



RB SPECTRA SDN BHD



ANTI-BRIBERY AND CORRUPTION POLICY (Rev. 2)

1) Tittle

Anti-Corruption and Bribery Policy (*ABC Policy*)

2) Purpose

The purpose of this Policy is to:

- a. Set out the responsibilities of RB SPECTRA, and of those working for RB SPECTRA, in observing and upholding RB SPECTRA's position on bribery and corruption
- b. Provide information and guidance to those working for RB SPECTRA on how to recognize and deal with bribery and corruption issues.

3) Definitions

- a) **Bribe** – Anything of value given in an attempt to affect a person's actions or decision in order to gain or retain a business advantage. Anything of value includes cash, entertainment or others gifts or courtesies.
- b) **Corruption** – The misuse of a public office or power for private gain or the misuse of private power in relation to business outside the realm of stakeholder.
- c) **Facilitation Payments** – Small sums, unofficial payment made to secure or expedite a routine stakeholder action by a stakeholder official.
- d) **Kickbacks** – The return of a sum already paid or due as a reward for awarding of furthering business.

All above payments cannot be made.

4) Scope

This Policy applies to all companies within the RB SPECTRA and RBS Group.

This includes all individual working at all levels and grades, including directors, Head of Dept, senior managers, managers, officers, employees (whether full-time, part-time, contract or temporary), consultants, contractors, trainees, seconded staffs, volunteers, interns, agents, sponsors, suppliers, customers, any thirds party and any other person associated with us.

5) Gifts and Entertainment

5.1 RB SPECTRA's policy and practice encourage the use of good judgment, discretion, and moderation when giving or accepting gifts or entertainment in business settings. Gift giving and entertainment practices may vary in different cultures; however, any gifts and entertainment given or received must be in compliance with law, must not violate the giver's and/or receiver's policies on the matter, and be consistent with local custom and practice. We do not solicit gifts, entertainment, or favors of any value from persons or firms with which RB SPECTRA actually or potentially does business.

5.2 All benefits, if given or received (including Gifts and Entertainment) must be:-

- Reasonable in value – e.g. normally below RM100.00
- Infrequent in nature
- Transparent and open
- Not given to influence or obtain an unfair advantage
- Respectful and customary

6) Donations and Political Contribution

6.1 RB SPECTRA do not make charitable donations or contributions to political parties.

6.2 Contributions or donations made by RB SPECTRA to community projects or charities need to be made in good faith and in compliance with RB SPECTRA Code of Ethics, this Anti-Corruptions Policy and all relevant RB SPECTRA's policies and procedures.

7) Responsibility

- 7.1 RB SPECTRA take corruption and bribery very seriously and do not tolerate in any form including facilitation payments and kickbacks. Any violation of this Policy will be regarded as serious matter by the Company and shall result in disciplinary action through domestic inquiries, including termination, consistent with HR policy and related local law.
- 7.2 The Board has oversight of this Policy and the MD are responsible for ensuring the compliance with this Policy. Every employee and manager is required to be familiar with and comply with this Policy.
- 7.3 Bribery is a criminal offense. An employee will be accountable whether he/she pays a bribe himself/herself or whether he/she authorizes, assists, or conspires with someone else to violate an anti-corruption or anti-bribery law. Punishment for violating the law are against him/her as an individual and may include imprisonment, probation, mandated community service and significant monetary fines which will not be paid by RB SPECTRA.
- 7.4 Employee must notify his/her manager as soon as possible if he/she believes or suspect that a conflict with this Policy has occurred, or may occur in future.
- 7.5 Provisions under section 17A of the MACC Act 2009, has defines the principle of liability corporate organization commercial is doing an error if any employees and / or parties allied corruption for the benefit of the organization. RB SPECTRA can be considered guilty in either case top management and / or their representatives know about employee misconduct or their allies.

8) Protection

- a. Employees who refuse to accept or offer a bribe or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy even if they turn out to be mistaken.
- b. Unethical Activity Internal Reporting flow

Unanimous Employee → HOD/HR Manager → Investigation Process (Board/MD)

9) Training and Communication

- a. All existing employees operating in areas that are perceived as high risk will receive regular, relevant training on how to implement and adhere to this Policy.
- b. Our zero-tolerance approach to corruption and bribery must be communicated to all suppliers, customers, contractors, agents, business and other partners at the outset of our relationship with them and as appropriate thereafter.
- c. Communication process flow

Management Briefing → Employee Declaration Form → Routine Refresher

- d. New employee briefing to include this ABC policy

10) Monitoring and Review

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

11) Employees Declaration

Any employees that has any personal relationship with any third-party suppliers, customers, contractors, agents, business and other partners at the outset of our business relationship are required to make a written declaration to the HR Manager or HODs respectively to avoid any future misunderstanding and conflicts. Employees are not authorized to get involved in any of the deals should this situation occurred.

Potential risk scenarios

The following is a list of possible red flags that may arise for an individual while working for RB SPECTRA and which may raise concerns under various anti-corruption and anti-bribery laws. The list is not intended to be exhaustive and is for illustration purposes only.

If an employee encounters any of these red flags while working for RB SPECTRA, he/she must report them promptly to his/her manager or to the HR Manager.

- (a) Become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- (b) Learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a “special relationship” with government officials;
- (c) A third party insists on receiving a commission or fee payment before committing to sign up a contract with us, or carrying out a government function or process for us;
- (d) A third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoices or receipt for a payment made;
- (e) A third party requests an unexpected additional fee or commission to “facilities” a services;
- (f) A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- (g) A third party requests that a payment is made to “overlook” potential legal violations;
- (h) receive an invoice from a third party that appears to be non-standard or customized;
- (i) A third party insists on the use of side letters or refuses to put terms agreed in writing;
- (j) Been offered an unusually generous gift or offered lavish hospitality by a third party.
- (k) An employee that using his/her authority to serve the company’s needs by providing his/her services or products out of their scope of works for their personal interest which can conflicts and influence to their judgements.
- (l) An employee that has authority to make the decision and bias to their “special relationship” third party and make an unfair decision based on their personal interest, without declaring and obtaining written approval from the top management personnel.

Staff Declaration Form

I, _____, hereby declare that I have read and understood RB SPECTRA's Anti-Bribery and Corruption Policy. I will abide by the requirements and provisions set out in the Policy, as required by my employment contract.

I/C No:

Title:

Date: