



ANTI-BRIBERY & CORRUPTION POLICY (“ABC Policy”)

UCrest Berhad and its subsidiaries (“UCrest Group”) are committed to running our business operations on a foundation of integrity, transparency and honesty. U Crest Group adopts a zero-tolerance policy towards any forms of corruption and bribery in our businesses. U Crest Group and employees have to observe the anti-bribery and anti-corruption legislations and regulations in the countries where we have business activities in and undertake ourselves to not engage in any corrupt or improper practices. U Crest Group will devise and improve our processes continuously to prevent direct or indirect bribery, in order to safeguard, uphold our values and be in full compliance of this Anti-Bribery and Corruption Policy.

SECTION 1

1.0 PURPOSE

- 1.1 This ABC Policy is intended to:
- (a) provide information and guidance the obligations of U Crest Group and all parties working for/with/on behalf of U Crest Group (“**Parties**”) in observing and upholding our anti-bribery and corruption commitment which is an integral part of our business ethics and Group Standards of Conduct;
 - (b) set out guidance to all Parties in detecting potential corruption activities and to curb corruption practices; and
 - (c) to promote better corporate governance culture and ethical behavior amongst U Crest Group Directors and employees.
- 1.2 This ABC Policy may not provide definite answers to cover all situations. As such, we encourage you to reach out to us immediately when in doubt by contacting the HR Manager or your Head of Department.



2.0 DEFINITION

- 2.1 **Corruption** is a malpractice (wrongdoing) on the part of an authoritative party through illicit, dishonest and unethical means to obtain benefits or personal gains. Corruption activities includes soliciting, offering, receiving gratification in the form of cash, goods, services, personal favour directly or indirectly to influence decision and/or obtain an intended/ desirable outcome.
- 2.2 **Bribery** is an act of offering, promising, giving, accepting or soliciting any gratification as an inducement or a reward for authoritative party to show favour or disfavour or to perform or to abstain from performing or to aid in procuring, expediting, delaying, hindering or preventing the performance of any official duties. Bribery is essentially a form of corruption.
- 2.3 **Gratification** is defined in the Malaysian Anti-Corruption Commission (“**MACC**”) Act 2009 and summarized as *money, donation, gift, loan, fee, reward, valuable security, property or interest in property whether movable or immovable, finance benefit, employment, agreement to provide employment, release, discharge of obligation or liability, forbearance to demand, service or favour of any description like protection or forbearance to charge, any forms undertaking, promise, rebate, discount, or any other similar advantage which are done/given/received corruptly.*

3.0 APPLICABILITY

- 3.1 This ABC Policy is applicable to:
- (a) All UCrest Group’s Directors and employees (including but not limited to part time, full time, contractual, permanent or probationers, interns, trainees, trainers); and
 - (b) All UCrest Group’s Business Partners (anyone whom UCrest Group has or intend to have business relationship or in any way associated with UCrest Group including but not limited to vendors, suppliers, contractors, sub-contractors, agents, customers etc.)

THIS ABC POLICY covers the following areas:

- A. Donations and Sponsorship;
- B. Gifts;
- C. Hospitality;
- D. Political Contributions; and
- E. Facilitation Payment;

4.0 DONATIONS AND SPONSORSHIPS

4.1 Definition:

- (a) Donation: shall refer to charitable contribution/humanitarian aid whether in the form of cash/cash equivalent/goods made out of care and concern for social causes.
- (b) Sponsorship: shall refer to contribution of any kind in the form of services, monies, goods to support an event or organisation made to promote/enhance/strengthen business relationships.

4.2 UCrest Group adopts the measures and standards stated in Clause 4.2 and Clause 4.3 to ensure all donations and sponsorships made are in compliance with the laws of Malaysia.

4.3 Acceptance of sponsorships is only permissible for UCrest Group corporate events. However, sponsorships must be refused if acceptance could give rise to appearance/inference of corruption or association with illegal activities. All acceptance of sponsorships must be reported to Management and must be recorded accordingly.



5.0 GIFTS

- 5.1 UCrest Group strives to achieve the highest standard of integrity in the conduct of our business. As such, our Directors and employees (including their family members) are prohibited from directly or indirectly offering, accepting or soliciting for gifts whether in the form of monetary form (cash or cash equivalent) or in the form of discount, rebate or any other related matters to avoid bribery/conflict of interest as well as appearance of the same in all existing and potential business dealings which may be in violation of MACC Act 2009 and has detrimental effect on our corporate image.
- 5.2 We impose responsibility on our Directors and employees to achieve common understanding with our Business Partners and to ensure adherence in this regard.

5.2.1 Receiving Gifts

- 5.2.1.1 UCrest Group acknowledges that gift-giving is a common business etiquette which denotes friendliness and respect. Therefore, it is no surprise that third parties may still persist in giving gifts (whether to individual Directors or employees) and rejection of the same will be construed as insensible or culturally deemed offensive.
- 5.2.1.2 When such situation arises, the individual Directors or employees are allowed to accept the gifts. However, all gifts received **MUST** be surrendered and declared to the management **IMMEDIATELY** where the management is expected to deal with the gifts in accordance with UCrest Group's internal guidelines.
- 5.2.1.3 In principle, all gifts shall be **rejected** and if received, must be **returned** especially in the following circumstances:-
- (a) gifts received during **sensitive periods** such as tender or bidding exercise and related situations;
 - (b) gifts are given with the intention of causing undue influence to decision makers or appearance of the same;
 - (c) gifts are given with the expectation of gaining a return personal/corporate favour from the recipient;
 - (d) gifts are provided secretly or provided through third parties such as family members/friends of directors or employees; and/or
 - (e) acceptance of gifts under the circumstances is prohibited under any laws in Malaysia.

5.2.2 Providing Gifts

- 5.2.2.1 UCrest Group do not allow our Directors and employees (including their family members) to offer gifts to our Business Partners whether it is on behalf of UCrest Group or in their own personal capacities.



5.3 For avoidance of all doubts, kindly take note of the following:-

- (a) any premium/novelty items which carry company name, company logo or other relevant details printed on it which are given out equally to members of public or any third parties and serve as advertising or promotional purposes **shall not** constitute “gift”.
- (b) the practice of providing and receiving gifts differ among countries, regions, cultures and religions. As such, the degree of acceptability varies on a case-to-case basis and shall be subject to internal approvals.

6.0 HOSPITALITY

6.1 UCrest Group recognises the act of providing hospitality to our stakeholders is an acceptable social practice to promote and maintain cordial business relationship.

6.2 Hospitality is only regarded as improper/illegitimate if any of the following occurs:-

- (a) to cause undue influence to decision makers; and/or
- (b) done with the expectation of gaining a return personal/corporate favour from the recipient of hospitality; and/or
- (c) the recognition of the fact that the act of offering and accepting would be improper under the circumstance such as the hospitality is also provided to family members of the Director or employee, or includes a vacation package etc.; and/or
- (d) it is provided secretly; and/or
- (e) it is prohibited under any laws in Malaysia; and/or
- (f) the hospitality is considered lavish under reasonable social norm standard.

6.3 Examples of hospitality permissible by Key ASIC Group:-

- (a) casual lunch meetings;
- (b) accommodation/transportation for corporate meetings;
- (c) corporate activities such as annual/company dinner, customer appreciation dinner, product launching events.

6.4 UCrest Group prohibits all Directors and employees (including their family members) from offering, accepting and soliciting hospitality inappropriately and/or excessively from any third parties (including our Business Partners) which potentially cause undue influence in their decision making process especially during **sensitive periods**.

6.5 All hospitality received and offered must be declared by our Directors and employees and to be documented in accordance to UCrest Group internal guidelines.

6.6 Prior to offering hospitality, approval must be obtained internally (which necessitate the performance of risk assessment, value threshold, frequency and obtaining approval mandate set out in UCrest Group internal guidelines).



7.0 POLITICAL CONTRIBUTIONS

- 7.1 UCrest Group will not make any contribution whether in the form of cash/cash equivalent, services and/or goods to any political parties for campaigns and routine activities.
- 7.2 In any event that any gift/sponsorship/donation is made to any political parties (who are our Customers) pursuant to Section 2 Clause 4, Clause 5 and Clause 6, it shall not be construed/implied as an indication of UCrest Group's support to that political party's ideology and/or an attempt to obtain any business/personal benefits.

8.0 FACILITATION PAYMENT

- 8.1 UCrest Group implements a strict "**No Facilitation Payment**" policy. Facilitation payment is a payment made to authoritative personnel as an incentive/encouragement to complete some process or work speedily and efficiently.
- 8.2 Facilitation payment is only permissible in extreme circumstances where UCrest Group's employees' safety is at stake and such payment is mandatory to ensure the safety of our employees. Upon occurrence of such incident, declaration of facilitation payment made must be declared to the Top Management and to be recorded in accordance to UCrest Group internal guidelines.



SECTION 3

9.0 RECRUITMENT OF EMPLOYEES

- 9.1 UCrest Group, provides equal opportunity for any qualified and competent individual to be employed by the UCrest Group of companies from multicultural and multiracial background, sourced from externally, locally and internationally. 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.
- 9.2 In line with this, more detailed background checks such as criminal, bankruptcy, financial (credit rating) and reference checks will be conducted when hiring employees for management positions, as they would be tasked with decision making obligations. Periodically, all employees are required to make self-declaration to the Human Resource Department on matters pertaining to conflict of interest, compliance and corruption.

10.0 APPOINTMENT OF BOARD MEMBERS / DIRECTORS

- 10.1 Directors who are not employees of UCrest Group are required to make a self-declaration on matters pertaining to conflict of interest, compliance and corruption to the Board Chairman when they are first appointed and subsequently, on an annual basis.

11.0 EMPLOYEES' & DIRECTORS' DECLARATION

- 11.1 All UCrest Group Directors and employees (existing/new recruits) shall undergo training and complete assessment on ABC Policy. It is mandatory for all UCrest Group Directors and employees to periodically declare strict compliance of this ABC Policy in the course of their employment/service.



12.0 MONITORING

- 12.1 UCrest Group shall conduct periodic audit/review to ensure compliance of this ABC Policy. The audit exercises may be conducted by UCrest Group's Compliance officers or external consultants.
- 12.2 Non-compliance of this ABC Policy is equated to violation of the MACC Act 2009. UCrest Group adopt a stringent approach towards any misconduct in view of the seriousness of this matter. Any misconduct shall have the following consequences (whichever applicable):-
- i. Employees : immediate suspension pending investigation, if found guilty, outright dismissal.
 - ii. Directors : immediate suspension pending investigation at Group level, if found guilty, termination of directorship.
 - iii. Business Partners : immediate suspension of all obligations under the contract. If found true, termination of contract.

13.0 WHISTLEBLOWER POLICY

- 13.1 UCrest Group is committed to the values of accountability, transparency and impartiality in the conduct of our business and affairs. UCrest Group subscribes to open door policy for anyone to share concerns through appropriate means. In line with this, UCrest Group implements this "**Whistleblower Policy**" to encourage any parties to report any misconduct through this platform.
- 13.2 UCrest Group has adopted the highest professional standard of confidentiality and protection measures to ensure strict confidence of a whistleblower's information and immunity against any forms of intimidation/harassment and/or detrimental actions taken against the whistleblower.
- 13.3 The information of alleged wrong doing can be classified in many ways: violation of UCrest Group policy/rules, regulation or threat to public interest/national security, as well as fraud and corruption.
- 13.4 All reports/complaints made in good faith shall be dealt with in a prompt manner, unescorted by fear of reprisal regardless of the outcome of the investigation.

We encourage all whistleblowers to provide information/suspicion of misconduct through UCrest Group's E-mail: hr@ucrest.net.



14.0 RECORD KEEPING

- 14.1 All financial records and proper documentations trail of UCrest Group with Third Parties will be properly kept and we will have appropriate control measures in place to evidence, substantiate and justify for the business reason of any making of payments to, and receiving of payments from Third Parties.
- 14.2 All expenses and claims relating to any gifts or entertainment made to Third Parties will be subjected to rigorous screening process in accordance with UCrest Group's internal reimbursement procedures in order to minimise the risk of financial outflow in contravention of anti-corruption or anti-bribery laws.
- 14.3 All documents, accounts and records relating to Business Transactions with Third Parties will be prepared and maintained with strict accuracy and completeness. No documents (as aforementioned) are to be kept "off-book" to facilitate or conceal any improper payments.

15.0 CONTINUOUS REVIEW OF ABC POLICYW

- 15.1 UCrest Group is mindful of the importance to combat corruption and is resolute to continually enhance this ABC Policy to ensure its efficacy and effectiveness is maintained. UCrest Group will monitor compliance with the Policy and review the Policy regularly to ensure that it continues to remain relevant and appropriate.