

# SCC HOLDINGS BERHAD

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## ANTI-BRIBERY AND CORRUPTION POLICY

### 1. INTRODUCTION

This Anti- Bribery and Corruption Policy “(ABCP)” is to prevent the occurrence of corruption and bribery practice in relation to the businesses of SCC Holdings Berhad and its subsidiaries “(The Group)”.

The Group conducts its business in a legal and ethical manner. The Group will take reasonable and appropriate measures to ensure its businesses or any transactions do not participate in corruption activity for its advantages or benefits.

This Policy is supplemental to, and shall be read in conjunction with the Code of Ethics and Conduct of the Group.

### 2. DEFINITION OF BRIBERY AND CORRUPTION

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal, unethical or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage and can take the form of gifts, loans, fees, rewards or other advantages.

Corruption is the abuse of entrusted power for private gain.

### 3. OBJECTIVE

The objective of the Policy is to provide clarity and guidance to the Directors, Officers and Employees on standards of behaviour to which they must adhere and how to recognise as well as deal with bribery and corruption. The Policy is not intended to be exhaustive, and there may be additional obligations that the Directors and Employees are expected to adhere to or comply with when performing their duties. For all intents and purposes, the Directors and Employees shall always observe and ensure compliance with all applicable laws, rules and regulations to which they are bound to observe in the performance of their duties.

This policy need to be read and understood clearly by the employee. Disciplinary action will be taken including termination of employment if violation of the policy.

#### **4. APPLICABILITY**

This policy is applicable to:

- (a) Directors (Both executive and non-executive), officers, employees (either permanent, probationary, contract or temporary staff) and volunteers of The Group; and
- (b) any third party (person or entity) who performs services for or on behalf of the Company. This includes actual and potential clients, customers, joint-ventures, joint-venture partners, consortium partners, outsourcing providers, contractors, consultants, sub-contractors, suppliers, vendors, agents, distributors, representatives, intermediaries and investors

#### **5. GUIDANCE ON ANIT-BRIBERY AND CORRUPTION**

##### **5.1 Gifts, Hospitality and Entertainment**

This Policy does not prohibit normal business hospitality, so long as it is reasonable, appropriate, modest and bona fide corporate hospitality.

Some examples of acceptable gifts and/or benefits are as follows:

- (a) token gifts offered in business situations or to all participants and attendees, for examples, work related seminars, conferences, trade and business events;
- (b) gifts presented at work-related conferences, seminars and/or business events;
- (c) gifts given in gratitude for hosting business events, conferences and/or seminars;
- (d) refreshments or meals during meetings or as participants of work-related conferences and/or seminars; and
- (e) meals for business purposes.

Gifts and entertainment given and received as a reward, inducement or encouragement for preferential treatment or any other advantage, or inappropriate or dishonest conduct are strictly prohibited. Particularly, no gifts, hospitality or entertainment may be given or accepted during a crucial process such as contractual negotiations or tender processes if there is any realistic risks that giving and acceptance of such articles could very well manipulate and influence the outcome of such processes and negotiations.

Gifts or entertainments may only be presented to a third party only in the situation that it is consistent with the customary business practice, and that the gifts or entertainment are humble in value and cannot be interpreted as inducements to trade. Guidance from the Management must be sought if there is any doubt regarding this issue.

#### 5.2 Facilitation Payments

Facilitation payments are unofficial payments or other advantages made to secure or expedite the performance of a routine action by an officer of public body.

Directors or Employees shall not promise or offer, or agree to give or offer, facilitation payments to an officer of any public body.

In any case, employee must immediately notify their superior for consultation should they are asked or offered of such payments.

#### 5.3 Political Contribution

In respect of political contributions, funds or resources of the Group must not be used to make any direct or indirect political contributions on behalf of The Group without approval from the Board of Directors. Any appearance of making such contributions or expenditure to any political party, candidate or campaign, must also be avoided.

#### 5.4 Donations and Sponsorships

The Group allows charitable donations and sponsorships for legitimate reasons and as permitted by existing laws and regulations, whether of in-kind services, knowledge, time, or direct financial contributions.

No donation or sponsorship can be offered or made without the prior approval of the Group Managing Director. The records of all charitable contributions shall be kept by the Group Accounts Department.

### **6. RECORDS KEEPING**

It is important that proper and complete records be maintained with accuracy and completeness for all payments made to third parties in the ordinary course of business as these will serve as evidence that such payments are not linked to corrupt and/or unethical manner.

Employees must declare all gifts, hospitality or entertainment to respective Head of Department for recording into a register which is subject to internal audit review. All expenses claim from Employees incurred to third parties should be

approved by the Head of Department and specifically recorded the reason for such expenses.

## **7. COMPLIANCE TO THE LAW**

The Group will comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions within which the Group operates. Directors and Employees are expected to understand and comply with the Malaysian Anti-Corruption Commission Act 2009 (including any amendment thereof). The Group reserves the right to report any actions or activities suspected of being criminal in nature to the police or other relevant authorities.

## **8. REPORTING ON VIOLATIONS**

Any Employee who knows of, or suspects, a violation of the Policy, is encouraged to whistle-blow or report the concerns through the mechanism set out under the Group's Whistle-blowing Policy. The provision, protection and procedure of the Whistle-blowing Policy for reporting of the violations of the Policy are available on the SCC Holdings Berhad's website at [www.sccholdings.com.my](http://www.sccholdings.com.my). No individual will be discriminated against or suffer any sort or manner of retaliation for raising genuine concerns or reporting in good faith on violations or suspected violations of the Policy. All reports will be treated confidentially.

## **9. REVIEW OF THE POLICY**

The Board will monitor compliance with the Policy and review the Policy regularly to ensure that it continues to remain relevant and appropriate.

This Policy was reviewed and approved by Board on 1<sup>ST</sup> June 2020.