

DANCOMECH HOLDINGS BERHAD
REGISTRATION NO. 201301020455 (1050285-U)

ANTI-BRIBERY AND CORRUPTION POLICY

A. PREAMBLE

The Board of Directors (the “Board”) of Dancomech Holdings Berhad (“DHB” or the “Company”) has established and adopted the following Anti-Bribery and Corruption Policy (this “Policy”) which is applicable to the Officers (as defined below) and Business Associates (as defined below) of DHB and its subsidiaries (the “Group”). This Policy sets out the principles of the Group and provides guidance to the Officers and Business Associates of the Group in dealing with Bribery and Corruption (as defined below) that may arise in the day-to-day business of the Group.

This Policy should be read in conjunction with the Board Charter, the Code of Ethics of Directors, the Code of Conduct, and the Whistle-Blower Policy of the Group, which are available on the Company’s website at www.dancomech.com.my.

B. DEFINITIONS

Unless otherwise defined or the context otherwise requires, the following definitions shall apply throughout this Policy:

- Board** : The Board of Directors of DHB
- Bribery and Corruption** : Any action of giving or receiving Gratification which would be considered an offence under the MACC Act. In practice, this means giving or receiving, agreeing to give or receive, promising or offering to give to or receive from any person any Gratification whether for the benefit of that person or another person with intent to illicitly influence the decisions or actions of a person who is in a position of trust within an organisation, either for the intended benefit of the Group or the persons involved in the transaction
- Business Associates** : An external party with whom the Group has established, or plans to establish, some form of business relationship. This includes but not limited to customers, vendors, suppliers, contractors, sub-contractors, advisers, consultants, business partners, principals, agents, and representatives of the Group
- DHB or the Company** : Dancomech Holdings Berhad

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- Gratification** : As defined in the MACC Act to mean:
- (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 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)
- Group** : DHB and its subsidiaries
- MACC Act** : Malaysian Anti-Corruption Commission Act 2009, as amended from time to time and any re-enactment thereof
- Officers** : Directors, management and employees of the Group
- Policy** : This Anti-Bribery and Corruption Policy of the Group

C. PRINCIPLES

This Policy has been established based on the following principles:

- (i) The Group is committed to conducting its business activities and dealings with trust, integrity, ethics and professionalism.

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- (ii) The Group has adopted a zero-tolerance approach towards Bribery and Corruption.
- (iii) The Group expects all Officers and Business Associates to actively uphold these principles in their daily activities.
- (iv) The Group is committed to operate within the relevant laws in Malaysia and elsewhere where it has business dealings, against Bribery and Corruption.

D. AREAS OF COVERAGE

This Policy covers the following areas:

- (i) General anti-bribery and corruption statement
- (ii) Responsibilities
- (iii) Conflicts of interest
- (iv) Gifts, entertainment, hospitality and travel
- (v) Donations and sponsorships
- (vi) Facilitation payments
- (vii) Record keeping
- (viii) Whistle-blowing
- (ix) Training and communication

E. GENERAL ANTI-BRIBERY AND CORRUPTION STATEMENT

The Group is committed to conducting its business activities and dealings with trust, integrity, ethics and professionalism. In this regard, the Group has adopted a zero-tolerance approach towards Bribery and Corruption. As such, all forms of Bribery and Corruption are strictly prohibited in all business dealings of the Group.

F. RESPONSIBILITIES

All Officers and Business Associates have the following responsibilities under this Policy:

- (i) To read, understand and comply with this Policy;
- (ii) To avoid committing any acts of Bribery and Corruption at all times;
- (iii) To seek appropriate guidance from the management of the Group or the Board pertaining to Bribery and Corruption matters when in doubt;
- (iv) To promptly report any violation or suspected violation of this Policy through the appropriate channels (please refer to Section L below for further details); and
- (v) To attend training on anti-Bribery and Corruption organised by the Group, when required.

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The Group will take disciplinary action against any Officer or Business Associate who fails to comply with this Policy, up to and including termination of employment (for Officers) or termination of contract (for Business Associates). The Group may also pursue legal remedies to recover any losses incurred due to non-compliance.

G. CONFLICTS OF INTEREST

During his/her employment with the Group, an Officer shall not, without the prior consent of the Group:

- (i) be employed by any other company or person or conduct business or be concerned or interested in any other business, whether in competition with that of the Group or not, or engage in any activity where the skill or knowledge which the Officer develops or applies in his or her position is transferred or applied to such activity in derogation of the present or prospective business interests of the Group; and
- (ii) accept any appointment to membership of the board of directors, standing committee or similar body of any company, organisation or government agency, whether or not a possible conflict of interest might result from the acceptance of such appointment.

The Officer shall disclose to the Group any interest which the Officer or his or her family or relatives have or may have in any business establishment or authorities which the Group has business or other dealings with.

H. GIFTS, ENTERTAINMENT, HOSPITALITY AND TRAVEL

All Officers and Business Associates must exercise caution in relation to offering or accepting gifts, entertainment, hospitality and travel to/from other parties. Generally, all Officers and Business Associates are prohibited from offering or accepting gifts, entertainment, hospitality and travel to/from other parties, unless the following criteria are fully met:

- (i) It does not contain any intent or element of Bribery and Corruption;
- (ii) It is not made with the intent of influencing decision-making or obtaining an unfair advantage;
- (iii) It is given/received in a transparent and open manner;
- (iv) It is given/received in accordance with general business practice or in relation to cultural celebrations, and does not breach any laws; and
- (v) The value involved is reasonable and not excessive.

Any gifts, entertainment, hospitality and travel given or received shall be declared to and approved by the management, i.e. any one of the Directors of the respective subsidiaries of the Group.

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I. DONATIONS AND SPONSORSHIPS

The Group allows for donations and sponsorships as part of its corporate social responsibilities, provided that the donations and sponsorships:

- (i) do not contain any intent or element of Bribery and Corruption;
- (ii) are not made with the intent of influencing decision-making or obtaining an unfair advantage;
- (iii) are made in a transparent and open manner, and properly documented; and
- (iv) do not breach any laws.

In this regard, prior approval of the management, i.e. any one of the Directors of the respective subsidiaries of the Group, is required for making any donation or sponsorship. All donations and sponsorships must be properly documented and retained for audit purposes.

J. FACILITATION PAYMENTS

The Group strictly does not allow for the use of facilitation payments in its business activities. Facilitation payments refer to payment or other provision made to secure a positive outcome or to expedite the performance of a person in charge of making a decision or undertaking the performance.

In this regard, any request for facilitation payments must be immediately reported to management or via the Whistle-Blower Policy.

K. RECORD KEEPING

The Group's records must be prepared accurately and honestly, both by the preparers of financial statements and by Officers who contribute to the creation of business records, for example, by submitting full details and documentation of expense, order and invoice records. The Group takes obligation to maintain business records for operational, legal, financial, historical and other purposes seriously and takes appropriate steps to ensure that the content, context and structure of the records are reliable and authentic.

Reliable internal controls are critical for proper, complete and accurate accounting and financial reporting. Officers must ensure that all records are complete, accurate, and properly documented to support transparency, accountability, and compliance with applicable laws.

L. WHISTLE-BLOWING

If an Officer or Business Associate knows of any violation or suspected violation of this Policy, he or she should report it to the Group via the appropriate channels as set out in the Group's Whistle-Blower Policy.

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The Group makes every effort to maintain the confidentiality of any individual who reports concerns and possible violation of this Policy. Any Officer or Business Associate who retaliates or encourages others to retaliate will be subjected to disciplinary actions, up to and including termination of employment or business engagement, as the case may be. The Group does not tolerate any form of retaliation against anyone who makes a report in good faith.

The Group shall investigate reported concerns promptly and confidentially with the highest level of professionalism and transparency. All internal investigations and audits are conducted impartially, independently, and without predetermined conclusions. Every Officer or Business Associate shall be expected to cooperate fully with audits, investigations and any corrective action plans, which may include areas for continued monitoring and assessment.

Where external investigations are required, every Officer or Business Associate shall appropriately respond to, cooperate and shall not interfere with, any lawful government inquiry, audit or investigation.

M. TRAINING AND COMMUNICATION

The Board shall ensure that this Policy permeates throughout the Group and is complied with by all Officers and Business Associates.

In this regard, the Group shall ensure that this Policy is being communicated to all Officers and Business Associates from the onset of their employment or business engagement. All new Officers and Business Associates shall be briefed on this Policy upon joining the Group or upon engagement, as the case may be. In addition, a copy of this Policy is available on the Company's website at www.dancomech.com.my for the reference of all parties.

Further to that, the Group will provide periodic awareness and training programmes on this Policy to the Officers or Business Associates to ensure understanding and compliance, and reinforcement of the Group's Anti-Bribery and Corruption culture.

N. PERIODIC REVIEW

The Board will periodically review this Policy to ensure that it remains relevant and updated and will communicate the amendments or changes, if any, to the Officers and Business Associates.