

SCC Group

Anti Bribery & Anti- Corruption Policy

DATE: 22.12.2023

REV: 0

1.0 Introduction

- 1.1 The Anti-Bribery and Anti-Corruption (“ABAC”) Policy outlines the principles of bribery and corrupt practices that may arise in the course of business for Swang Swai Chuan Limited (“SCC”) and its subsidiaries (collectively referred to as “SCC Group”).
- 1.2 SCC Group is committed to conducting business dealing with integrity, honesty and takes a strong zero-tolerance approach against all forms of bribery and corruption.

2.0 Scope and Applicability

- 2.1 This Policy applies to all Stakeholders, which include but not limited to:
 - (a) all members of the Board of Directors of SCC; and
 - (b) all employees of SCC Group.
- 2.2 All third parties including Business Associates and other stakeholders, who conduct business for and/or on behalf of SCC Group, are expected to comply with this Policy.
- 2.3 SCC is committed to upholding its commitment to prevent acts of bribery and corruption and to continuously improve its anti-bribery and anti-corruption policies. SCC Group may develop further integrity measures and update this Policy, as and when necessary.
- 2.4 This Policy shall also be read together with the following policies:
 - (a) Whistleblowing Policy;
 - (b) Supplier Code of Conduct;
 - (c) Human Resource Internal Control Policy;
 - (d) Expenses and Payment Standard Operating Procedures;
 - (e) Conflict of Interest Policy; and
 - (f) General Code of Conduct.
- 2.5 SCC Group complies with all applicable laws and regulations in the countries where SCC operates in. If there is a conflict between mandatory laws and principles in this Policy, the law shall prevail.

3.0 Board Responsibilities

- 3.1 This Policy is reviewed and approved by the Directors and its Audit Committee. The oversight of this Policy has been delegated to the Audit Committee, which monitors the effectiveness of and compliance of this Policy.

- 3.2 The Directors set the tone at the top and articulation of commitment towards prohibition of bribery and corruption in the business conduct of SCC Group.

4.0 Definitions and Abbreviations

“Bribery”	<p>Bribery is defined as any action which would be considered as an offence of giving or receiving ‘Gratification’ under the Malaysian Anti-Corruption Commission Act 2009 and its 2018 amendment (MACCA). In practice, this means offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person a position of trust within an organisation.</p> <p>Bribery may be ‘outbound’, where someone acting on behalf of SCC Group attempts to influence the actions of someone external, such as a Government official or client decision-maker. It may also be ‘inbound’, where an external party is attempting to influence someone within SCC Group such as a senior decision-maker or someone with access to confidential information.</p>
‘Business Associate’	<p>An external party with whom the organisation has, or plans to establish, some form of business relationship. This primarily include counterparties, business partners, clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors</p>
“Corruption”	<p>For the purpose of this Policy, corruption, is defined primarily as any action which would be considered as an offence of giving or receiving ‘Gratification’ under MACCA. In addition, corruption may also include acts of extortion,</p>

	collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.
“Directors”	Refers to all members of the Board of Directors of SCC.
“Employee”	Refers to any person who is in the employment of any of the companies in the SCC Group, but not limited to executives and non-executives, contract employees, trainees, interns, seconded staff (whether permanent, fixed or on a temporary basis).
“Gratification”	<p>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;</p> <p>b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;</p> <p>c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;</p> <p>d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;</p> <p>e) any forbearance to demand any money or money’s worth or valuable thing;</p> <p>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</p> <p>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).</p>
“Stakeholders”	Refers to Directors, Employees, Business Associates and any other third party who conducts business for and on behalf of SCC Group.

5.0 Policy Statement

- 5.1 SCC prohibits all forms of bribery and corruption in relation to all of SCC Group's activities in all jurisdictions where businesses are conducted. In addition to bribery, all Employees and Directors must not participate in any corrupt activity, such as extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.
- 5.2 Bribery may take the form of anything of value, such as money, goods, services, property, privilege, employment position or preferential treatment. All Employees and Directors shall not therefore, whether directly or indirectly, offer, give, receive or solicit any item of value, in the attempt to illicitly influence the decisions or actions of a person in a position of trust within an organisation, either for the intended benefit of SCC Group or the persons involved in the transaction. All Employees and Directors shall not therefore, whether directly or indirectly, offer, give, receive or solicit any item of value, in the attempt to illicitly influence the decisions or actions of a person in a position of trust within an organisation, either for the intended benefit SCC Group or the persons involved in the transaction.
- 5.3 Corruption involves the misuse of office or position or power for gain to oneself, relatives, or associates, by directly or indirectly offering, giving, receiving or promising anything of value or a gratification (which could be financial or non-financial), to/from any person one is dealing with to obtain or retain business or to gain an improper business advantage which is illegitimate, immoral or incompatible with ethical standards.
- 5.4 This Policy applies equally to SCC Group's business dealings with commercial ('private sector') and Government ('public sector') entities, and includes their directors, officers, agents and other appointed representatives. No Director, Employee or any of the external party will suffer discrimination, demotion, penalty or other adverse consequences in retaliation for refusing to pay or receive bribes or participate in other illicit behaviour.
- 5.5 SCC Group does not offer employment to prospective employees in return for previous favour or in exchange of improper favour.
- 5.6 SCC Group awards contracts and employee positions purely based on merits.

6.0 Due Diligence

- 6.1 Before entering into any formalised relationship such as a commercial contract, agreement or transaction with any Business Associates and any other third parties performing work for or providing services to, or working with SCC Group, or for and on behalf of SCC Group the

Supply Chain or Sales Department must do their due diligence in conducting a review of the third party's background, business reputation and financial standing.

- 6.2 Any new Business Associates transacting with SCC Group will be requested to register as a new vendor with SCC Group by completing and signing the Vendor Registration Form (including the Anti-Bribery and Anti-Corruption Declaration Form).

7.0 Risk Assessment

- 7.1 SCC shall undertake a corruption and bribery risk assessment of SCC Group's overall operations at least once in three (3) years, with intermittent assessments carried out as and when necessary (including when there is a change in law or there are circumstances whereby a risk assessment is warranted) to identify, analyse, assess and prioritise actions needed to mitigate internal and external corruption/bribery risks identified.
- 7.2 Finance Department shall conduct regular risk assessments to identify the bribery and corruption risks potentially affecting SCC Group. Finance Department shall also review the suitability of this Policy from time to time, taking into account relevant developments in the legislature as well as evolving industry and international standards.

8.0 Gifts, Hospitality & Travel

- 8.1 SCC Group is prohibited from receiving, giving or asking for (soliciting) gifts from external parties to influence any business decisions. Under no circumstances may SCC Group's employees accept gifts in the form of cash or cash equivalent, including gift certificates, loans, commissions, coupons, discounts or any other related forms.

There are exceptions whereby receiving and provisions of the gifts are permissible in the following situations:

- (a) exchange of gifts or the corporate gifts of nominal / appropriate value at the company to company level (for example: gifts exchanged between companies as part of official visit);
- (b) festive or ceremonial gifts, up to a limit of RM 300, during festive seasons or other ceremonial occasions;
- (c) gifts given to external organisations or individual in relation to company official function, work-related conferences, corporate events and activities (for example: door gifts or commemorative gifts to all that attending the events); and

- (d) corporate gifts bearing a company's name and logo and are of nominal / appropriate value.

8.2 If there any doubts whether any of the gifts are appropriate, please seek clarification from HR Department before giving or receiving the gift.

9.0 Entertainment

9.1 It is a common practice within the business environment to provide entertainment to foster business relationship by providing reasonable and proportionate entertainment under appropriate circumstances. SCC Group's Employees may offer appropriate and proportionate entertainment that is legal and reasonable within the scope of their work as part of business networking as well as a measure of goodwill towards the recipients.

9.2 SCC Group's Employees are expected to always exercise proper care and good judgement when providing entertainment to external parties.

10.0 Donations and Sponsorships

10.1 SCC Group may offer charitable donations and sponsorships provided that they are ethical and legal under applicable laws and not with the intention to influence any business decisions or cause others to perceive it as such. Such donations or sponsorships shall not violate SCC Group's core values, policies and applicable laws.

10.2 All Employees must exercise good judgement and due diligence to assess the purpose and intention of the donations and sponsorships, and the reputation or status of the beneficiaries. All donations or sponsorships shall be offered and made in a transparent manner in accordance with SCC Group's policies and practices.

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

11.0 Facilitation payments

11.1 Facilitation payments are gratification or inducements to secure or expedite a routine function which one person shall be or is responsible for performing as part of his/her daily roles and responsibilities. The payments are usually small payments paid unofficially to expedite routine administrative processes on matters such as visas, permits, licenses, and custom clearance.

11.2 Employees are prohibited to directly or indirectly offer, promise, give, solicit or accept, agree to accept, or attempt to obtain anything that might be regarded as a facilitation payment in any form.

11.3 Employees are expected to notify their immediate superior when encountered with any requests for a facilitation payment. In addition, if a payment has been made and Employees are unsure of the nature, their immediate superior must be immediately notified and consulted. They must also ensure that the payment has been recorded.

12.0 Conflict of Interest

12.1 Conflict of interest arise in situations where there is personal interest that could be considered to have potential interference with objectivity in performing duties or exercising judgment on behalf of a company. All Employees should avoid situations in which personal interest could conflict with their professional obligations or duties. Employees must not use their position, official working hours, SCC Group's resources and assets, or information available to them for personal gain or to SCC Group's disadvantage.

12.2 In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to respective Head of Department considering the proposed transaction or arrangement.

13.0 Recruitment and Promotion

13.1 SCC Group recognises the value of integrity. SCC Group's recruitment, training, performance, evaluation, remuneration, recognition and promotion for all Employees, including management, shall be designed and regularly updated to recognise integrity.

14.0 Employee Declaration

14.1 All Employees shall certify in writing that they have read, understood and will abide by this Policy. A copy of this declaration shall be documented and retained by the Human Resources Department for the duration of the Employee's employment.

15.0 Systematic Review & Monitoring

15.1 SCC Group recognises that managing an anti-bribery programme is a continuous process, and by assessing risk, a systematic review and having monitoring processes in place, are necessary to ensure its objectives are being met. Audit Committee will be responsible for

overseeing the process of reviewing the effectiveness and compliance to the anti-bribery and corruption programme and policy.

16.0 Record Keeping

16.1 Employees must ensure that all expense claims relating to hospitality, gifts or expenses incurred to Business Associates and/or any person are submitted in accordance with SCC Group's applicable policy and specifically record the reason for such expenditure. All Employees shall further ensure that all expense claims shall comply with the terms and conditions of this Policy and all other SCC's procedures and practices.

17.0 Reporting of Policy Violation

17.1 It is the responsibility of SCC's Employees to prevent, detect and/or report any bribery and other forms of corruption, including the encouragement of whistleblowing. Suitable reporting channels have been established and maintained for receiving information regarding violations of this policy, and other matters of integrity provided in good faith by SCC Group's Employees.

17.2 Reports made in good faith, shall be addressed in a timely manner and without incurring fear of reprisal regardless of the outcome of any investigation. Retaliation in any form against SCC Group's Employees where the person has, in good faith, reported a violation or possible violation of this Policy is strictly prohibited.

18.0 Training and Awareness

18.1 SCC Group shall periodically conduct awareness programmes in the form of internal training for its Employees to refresh awareness of anti-bribery and anti-corruption topics and measures, and to continuously drive the integrity and ethics culture. SCC Group will also provide ABAC training and awareness to new recruits and employees promoted or transferred to new roles.

18.2 The Human Resources Department may at any time recommend that certain trainings be repeated to any Employee or group of Employees in any unit or department, if deemed necessary, based on circumstantial requirements.

18.3 The Human Resources Department shall maintain all records of trainings.

19.0 Non-compliance with this Policy

19.1 SCC regards bribery and acts of corruption as serious matters and will apply penalties in the event of non-compliance to this Policy. For SCC Group's Employees, failure to comply with

this Policy may subject an individual to disciplinary action, up to and including termination of employment, in accordance with the applicable SCC Group's policies.

19.2 Failure by a third-party to comply with this Policy and any applicable anti-corruption and bribery laws may result in the termination of contract and/or further legal action may also be taken in the event that SCC Group's interests may have been harmed as a result of non-compliance by individuals or other third party.

19.3 SCC Group is committed to protect, within reason and means, anyone who reports or raises a concern in good faith, and those who participate in or conduct an investigation, from retaliation.

20.0 Communication

20.1 This Policy must be appropriately communicated to all Stakeholders, and their understanding and compliance is vital to its success.


21.0 Policy Review

21.1 The Policy will be reviewed and updated, as and when necessary. If there is any requirement to update, improve, and / or amend this Policy to ensure effective implementation, proposed changes shall be submitted for approval by the Executive Managing Director. Key information on addition of new policy and deletion or variation of existing policy shall be indicated for version control purpose.

REVISION HISTORY:

REV NO	DATE	DESCRIPTION	REVISED BY

Appendix – Supplier Evaluation Form

	SCC MARKETING (M) SDN BHD	Document No: SCC/GMP04A	Page: 1/2 Revision No: 00
NEW SUPPLIER EVALUATION		Date: 01/10/2021	

Part 1: For Office Use Only

Product / Service required:

Part 2: For Supplier Use Only (Fill up the appropriate column)

Company Name:	Contact Person:
Address:	Tel/ Fax:

A) QUALITY

1) Do you have an established quality system?
(i.e. ISO 9001, ISO 22000, GMP, HACCP etc)
If yes, please attach a copy of the certificate

<input type="checkbox"/> Yes	<input type="checkbox"/> No
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1) Do you carry out inspection for:

a) Incoming raw material?	<input type="checkbox"/> Yes <input type="checkbox"/> No
b) Work in progress?	<input type="checkbox"/> Yes <input type="checkbox"/> No
c) Finished goods?	<input type="checkbox"/> Yes <input type="checkbox"/> No

If yes, please attach a copy of the quality plan


B) PRICE

1) Term of payment days
Please attach quotation

C) DELIVERY

1) Delivery Lead Time Days

Part 3: For Office Use Only

	SCC MARKETING (M) SDN BHD	Document No: SCC/GMP04A	Page: 2/2 Revision No: 00
NEW SUPPLIER EVALUATION		Date: 01/10/2021	

1) Can the new supplier provide quality product/ compliance to food safety/good service?
 Yes No

2) Is the price competitive? Yes No

Remarks/ other comments:

Evaluated by: _____ Date: _____

Part 4: Sample Evaluation (if Any)

1) Does the sample meet the requirements? Yes No

Evaluated by: _____ Date: _____

Part 5: Approval

Approved KIV Reject

Approved by: _____ Date: _____

Note: If approved, the new supplier shall be registered in the Approved Supplier List.