



Company	Apex Equity Holdings Berhad [199001016563 (208232-A)]
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1.2	3 Oct 2022	Updated Company Logo, and revised ARMC to GBRC.
1.3	28 Jul 2023	Updated Company Logo.
1.4	26 Feb 2026	Revised definition for Company, addition of Section 5 on Corruption, revised the review period of this Policy to a minimum three-year review cycle and compilation of minor amendments.

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Preamble

This Anti-Bribery and Corruption (ABC) Policy document the Company policy that is established in accordance to the Company practices and the rules and regulations on section 17(A) of Malaysian Anti-Corruption Commission Act 2009.

The purpose of this Policy is to promote the integrity of the Company with no bribery and corruptions, in line with the Malaysian Code on Corporate Governance (MCCG) for a healthy corporate structure that engenders integrity, transparency and fairness.

This Anti-Bribery and Corruption (ABC) have policy and procedures. The procedures are segregated from the Policy. The Anti-Bribery and Corruption (ABC) Procedures document the Company practices on the handling of bribery and corruption matters that is in accordance with the guidelines on Adequate Procedures as issued by the prime minister's department, where it is emphasizes on the T.R.U.S.T principles.

T=Top Level Commitment

R=Risk Assessment

U=Undertake Control Measures

S=Systematic Review, Monitoring and Enforcement

T=Training and Communication

This Anti-Bribery and Corruption (ABC) Policy is publicly available at the Company official website, and the Anti-Bribery and Corruption (ABC) Procedures will be on internal circulation basis.

Anti-Bribery and Corruption (ABC) Policy

1 Abbreviations

Term	Descriptions
ABC	Anti-Bribery and Corruption.
associate(s)	Directors, senior managers, officers, employees, consultants, contractors, trainees, agency staff, volunteers, interns, agents, sponsors or any person associated with the Company or any of the branches or subsidiaries where the engagement has relation in between the commercial organisation and its business associates which will have the same meaning per MACC Act.
Board of Directors	The Board of Directors of Apex Equity Holdings Berhad, unless specifically stated otherwise.
Company	Apex Equity Holdings Berhad and its subsidiaries whether at HQ or at any Branches or subsidiaries and affiliates (if any).
Committee	The appropriate Committee of the Company, where applicable.
GBRC	Apex Equity Holdings Berhad's Group Board Risk Committee.
MACC	Malaysia Anti-Corruption Commission.
MACC Act	Malaysia Anti-Corruption Commission Act 2009.
Policy	Policies and/or Procedures Manual, unless specifically stated otherwise.
SC	Securities Commission Malaysia.
SC Requirements	Refers to any requirements as informed by SC on the requirements to be adhered with.
third party(ies)	Any individual or organization that an associate will come in contact with in the course of work or engagement with the Company and includes existing clients, potential clients, suppliers, distributors, third party vendors, service providers, agents, advisers,

Term	Descriptions
	business associates and government / regulatory bodies including their advisors, representatives and officials, politicians and political parties.
Top level management	The Board of Directors of the Company, unless specifically stated otherwise.

2 Applicability

This ABC Policy is applicable to the employees of the Company at all levels and grades, which includes associates and third parties. The adequate procedures on T.R.U.S.T principles as outlined in ABC Procedures shall be applied to the employees of the Company, associates and third parties.

3 Policy Statement

We are committed to conduct our business with integrity. With such a commitment, we have developed our ABC Policy and as our clients and service provider, you must comply with the terms as contained herein for your activities with us.

We take a zero-tolerance approach to bribery and corruption, regardless of the amounts involved and at whatever level of the organization. Clients and service providers is to take all and any measures to prevent corrupt practices in its dealings with us. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

Clients and service providers are prohibited from engaging in any bribery or bribery attempt which includes but not limited to payments through third parties.

Clients and service providers must not offer or provide, either directly or indirectly any bribe, gift, reward, consideration, favor or any advantage (material or otherwise) to any of our representatives for the purpose of influencing them to act in contrary of our ABC Policy or obtain any rewarding treatment with respect of any terms, conditions or price of a contract.

Clients and service providers must not collude with other parties to compromise or instigate any third party to perform any such actions.

This ABC Policy shall be read in conjunction with the Group's other existing policies, including but not limited to the Vendor Code of Conduct and any other relevant policies, guidelines, or standards that may be published on the Company's website from time to time.

This ABC Policy aims to set out our responsibilities to comply with the laws against bribery and corruption and to provide guidance on how to identify and deal with issues relating to bribery and corruption. Where any applicable law or regulation imposes stricter requirements than this Policy, such law or regulation shall prevail.

Periodic risk assessment will be undertaken and such assessment will be documented and periodically reviewed. The Committee will be updated at least once in every three (3) years in accordance with applicable laws and regulations.

4 Objective

This ABC Policy is established in accordance to the MACC requirements. It aims to create an awareness to the associates and third parties on the importance of anti-bribery and corruption in work place, and to promote an integrity culture with no bribery and corruption in the work place, towards a health working environment and fairness of business relationship without hidden arrangement.

In addition, the objective of this ABC Policy is also emphasizing on strictly prohibits any act of corruption and bribery regardless of its form, and requires all associates to ensure compliance with all applicable anti-corruption and bribery regulatory requirements on the day-to-day operations, and conducting business to protect the Company's reputation.

5 Corruption

Corruption refers to the abuse of entrusted power, position, or authority for personal gain or for the benefit of another party.

Corruption includes any act or omission that is dishonest, unlawful, or constitutes a breach of trust, duty, good faith, or impartiality in the performance of one's functions or activities, whether in the public or private sector. Corruption constitutes a criminal offence under applicable laws, and any individual or entity involved may be subject to civil and/or criminal liability.

Corruption may be carried out directly or indirectly, including through associates, intermediaries, or third parties, and may involve monetary or non-monetary benefits.

It includes, but is not limited to: –

- i) The misuse of one's position or authority to obtain an improper advantage for oneself or for another party;
- ii) Any act of fraud, embezzlement, misappropriation of funds or assets, or abuse of power for personal benefit; or
- iii) Any conduct intended to improperly influence a decision, action, or outcome in order to secure an undue business or personal advantage.

6 Bribery

Bribery is the corrupt solicitation, acceptance, or transfer of value in exchange for official action.

Bribery refers to the offering, giving, soliciting, or receiving of any item of value as a means of influencing the actions of an individual holding a public or legal duty. Bribery constitutes a crime and both the offeror and the recipient can be criminally charged. Bribery not only refers to direct payments but also includes the authorizing or permitting an associate or third party to commit any of the acts, as well as indirect facilitation, digital payments, and gifts-in-kind or take part in any actions identified below.

It includes, but is not limited to: -

- i) The offer, promise or receipt of any gift, hospitality, loan, fee, reward or other advantage to induce or reward behavior which is dishonest, illegal or a breach of trust, duty, good faith or impartiality in the performance of one's functions or activities (whether public, or in their employment or connected with the business);
or
- ii) The offer or promise of any gift, hospitality, loan, fee, reward or other advantage to a public official with the intention of influencing / obtaining a business advantage.

7 Unacceptable Practices

It is **NOT** acceptable to:

- i) Give, promise to give, offer a payment, gift or hospitality to secure or award an improper business advantage;
- ii) Give, promise to give, offer a payment, gift or hospitality to a government official, agent or representative to facilitate, expedite or reward any action or procedure;
- iii) Accept payment from a third party knowing or suspecting it is offered with the expectation that it will obtain a business advantage from them;
- iv) Induce another individual or associate to indulge in any prohibited acts;
- v) Give or accept any gift which will be reasonable perceived to be in contravention of this ABC Policy or applicable laws and regulations; or
- vi) Engage in any activity that will lead to the breach of this ABC Policy.

8 Facilitation Payments and Kickbacks

The Company prohibits making or accepting any facilitation payments or kickbacks of any kind. Small payments made to secure or expedite a routine action is considered a facilitation payment whilst payments made in return for a business favor or advantage will constitute a kickback.

9 Company Making Donations or Sponsorships

The Company will make donations or Sponsorships so long as it does not contravene any applicable laws or regulations. All donations or sponsorships must obtain approval and must be accurately documented.

10 Dealing with Third Parties

Appropriate due diligence to be conducted when dealing with third parties to avoid the Company from being exposed to risks of third parties not following ethical business practices. The Company takes care in its dealing with third parties and requires all third parties to be ethical and comply with applicable anti-bribery laws and regulations.

The Company to have in place adequate procedures to vet third parties within the specific / relevant Departments. When it becomes likely during the course of relationship that a third party is engaging in inappropriate actions, then the Company's Committee must be contacted for guidance.

11 Gifts, Entertainment and Hospitality

The Company shall not accept gifts, entertainment and hospitality if they are likely to be seen to conflict with any duties owed to clients.

Gifts, entertainment and hospitality should only be given as a purely personal matter and must not be likely to induce the recipient to give anything in return. If the Company receives any proposal or suggestion to make (or indeed receive) any such payment, it has to be reported immediately to their immediate superior. All gifts, entertainment and hospitality are subject the threshold with certain approval to be obtained and must be accurately documented.

12 Associates' Responsibilities

Associates dealing with the Company must read and understand the requirements under this ABC Policy and must at all times adhere with the terms and conditions contained herein.

Associates are responsible to prevent, detect and report corruption of all those working for us or under our control and to avoid any activity which will lead to, or suggest a breach of any term in this ABC Policy.

Key responsibilities of associates include:

- i) Be familiar with applicable requirements and directives of this Policy and communicate them to subordinates, where applicable;
- ii) Promptly and accurately record all transactions and payments in reasonable detail;
- iii) Raise suspicious transactions to immediate superiors for guidance on the next course of action;
- iv) Promptly report violations or suspected violations through the appropriate channels; and
- v) Complete trainings and assessments promptly, and comply with the Policy.

Associates are required to use the Company's Whistleblowing reporting channel in relation to any suspected bribery and/or corruption incident, in accordance with the Company's Whistleblowing Policy. Associates are to immediately notify to your reporting superior or to the Group Legal, Human Resource and Administration when you become aware or suspect or have reason to believe that a breach of any term of this ABC Policy has happened or is likely to take place.

Any associate in breach of this ABC Policy will face appropriate disciplinary action, which could result in termination for breach. The Company reserves the right to terminate a contractual relationship with other associates when they breach any of the terms of this ABC Policy.

13 Record Keeping

The Company is to maintain proper and accurate financial books and records as well as adequate measures to prevent corrupt practices.

14 Raising Concern and Protection for Raising Concern

14.1 Raising Concern

Associates are encouraged to raise concerns of potential or current suspicion of malpractices to their immediate superior or in the event of uncertainty of chain of reporting, to Group Legal, Human Resource and Administration immediately. Please see **Schedule 1** for the potential risk scenarios as a reference.

14.2 Protection for Raising Concern

We take responsibility to ensure we act with integrity and encourage openness and will support anyone who raises a genuine concern in good faith. The Company assures that we are committed to ensuring no unfair or detrimental treatment for reporting in good faith.

15 On-Going Training

Communication and/or dissemination of this ABC Policy will be made available to everyone within the Company. The Company's stand on zero-tolerance policy toward bribery and corruption must be communicated to all and to this end continued on-going training will be conducted. Adequate training to be given to employees and business associates to ensure their thorough understanding of the Company's anti-corruption and anti-bribery position.

16 Monitoring and Review

The Compliance and Legal Department is to monitor the effectiveness and review the implementation of this ABC Policy. Regular checks on the effectiveness of this ABC Policy including but not limited to reporting and escalation will be reviewed from time to time and in any event at least once every three (3) years, and where necessary make the necessary changes to be inclusive. Group Legal, Human Resources and Administration is to assist in the implementation of this ABC Policy.

17 Stakeholder of Policy and Prevailing Law

17.1 Stakeholder

The Board of Directors will be overall responsible to ensure the ABC Policy is adequate and effective and is in line with prevailing rules and regulations i.e., the MACC Act.

17.2 Prevailing Law on MACC Act (Act 694) :

1. Soliciting/Receiving Gratification (Bribe) [section 16 and 17(a) MACC Act 2009].
2. Offering/Giving Gratification (Bribe) [section 17(b) MACC Act 2009].
3. Intending to Deceive (False Claim) [Section 18 MACC Act 2009].
4. Using Office or Position for Gratification (Bribe) (Abuse of Power/Position) [Section 23 MACC Act 2009].

Board of Directors are also to ensure that the Company has in place Adequate Procedures pursuant to the MACC Guidelines on Adequate Procedures (**T.R.U.S.T Principles**) which encompass the following: -

- (i) Top Level Commitment;
- (ii) Risk Assessment;
- (iii) Undertake Control Measures;
- (iv) Systematic Review, Monitoring and Enforcement; and
- (v) Training and Communication

SCHEDULE 1

Potential Risk Scenarios – “RED FLAGS”

This Schedule contains a list of possible risk scenarios which will arise during the course of business.

This is not an exhaustive list and is for illustrative purpose only.

Please report immediately (per Whistleblowing Policy) when you encounter any of the possible risk scenarios below:

- (a) Being aware that a third party is engaged in or has been accused of engaging in improper business activities / practices;
- (b) Discovering that a third party pays bribes or requires bribes to be paid to them for business dealings with them;
- (c) A third party insists on receiving commission or fee for payment before committing to sign up to a contract with us or carrying out a government function with us;
- (d) A third-party requests payment in cash or refuses to sign a formal agreement or to provide an invoice or receipt for a payment made;
- (e) Requests from a third party to make payments to a country or jurisdiction different from where the third party resides or conducts its business;
- (f) A third-party requests unexpected additional fees or commission to facilitate a service;
- (g) Demands of lavish entertainment or gifts before commencing or continuing with the contractual agreement or provision of service;
- (h) Requests from third party to overlook potential legal / regulatory violations;
- (i) Requests to provide employment or some advantage to the third party’s friend or relative;
- (j) Receiving an invoice from a third party which appears to be not customized to Company standards;
- (k) Refusal by the third party to put terms in writing;
- (l) Invoice not reflecting the service provided;
- (m) Requests to use the services of an agent, intermediary, consultant or supplier not typically known or used by the Company; and/or
- (n) The offer of an unusual generous gift or lavish hospitality by a third party.