



An Edeltec Group of Companies

Edeltec Holdings Berhad

Anti-Bribery and Anti-Corruption Policy



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1.0 Purpose

The purpose of the Anti-Bribery and Anti-Corruption policy is to ensure compliance with all applicable anti-corruption regulatory requirements when conducting business. This policy is also intended to define the company's commitment and stand against bribery and corruption in all forms and circumstances.

2.0 Scope

This policy applies to members of EDELTEQ and its stakeholders which include:

- Board of Directors
- Management and employees
- Business Associates which comprise of customers, vendors, contractors, consultants, agents, outsourcing providers, solicitors, investors and valuers
- All parties involved directly or indirectly in the affairs of Edeltech.
Applies to members of the public, where relevant.

3.0 Gift and Entertainment

Employees shall exercise proper care and good judgement in receiving and giving gift or entertainment without intention or expectation of favours. Accepting a gift on behalf of Edeltech is allowed only in very limited circumstances, where employees are expected to immediately notify his/her HOD and record the gift in the Gift Register Form. Employees may only accept the gift where there is no conflict of interest in accepting or offering the gift.

Entertainment is part of customer relationship building or guest reception during official site visits. Hence, it's a part of business requirement but all Entertainment expenses shall be on a "need to" basis only. Entertainment must not be carried out indiscriminately, excessively or in a lavish manner.

4.0 Donation and Sponsorship

All sponsorship and donations can only be made after management approval in appropriate circumstances and transparent manner. The donation and sponsorship need to be made in good faith and must not be used to influence a business deal and decision. Due diligence is required to be conducted prior to the donation and sponsorship contribution.

5.0 Political Donation and Contribution

Company shall not make any contribution and donation to any political parties. Personal contribution by Employees or members of Edeltech to political parties shall never be associated with the Company, all personal donation and contribution are deemed to be carried out in their personal capacity and not on behalf of the Company.



6.0 Facilitation Payment

Facilitation payments include illegal and unofficial payments or contributions made to secure or expedite a service or an administrative process to which a person or company is entitled. A small monetary payment or gift might be required in certain deals or activities, for example while seeking approval of documents in foreign countries such as a visa, license, or regulatory approval.

The Board of Directors, Company Management, Employees or Service Providers shall not be involved in any activity that might lead to a facilitation payment or allow other parties to make facilitation payments on behalf of Edeltec.

Any parties who have questions, concerns, or doubts regarding the facilitation payment, the individual shall raise queries with the Board of Directors or company management.

7.0 Reporting procedures

All members of Edeltec or associated third parties have responsibility to report and disclose the suspected violations of this policy through whistleblowing channel at whistleblowing@edeltec.com