING			
Public Official	Yes / No	#Value / Estimated Value	
Type of Entertainment			Approval by
Management <ul style="list-style-type: none"> Executive and above 		Business Meal (Below 10 pax) <i>Not more than RM100/person/occasion</i>	Head of Department
		Business Meal (10 pax and above) <i>Not more than RM100/person/occasion</i>	Group Chief Financial Officer
Top Management <ul style="list-style-type: none"> Head of Departments Top Management 		Business Meal <i>Not more than RM500/person/occasion</i>	Group Chief Financial Officer
		Golfing	Group Chief Financial Officer
# Details / Remarks			

*RECEIVING / BEING OFFERED			
Public Official	Yes / No	#Value / Estimated Value	
Description of the Entertainment			
# Details / Remarks			

Name of receivers / givers <i>(Please provide a list should the space provided not sufficient)</i>	Company	Designation

APPROVAL

TO BE APPROVED BY HEAD OF DEPARTMENT / GROUP CHIEF FINANCIAL OFFICER			
Name			
Designation			
Decision	<input type="checkbox"/>	Approve	<input type="checkbox"/>
			Decline
Reason			
Signature			Date

Note: ALL entertainment shall be approved in advance by **Authorised Signatories** as per the approved Policy.

FOR OFFICE USE	SERIAL NO.:	
-----------------------	--------------------	--

CONFLICT OF INTEREST DECLARATION FORM

This declaration form is in accordance with the Enfrasys Group's Anti-Bribery & Anti-Corruption (ABAC) Policy & Guidelines. Business Associates and/or Employees must declare all the perceived, potential and actual conflict of interest. Where a conflict arises that has not been declared, you are required to make a declaration of such conflict of interest within seven (7) working days from the day the said COI arises. Once the form is filled out, it should be forwarded to the Human Resources & Administrations Department for validation. Following this, the form will be confidentially maintained by the Legal & Compliance Department. It's important to note that the Legal & Compliance Department is tasked with preserving a copy of the validated form for auditing purposes. **Please refer to the ABAC policy and Guidelines for reference of the terms.**

Non-compliance:

1. Failure to disclose a conflict of interest, or refusal to resolve or properly manage a conflict, will be treated as a disciplinary matter. Action will be taken in accordance to the disciplinary processes of the Enfrasys Group of Companies.
2. Depending on the circumstances and the severity of the breach, the action taken may involve reporting to enforcement agencies such as the Malaysian Anti-Corruption Commission, the Royal Malaysian Police, and/or equivalent authorities for further action.

CONFLICT OF INTEREST DISCLOSURE STATEMENT.

PART A: DETAILS OF EMPLOYEE / OFFICER			
Name		Department	
Employee ID		Position	
NRIC		Joined Date	

I hereby declare that I have read and understand the Enfrasys Group's Conflict of Interest Declaration Form and I understand that should any new conflict of interest arise and if there is an important change to an existing conflict of interest, I am required to report this promptly and complete the Conflict of Interest Declaration Form.

(Please tick boxes if applicable)

Num	Types of Conflict	Tick if Applicable
1.	Other Business Interest	
2.	Other Employment	
3.	Corporate Directorship	
4.	Trading in 'Anything of Value'	
5.	Personal or Private Relationship	



**ENFRASYS GROUP OF COMPANIES
CONFLICT OF INTEREST DECLARATION FORM**

(ENFRASYS/P/LC/02/F/007/R00)

ACKNOWLEDGEMENT

To the my best of knowledge, the information provided on this form is complete disclosure of any known or potential Conflicts of Interest that I may have in relation to my position at Enfrasys Group of Companies.

I accept full responsibility if the information provided is found to be false or misleading.

.....

Name:

Date:

CONFLICT OF INTEREST DECLARATION FORM

This declaration form is in accordance with the Enfrasys Group’s Anti-Bribery & Anti-Corruption (ABAC) Policy & Guidelines. Business Associates must declare all the perceived, potential and actual Conflict of Interest (“COI”). Where a conflict arises that has not been declared, you must declare such conflict of interest within seven (7) working days from the day the said COI arises. Once the form is filled out, it should be forwarded to the Business Development / Procurement Department for validation. Following this, the form will be confidentially maintained by the Legal & Compliance Department. It’s important to note that the Legal & Compliance Department is tasked with preserving a copy of the validated form for auditing purposes.

Non-compliance:

1. Failure to disclose a conflict of interest, or refusal to resolve or properly manage a conflict, will be treated as a disciplinary matter. Action will be taken in accordance with the disciplinary processes of the Enfrasys Group of Companies.
2. Depending on the circumstances and the severity of the breach, the action taken may involve reporting to enforcement agencies such as the Malaysian Anti-Corruption Commission, the Royal Malaysian Police, and/or equivalent authorities for further action.

CONFLICT OF INTEREST DISCLOSURE STATEMENT.

PART A: DETAILS OF BUSINESS ASSOCIATES			
Company Name		Business Registration No	
Representative’s Name		Designation	
NRIC / Passport No.		Department	

I hereby declare that I have read and understand the Enfrasys Group's Conflict of Interest Declaration Form and I understand that should any new conflict of interest arise and if there is an important change to an existing conflict of interest, I am required to report this promptly and complete the Conflict-of-Interest Declaration Form

(Please tick boxes if applicable)

NO.	CONFLICT OF INTEREST SITUATIONS	TICK IF APPLICABLE
1	Do you or any family members or person associated have any personal or private dealings with Enfrasys Group of Companies?	
2	Do you have any financial or personal gain from the transaction or dealing with Enfrasys Group of Companies, or did you receive any financial or personal benefits, such as gifts, salary, fees, loans or guarantees of obligations, free service or discounts?	
3	Do you have an opportunity for personal gain through your position or using Enfrasys Group's facilities, equipment, systems or other properties?	
4	Are any of your family members employees of the Enfrasys Group of Companies?	
5	Are you aware of any other events, transactions, or situations that have occurred or may occur in the future that you believe should be brought to the attention of the Enfrasys Group's Board of Directors?	

ACKNOWLEDGEMENT

I hereby affirm that the information filled in this form is a disclosure of any real or potential conflicts of interest that could impact on my association with Enfrasys Group of Companies. I acknowledge and accept that I will be held accountable if any of the disclosed information is subsequently discovered to be false or misleading.

.....

Signature

Representative's Name : _____

Date : _____

Company's Name : _____

Company's Stamp : _____