



ANTI-BRIBERY & CORRUPTION POLICY STATEMENT

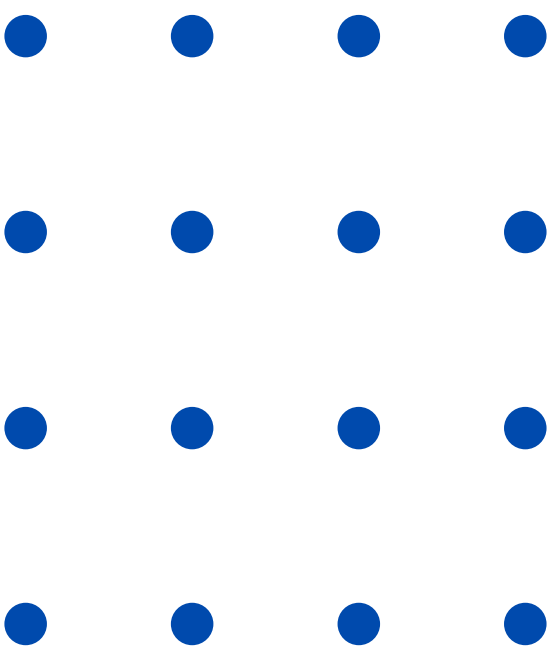
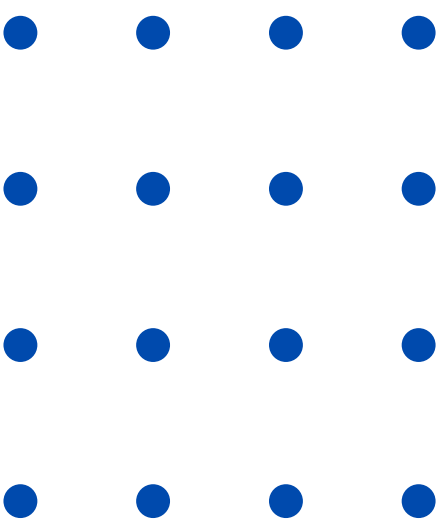
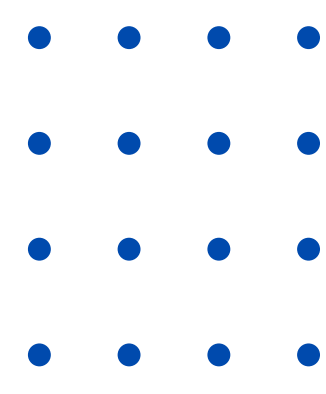


Table of contents



Introduction	1
Purpose	1
Application	1
Failure to Comply with "ABC Policy Statement"	2
Our Commitments	2
Waiver	2



Introduction

PROLINTAS Group of Companies ("PROLINTAS") is built upon a strong foundation of integrity. We are committed to conducting business in accordance with the highest legal, professional, and ethical standards with whomever we may deal with, and wherever we operate.

Bribery is a criminal offense and PROLINTAS does not tolerate bribery or corruption in any form. This zero-tolerance policy extends to all PROLINTAS business relationships and applies in all jurisdictions in which we operate. Failing to recognize and avoid bribery and corruption risks can have a devastating impact on PROLINTAS’s reputation, business, and can create criminal and/or civil liability for PROLINTAS and the individuals involved.

The purpose of this policy (hereinafter referred to as the "ABC Policy Statement") is to ensure compliance with the Malaysian Anti-Corruption Act 2009 ("MACC Act") and any other applicable laws pertaining to countering bribery and corruption in all jurisdictions in which PROLINTAS operates or transacts business.

We adopt an Anti-Bribery and Corruption Policy which sets out the principles and procedures to help prevent corruption by, on behalf of, or against the organization, and to detect, report and deal with any breach which may occur.

Purpose

The purpose of this policy is to:

- Establish expectations and responsibilities for all PROLINTAS employees in the observance of and compliance with ABC Policy Statement;
- Provide guidance to PROLINTAS employees on how to recognize, avoid, and report suspected acts of bribery and corruption; and
- Prescribe principles and controls intended to prevent, detect, and remediate bribery and corruption risks.

Application

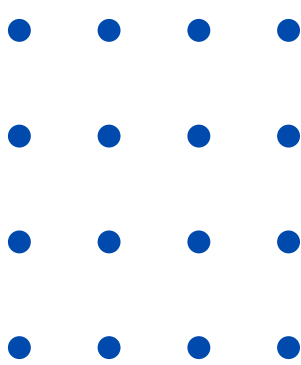
This PROLINTAS Group "ABC Policy Statement" applies to its Board of Directors and members of the committees of the Board of Directors (collectively known as “Board”), senior management, employees of PROLINTAS, whether permanent or temporary, stakeholders of PROLINTAS Group, as well as its business counterparties (collectively, “Representatives”).

It is not intended to provide definitive answers to all questions regarding bribery and corruption, but rather to provide its Representatives with a basic introduction to how PROLINTAS combats bribery and corruption in furtherance of the PROLINTAS Group’s commitment to lawful and ethical behaviour at all times.

This PROLINTAS "ABC Policy Statement" shall be read together with the Code of Business Ethics and Conduct, Whistleblowing Policy, Employee Handbook, and all the internal policies and procedures relating to PROLINTAS Group of Companies.

In the event of any inconsistency or conflict between the terms of this ABC policy Statement and the law, the law shall prevail. If you perceive that a provision in this ABC Policy Statement conflicts with the law in the local jurisdiction where your business operates, you should consult with your Head of Department/Division, Human Capital Division, or Integrity & Governance Department of PROLINTAS.

Failure to comply with "ABC Policy Statement"



Bribery or other corrupt behaviour can have serious repercussions for both you and PROLINTAS Group. You might lose your job, pay penalties or go to jail, and PROLINTAS Group might suffer reputational harm, financial loss, and be barred from doing business, among other unpleasant outcomes. Business counterparties may experience termination, discontinuation, suspension of, or withdrawal from any business relationship.

Our Commitments

PROLINTAS is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. We have zero tolerance for bribery and corrupt activities which will expose the company to reputational and legal risk. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, where we operate, within or outside of Malaysia.

PROLINTAS will uphold all laws relating to any bribery and corruption in all jurisdictions in which we operate. We are bound by the MACC Act in regard to our conduct both in Malaysia and abroad.

PROLINTAS will not offer or pay anything of value or accept any gratification for any improper purpose whether directly or indirectly or through any Person Associated with improperly influencing any act or decision relating to the Group. We will select our business partners carefully and carry out due diligence based on bribery and corruption risk assessment and will monitor their commitment to ethical and lawful conduct. Employees are prohibited from asking for or soliciting gifts from external parties.

PROLINTAS shall adhere to all legal requirements, including Section 17A (Corporate Liability), Anti-Bribery Management System ("ABMS"), and internal anti-bribery and corruption policies and procedures.

PROLINTAS will refrain from conducting business with or associating itself with individuals or companies who do not accept its values, principles, and policies to protect the reputation of the company.

PROLINTAS encourages any raising of concerns and incidence to be reported via the established whistleblowing channels and as per the Whistleblowing Policy of PROLINTAS Group.

PROLINTAS shall continuously enhance its anti-bribery and corruption policies and practices, including its ABMS, and carry out continuous monitoring and auditing of compliance with the T.R.U.S.T Principles established by the government and Malaysian Anti-Corruption Commission ("MACC").

Waiver

In accordance with the requirements of all relevant regulations, this PROLINTAS Group ABC Policy Statement will be periodically reviewed and updated. The Full Board or the Board Audit Committee of the PROLINTAS Group must approve any departure or waiver from this PROLINTAS Group ABC Policy Statement.