



SHIN YANG GROUP BERHAD

Registration No: 200401027554 (666062-A)

(Incorporated in Malaysia)

ANTI-BRIBERY & CORRUPTION POLICY (ABC POLICY)

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This document is authorised and endorsed by the signed signatory below for distribution and implementation applicable to all companies

Captain Ting Hien Liong
Chief Executive Officer

Ling Chiong Sing
Group Managing Director

Datuk James Ling Lu Kiong
Group Executive Vice Chairman

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ANTI-BRIBERY & CORRUPTION POLICY

1. POLICY STATEMENT

- 1.1. SHIN YANG GROUP BERHAD (“**SYGROUP**”) and its group of companies (“**the Group**”) is committed to conduct business in compliance with the laws of the jurisdictions in which the Group operates.
- 1.2. The Group adopts a zero-tolerance policy against all forms of bribery and corruption.
- 1.3. The Board of Directors (“**The Board**”) had developed the Anti-Bribery & Corruption Policy (“**ABC Policy**”) to set forth the Group’s core principles, policy requirements and procedures to ensure compliance with applicable anti-bribery and corruption laws.

2. OBJECTIVE

- 2.1. The purpose of the ABC Policy is to provide information and guidance to the Directors, employees and business associates on standards of behaviour and to uphold their responsibilities to which must be adhered to, recognised, as well as dealing with bribery and corruption

3. SCOPE

- 3.1. The Policy is intended to apply to:-
 - a) Directors (Executive and non-executive) of the Group;
 - b) Employees of the Group include all senior management and executive; and
 - c) Contractors, consultants, vendors, suppliers, agents, partners and third parties who perform services for or on behalf of the Group (“**Business Associates**”)

4. DEFINITIONS

- 4.1. **Bribery** is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of money, gifts, loans, fees, rewards or other advantages (taxes, services, donations, favours etc.)
- 4.2. **Corruption** is the abuse of entrusted power for a private gain.
- 4.3. **Corrupt practices** include accepting gratification, corruptly procuring tenders, bribing officers of public institutions and using an office or position for personal gratification.

5. GUIDANCE ON BRIBERY AND CORRUPTION

5.1. Gifts and Hospitality

The Directors, employees and business associates of the Group should not accept or give any forms of gifts, and hospitality.

The group recognises that the exchange of business courtesies, during festive periods particular is customary and legitimate to create goodwill and/or strengthen business and commercial relationships, and if done at the correct circumstances and complies with relevant laws, the said action is then acceptable.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the consent of the employee's immediate superiors or head of department should be sought.

5.2. Facilitation Payments

Facilitation payments are inducements or incentives given to secure or expedite a routine function that an individual is ordinarily obliged to perform. They are usually small unofficial payments paid to speed up routine administrative processes such as licenses, permits or visas.

We at SYGROUP:

- Prohibit any form of facilitation payments; and
- Must not offer, promise, give, request, or accept anything, which might be regarded as a facilitation payment.

An exception to this prohibition may be tolerated if a facilitation payment is made in the context of an imminent threat i.e. loss of life, limb or liberty. Examples of such exceptional situations:

- You are in a foreign country where its official officer has requested for a small payment from you or else he is going to confiscate your personal belongings and passport, and will take you in custody (threat to personal safety);
- Demand for payment to secure an emergency admission into hospital; or
- Demand for payment when there is a threat to shipment and personal safety or under duress of piracy.

In any circumstances, employees are expected to notify their immediate superiors or head of department when encountered with any requests for a facilitation payment. In addition, if a payment has been made and employees are unsure of the nature, their immediate superior must be immediately notified and consulted. They must also ensure that the payment has been recorded transparently.

5.3. **Political Contribution**

As a general principal, the Group does not provide nor offer monetary or all-kind political contributions to any political parties or candidates for political office.

Payments to a government entity such as payments to the host country's federal treasury required by contract or law, are not prohibited, so long as they are made with due care to the government entity and not to any individual official.

The Group encourages employees to participate in the political election process by voting. Employees may choose to make personal political contributions as appropriate within the limits established by law but under no circumstances should they make any representation that they are doing so on behalf of or with the support of the Group. Under no circumstances, will any employee be compensated or reimbursed in any way by the Group for a personal political contribution.

5.4. **Charitable Contribution and Sponsorships**

Charitable support and donations are acceptable, whether in-kind services, knowledge, time, or direct financial contributions. However, such requests must be carefully examined for legitimacy and decisions must not be made to influence a business outcome.

All charitable contributions must be reviewed and authorised by the Management or the Board where applicable. There must be adequate proof of receipt by the beneficiaries and all records of contributions must be kept by the Group.

5.5. **Dealing with Statutory Authorities**

No payments should be made to statutory officials beyond what is required by law or regulations in order to ensure that smooth transaction through the official process or to ensure that goods are processed in a timely manner.

Be cautious if a statutory official offers a 'fast track' process. This could be another way of asking for a bribe.

Be wary of working with service providers who state that they can solve official issues using their relationship with the authorities.

5.6. **Conduct of due diligence**

To ensure that Business Associates share its stance against bribery and corruption, the Group shall undertake a due diligence process to assess the integrity of the Business Associates, in relation to background checks, document verification or conduct of interviews, as deemed appropriate, before entering into any formalised relationship with them; and

The departments responsible to conduct the relevant due diligence are as follows:

- For onboarding of Board Members - Company Secretariat / Nominating Committee
- For recruitment of Employees - Human Resource Department;
- For empanelling of service providers, agents, contractors, business partners and intermediaries - the respective functional department.

6. ADHERENCE AND COMPLIANCE

- 6.1. The Group is committed to conduct business in a ethical manner and shall comply with all applicable laws and regulations set by the government. All Directors and employees are required to read, understand and comply with the ABC policy. A breach of any provisions of the Policy may result in disciplinary action.
- 6.2. Business associates who have partaken in the non-compliant act may be subjected to blacklisting, termination of contracts, and exposure to legal action, wherein the Group's interest have been impacted by the non-compliance of individuals or organisations.

7. RECORD KEEPING

- 7.1. The Group shall keep detailed and accurate financial records and shall have appropriate internal controls in place to act as evidence for all payments made. The Group shall declare and keep a written record of the amount and reason for gifts, hospitality, donations and sponsorships accepted and given and understand that such expenses or incomes are subjected to management review.

8. CONFIDENTIALITY AND PROTECTION

- 8.1. Should you have any suspicious, or have any reasonable belief that the Policy has been breached or violated, you may report your concerns to your immediate superiors or Head of Department, or where that is not possible, to the Head of Human Resource.
- 8.2. No individual shall be discriminated against or suffer in any manner of retaliation for raising one's genuine concerns or reporting for the sake of goodwill. All reports against suspected violations of the ABC policy shall be treated confidentially.

9. REVIEW OF POLICY

- 9.1. The Board will monitor compliance of the ABC Policy and review the ABC Policy regularly to ensure that it continues to remain relevant and appropriate.

Last updated on 06.12.2023