

Anti-Bribery and Corruption Policy
(“Policy”)

M.E.I. Consultants Sdn. Bhd. (Co No: 367747-U) and **M.E.I. Project Engineers Sdn. Bhd.** (Co No: 173484-M) and our related companies (“**the Company**”) will not tolerate any corrupt, fraudulent or other criminal activities.

1 What Does This Policy Cover?

- 1.1 The Company is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure corrupt gratification is prevented. The Company has zero-tolerance for corrupt gratification and its associated activities. The Board of Directors of the Company (“Board”), management and employees are committed to acting professionally, fairly and with integrity in all of the Group’s business dealings and relationships in whichever country we operate.
- 1.2 This Policy sets out the Company’s duties and obligation to maintain sufficiently high standards of operational integrity and comply with all applicable anti-bribery and corruption legislation (“**Applicable Laws**”) in all countries where we operate.
- 1.3 It also contains guidance on how to identify instances of bribery and corruption and what steps to take should you find or suspect that they are taking place.

2 Who Must Comply with This Policy?

- 2.1 The Board, employees, officers, interns, casual and agency workers, third parties providing goods and services to the Company (“Third Parties”) and anyone else under the control of the Company must comply with this Policy.

3 Who Is Responsible For This Policy?

- 3.1 The Board is overall responsible for this Policy. They are responsible for ensuring that all employees comply with this Policy.
- 3.2 Business risks vary from one department to another. The Board are responsible for assessing the level of risk in each department of the Company and may, introduce additional measures if necessary.

4 What Is Bribery and Corruption?

- 4.1 Bribery includes offering, promising, giving, accepting or seeking financial or other incentives or rewards for actions that are in any way unlawful, unethical, infringing or improper.
- 4.2 Bribes may take the form of money, gifts, loans, fees, hospitality, services, discounts, contract awards or other benefits.
- 4.3 Corruption is the abuse of the power or position entrusted to private gain.
- 4.4 Examples:
 - (a) Offering a bribe

- (i) You offer potential customer tickets to a major sporting event, on the condition they agree to do business with us.
 - (ii) You bought a holiday package to Europe using Company's funds for the customer's CEO to thank him for influencing his company to enter into a contract with us.
- (b) Receiving a bribe
- (i) A supplier gives your nephew a job, but makes it clear that, in return, they expect you to use your influence in the Company to ensure that we continue to do business with them.
 - (ii) A supplier invites you and your families to their corporate offices in Switzerland and arranges tours to neighbouring countries under the guise of a work trip.

5 Obligations of the Board, Employees and Third Parties

5.1. In general, the Board, employees and Third Parties shall:

- (a) Read, understand and comply with the information contained within this Policy, and with any training or other anti-bribery and corruption information given from time to time.
- (b) Be 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 Policy.
- (c) Reject any form of unethical and/or corrupt practices, and comply with all applicable laws, statutes, regulations and codes relating to anti-bribery and anti-corruption at all times.
- (d) Not solicit, accept, agree to accept, obtain, or attempt to obtain from any party for his/her own benefit or the benefit of any other party, any bribe or gratification as an inducement or a reward for doing or forbearing to do, or for having done or forborne to do any act in relation to the Company's affairs or business;
- (e) Not offer, promise or give any bribe or gratification to any party as an inducement or a reward for doing or forbearing to do or for having done or forborne to do any act in relation to the Company's affairs or business;
- (f) Ensure that any subsequent party(ies) employed by, engaged by or associated with him/her, who will provide goods and/or services in connection to any agreements entered with the Company, are fully aware, understand and comply with the Policy.

6 Risk Assessment

- 6.1 We aim to ensure that our anti-bribery and corruption procedures are proportionate to the risks we face.
- 6.2 We have identified certain aspects of our business where we are presented with higher risk. These include the following:
- (a) gifts and hospitality;
 - (b) facilitation payment and “kickbacks”; and
 - (c) charitable donations and sponsorship.

7 Gifts and Hospitality

- 7.1 This Policy does not prohibit giving or accepting reasonable and appropriate hospitality or entertainment for legitimate purposes, such as:
- (a) establishing or maintaining good business relationships;
 - (b) improving or maintaining our image or reputation; or
 - (c) marketing or presenting our products and/or services effectively.
- 7.2 Gifts and Hospitality are permitted to be given and accepted if the following requirements are met:
- (a) it is not intended to influence a third party to obtain or retain business or business advantage or to reward the provision or retention of business or business advantage or to explicitly or implicitly exchange favours or benefits;
 - (b) it is appropriate in the circumstances, taking into account the reason for the gift, its timing and value;
 - (c) it is given openly, not in secret; and
 - (d) it complies with all Applicable Laws.
- 7.3 We appreciate that practice varies across countries and regions. The test to be applied is whether the gift, hospitality or payment is reasonable and justified in all circumstances. The intention behind it should always be taken into consideration.
- 7.4 No Gifts and Hospitality including cash or cash equivalent may be given without prior approval by any member of the Board .

8 Facilitation Payment and “Kickbacks”

- 8.1 These are non-official (unapproved) payments made in return for a business advantage or some other form of benefit. Their objective is generally to speed up or facilitate a routine process or activity more easily.
- 8.2 We will never make or accept facilitation payment and kickbacks, and you are not permitted to engage in any conduct that attempts or succeeds in involving us in such activity. We consider these practices to be equally corrupt and prohibited.

9 Charitable Donations and Sponsorship

- 9.1 Charitable donations and sponsorships are acceptable. However, such contributions shall not be used as a scheme for concealing bribery.
- 9.2 No donation or sponsorship may be made or offered without prior approval by the Board .

10 Record Keeping

- 10.1 You must declare to the Board any kind of hospitality or gift you have given or received, and report and submit details to the Company’s Human Resources Department, for their record.
- 10.2 You must submit all claims relating to hospitality, gifts or payments to third parties in accordance with the Company's internal policies and record the reason for the expenses.
- 10.3 All accounts, invoices and other records relating to dealings with third parties, including suppliers and customers, should be prepared with strict accuracy and completeness.
- 10.4 There should be no off-book accounts to facilitate or hide any non-official (unapproved) payments made to third parties.

11 Reporting Obligations and Protection for Those Reporting

- 11.1 You must report any conduct or activity that you believe amounts to bribery or corruption, as well as any attempt by others to engage you in that activity.
- 11.2 You should report this belief, as soon as reasonably practicable to any member of the Board

12 Consequences of Failure to Comply

- 12.1 We take compliance of this Policy very seriously. Any failure to comply puts you and the Company at risk, and there are serious consequences and penalties imposed by the Applicable Laws.
- 12.2 Because of the importance of this Policy, failure to comply may result in disciplinary action, which may include dismissal.

12.3 The Company also reserves the right to terminate the contractual relationship with any individual, Third Parties or organization that violates this Policy.

13 Training and Communication

13.1 All employees working in areas identified as high risk by the Board will receive regular, relevant training on how to implement and adhere to this Policy.

13.2 Our zero-tolerance approach to corruption and bribery must be communicated to all Third Parties, agents, businesses and other partners at the beginning of our relationship with them and as appropriate thereafter.

14 Review of This Policy

14.1 The Board will monitor compliance and review this Policy on a regular basis to ensure that it remains relevant and appropriate.

Dated: 1st June 2020