

Anti-Bribery and Anti-Corruption

Purpose

The purpose of this Anti-Bribery & Anti-Corruption Policy is to set out the key principles and guidelines in relation to improper solicitation, bribery, other corrupt activities and issues that may arise in the conduct of business dealings and relationships. This Policy is in compliance with the requirements pursuant to the Malaysian Anti-Corruption Commission (“MACC”) Act 2009 and any other relevant laws and regulations.

Scope

This policy is applicable to Scicom (MSC) Berhad and its subsidiaries.

Definitions

Terms	Descriptions
ARMC	Audit and Risk Management Committee
Associates	Business associates, partners, directors, employees, agents, vendors, distributors, suppliers, contractors, consultants and any other third-party service providers or persons who perform services for or on behalf of SCICOM.
Bribery & Gratification	Act of giving, agreeing to give, promises or offers to any person any gratification (including payment of cash, gifts, excessive entertainment, forgiveness of debts or an inducement of any kind offered or given to any person) with the intent (a) to obtain or retain business for the company ; or (b) to obtain or retain an advantage in the conduct of business for the company.
Board	Board of Directors of Scicom (MSC) Berhad
CFO	Chief Financial Officer
Corruption	When a person, associate, agent offers or gives money or gratification to another person as an inducement or reward for that person or another person to do an act or not to do an act in relation to the business of the company. Corrupt offences include but are not limited to the following: <ul style="list-style-type: none"> • Solicits or receives gratification • Promises, gives or offers gratification • Gives or uses false claims • Misuse of office or position by officers or any associated persons of the business
Employees	All employees including directors of SCICOM.
Entertainment / Hospitality Expenses	Meals, drinks, lodging, travel, or other expenses given to or received from people who have, who may have facilitated the creation of a business relationship with SCICOM. This includes expenses incurred by a prospective client, customer or business partner. Expenses can be a legitimate contribution to achieving a business outcome and, also includes attendance at social, cultural or sporting events.
Family/relative	Members include spouse(s), children (including step-children and adopted children), parents, step-parents, siblings, step-siblings, grandparents, grandchildren, in-laws, uncles, aunts, nieces, nephews,

Terms	Descriptions
	and first cousins, any lineal ascendant or descendant of that person.
Gifts	Money, goods or services, which, if given appropriately, are a mark of friendship or appreciation. Gifts should be given without expectation of consideration or value in return.
Money Laundering	Process of introducing money, property or other assets derived from illegal and criminal activities into the legal financial and business cycle to give it a legitimate appearance. It is a process to clean 'dirty' money in order to disguise its criminal origin.
Public Officials	Includes members of the administration, civil servants, members of the police and armed forces, judicial and legal services, educationists, politicians, political secretaries, members of Parliament, officers to Public Bodies, candidates for public office, officials of any political parties and officials of any state-owned enterprises.
Public Bodies	Includes the Government of Malaysia, State Government, any local and statutory authority, national or state department, registered societies, registered sports bodies, company or subsidiary of any public bodies.
The Company	Scicom (MSC) Berhad
The Group or SCICOM	Scicom (MSC) Berhad and its subsidiaries

Policy

1. Policy Statement

SCICOM has adopted a ZERO tolerance policy against all forms of bribery and corruption in compliance with the Malaysian Anti-Corruption Commission Act 2009 (revised 2018) ("MACC Act").

SCICOM's Code of Business Conduct and Ethics (CODE) sets out our core principles in this regard. Scicom's Anti-Bribery and Anti-Corruption Policy (hereinafter referred to as the "SABAC Policy") outlines those principles.

SCICOM adopts the SABAC Policy to safeguard the integrity and credibility of the Company in upholding the principles of good conduct, professionalism as outlined in the Company's Code of Business Conduct and Ethics.

SCICOM applies a range of procedures for the prevention of bribery and corruption. These include risk assessment, implementation of risk mitigation measures and appropriate controls, managing of third-party risks, training and communication, as well as monitoring and reviews. The management will perform a comprehensive risk assessment on every three year, with intermittent assessments conducted when necessary. The management review and assess the adequacy and implementation of the SABAC policy on a regular basis.

The SABAC Policy provides detailed guidelines on the standards of compliance expected from each employee as well as the Directors, Associates, subsidiaries and associated companies in relation anti-corruption and bribery. If necessary, the management will perform due diligence/background check on relevant personnel prior to entering any formalized relationship.

While the policy is not intended to be exhaustive, SCICOM's employees and/or any person(s) associated with SCICOM shall always observe and ensure compliance with all applicable laws, rules and regulations, policies and procedures to which they are bound to observe in the performance of their duties and obligations.

SCICOM prohibits its Directors, Employees, Representatives, whether acting for himself or another, to perform or do any of the following:

- (a) give, promise to give, or offer, a payment, loan, reward, gift or entertainment, etc, to a Public Official or any third party with the expectation or hope that a business advantage will be received, or to reward a business advantage already obtained, for example securing a permit, securing or renewing a contract with favourable terms, to obtain information not readily available, to influence a Public Official or third party to take or omit an action in violation of his or her duty, or anything related to the performance of his duty;
- (b) to make 'facilitation payments', which also includes - to give, promise to give, or offer, a payment, loan, reward, gift, entertainment, etc to a Public Official, or any third party to secure or expedite the performance of a routine procedure.
- (c) However, SCICOM recognises that there could be circumstances where a facilitation payment may be necessary to avoid injury, loss of life or liberty. Any such facilitation payment to be made should obtain prior approval of the Group Chief Executive Officer where practicable, or if prior approval is not practicable, to be immediately reported to the Group Chief Executive Officer.
- (d) threaten or retaliate against any person who has refused to commit a bribery offence or who has raised concerns under this Policy;
- (e) participate in any corrupt activity such as extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering;
- (f) engage in any activity that might lead to a breach of this Policy.

1.1. Gifts, Entertainment, Hospital and Travel

This policy does not prohibit normal business hospitality, so long as it is reasonable and justifiable. The intention behind any gift, entertainment, hospitality or travel should always be considered and nothing should be specifically expected or demanded in return.

As a general principle, Directors, Employees, or Associates should not accept from or give a gift, entertainment, hospitality or travel benefits to a third party (including a Public Official) if it is made with the intention of influencing the Public Official or the third party to obtain or retain business, or in exchange for favours or benefits.

1.2. Charitable Contributions, Donations and Sponsorships

Charitable contributions, donations and sponsorships are acceptable, whether of in-kind services, knowledge, time, or direct financial contributions. However, Directors, Employees and Representatives must be careful to ensure that the charitable contributions, or any contribution of kind are not used to conceal bribery or corruption.

1.3. Conflict of Interest

Directors, Employees and Associates with actual or potential conflict of interest are expected to declare in writing to SCICOM, even if the knowledge arises after being engaged by SCICOM.

Furthermore, SCICOM prohibits Directors, and Associates from gaining improper advantage due to their relationship with SCICOM's employees (i.e. any immediate family which applies to parents, parents-in-law, siblings, spouse, children including adopted child and step-child and nominees of the employees).

1.4. Record Keeping

It is important that proper and complete records be maintained of all payments made to third parties in the usual course of business as these would serve as evidence that such payments were bona fide, and not linked to corrupt and/or unethical conduct. All accounts, invoices, documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with accuracy and completeness.

1.5. Responsibilities

The prevention, detection and reporting of bribery and corruption is the responsibility of all.

Reports of such activity or knowledge of such activity may be lodged with SCICOM's whistle-blowing channel. For Directors and Employees, you should also notify the Group Senior Vice-President of Human Resource Management as soon as possible if you believe or suspect a breach of this policy has occurred or may occur in the future.

SCICOM, under its practice of respecting and recognizing human rights shall not discriminate or retaliate against any individual for raising genuine concerns or reporting in good faith on breach or suspected breach of this Policy. All reports will be treated confidentially.

1.6. Training, Communication, Engagement of Representatives

Awareness of this policy forms part of the induction process for all new employees. Existing employees will receive training on this policy.

The Management and employees must communicate this policy to all Associates at the outset of their engagement with SCICOM and at suitable intervals, and shall ensure that engagement of Associates shall be subject to this policy.

2. Consequences of Breach

SCICOM views any breach of this policy as a serious matter and will take immediate and necessary action against any employee and/or associates who is proven to be or have been involved in acts of bribery and/or corruption, including but not limited to disciplinary action against Employees (including warning, demotion or immediate dismissal), suspending or terminating contracts of associates or reporting to the authorities.

3. Review of the Policy

The Board and the ARMC shall review this Policy periodically to ensure that it continues to remain relevant and appropriate.