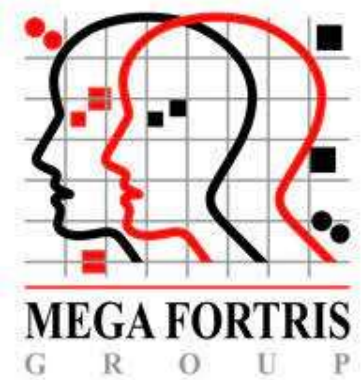


MEGA FORTRIS BERHAD

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

We, Mega Fortris Berhad and its group of companies (hereinafter referred to as "**Mega Fortris**" or "**Company**") are committed to uphold and maintain the highest standard of integrity and ethics in conducting our business and day-to-day operations. We do not condone bribery and corruption activities and we adopt a strictly zero-tolerance policy against such unlawful and unethical conducts.

1. SCOPE AND COVERAGE

The principles and obligations set out in this policy applies to all employees of the Company ("**Employees**") and the business partners of the Company, including contractors, sub-contractors, consultants, agents, vendors, representatives, customers and any third party who perform work or services for or on behalf of Mega Fortris ("**Business Partners**").

2. ANTI-BRIBERY AND ANTI-CORRUPTION

The Company takes a zero-tolerance approach to bribery and corruption. Therefore, all Employees and Business Partners acting on behalf of the Company are prohibited from all forms of bribery and corruption and shall refrain from, whether directly or indirectly, any bribe from any personnel, official, agent, individual of any government, commercial entity, or individual in connection with the business or activities of the Company.

3. GIFTS, HOSPITALITY AND ENTERTAINMENT

Generally, all Employees including their family members are prohibited from giving and / or receiving gifts and / or hospitality for whatever reason and at any time, unless within the approved threshold set by the Company or with the express approval of the Company.

Business Partners acting on behalf of the Company should also exercise caution and ensure that it shall not give and / or receive gifts and / or hospitality on behalf of the Company when performing services and / or acting on behalf of the Company.

4. FACILITATION PAYMENT

Facilitation payment is a payment made with the intention to secure or expedite the performance of a routine or an administrative process. Employees and Business Partners shall not promise or offer, or agree to give or offer, or make, directly or indirectly, any facilitation payments to any person including public officials.

5. SPONSORSHIPS, DONATIONS AND CHARITABLE CONTRIBUTIONS

All donations, sponsorships and charitable contributions by the Company must not be used as a medium to cover up or disguise an undue payment or bribery and must be done in accordance with the approval limits / budgets based on the Company's policies.

Appropriate due diligence must first be conducted on the recipient of any sponsorship, donation or charitable contribution to rule out any red-flags. Furthermore, any sum of donation or contribution shall be accurately stated in the Company's accounting books and records.

6. POLITICAL ACTIVITIES OR CONTRIBUTIONS

The Company does not make or offer monetary or in-kind political contributions to political parties or candidates.

7. DEALINGS WITH THIRD PARTIES

All third parties having a business relationship with the Company, shall not offer or provide, direct or indirectly, to the Employees, any form on bribe, gift, reward, consideration, favour or any advantage.

All third parties are required to undergo due diligence by the Company, prior to entering into any business or contractual relationship. All third parties shall be subject to ongoing and periodic monitors and / or due diligence by the Company to ensure ongoing compliance.

The Company will not enter into any business dealings with any third parties who have a reputation of engaging and / or may reasonably be suspected of engaging in any bribery or improper business practices.

8. DEALINGS WITH PUBLIC OFFICERS AND GOVERNMENT OFFICIALS

Employees and Business Partners acting on behalf of the Company shall exercise the utmost caution in dealing with Public Officials and Government Officials, whether in Malaysia or in any other jurisdictions. It should be noted that punishment for corruption and bribery may be more stringent in other jurisdictions. In dealing with Public Officials and Government Officials, the Employees and Business Partners acting on behalf of the Company are:

(a) prohibited from paying for non-business travel and hospitality for any Public Officials and Government Officials and/or their families and/or associated persons;

(b) required to comply with the local anti-corruption laws; and

(c) required to ensure that all documentations pertaining to the gift, entertainment, or hospitality are properly recorded and stored.

9. CONFLICT OF INTEREST

A conflict of interest arises when a personal, professional or financial interest interferes with a person's carrying out of his or her duty, or it could influence the person's ability to make decisions objectively. Employees and Business Partners acting on behalf of the Company shall at all times avoid actual or apparent conflict of interest and shall disclose or declare any such conflicts to the Company without delay.

10. RECRUITMENT POLICY

The Company places considerable importance on the background screening of candidates and employees shall be selected based on the approved selection criteria, and to ensure that no element of corruption is involved in the hiring process. The Company does not rely or provide any form of support letters.

11. RECOGNITION OF LOCAL AND INTERNATIONAL LAWS

The Company is committed to conduct its business in compliance with all laws, including foreign laws where it does its business.

12. CONSEQUENCES OF POLICY VIOLATIONS

Employees who violate this policy may be subject to discipline actions and or termination of employment. Business Partners who violate this policy may give rise to termination of relationship and / or contract with the Company.

The Company shall not in any event be liable for any losses or damages as may be incurred by you as a result of such termination.

13. TRAINING AND COMMUNICATION

The Company will from time to time provide training for all Employee and if an Employee unreasonably refuses or fails to attend any of the training, disciplinary action may be imposed on such Employee. The Company may in certain instances also require its Business Partners to attend any such training as it deems fit.

14. RISK ASSESSMENT, MONITORING AND REVIEW

The Company will also periodically conduct risk assessment on all personnel and its business processes to identify and assess the corruption risks that the Company is exposed to, and to improve its anti-bribery and anti-corruption program. Where necessary, the Company may undertake independent and external assessment to ensure compliance with the current applicable laws.

The Company will be monitoring compliance with this policy.

Last Reviewed : 01 August 2026
Last Revised : 31 January 2024