

## ANTI-CORRUPTION POLICY

### INTRODUCTION

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Sunzen Biotech Berhad and its group of companies (“**Sunzen Group**”) has adopted a zero tolerance policy against all forms of bribery and corruption. The Sunzen Group anti-bribery and corruption policy (“**AC Policy**”) elaborate upon those principles, providing guidance to employees and it is also intended to apply to every director (executive and non-executive) concerning how to deal with improper solicitation, bribery and other corrupt activities and issues that may arise in the course of business.

This AC Policy is not intended to provide definitive answers to all questions regarding bribery and corruption. Rather, it is intended to provide employees with a basic introduction to how Sunzen Group combats bribery and corruption as part of Sunzen Group’s commitment to lawful and ethical behaviour at all times.

If you have any doubt about the scope of applicable laws or the application of Sunzen Group’s policies concerning the fight against bribery and corruption, you should contact Sunzen Group’s human resources department immediately.

Engaging in bribery or corrupt practices can have severe consequences for you and for Sunzen Group. You may face dismissal, fines and imprisonment, and the company may face damage to reputation, financial loss and disbarment from business and other negative consequences.

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### 1. Definitions

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<b>“Act”</b>	means the Malaysian Anti-Corruption Commission Act 2009, as amended from time to time;
<b>“Bribery and Corruption”</b>	<p>means any action which would be considered as an offence of giving or receiving ‘gratification’ under the Act. In practice, this means offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions or a person who is in a position of trust within an organisation.</p> <p>Bribery may be ‘outbound’, where someone acting on behalf of Sunzen Group attempts to influence the actions of someone external, such as a Government official or client decision-maker. It may also be ‘inbound’, where an external party is attempting to influence someone within Sunzen Group such as a senior decision-maker or someone with access to confidential information;</p>
<b>“Business”</b>	means any activity carried on for the purpose of gain or profit and includes all property derived from or used in or for the purpose of carrying on such activity, and all the rights and liabilities arising from such activity;
<b>“Business Associate”</b>	means an external party with whom Sunzen Group has, or plans to establish, some form of business relationship. This may include clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors;
<b>“Conflict of Interest”</b>	means when a person’s own interests either influence, have the potential to influence, or are perceived to influence their decision making at Sunzen Group;
<b>“Corporate Gift”</b>	means something given from one organisation to another, with the appointed representatives of each organisation giving and accepting the gift. Corporate gifts may also be promotional items given out equally to the general public at events, trade shows and exhibitions as a part of building Sunzen Group’s brand. The gifts are given transparently and openly, with the implicit or explicit approval of all parties involved. Corporate gifts normally bear Sunzen Group’s name and logo. Examples of corporate gifts include items such as diaries, table calendars, pens, notepads and plaques;

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<b>“Donation and Sponsorship”</b>	means charitable contributions and sponsorship payments made to support the community. Examples include sponsorship of educational events, supporting NGOs, and other social causes;
<b>“Facilitation Payment”</b>	means any sums of unofficial payment made to secure, expedite or facilitate an ordinary governmental action, process or procedure to a government official;
<b>“Family Members”</b>	means a person’s spouse(s), children (including step-children and adopted children), parents, step-parents, siblings, step-siblings, grandparents, grandchildren, in-laws, uncles, aunts, nieces, nephews, and cousins, as well as any other persons who are members of his/her household;
<b>“Gratification”</b>	means as defined in the Act:  (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 or employment of 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 favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and (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) above;
<b>“Hospitality”</b>	means the considerate care of guests, which may include refreshments, accommodation and entertainment at a restaurant, hotel, club, resort, convention, concert, sporting event or other venue such as Sunzen Group’s offices, with or without the personal presence of the host. Provision of travel may also be included, as may other services such as provision of

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guides, attendants and escorts; use of facilities such as a spa, golf course or ski resort with equipment included;

**“Personnel”** means all directors, consultants and all individuals under the employment of Sunzen Group at all levels, whether permanent, fixed-term or temporary, and wherever located; and

**“Public Officials”** means any official of the Federal Government, state government, government agencies and/or any regulatory, statutory or administrative bodies, whether in Malaysia or foreign.

## 2. ANTI-BRIBERY AND CORRUPTION POLICY

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### 2.1. Zero tolerance policy

Sunzen Group shall ensure that no Personnel engages in acts of Bribery and Corruption and trading in influence in both the public and private sectors and includes their directors, employees, agents and other appointed representatives. Even the possible appearance of Bribery and Corruption is to be avoided, in particular when dealing with Public Officials.

### 2.2. General Principles

All Personnel shall, at all times in making any Business decision affecting Sunzen Group, comply with the following principles:

- (a) strictly comply with the provisions of the Act;
- (b) shall not participate or condone any acts of forms of Bribery and Corruption;
- (c) the prevention, detection and reporting of any Gratification received, Bribery and Corruption and other forms of corruption howsoever arising;
- (d) all Personnel are required to avoid any activity that might lead to, suggest, imply or cause a breach of this AC Policy or the Act;
- (e) always exercise proper care and judgement;
- (f) avoid Conflict of Interest;
- (g) conscientiously maintain the highest degree of integrity and ethics;
- (h) comply fully with all applicable laws, all regulations, procedures and policies issued by Sunzen Group; and

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- (i) notify the management of Sunzen Group as soon as possible if it is believed or suspected that a conflict with this AC Policy has occurred, or may occur in the future, or if they have been offered any form of Gratification, Bribery and Corruption, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

**3. GIFTS**

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3.1. General Principles of Gifts

- (a) Sunzen Group has adopted a “No Gift Policy” and all Personnel (including their Family Members) are prohibited from, directly or indirectly, receiving or providing any Gratification.
- (b) It is the responsibility of the Personnel to inform any Business Associate that Sunzen Group practices a strict “No Gift Policy” and to request such Business Associate understanding and adherence to this AC Policy.
- (c) All Personnel may offer, give, accept or receive gifts that are promotional items of minimal value, normally bearing a company logo and only when it would customary to do so.
- (d) All Personnel shall not offer, give, accept or receive cash or cash equivalent items like gift vouchers etc.

3.2. Exceptions to the “No Gift Policy”

Subject always to obtaining to the prior written approval of Sunzen Group’s MD cum Group CEO :

- (a) Sunzen Group may provide gifts to Business Associate or receive gifts from Business Associate which are of minimal/nominal value (not expensive and extravagant), bearing the company logo and only when it would be customary or reasonable to do so.
- (b) reasonable circumstances where gift may be given or received include the celebration of various festivals in Malaysia.
- (c) any gift given or received must not be made with the intention to improperly influence the Business decision-making by a Business Associate or Personnel to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits towards Sunzen Group or the Personnel;

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- (d) the Personnel shall comply with this AC Policy, the Act and local laws and regulations in all relevant countries;
- (e) the gift received or provided shall not include cash or a cash equivalent;
- (f) the gift shall be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift;
- (g) value of the gift (including entertainment or hospitality) in cumulative offered to or received from each Business Associate ~~in a calendar year~~ shall not exceed Ringgit Malaysia Five Hundred (RM500.00).
- (h) any gift received shall not be illicit, illegal or sexual in nature;
- (i) shall be given or received openly/publicly and not in secretly; and
- (j) in the case of gifts, they must not be offered to, or accepted from the Government, Public Officials or their representatives, politicians or political parties, without the prior approval of Sunzen Group's MD cum Group CEO.

**3.3. Prohibited Gifts**

Employees are prohibited from giving and should immediately decline, reject and return (if received) the following:

- (a) any gift of cash or cash equivalent which includes but is not limited to vouchers, discounts, coupons, shares, commission, digital assets;
- (b) any gifts involving parties engaged or to be engaged in a tender or competitive bidding exercise;
- (c) any gifts that comes with a direct/indirect suggestion, hint, understanding or implication that in exchange for the gift, some expected or desirable outcome is required, irrespective of whether it materialises as anticipated. This includes without limitation receiving or giving a business advantage or obtaining approvals, licenses, permits from the regulatory authorities;
- (d) any gift that would be illegal or in breach of the Act or foreign bribery and corruption laws; and
- (e) any gift which is lavish or excessive, for e.g., valued above the maximum threshold permitted by Sunzen Group.

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Should an employee receive a gift that is not in compliance with such rule, it shall be returned. If that is not possible, the gift must be turned over to Sunzen Group as soon as possible and it will be considered as the property of Sunzen Group and Sunzen Group may deal with the gift as it deems fit.

### 4. ENTERTAINMENT

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#### 4.1. Providing Entertainment

- (a) It is a common practice within the business environment to provide entertainment to foster business relationship. Sunzen Group recognises the need to provide reasonable and proportionate entertainment under appropriate circumstances. Our Personnel may offer appropriate and proportionate entertainment that is legal and reasonable within the scope of their work as part of business networking as well as a measure of goodwill towards the recipients.
- (b) Whilst the act of hospitality through entertainment is a central part of business etiquette, it may create a negative perception if observed or known by others despite selfless motives behind the entertainment provided. Our Personnel must always bear in mind that perception is more important than facts and therefore our Personnel is expected to always exercise proper care and good judgement when providing entertainment to external parties, especially when it involves Government officials.
- (c) Our Personnel must not directly or indirectly provide or offer to provide entertainment with a view to cause undue influence or in exchange for favours or advantages. Such acts are considered a breach of this AC Policy and the Act.

#### 4.2. Accepting Entertainment

- (a) Sunzen Group recognises that occasional acceptance of appropriate and proportionate entertainment provided by Business Associate or other parties in the normal course of business is a legitimate way to network and to build business relationships.
- (b) However, it is important for our Personnel to exercise proper care and good judgement before accepting entertainment offered or provided by Business Associate or other external parties. This is to safeguard Sunzen Group's reputation and avoid allegations of impropriety or undue influence or worse, corruption.
- (c) Our Personnel must at all times conduct themselves with integrity in relation to accepting entertainment from any party. Our Personnel or any of their family members must not accept entertainment in exchange for an exercise or non-exercise of their job function or activity.

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**5. HOSPITALITY**

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5.1. Providing Hospitality

- (a) Sunzen Group recognises that providing Hospitality be it through corporate events, sport events or other public events, is a legitimate way to network, promote goodwill and build business relationships.
- (b) While providing appropriate and proportionate Hospitality is a reflection of Sunzen Group's courtesy and generosity, all Personnel must exercise proper care and good judgement to ensure that the arrangement is legal under applicable laws, made for the right reasons and reasonable in its form and limit. More importantly, it must not be given or give rise to the perception that it is given to obtain business or advantage of any kind or unduly influence the outcome of a Business decision.
- (c) Malaysia and international anti-bribery and anti-corruption laws impose strict restrictions on the value and level of corporate hospitality to be accorded to Public Official. Sunzen Group is committed to complying with all applicable laws and our Personnel must exercise special caution when providing corporate hospitality to public officials. Our Personnel must consult their immediate supervisor when offering any corporate hospitality to Public Official.

5.2. Accepting Hospitality

- (a) As a general principle, our Personnel must not directly or indirectly solicit Hospitality or accept Hospitality of any form that is excessive, inappropriate, illegal or given in response to, in anticipation of, or to influence a favourable business decision. For instance, our Personnel must refrain from accepting Hospitality from Business Associate who are engaged in a tender or competitive bidding exercise of Sunzen Group.
- (b) Notwithstanding the above, Sunzen Group recognises that occasional acceptance of an appropriate level of corporate hospitality given in the normal course of business is usually a legitimate contribution to building good business relationships. However, our Personnel must exercise proper care and good judgement to ensure that the arrangement is legal under applicable laws, made for the right reasons and reasonable in its form and limit. More importantly, it must not be accepted or give rise to the perception that it is accepted to obtain business or advantage of any kind or unduly influence the outcome of a Business decision.

**6. FACILITATION PAYMENT**

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- 6.1. Sunzen Group prohibits Facilitation Payment of any kind save and except in such emergency situations that the Personnel reasonably believes that his or her own or other's life, health or property could be in danger, the restriction of Facilitation Payment and Bribery and Corruption shall not apply.
- 6.2. If such Facilitation Payment is made, the Personnel must immediately report the incident to their direct supervisor and record the details and keep a record of what was paid to Human Resources Department.

## **7. POLITICAL ACTIVITY**

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- 7.1. Sunzen Group does not take political positions or associate with political movements, though we may participate in public debates which are of importance to our strategy and business performance.
- 7.2. Unless specifically approved by Sunzen Group's MD cum Group CEO, Sunzen Group does not make any political donations or contributions to any political parties, politically exposed persons or politically motivated projects. Whilst the Personnel are not restricted to make any personal political contribution in their own personal capacity, Sunzen Group will not make any reimbursement for personal contributions for these personal political contributions back to its Personnel.

## **8. DONATIONS AND SPONSORSHIPS**

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- 8.1. The following are general principles to adhere to in providing Donations and Sponsorships:
  - (a) ensure that such Donations and Sponsorships or other contributions are allowed by the Act or any other applicable laws and regulations, both local and foreign;
  - (b) all request for charitable donations and sponsorships must require approval from Sunzen Group's MD cum Group CEO;
  - (c) be only made to well established entities having an adequate organisational structure to guarantee proper administration of the funds; and
  - (d) not used as a means to cover up undue payment, Bribery and Corruption or Gratification, or with the intent of obtaining or retaining business or advantage in the conduct of Business for Sunzen Group.
- 8.2. Before making a commitment to provide Donations and Sponsorship or other contributions, Sunzen Head of Department is required to conduct proper due diligence to ensure that the

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request is legitimate and that any “red flags” that are raised are resolved prior to committing the funds.

- (a) the request is properly evaluated against this AC Policy and related policies relating to sponsorship and donation;
- (b) there is no risk or perceived improper advantage for Sunzen Group;
- (c) the proposed recipient is a legitimate organisation and proper due diligence/background checks has been conducted.

### **9. CONFLICTS OF INTEREST**

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- 9.1. Conflicts of Interest arise where there is personal interest that can be considered to have potential interference with objectivity in performing duties or exercising judgement for or on behalf of Sunzen Group. Our Personnel must avoid situations in which their personal interest would conflict with their duties and responsibilities. Our Personnel must not use their position, official working hours, Sunzen Group’s resources and assets, or information available to them for personal gain or to Sunzen Group’s disadvantage.
- 9.2. In situations where conflict of interest arises, all Personnel are required to immediately declare the matter to their immediate supervisor.

### **10. RECRUITMENT, PROMOTION AND SUPPORT OF PERSONNEL**

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- 10.1. Sunzen Group recognises the value of integrity in its Personnel and Business Associate. Sunzen Group’s recruitment, training, performance evaluation, remuneration, recognition and promotion for all Personnel, including management, shall be designed and regularly updated to recognize integrity and there shall not be any outside influence on the hiring process.
- 10.2. Sunzen Group does not offer employment to prospective personnel in return for their having improperly favoured Sunzen Group in a previous role.

### **11. BUSINESS ASSOCIATE**

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- 11.1. All Business Associate acting on behalf of Sunzen Group are required to comply with this AC Policy and all other policies as it relates to them.
- 11.2. In circumstances where Sunzen Group retains controlling interest, such as in certain joint venture agreements, Business Associate are required to adhere to this AC Policy. Where

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Sunzen Group does not have controlling interest, associates are encouraged to comply the same.

- 11.3. Due diligence should also be carried out with regards to any business associates intending to act on the Sunzen Group’s behalf as an agent or in other representative roles, to ensure that the entity is not likely to commit an act of bribery or corruption in the course of its work with Sunzen Group.
- 11.4. The extent of the due diligence should be based on a bribery and corruption risk assessment. Due diligence may include a search through relevant databases, checking for relationships with Public Official, self-declaration, and documenting the reasons for choosing one particular Business associate over another. The results of the due diligence process must be documented, retained for at least seven years and produced on request by the custodian of the process.

## 12. WHISTLEBLOWER PROTECTION

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- 12.1. If you suspect, or reasonably believe that this AC Policy has been, or is being breached, you have an obligation to report your concerns to your immediate superior and where applicable, you may report such concerns anonymously through any of the following channels:

Reporting Mode	Contact Details
<p><b>Letter</b> <i>(Please attach supporting evidence to substantiate your disclosure and assist in investigation.)</i></p>	<p><u>Mail to:</u> Sunzen Biotech Berhad No. 50, Jalan Anggerik Mokara 31/47, Kota Kemuning, 40460 Shah Alam, Selangor, MALAYSIA.</p> <p><u>Or Drop it at:</u> Drop Box located at Notice Board</p>
<p><b>Email</b> <i>(Please attach supporting evidence to substantiate your disclosure and assist in investigation.)</i></p>	<p><a href="mailto:whistleblowing@sunzen.com.my">whistleblowing@sunzen.com.my</a></p>

- 12.2. All concerns reported will be taken seriously, treated in confidential manner and investigated immediately. Your anonymity will be protected unless the disclosure is required by law pursuant to an investigation or legislation, but you may be required to provide a statement as supporting evidence to any investigation. Any retaliation directed against anyone making such report will not be tolerated.

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**13. SANCTIONS FOR NON-COMPLIANCE**

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- 13.1. Any Employee who breaches this AC Policy may face disciplinary action, which could result in dismissal for gross misconduct. Sunzen Group reserves the right to terminate our contractual relationship with any Business Associate if there is a breach of this AC Policy and may further report the matter to the appropriate authorities. Further legal action may also be taken in the event that Sunzen Group's interests have been harmed by the results on non-compliance by individuals and organisations.

**14. COMMITMENT BY SUNZEN GROUP**

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14.1. Risk Assessment

Sunzen Group shall annually or at any periodic intervals assess external and internal risks and where there is a change in law or business to identify, analyse, assess and prioritize any risk related to bribery and corruption. Based on the annual assessments, the respective business unit shall implement adequate procedures to prevent the company from being involved in corruption. The risk assessment shall be properly recorded and documented. The risk assessment will include procedures, steps of improvement and enhancement to strengthen Sunzen Group's framework in combatting corruption and bribery.

14.2. Due Diligence Prior to Engaging with Potential Business Associate

- (a) To help ensure that Sunzen Group only does business with a Business Associate that shares Sunzen Group's standards of ethics and integrity, Sunzen Group and the Personnel shall conduct prior due diligence to assess the integrity of Sunzen Group's prospective business counterparties. Sunzen Group shall not enter into any business dealings with any Business Associate which is reasonably suspected of engaging in Bribery and Corruption or improper business practices unless those suspicions are investigated and resolved to the satisfaction of Sunzen Group.
- (b) If at any point during the due diligence exercise or in the dealings with a Business Associate, there are conflicts of interest or "red flags" that are raised, these warrant further investigation by referring the matter to Risk Management Committee and must be sufficiently addressed before the engagement of the Business Associate can progress. Sunzen Group shall procure all Business Associate prior to entering into business dealings with them to fill in the Due Diligence Questionnaire in the form and manner as prescribed by Sunzen Group ("DDQ") to assess the risk of the Business Associate and whether is it fit and proper to conduct business relationships with them.

14.3. Due Diligence for Existing Business Associate

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Sunzen Group performs an on-going monitoring and manages the risk profile of existing Business Associate, by conducting the following:

- (a) no payment to personal account is allowed if the Business Associate is a body corporate;
- (b) any one-off advance payment to a Business Associate after a contract is signed and prior to delivery of services or goods, must be reviewed and approved by Sunzen Group's MD cum Group CEO before any such payment is made;
- (c) all and any Business Associate are subject to periodic compliance risk profile review. It includes requesting the Business Associate to update the DDQ. The frequency of review is as follows, as determined by Risk Management Committee:
  - (i) Higher Risk Business Associate: Annual review; and
  - (ii) All other Business Associate: Every two (2) years review or at contract renewal, whichever is earlier.

### 14.4. Conducting Due Diligence Check After Contracting

The following are the trigger events that will cause Sunzen Group to perform due diligence after contracting:

- (a) change of payee and/or change of bank payment account request are raised by the Business Associate;
- (b) when the periodic compliance risk profile review is due;
- (c) when there are changes of associated persons of a Business Associate, for e.g., change of beneficial owner or authorized person; or
- (d) any negative news or updates on the Business Associate which may raise concerns on doing business with the Business Associate.

### 14.5. Suspicious Transactions

The following are common "red flags" involving a Business Associate which includes but is not limited to:

- (a) the transaction involves a country known for a high incidence of corrupt payments;
- (b) business dealings involving Family Members or other "special" ties (which includes close relationships) with Public Official;

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- (c) a reference check reveals a flawed background or a reputation for “getting things done” regardless of the circumstances or suggests that for a certain amount of money, he can fix the problem;
- (d) objection to anti-bribery representations and warranties in commercial agreements or negative response when told of such requirements;
- (e) convoluted payment arrangements such as payment in cash, payment to a Business Associate or into accounts in other countries or requests for upfront payment for expenses or other fees;
- (f) the Business Associate requires that his/her identity not be disclosed as part of the business transaction;
- (g) inadequate credentials for the nature of the engagement or lack of an office or an established place of business;
- (h) refusal or reluctance to complete the DDQ.

**15. COMMUNICATION AND TRAINING**

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- 15.1. Training on this AC Policy is provided regularly to all Personnel and Sunzen Group’s zero-tolerance approach to Bribery and Corruption will, where appropriate, be communicated to any Business Associate that are engaging with Sunzen Group through various formats which includes but is not limited to corporate training programmes, seminars, townhall sessions, role-specific training, induction programmes featuring anti-corruption elements, web based programmed, other outreach programmes and their declaration under integrity pledge.
- 15.2. Sunzen Group may communicate the requirements and obligations under this AC Policy and related policies through various mediums and platforms which includes but is not limited to emails, newsletters, posters, code of business conduct, Sunzen Group’s website and internal platforms.

**16. RECORD KEEPING AND ACCOUNTING**

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- 16.1. Any economic benefit or liability shall be recorded and maintained in designated company accounts utilizing clear terms to appropriately describe its nature and use in accordance with widely recognized and accepted accounting principles and practices.
- 16.2. Sunzen Group ensures that all matters regarding the prevention of corruption and bribery which includes but is not limited to risk assessment, proposed improvements and

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amendments to process and procedures, annual reviews of policies, complaints, disciplinary actions taken on prohibited conducts is properly documented and recorded.

### **17. MONITORING YEARLY REVIEW**

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- 17.1. Sunzen Group ensures that the top-level management continuously monitors the effectiveness and reviews the implementation of this AC Policy annually and at appropriate intervals, considering its suitability, adequacy and effectiveness. Any improvements identified are made as soon as possible. Internal control systems and procedures are also subject to regular review to provide assurance that they are effective in eliminating any risks of Bribery and Corruption.
- 17.2. In addition to annual reviews, Sunzen Group is committed in ensuring the proper implementation and enforcement of the anti-bribery and corruption framework within Sunzen Group. These monitoring and enforcement steps may include the form of internal or external audits carried out by external reputable parties.
- 17.3. Sunzen Group also seeks to conduct continual evaluations and identify competent persons and establish proper compliance functions to perform the adequate monitoring and implementation of anti-corruption measures within Sunzen Group.
- 17.4. All Personnel are aware that they are responsible for the success of this AC Policy and should ensure they use it to disclose any suspected danger or wrongdoing. Sunzen Group will not hesitate to conduct disciplinary proceedings against the Personnel found to be non-compliant to this AC Policy or related policies.

### **18. AC POLICY UPDATES**

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Sunzen Group reserves the right to modify, update or amend the terms of this AC Policy at any time. By continuing in your employment and engagement with us after communication of our latest AC Policy, you are deemed to have accepted such modifications, updates or amendments.

### **19. DECLARATIONS**

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- 19.1. All Personnel shall certify in writing that they have read, understood and will abide by this AC Policy. A copy of this declaration shall be documented and retained by the Human Resources department for the duration of the Personnel's employment.

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- 19.2. Sunzen Group reserves the right to request information regarding a Personnel's assets in the event that the person is implicated in any bribery and corruption-related accusation or incident.

**GENERAL GUIDANCE AND CONTACTS**

[HR DEPARTMENT]

Email : [hr@sunzen.com.my]

No : 03-5122 9333

**RISK MANAGEMENT COMMITTEE**

\*To Be Advised

**\*\*\*END\*\*\***

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**DECLARATION**

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I hereby acknowledge that I have read and understood all terms and conditions contained in the AC Policy. I further agree and undertake to fully comply with the AC Policy and all applicable laws, regulations, policies, principles and guidelines in relation to anti-bribery, anti-corruption and fraud (“**Anti-Corruption Laws**”).

I have also been fully informed on the channels which are available to me as an avenue to report any misconducts or incidents in relation to any breach or suspected breach of this AC Policy and the Anti-Corruption Laws.

Signature : \_\_\_\_\_

Name : \_\_\_\_\_

NRIC No./ Passport No. : \_\_\_\_\_

Date : \_\_\_\_\_