

DATASONIC GROUP BERHAD
[200801008472 (809759-X)]

Anti-bribery Anti-corruption Policy (ABAC Policy)

Doc. No:	:	DGB-PLCY-ABAC
Rev. No:	:	2.0
Effective Date	:	08 Feb. 2022
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Status of Document Change Control

Rev. No:	Issue Date	Description of Document Change	Originator	Approved by
0	29 May 2020	First Issue	IGU	MD
1.0	30 Aug 2021	First Revision after editing.	IGC	BoD
2.0	08 Feb 2022	2 nd Revision to include the 'Table of Contents' and rearrange its content items.	IGU	MD

Prepared by IGC

Date: 2nd February 2022

Reviewed by Managing Director

Date: 7th February 2022

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1.0 PURPOSE

- 1.1** The purpose of this Anti-Bribery Anti-Corruption (ABAC) Policy is to establish a protocol for all Datasonic Group Berhad (DGB) and its subsidiaries' personnel, business associates and third parties' intermediaries who perform, or shall perform, services and act on behalf of DGB and its subsidiaries are aware of our ABAC Policy so as to prevent any potential, suspected or actual acts of bribery and corruption.
- 1.2** Datasonic Group Berhad (DGB) and its subsidiaries are committed to conduct our business dealings, relationships and operations with highest level of ethics and integrity and to comply fully with applicable statutory laws and regulatory requirements related to corporate liability in term of anti-bribery and anti-corruption. We have adopted a zero-tolerance approach against all forms of bribery and corruption and take a strong stance against such actions.

2.0 SCOPE

- 2.1** The scope of this Anti-Bribery Anti-Corruption (ABAC) Policy applies to all DGB and its subsidiaries' personnel, business associates and third party intermediaries who perform, or shall perform, services and act on behalf of DGB and its subsidiaries and extends to all business dealings, relationships and operations in all jurisdictions within which DGB and its subsidiaries operate.
- 2.2** This ABAC Policy applies in all countries or territories where DGB and its subsidiaries operate. Where local customs, standards, laws or other local policies apply that are stricter than the provision of this ABAC Policy, the stricter rules shall be complied with. However, if this ABAC Policy stipulates stricter rules than local customs, standards, laws or other local policies, the stricter provisions of this ABAC Policy shall apply.
- 2.3** In the context of this ABAC Policy, personnel refers to all individuals working at all levels and grades, including directors, senior managers, officers, employees (whether permanent, fixed-term or temporary), trainees, seconded staff, home-workers, casual workers and agency staff, volunteers, trainees, interns, protégé pupil, sponsors, or any other person associated with DGB and its subsidiaries.
- 2.4** Business associates and third party intermediaries refers to any external individual or organisation that DGB and its subsidiaries have, or plans to establish, some form of business dealings, relationships and operations. This shall include actual and potential clients, customers, contractors, suppliers, distributors, business contacts, agents, advisers, joint ventures, joint venture partners, intermediaries, sales representatives or consultants and government and agencies and public bodies, not limited to their advisors, representatives, public officials, politically exposed persons and political parties.

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3.0 TERMS AND DEFINITIONS

3.1 “Agent / Consultant”: Any individual acting as an agent or consultant, paid by DGB, acting on behalf of DGB and its subsidiaries in negotiating with third parties’ intermediaries.

3.2 “Anything of Value”: Any form of benefit, which includes, but is not limited to:

- Cash or cash equivalents, loans, gifts or prizes
- Employment offers or promises of future employment (to an individual or any of his/her relatives)
- Favourable terms on a product or service or product discounts
- Entertainment/hospitality (payment of travel, hotel, meals, living expenses, or costs of trips or resort stays)
- Use of vehicles or vacation homes
- Discounted or free tickets to events
- Services, personal favours, or home improvements
- Political or charitable donations
- Opportunity to buy direct shares ("friends and family shares") in a company with a connection to DGB and its subsidiaries.

3.3 “Assets”: Tangible or intangible resources controlled by the enterprise as a result of past transactions or events and from which future economic benefits are expected to flow to the enterprise. Such resources shall include buildings, sites, equipment, tools, supplies, communication facilities, funds, accounts, computer programmes, information, technology, documents, patents, trademarks, copyrights, know-how and other resources or property of the DGB and its subsidiaries.

3.4 “Bribe”: A financial or other inducement or reward for action, which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit that is intended to influence a decision or action.

3.5 “Bribery”: Bribery occurs when one person offers, promises, gives, accepts, receives or solicits a payment, gift, favour, or a financial or other advantage as an inducement from another to influence a business outcome improperly, to induce or reward improper conduct or to gain any commercial, contractual, regulatory or personal advantage. Such action is considered as an offence of giving or receiving ‘gratification’ under MACC Act 2009 (Act 694). It can be direct or indirect through third parties’ intermediaries.

Bribery can be ‘outbound or active’, where someone acting on behalf of DGB and its subsidiaries attempts to influence the actions of someone external, such as a government official or client decision-maker.

Bribery can also be “inbound or passive”, where an external party is attempting to influence someone within DGB and its subsidiaries such as a decision-maker or someone with access to confidential information including proprietary information and intellectual property.

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3.6 **“Corruption”**: Any form of abuse of power for business and/or personal gain and may include, but is not limited to, bribery. Bribery is a sub-set of corruption. Corruption can include graft, acts of extortion, collusion, breach of trust, abuse of public property or function, trading under influence, embezzlement, concealment, obstruction of justice, patronage, clientelism, cronyism, nepotism, inside trading, illicit enrichment, fraud or money laundering, facilitation payments or other forms of improper business practice. It can be summarised as the misuse or abuse of entrusted power or office, whether in the public or private sector, for private or personal gain.

3.7 **“Conflict of Interest”**: Occurs when an individual or organization is involved in multiple interests, one of which could possibly corrupt, or be perceived to corrupt, the motivation for an act in another. Conflict of Interest arises in a situation where you are or may be in a position to take advantage of your role by using assets, confidential information, proprietary information or intellectual property for the benefit of yourself or a closely related person.

3.8 **“Detrimental Conduct”**: Any threatened, proposed or actual, direct or indirect, act or omission that can result in harm to a person, whistle-blower or other relevant party, related to the reporting of a concern or wrongdoing.

Harm includes any adverse consequence, whether work-related or personal, including dismissal, suspension, demotion, transfer, change in duties, alteration of working conditions, adverse performance ratings, reduced opportunity for advancement, denial of services, blacklisting, boycotting, damage to reputation, financial loss, prosecution or legal action, harassment, isolation, or any form of physical or psychological harm.

Detrimental conduct includes retaliation, reprisal, retribution, deliberate action or omissions, done knowingly or recklessly to cause harm to a person, whistle-blower or other relevant parties.

Detrimental conduct also includes the failure to prevent or to minimise harm by fulfilling a reasonable standard of care at any step of the whistleblowing process.

3.9 **“Donation”**: A donation is a voluntary contribution in the form of monetary or non-monetary gifts to a fund or cause for which no return service or payment is expected or made. It can be charitable gift, contribution, subscription, present, hand out, grant, offering, gratuity, endowment or other similar donation that can be perceived by a third party, to be for the purpose of bribery even if neither the giver nor the receiver intended it to be for this purpose. It can include giving or providing cash, venues, equipment, personnel time or other benefit.

Contributions to industry associations or fees for memberships in societies and organizations that serve business interests are not necessarily considered donations.

3.10 **“Facilitation Payments”**: Facilitation payments are small payments or bribes to officials with a view and purpose to speeding up or expediting routine governmental transactions to which the payer is already entitled but not to obtain or retain business or any other undue advantage. Examples include payments to speed up customs clearances and extra fees to officials to secure electricity connections or printing out of permits and licenses.

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- 3.11 **“Fraud”**: A false representation of a matter of fact, whether by words or by conduct, by false or misleading allegation, or by concealment of what should have been disclosed, that deceive or is intended to deceive another person.
- 3.12 **“Gifts”**: Money, movable or immovable property, vehicle, shares, travel tickets, entertainment, service, club membership, any form of discounts or commissions, hampers, jewellery, ornament, souvenirs, customary tokens of appreciation or anything of value which is given to or received by personnel, his or her spouses or any other person on his behalf, without any or insufficient consideration known to the personnel.
- 3.13 **“Gratification”**: as defined in the MACC Act 2009 means:-
- (a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
 - (b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
 - (c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
 - (d) any valuable consideration of any kind, any unlawful discount, commission, rebate, bonus, deduction or percentage;
 - (e) any forbearance to demand any money or money's worth or valuable thing;
 - (f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and
 - (g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs a) to f).
- 3.14 **“Hospitality (Meals and Entertainment)”**: A generous and friendly, invitation, treatment, reception to social function, sporting event or entertainment that can be perceived by a third party, to be for the purpose of bribery even if neither the giver nor the receiver intended it to be for this purpose.
- 3.15 **“Intellectual Property”**: Proprietary business or technical information of value protected by patent, trademark, copyright, or trade secret laws.
- 3.16 **“Kickback”**: A bribe to obtain an undue advantage, where a portion of the undue advantage is 'kicked backed' to the person who gave, or is supposed to give, the undue advantage. Kickbacks arise when suppliers or service providers pay part of their fees to the individuals who give them the contract or some other business advantage.
- 3.17 **“Personnel”**: All individuals working at all levels and grades, including directors, senior managers, officers, employees (whether permanent, fixed-term or temporary), trainees, seconded staff, home-workers, casual workers and agency staff, volunteers, trainees, interns, protégé pupil, sponsors, or any other person associated with DGB and its subsidiaries.

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3.18 **“Proprietary Information”**: Information held by a person or entity concerning the know-how, trade secrets or other information of any kind, whether in printed or electronic format, including but not limited to Intellectual Property rights, technical information, business processes, sales forecasts, marketing strategies, customer lists or potential customer information, financial records or operations which is regarded as being confidential in nature (whether or not labelled as confidential) and belongs to and owned by DGB and its subsidiaries.

3.19 **“Public Official”**: Any person who is a member, an officer, an employee or a servant of any government or other public body, agency or legal entity, at any level, including officers or employees of state-owned enterprises and officers or employees of enterprises which are mandated by a public body or a state-owned enterprise to administer public functions.

A public officer means a person lawfully holding, acting in or exercising the functions of a public service or body. A public body includes the federal government, state government, local authorities, and their departments, services and undertakings. Also included are companies or subsidiaries over which a public body has controlling power or interest, and various registered societies and trade unions.

Public official includes a member of the administration; a member of Parliament; a member of a State Legislative Assembly; a judge of the High Court, Court of Appeal or Federal Court; and any person receiving any remuneration from public funds, and where the public body is a corporation sole, includes the person who is incorporated as such.

Thus, public official is an officer or employee (regardless of rank) of:

- (i) any national, provincial, regional or local government agency or department including: schools, universities, healthcare facilities, police agencies, military entities, customs officials, local tax officials, issuers of government permits, approvals or licenses, and immigration officials;
- (ii) any government owned/controlled company or commercial entity including Government-linked Companies;
- (iii) public (quasi-governmental) international organization (such as the United Nations, World Bank, International Monetary Fund, International Olympic Committee, African Union, etc.)
- (iv) a political candidate, party or any officer or employee of a political party
- (v) any private person acting in an official capacity for or on behalf of any government or public international organization (such as an official advisor to the government or a consultant responsible for making procurement recommendations to a government).

3.20 **“Retaliation”**: Action by way of unfair, unlawful or otherwise inappropriate reprisal taken in return of an actual or perceived injury or offence.

3.21 **“Sponsorship”**: Sponsorship is about partnering with external organisations to deliver mutual benefits through an exchange of monies, products, services, content or other intellectual property.

3.22 **“Third Party Intermediaries”**: Any external individual or organisation that DGB has, or plans to establish, some form of business relationship. This may include actual and potential clients, customers, contractors, suppliers, distributors, business contacts, agents, advisers, joint ventures, joint venture partners, intermediaries, sales representatives or consultants and

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government and agencies and public bodies – this includes (but is not limited to) their advisors, representatives, public officials, politically exposed persons and political parties.

3.23 “Applicable laws”: Principal Anti-Corruption laws that all DGB and its subsidiaries’ personnel are expected to understand and comply with these jurisdictions (but not limited to) :-

- (i) Malaysian Anti-Corruption Commission (MACC) Act 2009 (Act 694);
- (ii) Indonesian KPK (Amended) Law No: 19/2019 and Supreme Court Regulation No: 13/2016;
- (iii) Philippines’ Anti-Graft and Corruption Practice Act No: 3019/1960;
- (iv) New Zealand’s Crimes Act 1961 and Secret Commissions Act 1910;
- (v) Kingdom of Bahrain Penal Code (Decree Law No: 15/1976) Articles 186 - 193 and 417 – 427.

4.0 APPLICABLE FORMS

4.1 Personnel Declaration Form

5.0 RESPONSIBILITIES

5.1 Datasonics Group Berhad (DGB)’s Governing Body and Top-level Management are responsible for establishing this Anti-bribery Anti-corruption (ABAC) Policy within DGB and its subsidiaries and supported by an appropriate corporate culture of integrity led by the Board of Directors, Executive Leadership and Senior Management, which prohibits bribery and corruption involving DGB and its subsidiaries’ personnel, business associates and third parties’ intermediaries who perform, or shall perform, services and act on behalf of DGB and its subsidiaries.

5.2 Board of Directors, Executive Leadership and Senior Management are responsible for the development and implementation of an Anti- Bribery and Anti-Corruption Policy that covers Datasonics Group Berhad (DGB) and its subsidiaries and is designed to ensure it complies with all applicable laws and conducts business in accordance with this Anti-Bribery and Corruption Policy.

5.3 It is the responsibility of the management of each subsidiaries / division / department to ensure that all DGB and its subsidiaries’ personnel, business associates and third parties’ intermediaries who perform, or shall perform, services and act on behalf of DGB and its subsidiaries are aware of this ABAC Policy so as to prevent any potential, suspected or actual acts of bribery and corruption.

5.4 The Integrity and Governance Committee (IGC) Lead and IGC Chairman are responsible for the implementation of this ABAC Policy in DGB and its subsidiaries for which they are responsible through an Anti-Bribery and Anti-Corruption Programme that is developed in cooperation with business and management, and takes account of specific local circumstances.

5.5 The IGC Lead shall report to Board of Director, Executive Leadership and Senior Management on the implementation of this programme. The IGC shall also monitor the design, implementation, adequacy, and effectiveness of the Anti-Bribery and Anti-Corruption Programmes, including specific compliance measures required by this Policy.

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- 5.6 The Managing Director is the ultimate owner of this ABAC Policy (and related documents) and has overall responsibility for the implementation of this ABAC Policy in DGB and its subsidiaries.
- 5.7 The custodian of this ABAC Policy is the IGC who shall be responsible for incorporating any amendments and updates into this document, obtaining approval from the Board of Directors and the Risk Management Committee for the amendments and updates, as well as distributing the same to the relevant parties.
- 5.8 This ABAC Policy shall be reviewed on an annual basis during the Group Management Committee (GMC) Meeting and, in addition, can be reviewed from time to time to take account of, for example, changes to legislation, regulatory developments or organizational changes.
- 5.9 Appropriate due diligence and monitoring of activities shall be undertaken in relation to the appointment of such high-risk personnel, business associates or any third parties' intermediaries who perform, or shall perform, services and act on behalf of DGB and its subsidiaries.
- 5.10 If any of DGB and its subsidiaries' personnel, business associates and third parties' intermediaries who perform, or shall perform, services and act on behalf of DGB and its subsidiaries believes that the objectives of this ABAC Policy are not being correctly adhered to by any parties; then they shall seek to raise any concerns with their immediate superior and line manager or in accordance with the terms of our Whistleblowing Policy (DGB-PLCY-WB)

6.0 PROCEDURES

6.1 ABAC Policy Statement

Datasonic Group Berhad is committed to maintain and preserve the highest standard of governance, integrity, accountability and transparency in all our business activities as a recognized and reputable investment holding and to provide creative and innovative Information and Communication Technology (ICT) business solutions through proper implementation of ISO 37001:2016 Anti-bribery Management System (ABMS) and Ministerial Guidelines on Adequate Procedures (GAPs) to prevent, detect, and respond to bribery and corruption.

Datasonic Group Berhad shall conduct all our business dealings, relationships and operations in an honest, fair and ethical manner with a zero-tolerance approach towards bribery and corruption in accordance with the requirements of its ABMS & GAPs, our established processes, policies and procedures; the guidance and directives of the Governing Body (Board of Directors) and independence support from Integrity & Governance Committee.

Datasonic Group Berhad shall uphold all statutory laws and regulations relating to anti-bribery and anti-corruption and maintain a culture of integrity for all employees and stakeholders with the encouragement to raise any concerns in good faith through our Whistleblowing Policy without fear of reprisal.

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To achieve this goal, Datasonic Group Berhad shall:

Driving our commitment and continual improvement of Anti-bribery Management System (ABMS) through activities of conducting bribery risk assessment, internal audits, management reviews and setting, reviewing and achieving anti-bribery objectives;

Guiding our personnel to apply the Guidelines on Adequate Procedures (GAPs) on curbing, curtailing and combating bribery and corruption;

Bonding our multi-stakeholders to adopt the ABAC Policy and any violation or non-complying with its policies, procedures, guidelines and directives may result in disciplinary action.

With this Policy, DGB has established an Integrity and Governance Committee to be responsible for development and implementation of MS ISO 37001 Anti-Bribery Management System. If any personnel has breached not only this ABAC Policy but also the Code of Code, and other policies and found guilty of a criminal act or serious misconduct shall be considered to have committed a serious disciplinary offence and shall face disciplinary action.

6.2 Implementation Guidelines

- (a) What is a bribe? A bribery is any money, gift or advantage financial or otherwise, given or received to influence the recipient's conduct such as gifts, meals, entertainment, expenses, below-market discounts, contribution, donations, services, loans, fee, valuable security, property, rewards, kick-backs, preferential treatment, financial benefits, any office, dignity, employment, contract of employment or services or anything else of value.
- (b) DGB and its subsidiaries take a zero-tolerance approach towards bribery and corruption, and is committed to behaving professionally, fairly and with integrity in all our business dealings and relationships wherever DGB and its subsidiaries operate and implementing and enforcing effective systems to counter bribery and corruption.
- (c) The consequences of bribery and corruption are severe, and include imprisonment for individuals, unlimited fines, debarment from tendering for public contracts, and damage to DGB and its subsidiaries' reputation.
- (d) All DGB and its subsidiaries' personnel, business associates and third parties' intermediaries who perform, or shall perform, services and act on behalf of DGB and its subsidiaries are forbidden to offer, promise or give a bribe of any kind to any person, whether directly or indirectly, in order to induce or reward that person for performing its duties or activities improperly (active bribery); or to provide anything of value to public officials (including politicians or persons connected with them) in order to influence any act or decision by or through such officials or to obtain or retain business, is not allowed, unless permitted and required by applicable law.
- (e) All DGB and its subsidiaries' personnel, business associates and third parties' intermediaries who perform, or shall perform, services and act on behalf of DGB and its subsidiaries are forbidden to

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receive, request or agree to receive a bribe of any kind from any person, whether directly or indirectly (passive bribery).

- (f) All DGB and its subsidiaries' personnel, business associates and third parties' intermediaries who perform, or shall perform, services and act on behalf of DGB and its subsidiaries shall record all transactions and payments properly and shall not establish any undisclosed or unrecorded account. False or artificial entries are NOT to be made in the books and records of DGB and its subsidiaries for any reason.
- (g) DGB and its subsidiaries prohibits the use of contracts or consulting agreements to channel improper payments through agents or intermediaries to private individuals, public or government officials.
- (h) DGB and its subsidiaries do not make any direct or indirect contributions such as money, gifts or advantages provided to relatives of a public official (politically exposed person) or private person or to corporate entities.
- (i) The use of persons associated with DGB and its subsidiaries such as contractors, suppliers, distributors, business contacts, agents, advisers, joint ventures, joint venture partners, intermediaries, sales representatives or consultants that are known to pay bribes is forbidden.
- (j) Bribery does not only relate to dealings with public officials but also dealings with corporate entities and private persons such as clients, business associates, suppliers and their employees.
- (k) No bribes of any sort may be paid to or accepted from customer, business associates, suppliers, politician, government advisors or representatives, private persons or companies.
- (l) This ABAC Policy does not prohibit normal and appropriate hospitality (given or received) in accordance to our Gift, Hospitality and Donation guidelines.

6.3 Compliance to the Law

- (a) Datasonic Group Berhad (DGB) and its subsidiaries shall comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions within which DGB and its subsidiaries operates.
- (b) There are four (4) types of corruption offences stipulated in the MACC Act 2009 (Act 694) and are as follows:-
 - (i) Soliciting / Receiving Gratification (Bribe) by individual and through agent respectively – MACC Act Sections 16(a) and 17(a);
 - (ii) Offering / Giving Gratification (Bribe) by individual and through agent respectively – MACC Act Sections 16(b) and 17(b); and Offering / Giving Gratification by Commercial Organization (Offence by Commercial Organization – Corporate Liability);
 - (iii) Intending to Deceive (False Claim) – MACC Act Section 18;
 - (iv) Using Office or Position for Gratification (Bribe) (Abuse of Power / Position) – MACC Act Section 23;

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- (c) DGB and its subsidiaries' reserve its right to report any actions or activities suspected of being criminal in nature to the government agencies, anti-corruption agency, police or other relevant authorities.

6.4 Supplementary to ABAC Policy

- (a) This ABAC Policy shall be read in conjunction with Datasonic Group Berhad (DGB) and its subsidiaries' various policies and procedures such as :-
- (i) Code of Conduct and Ethic for Directors;
 - (ii) Corporate Disclosure Policy and Procedures;
 - (iii) Employee Business Conduct Guidelines;
 - (iv) Employee Handbook;
 - (v) Discretionary Authority Limits ("DAL"); and
 - (vi) Whistle-blower Policy

6.5 Anti-bribery Compliance Function (Integrity & Governance Committee)

- (a) Datasonic Group Berhad (DGB) and its subsidiaries have established and shall continue to maintain an Integrity & Governance Committee to be responsible for all anti-bribery and anti-corruption compliance matters.
- (b) The IGC is adequately equipped to act effectively against bribery and corruption in the following manner:
- (i) overseeing the design and implementation DGB's Anti-bribery Management System (ABMS) and Ministerial Guidelines on Adequate Procedures (GAPs);
 - (ii) providing advice and guidance to personnel on the ABMS & GAPs and issues relating to anti-bribery and anti-corruption compliance programme;
 - (iii) ensuring that the ABMS and GAPs conform to the requirements of ISO 37001:2016; and MACC Act Section 17A;
 - (iv) reporting on the performance of the ABMS and GAPs and opportunities for improvement and need for change or innovation to the Governing Body and Top Management, as appropriate;
 - (v) ensuring that integrity of the ABMS and GAPs is maintained, when changes to ABMS and GAPs are planned and implemented.
- (c) The IGC Lead has direct and prompt access to the Governing Body and Top Management for any issue or concern that needs to be raised in relation to anti-bribery and anti-corruption, ABMS and GAPs.
- (d) Appropriate resources shall be provided for effective operation of the ABMS and GAPs compliance programme and that the IGC is staffed with persons who have the appropriate competence, status, authority and independence.

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- (e) The lines of authority for the IGC is tasked with responsibility for overseeing the ABMS and GAPs compliance programme shall be directly to the Board of Directors and Top-level Management.

6.6 Gifts, Hospitality and Donations

6.6.1 Gifts and Hospitality (Meals & Entertainment) Policy

- (a) This Gift and Hospitality (Meals & Entertainment) Policy does not prohibit the giving or accepting of reasonable and appropriate gift or hospitality for legitimate purposes such as building and fostering business relationship, networking and goodwill, maintaining our corporate image or reputation, or promoting our products and services.
- (b) Datasonic Group Berhad (DGB) and its subsidiaries recognise that the practice of giving and receiving business gifts varies between companies, countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable shall inevitably differ for each circumstance.
- (c) DGB and its subsidiaries accept normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets any of the following propositions or requirements: -
- (i) It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits (e.g. discounts, provision of free products or services, provision of vehicles at discounted or zero cost rates, servicing and other provisions are not permitted in exchange for undue influence);
 - (ii) It is in compliance with local law or does not contravenes the same;
 - (iii) It does not include cash or a cash equivalent (e.g. a voucher or gift certificate) and not be given in secret;
 - (iv) It is appropriate for the circumstances (e.g. giving small gifts during festive seasons);
 - (v) It is given/received openly with proper declaration accepted by DGB's management, and not secretly or discreetly given/received;
 - (vi) It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the top-level management.
- (d) DGB and its subsidiaries' personnel shall not offer to, or accept from, third parties, gifts, hospitality, rewards, benefits or other incentives that could affect either party's impartiality, influence a business decision or lead to the improper performance of an official duty. Similarly, they shall not offer or accept cash donations.
- (e) DGB and its subsidiaries' personnel may offer and accept 'reasonable' and 'proportionate' gifts and hospitality such as meal, corporate event, function or sporting events. In determining what is 'reasonable' and 'proportionate', DGB and its subsidiaries' personnel shall consider the value of the gift or benefit, as well as the frequency with which the same or similar gift or benefit is offered. Gift shall be (a) **Genuine** (appreciation without encouragement); (b) **Independent** (without effect on future); (c) **Free** (without obligation) and limited **Frequency**; and (d) **Transparent** (declared openly).

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- (f) In all cases, DGB and its subsidiaries' personnel shall ensure that the gift or benefit:
- (i) is being given as an expression of goodwill and not in expectation of a return favour (a gift designed to secure a return favour could be seen as a bribe).
 - (ii) is commensurate with generally accepted standards for hospitality taking into account the norms for the industry/professional sector in which it is offered.
 - (iii) is being provided openly and transparently and is of a nature that shall not cause DGB embarrassment if publicly reported.
 - (iv) complies with local laws and regulations, including the recipient's own rules (bearing in mind that government rules on offering and receiving gifts or benefit are often particularly tight).
 - (v) meets the value limits set by DGB and has all required approvals. In cases of uncertainty, all personnel shall seek advice from their superior or line managers.
- (g) A gift or hospitality shall not be appropriate if it is unduly lavish or extravagant or could be seen as an inducement or reward for any preferential treatment (for example, before, during and after contractual negotiations or a tender process).
- (h) Hospitality (meals and entertainment) shall be unsolicited and not affect, or be perceived as affecting, business judgment. Meals and entertainment may only be offered to and received from the DGB and its subsidiaries' representative dealing with the customer or service provider in their role in DGB and its subsidiaries, is for purposes supported by DGB and its subsidiaries and may only be offered in conjunction with legitimate business meetings, conferences or events hosted, supported or sponsored by DGB and its subsidiaries. They shall never be provided on a stand-alone basis.
- (i) Gift shall be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gift shall be given out in our corporate name and not as in private or individual name. Promotional corporate gift of low value such as stationery, commemorative items, fruit baskets, food hampers, caps, mugs and other corporate gifts.
- (j) If prior approval cannot be realistically obtained before the initial acceptance of a gift or hospitality, the DGB and its subsidiaries' personnel shall report and seek retrospective approval, or otherwise, at the required level as soon as possible after initial acceptance.
- (k) Spouses or partners may be included in an invitation to, for example, hospitality such as meals, corporate function or sporting events, where this does not create or give the appearance of an inducement.

6.6.2 Permissible and Allowable Gifts, Hospitality and Donations

- (a) Datasonic Group Berhad (DGB) and its subsidiaries' personnel shall seek prior approval from their office/function heads for all gifts or benefits received or offered with a value of more than RM350.00 or equivalent (for non-management) prior to final acceptance. Executive Directors can approve the offering or acceptance of gifts or hospitality up to a maximum notional value of RM500.00 or equivalent (for managers and executives).

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- (b) Any gifts or hospitality with a notional or actual value in excess of RM500.00 or equivalent (for senior managers and above) but less than RM1,000.00 or equivalent shall be approved by the Managing Director.
- (c) With regards to the offering and acceptance of gifts and hospitality for Malaysian public officers, the value shall not exceed the allowable amount as stated in the Service Circular No. 3 of 1998 (Surat Pekeliling Perkhidmatan Bilangan 3 Tahun 1998) and the Service Circular No: 5 of 2008 (Surat Pekeliling Perkhidmatan Bilangan 5 Tahun 2008).
- (d) With regards to the offering and acceptance of gifts and hospitality for oversea business partners, the value shall not exceed the allowable amount as stated by the respective country's Anti Bribery and Anti-Corruption Law.
- (e) Gifts with the maximum notional value or equivalent mentioned above and, in any event, shall not occur more than three (3) times a year with the same person. All approvals shall be given in writing, and records of gifts received, from whom and by whom, shall be recorded in an office or function log established for such purpose.
- (f) Hospitality (meals and entertainment) shall not exceed RM350.00 (for non-management), RM500.00 (for managers and executives) and between RM500.00 – RM1,000.00 (for senior managers and above) and in any event, shall not occur more than three (3) times a year with the same person. Spouses or other guests of the invitee shall not be included.
- (g) Agreed standard market rebates, reductions, discounts or similar advantages in business to business transactions are allowable and shall be incorporated in the contracts. Any benefits are only for the organization (instead of individuals) and shall be made transparent by the parties to Top-level Management and Integrity & Governance Committee.
- (h) Paying routine government fees, if this is so required by applicable regulations is allowable and it shall not benefit an individual. However, facilitation payment is not permissible.
- (i) Recording of gifts - A log of all gifts given or accepted shall be recorded and kept. This include a record of the gift's nature and value, the names of the giver and the recipient, the reason or occasion for the gift, and the fact of the approval of the giving or retention of the gift. Such logs shall be filed and maintained for review by top-level management.

6.6.3 Charitable Donations Policy

- (a) As part of its corporate citizenship activities, Datasonic Group Berhad (DGB) and its subsidiaries accept (and indeed encourage) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) or provide sponsorship, to sporting or culture event and that shall be made directly to an official entity and agrees to disclose all charitable contributions it makes.
- (b) DGB and its subsidiaries shall only provide donation, contribution and sponsorship to organisations that serve a legitimate public purpose, and which are themselves subject to high standards of transparency and accountability.

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- (c) Any such charitable donation, contribution or sponsorship made are legal and ethical under local laws and practices and shall be transparent and properly documented. Such donation, contribution and sponsorship are only offered and made with the approval of the authorised personnel as set in the Discretionary Authorization Limit (DAL).
- (d) Appropriate due diligence shall be conducted on the proposed recipient charity and a full understanding obtained as to its bona fides to ensure that charitable donation, contribution and sponsorship are not used to facilitate and conceal any acts of bribery.

6.6.4 Political Contribution Policy

- (a) Datasonic Group Berhad (DGB) and its subsidiaries have a policy of strict political neutrality; it does not make political donations or contributions to any political parties, organisations, or individuals engaged in politics nor does it incur any political expenditure.
- (b) DGB and its subsidiaries shall co-operate with governments and other official bodies in the development of policy and legislation that may affect its legitimate business interests, or where it has specialist expertise.
- (c) DGB and its subsidiaries' personnel are entitled to their own political views and activities, but they shall not use DGB and its subsidiaries premises or equipment to promote those views or associate their views with those of DGB and its subsidiaries.
- (d) DGB and its subsidiaries respect the right of individual personnel to make personal contributions, provided they are not made in any way to obtain advantage in a business transaction.
- (e) DGB and its subsidiaries communicate views to government and others, on matters which affect its business interests or those of its shareholders and personnel, as a way of assisting in the development of regulation and legislation affecting the business.

6.7 Facilitation Payment

- (a) Datasonic Group Berhad (DGB) and its subsidiaries' personnel shall not make unofficial facilitation payments or extra payments in order to secure or expedite routine administrative actions, such as government papers, customs clearances, visas, permits or licenses.
- (b) If DGB and its subsidiaries' personnel encounter a demand for a facilitation payment, or think they are likely to do so, they shall report the situation to their superior or line manager without delay. Superior or Line managers shall then ensure that the Managing Director is informed at the earliest possible opportunity.
- (c) DGB and its subsidiaries recognise that demands for facilitation payments are often backed by a form of extortion and that in exceptional circumstances resistance may not be feasible. An extreme example would be a demand for payment to secure an emergency admission into hospital or enter and exit across war-torn boundaries.

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- (d) Where the facilitation payment is being extorted or DGB and its subsidiaries' personnel are being coerced to pay it and their safety or liberty is under threat or they feel that they have no alternative but to pay for personal or family peace of mind. In such circumstance, then they may pay the facilitation payment.
- (e) DGB and its subsidiaries accept that personnel need to use their best judgement. The concerned personnel shall report such incident where they feel forced to make a facilitation payment to their superior or line manager at the earliest opportunity.
- (f) DGB and its subsidiaries shall stand by their personnel who find themselves placed in exceptional situations provided that the personnel have provided absolute transparency as to the circumstances surrounding a payment shortly after the incident has occurred.

6.8 Conflict of Interest

6.8.1 Conflict of Interest Policy

- (a) Datasonic Group Berhad (DGB) and its subsidiaries' personnel shall avoid situations or transactions in which their personal interests could conflict or might be seen to be in conflict with the interests of DGB and its subsidiaries.
- (b) Conflicts of interest can arise if individuals have a personal interest in business dealings involving DGB and its subsidiaries'. Conflict of interest is also arisen when an individual's objectivity is compromised or perceived to compromise with his / her professional obligation at DGB and its subsidiaries, by any form of personal interests.
- (c) Personal interest can be direct or indirect and refers not only to personal interests but to those of family members and friends (closely related persons). If there is a potential for conflict, the interests of DGB and its subsidiaries shall take priority.
- (d) A 'relative' or 'immediate family' includes:
 - (i) Spouse;
 - (ii) Siblings (brother(s)/sister(s);
 - (iii) Spouse's siblings;
 - (iv) Your direct line of ascendant (parent / grandparents) or descendant (children / grandchildren) including your spouse's and your spouse's siblings;
 - (v) Uncle, aunt or cousin;
 - (vi) Son-in-law or daughter-in-law.
- (e) A "Closely Related Person" is someone, company, corporation, partnership or other business enterprise which are closely related through common personal friendship, ownership, control, management, financial inter-dependence, cross-guarantees or even anyone living in the same household as individual employee and personnel.
- (f) A possible conflict of interest may arise when a person:

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- (i) acting on any client information gained through their employment with DGB and its subsidiaries for personal gain such as passing such information to a third party; or acting in any way that could be construed as insider trading;
 - (ii) Has a financial interest and possess controlling rights in a supplier, competitor or customer when the person is involved in DGB and its subsidiaries' decision making relating to, or of relevance, to the supplier, competitor or customer;
 - (iii) Engages in activities that compete with, or perceived to compete with DGB and its subsidiaries' interest; or
 - (iv) Allows business decisions to be influenced, or appear to be influenced, by personal or family interests.
- (g) DGB and its subsidiaries' personnel shall avoid situations and positions where a personal relationship (e.g. family member, friend) and/ or personal benefit influences and impairs your ability to perform your professional obligations and responsibilities at DGB and its subsidiaries. Personnel shall disclose any actual, potential or perceived conflicts of interest to their superior or line manager.
- (h) DGB and its subsidiaries' personnel shall also regularly declare any conflicts of interest according to the scheduled declarations process; declare conflicts of interest when taking up a new position (i.e. through promotions or job transfer) and seek conflicts of interest declarations from business associates you intend to deal with or have dealings with.

6.8.2 Family Members and Close Personal Relationships

- (a) Datasonic Group Berhad (DGB) and its subsidiaries' personnel (Board of Directors, Executive Leadership, Senior Management, Officers and Employees) shall not hire, recommend hiring, exert influence over hiring decisions, supervise, affect terms and conditions of employment or influence the management of any family members engaged by DGB and its subsidiaries.
- (b) However, family members of DGB and its subsidiaries' personnel (Board of Directors, Executive Leadership, Senior Management, Officers and Employees) shall be hired as employees or consultants only if the appointment is based on competency, qualification, performance, skills and experience, and in accordance with DGB and its subsidiaries' Human Capital hiring policies and procedures.
- (c) DGB and its subsidiaries' personnel (Board of Director, Executive Leadership, Senior Management, Officers and Employees) shall also disclose business activities in DGB and its subsidiaries' which involve family members and refrain from any related decision-making process.
- (d) Any substantial interest held by DGB and its subsidiaries' personnel's (Board of Director, Executive Leadership, Senior Management, Officers and Employees) family members in a competing company, competitors or other related companies shall be declared to the Managing Director.

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6.9 Whistle Blowing (WB) Policy

- (a) All Datasonic Group Berhad (DGB) and its subsidiaries' personnel are encouraged to raise concerns about any issue or suspicion of malpractice or any attempted, suspected or actual bribery and corruption at the earliest possible stage. If they are unsure whether an act constitutes bribery or corruption, or if they have any other queries, these shall be raised with the IGC
- (b) It is essential to report any attempted, suspected and actual bribery. DGB and its subsidiaries' personnel, business associates and third parties' intermediaries who perform, or shall perform, services and act on behalf of DGB and its subsidiaries shall immediately notify and report to the IGC if personnel have any suspicion or knowledge that bribes are being paid, or if personnel have been offered a bribe or is requested to provide a bribe in favour of DGB and its subsidiaries.
- (c) It is important that DGB and its subsidiaries' personnel inform the IGC as soon as possible if they are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.
- (d) If personnel make a report or disclosure about any actual or perceived bribery or corruption in good faith, belief, without malicious intent, that a breach or violation as aforesaid may have occurred or may about to occur, personnel shall be accorded protection of confidentiality, to the extent reasonably practicable, notwithstanding that, after investigation, it is shown that personnel were mistaken. In addition, DGB and its subsidiaries' personnel who whistleblow internally shall be also are protected against detrimental action for having made the disclosure, to the extent reasonably practicable.
- (e) If personnel believe that there has been a violation (or an intention to do so) of this Whistle Blowing Policy, personnel shall, at any time, talk to the superior, line manager or Legal Officer to seek initial advice, information or guidance. Personnel can also make a formal complaint to the individuals.
- (f) If personnel have any doubt whether an activity is permitted or falls within the scope of any anti-bribery legislation, personnel shall consult the IGC. (If the employee is uncertain about whether a certain action or behaviour can be considered bribery or corruption, he/she should speak to the Director or Head of Department or appropriate channels available.)
- (g) Detailed steps for raising concerns are described in accordance to our Whistleblowing Policy DGB-PLCY-WB).
- (h) This Whistle Blowing Policy cannot provide DGB and its subsidiaries' personnel with comprehensive solutions to every potential bribery or corruption situation that may arise. In case of uncertainty about the correct response to any situation DGB and its subsidiaries' personnel is required to discuss the situation with their superior, line manager or IGC, who shall consult with the Director and/or then if necessary with Managing Director's about any ethical or legal problems.
- (i) DGB and its subsidiaries have a responsibility for helping detect, prevent and respond to potential bribery and any other suspicious activity or wrongdoing. DGB and its subsidiaries are absolutely committed to ensuring that all of us have a safe, reliable, and confidential way of reporting any

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suspicious activity. Each and every DGB and its subsidiaries' personnel know how they can speak up without fear of doing so.

6.10 Consequences of Bribery and Corruption

- (a) If Datasonic Group Berhad (DGB) and its subsidiaries were involved in an incident of bribery and corruption that could have serious consequences for its business in other countries where DGB and its subsidiaries is active. Therefore, it is imperative that DGB and its subsidiaries and its personnel, business associates and third parties' intermediaries acting for or on behalf, shall comply with these ABAC Policy.
- (b) DGB and its subsidiaries shall not tolerate any form of bribery. Failure to comply with these ABAC Policy and guidelines or related policies and SOPs can result in disciplinary or other actions in accordance with the employment agreements of individual personnel involved.
- (c) Any violation of applicable laws in relation to anti-bribery can constitute an offence and can lead to prosecution of DGB and its subsidiaries and individuals involving prison sentences and serve financial sanctions.

In addition, under circumstances of suspicious behaviour, allegations and/or investigation relating to bribery or corruption, the Group Human Capital Development Department reserves all rights to request the relevant employee to declare information regarding assets owned or family ties and relationships as relevant and as deemed necessary.

6.11 Responsibilities of Personnel

- (a) All Datasonic Group Berhad (DGB) and its subsidiaries' personnel shall declare in writing that they have read, understood and shall abide and comply with the information, guidelines and requirements contained in this ABAC Policy.
- (b) A copy of this declaration shall be documented and retained by the Group Human Capital Development Department for the duration of the personnel's employment. A sample declaration can be found in the Appendix of this ABAC Policy. In the event, personnel are unsure or is in doubt of any of the provisions or requirements, the personnel shall seek the advice or clarification from their superior, line manager or Integrity & Governance Committee.
- (c) All DGB and its subsidiaries' personnel are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this ABAC Policy.
- (d) If any personnel has reason to believe or suspect that an instance of bribery or corruption has occurred or shall occur in the future that breaches this ABAC Policy, the personnel shall promptly notify the superior, line manager or IGC or appropriate channels for guidance on the next course of action.

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- (e) If any personnel breach this ABAC Policy shall face disciplinary action and could result in withholding of bonuses, increments and merits awards, denial of promotion and termination of my employment or dismissal for gross misconduct. DGB and its subsidiaries reserve its right to terminate a contractual relationship with personnel if one has had breach this ABAC Policy. Further legal action shall also be taken in the event that DGB and its subsidiaries' interests have been harmed or compromised as a result of non-compliance.

6.12 Protection of Personnel

- (a) Datasonic Group Berhad (DGB) and its subsidiaries are committed to ensuring no one suffers any detrimental treatment or retaliation as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future.
- (b) Any of DGB and its subsidiaries' personnel who knows of, or suspects, a violation of this ABAC Policy, is encouraged to whistle blow or report the concerns through the mechanism set out under WhistleBlowing Policy (DGB-PLCY-WB).
- (c) The provision, protection and procedure of the Whistle Blowing Policy for reporting of the violations of this ABAC Policy are available and no individual shall 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 this ABAC Policy. All reports shall be treated confidentially.
- (d) DGB and its subsidiaries' personnel who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. DGB and its subsidiaries aim to encourage openness and shall support anyone who raises genuine concerns in good faith under this ABAC Policy, even if they turn out to be mistaken.
- (e) DGB and its subsidiaries are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future.
- (f) Detrimental conduct includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform IGC immediately. If the personnel have reason to believe that they have been subjected to unjust conduct as a result of a concern or refusal to accept a bribe, the personnel shall inform the Head of Group Human Capital Development Department immediately.
- (g) No malicious, vindictive or baseless accusations shall be made by any personnel against another personnel. Appropriate action shall be taken against any personnel making such malicious, vindictive or baseless accusations.
- (h) Similarly, if any of the DGB and its subsidiaries' personnel is a victim of bribery or corruption, It is important that the personnel shall inform the IGC or the confidential helpline as soon as possible if one have been offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

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6.13 Five Adequate Procedure Principles - T.R.U.S.T

- (a) Datasonic Group Berhad (DGB) and its subsidiaries recognises the fact that bribery and corruption offences present serious risks for every business activity. Breaches of bribery and corruption laws can lead to unlimited fines for organizations and imprisonment for individuals. Under the MACC Act 2009 Section 17A, a commercial organization commits an offence if any person associated with that commercial organization corruptly gives, agrees to give, promises or offers to any person any gratification whether for the benefit of that person or another person with intent – (i) to obtain or retain business for the commercial organization; or (ii) to obtain or retain an advantage in the conduct of business for the commercial organization.
- (b) DGB and its subsidiaries shall establish its **Top-level Commitment** for ensuring that DGB and its subsidiaries shall practice the highest level of integrity and ethics and to comply fully with the applicable statutory laws and regulatory requirements on anti-bribery and anti-corruption; and to improve upon the effectiveness of its bribery and corruption risks management framework; internal controls and measures; systematic review, monitoring and enforcement; and training and communication.
- (c) DGB and its subsidiaries shall conduct periodically, informed and documented internal and external bribery and corruption **Risk Assessments**. This risk assessment shall be used to identify, establish, analyse, assess, and prioritise appropriate processes, systems and controls to mitigate and treat specific potential bribery and corruption risks of DGB and its subsidiaries and when there is a change in statutory laws and regulatory requirements or circumstance of the business.
- (d) DGB and its subsidiaries shall put in place and **Undertake Control Measures** and contingency measures which are reasonable and proportionate to the nature and size of DGB and its subsidiaries in order to address any bribe and corruption risks arising from weaknesses in DGB and its subsidiaries' governance framework, processes, policies and procedures including due diligence, an accessible and confidential trusted reporting (Whistleblowing) channel which may be used anonymously and policies and procedures that cover general anti-bribery anti-corruption policy, conflicts of interest, donations contributions and sponsorships.
- (e) DGB and its subsidiaries shall ensure regular **Systematic Review, Monitoring and Enforcement** are conducted to assess the performance, efficiency and effectiveness of the anti-bribery programme, and ensure the programme is monitored and enforced. Such reviews may take the form of an internal audit, or an audit carried out by an external party. The reviews shall form the basis for any efforts to improve existing anti-bribery anti-corruption controls.
- (f) DGB and its subsidiaries shall develop and disseminate internal and external **Training and Communications** relevant to its anti-bribery management system, in proportion to its operation, covering (i) ABAC policy; (ii) training; (iii) reporting channel; and (iv) consequences of noncompliance.

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6.14 Undertake Internal Control and Measures

- (a) Datasonic Group Berhad (DGB) and its subsidiaries shall maintain a system of internal controls and measures which can be found in other related financial and non-financial SOPs.
- (b) The Head of Company (HoC)/ Head of Department (HoD) is responsible for monitoring adherence to this policy and procedures designed to prevent or detect bribery and corruption.
- (c) Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits, internally or by an external party to ensure that they are effective in practice. Such reviews should include improvements of the existing anti-bribery and anti-corruption controls in the Group. The outcomes of the audits should be reported to the Executive Committee and Board Audit Committee.

6.15 Due Diligence

- (a) Datasonic Group Berhad (DGB) and its subsidiaries shall conduct due diligence on certain transactions, projects, business activities, business associates, and personnel, in particular where there is significant exposure to potential bribery and corruption risk – more than low bribery risks identified as part of DGB's risk assessment. The due diligence process is aimed at obtaining enough information in order to assess if there are bribery risks posed by these parties
- (b) DGB's bribery risk assessment assesses a more than low bribery risk in relation to:
 - (i) Specific categories of transactions, projects or activities,
 - (ii) Planned or on-going relationships with specific categories of business associates, or
 - (iii) Specific categories of personnel in certain positions.
- (c) Any arrangements, dealings or commitment which DGB and its subsidiaries make with any relevant parties or personnel (such Directors, Executive Leadership, Senior Management, Officers and Employees) is subject to clear contractual terms, including specific provisions that require the relevant parties or personnel to comply with minimum standards and procedures relating to this ABAC Policy.
- (d) Due diligence shall be conducted for more than low risk business associates and to include standard clauses in all contracts which enable DGB and its subsidiaries to terminate the contract in the event that bribery or an act of corruption has been proved to occur.
- (e) Due diligence shall be conducted on any relevant parties or personnel prior to entering into any formalised relationship with DGB and its subsidiaries. The extent of the due diligence shall be based on a bribery and corruption risk assessment.
- (f) Methods shall include background checks on the person or entity, online database, document verification process or conducting interviews with the person to be appointed to a key role where corruption risk has been identified. The results of the due diligence process shall be documented, retained for at least seven (7) years.

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- (g) Based on due diligence results, DGB and its subsidiaries shall either accept, decline, suspend or terminate relationships with personnel, business associates or any other parties engaging with DGB and its subsidiaries so as to protect DGB and its subsidiaries from any legal, financial, reputation and bribery risk.

6.16 Accurate Book and Record Keeping

- (a) Datasonic Group Berhad (DGB) and its subsidiaries shall keep detailed updated and accurate financial and non-financial records related to this ABAC Policy and procedures governing anti-bribery and anti-corruption measures, and shall have appropriate internal controls in place to act as evidence for all payments made.
- (b) Our objective of accurate book and record keeping is to maintain accurate and precise records in order to be transparent. DGB and its subsidiaries shall not:
- (i) Falsify, omit, misstate, alter or conceal any information or otherwise misrepresent the facts on a company record;
 - (ii) Encourage or allow anyone else to compromise the accuracy and integrity of our records;
 - (iii) Intentionally make a false or misleading entry in a record, report, file or claim; and
 - (iv) Engage in any scheme to defraud anyone.
- (c) All transactions shall be accurately, completely, and timely recorded in our financial books. The records shall accurately reflect and disclose the business rationale, purpose, substance and legality of all our local and cross-border transactions, payments and expenses, including gifts and hospitality.
- (d) All DGB and its subsidiaries' personnel shall declare all gifts and hospitality accepted or offered and submit details to the person in-charge who is assigned by the respective Division/Department for recording into a register which shall be subject to internal audit review.
- (e) All DGB and its subsidiaries' personnel shall also ensure that all expense claims relating to gifts, hospitality, gifts or expenses incurred to third parties are approved by the Head of Division/Department and shall be specifically recorded the reason for such expenditure.
- (f) The Finance Department shall maintain and keep a written record of all gifts and hospitality accepted or offered, and ensure such expenses claims incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure which shall be subject to managerial review.
- (g) All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, shall be prepared and maintained with strict accuracy and completeness. No accounts shall be kept "off-book" to facilitate or conceal improper payments.
- (h) DGB and its subsidiaries shall have appropriate internal controls in place, which shall evidence the business reason for making payments to third parties.

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6.17 Systematic Review, Monitoring and Enforcement

- (a) Datasonic Group Berhad (DGB) and its subsidiaries shall ensure regular Systematic Review, Monitoring and Enforcement are conducted to assess the performance, efficiency and effectiveness of the anti-bribery programme, and ensure the programme is monitored and enforced. Such reviews may take the form of an internal audit, or an audit carried out by an external party. The reviews shall form the basis for any efforts to improve existing anti-bribery anti-corruption controls.
- (b) The Board of Directors, Executive Committee, Executive Leadership, Senior Management of Datasonic Group Berhad are responsible for monitoring the effectiveness of this ABAC Policy and shall review the implementation of the Anti-bribery Management System (ABMS) and Ministerial Guidelines on Adequate Procedures (GAPs) on a regular basis so as to assess and ascertain its suitability, adequacy and effectiveness.
- (c) DGB and its subsidiaries shall conduct regular corruption risk assessment to identify the potential bribery and corruption risks affecting the business, set anti-bribery and anti-corruption objectives, and assess the effectiveness of the controls in achieving those objectives, at least once every 3 years. The scope, findings and results shall be properly updated and documented. The Board of Directors and the Board Risk Management Committee shall be kept informed of the identified risks.
- (d) Any deviation or waiver from this ABAC Policy shall be recommended by the Board Risk Management Committee for approval by the Board.
- (e) All DGB and its subsidiaries' personnel are responsible for the success of this ABAC Policy and shall ensure they use it to disclose any suspected danger or wrongdoing.
- (f) Personnel are invited to provide feedback and comment on this ABAC Policy and suggest ways in which it can be improved. Feedback, comments, suggestions and queries shall be addressed to IGC.
- (g) This ABAC Policy does not form part of any personnel's contract of employment and it may be amended at any time.
- (h) Datasonic Group Berhad (DGB) and its subsidiaries regard bribery and corruption as a serious matter. Non-compliance and violation of this ABAC Policy shall be subjected to disciplinary actions (e.g. reprimands, demotions, formal warnings, dismissal or termination of employment contract) and/ or any legal proceedings. Further legal action shall also be taken in the event that DGB and its subsidiaries' interests have been harmed as a result of non-compliance.
- (i) DGB and its subsidiaries shall have the right to exercise an audit or inspection on personnel, business associates, and third parties' intermediaries who are alleged or reported to be in non-compliance with our ABAC Policy.
- (j) DGB and its subsidiaries shall notify the relevant regulatory authority if any identified bribery or corruption incidents have been proven beyond reasonable doubt.

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- (k) Where notification to the relevant regulatory authorities have been done, DGB and its subsidiaries shall provide full co-operation to the said regulatory authorities, including further action that such regulatory authority decide to take against any convicted personnel.
- (l) If any of DGB and its subsidiaries' business associates and third parties' intermediaries are found to have breached any anti-corruption policies, laws or regulations or our ABAC Policy, such breach shall result in termination of contract(s) and if required, subject to legal proceedings. DGB and its subsidiaries' have the right to report any matter to the relevant government authorities or MACC.

6.18 Training and Communication

- (a) Datasonic Group Berhad (DGB) and its subsidiaries shall conduct awareness programme for all its personnel to ensure they understand DGB's Anti-bribery Anti-corruption Policy and its Anti-bribery Management Systems and Ministerial Guidelines on Adequate Procedures.
- (b) DGB and its subsidiaries shall provide training on this ABAC Policy as part of the induction process for all new personnel. All existing personnel shall be provided with details of this ABAC Policy and shall receive relevant training on how to implement and adhere to this ABAC Policy as necessary. All personnel shall also receive regular, relevant training on how to adhere to this ABAC Policy and shall be asked to formally accept that they shall comply with this ABAC Policy.
- (c) DGB and its subsidiaries' zero-tolerance approach to bribery and corruption shall be communicated to all personnel, business associates and third parties' intermediaries at the outset of any business relationship with them and as appropriate thereafter. In addition, all personnel, business associates and third parties' intermediaries shall be asked to formally accept declaration of acceptance this ABAC Policy on an annual basis.
- (d) The Group Human Capital Development Department shall maintain all records of trainings related to anti-bribery and anti-corruption attended by all DGB and its subsidiaries' personnel.

6.19 Immunity and Disclaimer

- (a) If any of DGB and its subsidiaries' personnel who participate in any act that constitute the act of violation of laws, policies and procedures mentioned above which he/she reported shall not be given immunity against any investigation or disciplinary/criminal proceeding arising out of the report made. Nevertheless, in such circumstances, the fact that he/she had caused the report to be made may be taken into consideration as a mitigating factor.

6.20 Review of ABAC Policy

- (a) The Board of Directors, Executive Committee, Executive Leadership, Senior Management of Datasonic Group Berhad shall monitor the implementation of this ABAC Policy and review the Policy regularly to ensure that it continues to remain relevant and appropriate for its suitability, effectiveness and efficiency.

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7.0 RECORD

- (a) Applicable records specified in sub-paragraph 4 (Personal Declaration Form) of this procedure shall be kept and retained as defined in our Standard Operating Procedure ***Control of Records***.

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Appendix I: Acknowledgement of Compliance Declaration Form

I, _____, hereby certify and declare that I have read and understood Datasonic Group Berhad (DGB)'s Anti-Bribery Anti-Corruption (ABAC) Policy with respect to compliance with MACC Act 2009 (Act 694) and I understand that this ABAC Policy applies to all DGB and its subsidiaries personnel (directors, senior managers, officers, and employees), business associates and third parties intermediaries.

I agree that any business decisions and actions that I am dealing with, shall be based on the best interest of DGB and its subsidiaries and shall not be motivated by personal interest, considerations or relationship. My relationships with prospective or existing business associates and third parties' intermediaries shall not affect my independent and sound judgment on behalf of DGB and its subsidiaries.

I also aware of this ABAC Policy regarding gifts and hospitality from and to any business associates and third parties' intermediaries with whom I am dealing with, and I certify that I have not violated these prohibitions.

I, hereby certify that, to the best of my knowledge and belief after reasonable review, I shall comply with all provisions of this ABAC Policy and understand my responsibility to immediate report any known or possible conflict of interest situations or suspected violations of ABAC Policy to my immediate superior, line manager or directly using the Whistleblowing channel.

I also certify my understanding that any failure by me to comply with this ABAC Policy shall result in disciplinary action taken against me, including but not limited to withholding of bonuses, increments and merits awards, denial of promotion and termination of my employment or dismissal for gross misconduct.

Signature : _____

Name : _____

NRIC or Passport Number : _____

Employee ID/Contract Number : _____

Designation : _____

Date : _____