



MOBILIA HOLDINGS BERHAD

Rev.04

MOBILIA GROUP

Anti-Bribery and Corruption Policy



1. Objective

This Anti-Bribery and Corruption Policy ("policy") is to set out Mobilia Holdings Berhad ("Mobilia") and its subsidiaries (collectively known as "Group") responsibilities to comply with laws and regulations in relation to bribery and corruption. This policy aims to provide guidance on how to recognize and deal with bribery and corruption issues to ensure the Group's businesses are conducted in honest, ethical and transparent manner.

2. Policy Statement

The Group is committed to conduct business activities in honest, ethical and transparent manner. We have adopted zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationship where we operate to against bribery and corruptions.

Any breach of this Policy or applicable local law could results in disciplinary action being taken and ultimately could result in dismissal. Further legal action may be taken in the event that the Group's interest has been harmed as a result of non-compliance and / or misconduct.

3. Applicability

We are bound by the laws pursuant to Malaysian Anti-Corruption Commission (Amendment) Act 2018 in regard to our conduct. This policy applies to all Board of Director, employees and any potential / existing business associates engaged in activities with the Group. Any arrangement the Group makes with these party is subject to clear contractual terms including specific provisions that require the third party to comply with standards and procedures.

4. Definition

For the purpose of the standards and procedures prescribed under this Policy.

"Bribery" means offering, giving, soliciting or accepting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person for acting or refraining from acting in relation to objectivity and performance of that person's duties.

"Corruption" means "the abuse of entrusted power for personal gain". In its wider sense, corruption includes bribery, extortion, fraud, cartels, abuse of power, embezzlement, and money laundering. It constitutes criminal offences in most jurisdictions with illegal profit to individuals / entities as their objectives.

"Business associates" mean any individual or organisation which the Group comes into contact with during the course of work, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government or public bodies, including their advisors, representatives and officials, politicians and political parties.

“Employee” means all individuals working at all levels and grades, whether permanent, fixed-term or temporary, including directors, senior managers, officers, executives, staff, consultants, contractors, trainees, seconded staff, casual workers and agency staff, volunteers, interns, agents, or any other person associated with us, or any of our subsidiaries or their employees, wherever located.

“Facilitation payment” means a form of unofficial payment made with the purpose to secure or expedite the performance of a routine or necessary action.

Top-level management” means all Directors of the Company.

5. Corruption Risk Assessment

A corruption risk assessment forms the basis of Mobilia's anti-corruption efforts. As such, the Group shall conduct internal and/or external corruption risk assessments annually and when there is a change in law or circumstance of the business. The processes of risk evaluation are as follows:

- Assessment of existing risk by updating its rating of probability and impact;
- Identify new risk, if any, and rating of its probability and impact;
- Assessment / update of control and management action plan relating to each risk; and
- Elimination of risk that is no longer relevant.

This risk assessment should be used to establish appropriate processes, and controls approved by the top-level management to mitigate the specific corruption risks the business is exposed to.

For this purpose, the Group shall conduct a comprehensive risk assessment, with intermittent assessments conducted when necessary. The assessment form (MHB-F01) may include the following:

- a) opportunities for corruption and fraud activities resulting from weaknesses in the Group's governance framework and internal systems/ procedures;
- b) financial transactions that may disguise corrupt payments;
- c) business activities in countries or sectors that pose a higher corruption risk;
- d) non-compliance of external parties acting on behalf of the Group regarding legal and regulatory requirements related to anti-corruption. Note that, given the wide definition of an associated person, a commercial organization can be liable for the acts of such third parties; and
- e) relationships with third parties in its supply chain (e.g. agents, vendors, contractors, and suppliers) which are likely to expose the commercial organization to corruption.

6. Conflict of Interest

Conflict of interest exists when an employee is / could be influenced by a personal interest in carrying out his / her duties in the Group's business environment and activities. A conflict of interest can be intentional, perceived or potential. Conflict of interest is an act that leads to partial decision making which constitute the element of a corrupt conduct.

Conflict of interest may arise directly or indirectly through an intermediary, such as third party, friends or family. As such, the Company encourage all employees to report any actual or potential conflict of

interest such as family relation, financial relation or other connection directly or indirectly related to their line of work when necessary.

7. Gifts and Hospitality

Gifts and hospitality given and received as a reward, inducement or encouragement for any other advantage or inappropriate or dishonest conduct are strictly prohibited. If giving or receiving gifts or hospitality is intended to influence normal decision making, the giver retains special advantage, this constitutes corruption.

Mobilia employee must not directly or indirectly solicit or accept gifts and hospitality in any forms that is excessive, inappropriate, illegal or given in response to, in anticipation of, or to influence a business decision.

Mobilia personnel must exercise proper care and good judgement when providing or accepting gifts and hospitality to or from external parties. If Mobilia employee is unsure of how to consider the intention behind any gifts and hospitality, they must always disclose and consult their immediate superiors to obtain advice and approval before proceeding.

The gifts and hospitality may be given to third party or received from third party are not prohibited, if they fulfil all of the following conditions:

- a. Made for the right reason - it should be clearly given as an act of appreciation or common courtesy associated with festive seasons or other ceremonial occasions;
- b. No obligation – it must not be used to influence or induce anyone to obtain or retain a business or to obtain some forms of business advantage, whether it is for business or for Mobilia personnel;
- c. Made openly – it must be done in an open and transparent manner;
- d. Legal – it complies with applicable laws;
- e. Documented – it must be recorded and disclosed properly, including the reason of the expenditure.

Mobilia shall maintain a REGISTER to record all gifts received by Mobilia employee from third parties. The head of department (“HOD”)/superior shall decide to approve the acceptance or require it to be returned. HOD or superior shall fill a form (MHB-F02) after approval given and submit to Compliance support team for filing. The gifts shall be distributed equally and fairly to all local Mobilia employee but not only benefit certain employee. For instance, if Mobilia receive hampers from suppliers, a lucky draw will be conducted to distribute all hampers to all local Mobilia employee fairly.

8. Donations, Sponsorship & Charitable Contributions

Mobilia employee are prohibited from receiving or giving donations and sponsorships to obtain a business or advantage of any kind or unduly influence the outcome of business decision. Mobilia will only provide charitable or educational donations and public welfare sponsorship if they are ethical and legal under applicable laws. Any donations, sponsorships and charitable contributions must be approved by the executive directors and it must be done in a transparent manner for social and moral responsibility.

9. Prohibition of Political contribution

Mobilia employee strictly prohibit to provide any form of political donation or support to political parties, individual politicians or towards political campaigns or initiatives for or on behalf of Mobilia particularly where it is to obtain any business or advantage. Any political contribution should be brought to the attention of the executive directors immediately and requires prior approval from executive director. Any payment must be properly recorded and accounted with supporting documents.

Mobilia employee may participate in political activities in their personal capacity with their own money and time. However, their political views and actions are personal and not reflective or representative of Mobilia. Mobilia will not reimburse any personal political contributions.

10. Entertainment

Employees and Directors are strictly prohibited from providing or offering to provide entertainment with a view to improperly cause undue influence on any party in exchange for some future benefit or result. Any acts of this nature, whether provided directly or indirectly through an intermediary, may be construed as an act of bribery.

The Group recognises that the occasional acceptance of a reasonable and modest level of entertainment provided by third parties in the normal course of business is a legitimate way to network and build good business relationships.

However, it is important for employees and Directors to exercise proper care and judgment before accepting entertainment offered or provided by a third party. This is not only to safeguard Mobilia's reputation, but also to protect employees and Directors from allegations of impropriety or undue influence.

In no event, however, may you or any of your family/household members accept entertainment in exchange for an exercise or non-exercise of your authority or otherwise to the detriment of Mobilia.

11. Facilitation payments

Mobilia prohibits the use of facilitation payments in its business dealings. Mobilia employee must never pay, offer, solicit or receive bribes of any forms including facilitation payments. Facilitation payment is an unofficial payment or other provision made personally to an individual intended to secure or expedite the performance of a routine or administrative duty or function.

It is usually small bribe payments (usually paid to low-level officials) made directly or indirectly to secure or speed up performance of a routine or to avoid bureaucratic delays and red tapes that may slow down certain business dealings. These payments are intended to influence the timing of public officials' action such as speed up the clearing goods through customs, processing visas and scheduling inspections.

12. Dealing with governments and public officials

Any improper or secret payments or transfer of items of any value (including gifts, business hospitality and facilitation payments) directly or indirectly to a government official or person associated with government officials to persuade that official or person to help the company to obtain undue or illegal benefits is strictly prohibited.

Mobilia employee must comply with all applicable laws, conduct themselves with integrity and apply the highest ethical standards whenever they deal or otherwise engage with government, government agencies, regulatory bodies, statutory bodies (whether local or foreign) and any of its officials.

13. Yearly assessment performed on Contractor, Supplier, Customers

The Group is committed to uphold the highest standard of ethics and integrity in all aspects of its procurement and sales activities. The Group should avoid dealing with any contractors, suppliers, customers known or reasonably suspected of corrupt practices or known or reasonably suspected to pay bribes.

The Group must ensure that all procurement and sales activities are in line with the procurement and sales policies and procedures.

The Group must conduct assessment/evaluation on prospective contractors, suppliers and customers to confirm whether or not these external parties have in place anti-bribery programmes and that they will not engage in any improper practices. The scope and extent of the assessment/evaluation required will vary depending upon the circumstances of each proposed transaction.

The Group should also monitor significant contractors, suppliers, customers and business associates as part of their regular review of the performance of the third parties. The Group has the right to terminate their services in the event that these third parties pay bribes or act in a manner which is inconsistent with this the Group's policy and code of conduct.

If any red-flags are raised, these issues must be resolved. If it is not possible then the company must be barred from being on the list of registered contractors /suppliers/customers/business associates and/or disqualified from participating in any the Group's business dealings.

14. Recruitment of Employees

The Group provides equal opportunity for any qualified and competent individual to be employed by the company from various multicultural and multiracial background.

The recruitment of employees should be based on approved selection criteria to ensure that only the most qualified and suitable individuals are employed. This is crucial to ensure that no element of corruption is involved in the hiring of employees.

In line with this, background checks should be conducted for successful candidate who would be responsible in management positions as they would be tasked with decision-making obligations. This is to ensure that the potential employee has not been convicted in any bribery or corruption cases nationally or internationally.

If you find or suspect that another person subject to this policy has violated or about to violate this policy or applicable law, whether deliberately or inadvertently, you must forthwith report the same, in writing, to your HOD/superior or Compliance support team.

15. RED FLAGS” OF BRIBERY

During transaction or business arrangement, you are expected to ask question and look out for corruption and bribery “red flags”. If you are unsure of the next course of action, you should consult the HOD/superior or Compliance support team and should not ignore the red flags. Transaction may not proceed if there are “red flags” yet to be resolved.

Examples of “red flags” include but not limited to the followings:

- a. The other party has a reputation or history of bribery;
- b. Excessive reliance on third-party agents or “middleman”;
- c. Unusual payment terms, such as large upfront payment or via agents;
- d. Large amount of cash payment;
- e. Payments to private account or offshore bank account;
- f. Large charity contribution or sponsorship;
- g. Gifts – lavishness, secrecy, inaccurate records;
- h. Request for invoice with amount differ from the payment;
- i. The other party refuses to disclose its owners, partners or principals;
- j. Objection to anti-bribery representations and warranties in commercial agreements or negative response when told of such requirements
- k. The transaction involves a country known for a high incidence of corrupt payments
- l. Family, business or other “special” ties with government or public officials

16. WHISTLEBLOWING POLICY

The Group encourages openness and transparency in its commitment to the highest standard of integrity and accountability.

If you 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, you will be accorded protection of confidentiality, to the extent reasonably practicable, notwithstanding that, after investigation, it is shown that you were mistaken. In addition, employees who whistleblowing internally will be also be protected against detrimental action for having made the disclosure, to the extent reasonably practicable.

Any alleged or suspected improper conduct must be disclosed using the procedures provided for in the Mobilia's Whistleblowing Policy as adopted for your jurisdiction, a copy of which is available at <http://www.mobiliainternational.com>

17. Systematic Review, Monitoring and Enforcement

The top-level management shall ensure that annual reviews are conducted to assess the performance, efficiency and effectiveness of the anti-corruption programme, and ensure the programme is enforced. Such reviews may take the form of an internal audit, or an audit carried out by an external party. Review report should be presented to the committee member(s) at least once a year.

The reviews should form the basis of any efforts to improve the existing anticorruption controls in place in Mobilia.

18. Training and Communication

The Group should develop and disseminate internal and external training and communications relevant to its anti-corruption management procedure, in proportion to its operation, covering the following areas:

- a) Policy and procedures;
- b) training;
- c) reporting channel; and
- d) consequences of non-compliance.

Communication of Policies

Mobilia's Anti-Corruption Policy and Guideline is made available to public and will be appropriately communicated to all employees and business associates.

When planning strategies for communicating Mobilia's position on anti-corruption, Mobilia shall determine account what key points should be communicated, to whom they should be communicated, how they will be communicated, and the timeframe for conducting the communication plan. Mobilia shall determine what languages the materials will be communicated in.

The communication of the Group's policy may be conducted in a variety of formats and mediums. These may include, but are not limited to:

- a) messages on the Group's intranet or website;
- b) emails, newsletters, posters; and
- c) code of business conduct and employee's handbooks.

Training

The Group provide its employees and business associates with adequate training to ensure their thorough understanding of Mobilia's anti-corruption position, especially in relation to their role within or outside the Group.

The training may be conducted in a variety of formats, including but not limited to:

- a) induction programs featuring anti-corruption elements;

- b) role-specific training, which is tailored to corruption risks the position is exposed to; and
- c) corporate training programs, seminars, and in-house courses.

19. Record keeping

Mobilia shall maintain and keep all records properly with accuracy and completeness for all payments made to third parties in the ordinary course of business which is prove as evidence that those payments not related to corrupt and unethical manner. All expenses claim from Mobilia personnel incurred to third parties should be approved by Managing director and/or Executive director and specifically recorded the reason for such expenses.

20. Revision

This policy will be updated, amended or revised from time to time to ensure its adequacy in implementation and enforcements. Mobilia reserves the right to all amendments, deletions or argument any terms and conditions or any part of this policy when necessary.

Adopted by Board on: 28 May 2020

Updated and adopted by Board on: 13 April 2023