

ANTI-BRIBERY AND CORRUPTION POLICY

1.0 INTRODUCTION

The Anti-Bribery and Corruption Policy ("the Policy") of Mega Sun City Holdings Berhad ("MEGASUN" and/or "the Company") is prepared with reference of the Guidelines on Adequate Procedures pursuant to Subsection (5) of Section 17A under the Malaysia Anti-Corruption Commission Act, 2009.

2.0 OBJECTIVE

The main objective of the policy is to ensure that the Company established the necessary safeguards which should prevent any conduct of bribery or corruption from happening.

The Policy is developed to:

- a) Set out the responsibilities of MEGASUN, and of those working for MEGASUN, in observing and upholding the Company's position against corruption and bribery; and
- b) Provide information and guidance to those working for MEGASUN on how to recognise and deal with corruption and bribery issues.

3.0 SCOPE

This Policy is applicable to MEGASUN and its subsidiary companies ("the Group").

This includes all individual working at all levels and ranks, including company directors, chief executive officer, managers, and employees (whether full-time, part-time, or contract) of the Company.

4.0 ANTI- BRIBERY AND CORRPUTION POLICY

4.1 Bribery and Corruption in all its forms as it relates to MEGASUN activities is prohibited.

4.2 Bribery and Corruption may take the form of anything of value, such as money, goods, services, property, privilege, employment position or preferential treatment. MEGASUN personnel shall not therefore, whether directly or indirectly, offer, give, receive or solicit any item of value, in the attempt to illicitly influence the decisions or actions of a person in a position of trust within an organisation, either for the intended benefit of MEGASUN or the persons involved in the transaction.

4.3 The anti-bribery and corruption statement apply equally to its business dealings with commercial ('private sector') and Government ('public sector') entities, and includes their directors, personnel, agents and other appointed representatives. Even the possible appearance of bribery or corruption is to be avoided, in particular when dealing with Government officials.

4.4 No employee will suffer demotion, penalty or other adverse consequences in retaliation for refusing to pay or receive bribes or participate in other illicit behavior.

4.5 MEGASUN is also committed to conducting due diligence checks on prospective personnel, particularly as it relates to appointments to positions where a more than minor bribery or corruption risk has been identified.

5.0 GIFTS, DONATIONS AND SPONSORSHIPS

5.1 The Company adopted a No-Gift Policy where the policy prohibits employees to receive gifts or asking for (soliciting) gifts from external parties including customers, business partners, suppliers, regulators, and government officers.

5.2 Gifts may be in the form of cash or cash equivalent, including gift certificates, loans, commissions, discounts services, advantage or any other benefit, which is not extended to all employees of MEGASUN.

5.3 However, corporate gift and souvenirs which are given out of hospitality are exempted if the following criteria are met:

- The items are attached with company logo.
- The items are given at the following types of event:
 - i. Open to public (e.g. job fair, trade events, conference, etc); or
 - ii. By invitation where the invitation is not exclusive to one organisation or person and participation is transparent (e.g. industry meeting, event, Annual General Meeting, etc.)
- The items are not concealed.
- The items are given equally to all participants attending the event without discrimination.

5.4 Donations and sponsorships are permitted however, the Company prohibits the giving and receiving of donations and sponsorships to influence business decisions.

6.0 FACILITATION PAYMENTS

6.1 MEGASUN adopts a strict policy of disallowing the use of facilitation payments in its business. Facilitation payment is a payment or other provision made personally to an individual in control of a process or decision. It is given to secure or expedite the performance of a routine or administrative duty or function.

6.2 Personnel shall decline to make the payment and report to the Company immediately when they encounter any requests for a facilitation payment. In addition, if a payment has been made and personnel are unsure of the nature, the Company must be notified immediately, and the payment recorded accordingly.

6.3 Only in the event that an employee's security is at stake is permitted to make the payment. The employee must immediately report the incident to their Head of Department to record the details and keep a record of what was spent.

7.0 AWARENESS

7.1 MEGASUN shall conduct an awareness programme for all its personnel on the Company's position regarding anti-bribery and corruption, integrity and ethics.

7.2 Our zero-tolerance approach to bribery and corruption must be communicated to all Level both internal and external parties, as appropriate thereafter.

8.0 MONITORING AND REVIEW

8.1 All workers are responsible for the success of this Policy and should ensure they use it to disclose any suspected danger or wrongdoing.

8.2 Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

8.3 MEGASUN shall conduct a minimum of two (2) risk assessments annually to identify the bribery and corruption risks affecting the business, set anti-bribery and corruption objectives, and assess the effectiveness of the controls in achieving those objectives.

9.0 REPORTING OF POLICY VIOLATIONS

9.1 Suitable reporting channels shall be established and maintained for receiving information regarding violations of this policy, and other matters of integrity provided in good faith by MEGASUN personnel.

9.2 Personnel who, in the course of their activities relating to their employment at MEGASUN, encounter actual or suspected violations of this policy are required to report their concerns using the reporting channels stated in Whistleblowing Policy.

9.3 Reports made in good faith shall be addressed in a timely manner and without incurring fear of reprisal regardless of the outcome of any investigation.

9.4 Retaliation in any form against MEGASUN personnel where the person has, in good faith, reported a violation or possible violation of this policy is strictly prohibited. Any MEGASUN personnel found to have deliberately acted against the interests of a person who has in good faith reported a violation or possible violation of this policy shall be subjected to disciplinary proceedings including demotion, suspension, dismissal or other actions (including legal action) which MEGASUN may pursue.

10.0 STAFF DECLARATION

10.1 All MEGASUN personnel shall certify in writing that they have read, understood and will abide by this policy. A copy of this declaration shall be documented and retained by the Human Resources Department for the duration of the personnel's employment. A sample declaration can be found in the Appendix of this Policy.

10.2 The Company reserves the right to request information regarding an employee's assets in the event that the person is implicated in any bribery and corruption-related accusation or incident.

APPENDIX

SAMPLE OF STAFF DECLARATION FORM

I, _____, hereby declare that I have read and understood MEGASUN's Anti-Bribery and Corruption Policy. I will abide by the requirements and provisions set of in the Policy, as required by my Employment Contract of Service.

I am fully aware of the consequences which may follow as a result of breaching the Policy.

Name :

IC No :

Position :

Date :