

EPIC

ANTI-BRIBERY

&

CORRUPTION

POLICY

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1.0 OBJECTIVE

This Anti-bribery and Corruption Policy (“ABC Policy or “the Policy”) has been developed to be in line with the Guidelines on Adequate Procedure issued pursuant to the Section 17A of the Malaysian Anti-Corruption and Commission Act 2009 (Amendment 2018).

2.0 SCOPE

This Policy shall apply to all directors and employees of EPIC Group and Business Associates.

3.0 DEFINITIONS

The following definitions shall apply throughout the policy unless otherwise expressly stated:

- a) “EPIC Berhad” or “the company” means Eastern Pacific Industrial Corporation Berhad.
- b) “EPIC Group” or “the Group” used for convenience where references are made to Eastern Pacific Industrial Corporation Berhad and its subsidiaries and controlled companies of both direct and indirect interests. The companies in which Eastern Pacific Industrial Corporation Berhad has direct or indirect shareholding are distinct legal entities.
- c) The term “Employee” means any person who is in the employment of the Group including but not limited to permanent, contract, executive, non-executive, secondees and individual on direct hire.
- d) The term “Bribery” means the act of offering, promising, giving, accepting or soliciting of an undue advantage or gratification, either directly or indirectly, and irrespective of location(s), as an

inducement or reward for a person acting or refraining from acting, in relation to the performance of that person's duties.

- e) The term "Corruption" is any unlawful or improper behaviour that seeks to gain an advantage through illegitimate means. Corruption includes, but not limited to, bribery, extortion, fraud, abuse of power, embezzlement, and money laundering.
- f) "Gratification" shall include but not be limited to pecuniary and non-pecuniary benefits such as money, donation, gift, loan, fee, reward, valuable security, property or interest in property, movable or immovable property, financial benefit, office, dignity, employment, contract of employment or services, agreement to give employment or render services in any capacity, any offer, undertaking or promise, whether conditional or unconditional, of any gratification, including favour which is of value to the recipient, forbearance which is beneficial to the recipient, and any other gratification as defined in the Malaysian Anti-corruption and Commission Act 2009 and its amendment(s) ("MACA").
- g) "Third Parties" means a person or body that is independent of the Group.
- h) "Business Associates" includes but not limited to clients, customers, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, sub-contractors, suppliers, vendors, advisors, agents, distributors, representatives, intermediaries and investors All Business Associates are third parties, but not all third parties are business associates.
- i) "Public Official" means person holding legislative, administrative or judicial office, whether by appointment, election or succession, or any person exercising a public function, including for a public agency or public enterprise, or any official or agent of a public domestic or international organization, or any candidate for public office.

- j) Unless otherwise stated, the following shall apply:
- i. “The Board” refers to the Board of Directors of the Company.
 - ii. “Group Head of Company” refers to the Business Head who runs all aspects of the Company (i.e., holds title such as Executive Directors, Chief Executive Officer, General Manager, etc.).
 - iii. “Joint Venture” refer to business venture which is undertaken jointly with unrelated partners. May take the form of subsidiaries, associates and unincorporated entities.
 - iv. “Management” refers to those persons who perform the task of managing a specific function of the Company (e.g., Chief Finance Officer, Heads of Department, etc).

4.0 CORPORATE LIABILITY PROVISIONS OF SECTION 17A OF MACC ACT 2009 (AMENDMENT 2018)

- 4.1 The provision of Section 17A under the MACC Act 2009 (Amendment 2018), establishes the principle of a commercial organization’s (including EPIC Group) corporate liability for the corrupt practices of its employees and/or any person associated with the commercial organization in cases where such corrupt practices are carried out for the organization’s benefit or advantage.
- 4.2 The penalties could be in the form of a fine of not less than ten (10) times the value of gratification or RM1 million, whichever is higher, or imprisonment for a term not exceeding 20 years, or both.
- 4.3 The Guidelines on Adequate Procedure was issued by the Prime Minister’s Office with the objective of assisting commercial organization to understand what adequate procedures should be implemented to prevent the occurrence of corrupt practices in

business activities and which could be relied on as a defence to absolve liability under Section 17A.

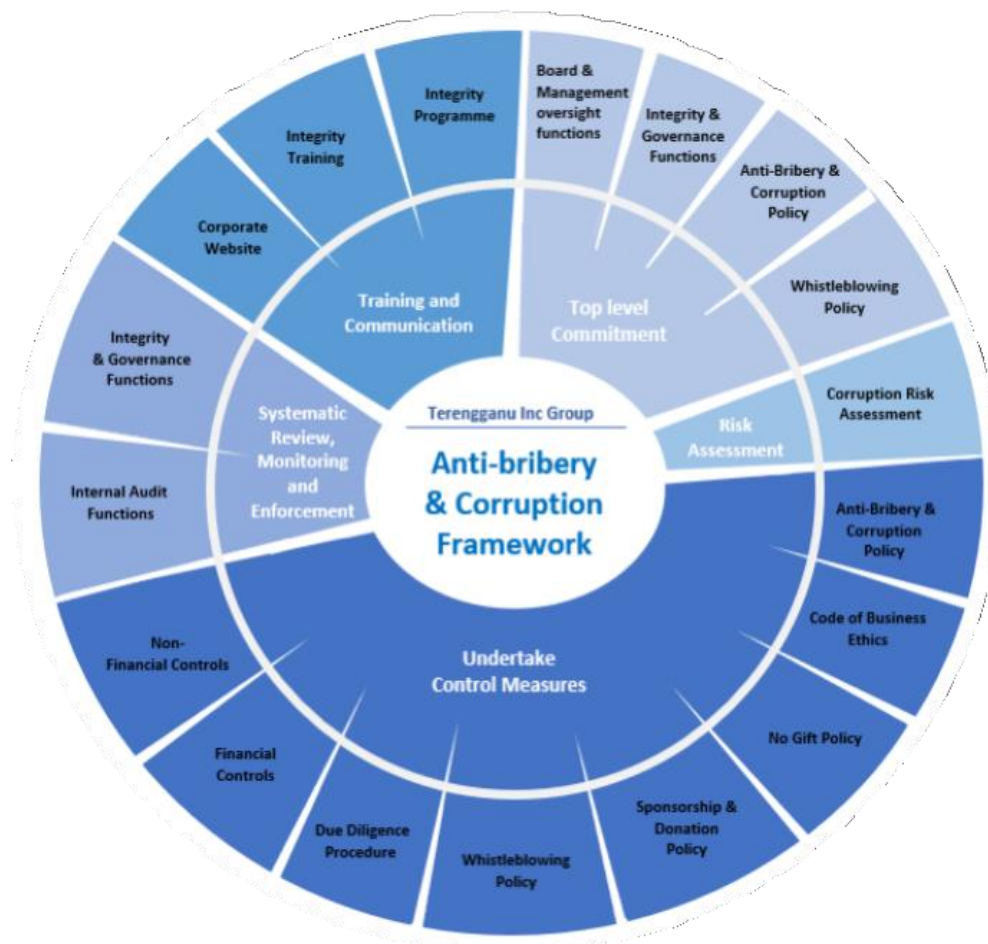
- 4.4 There are five (5) principles, which that may be used as reference points to assist commercial organization which as follows:
- a) Top Level Commitment.
 - b) Risk Assessment.
 - c) Undertake control measure.
 - d) Systematic review, monitoring and enforcement.
 - e) Training and communication.

5.0 ANTI-BRIBERY AND CORRUPTION POLICY STATEMENT

- 5.1 EPIC Group is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates, and in implementing and enforcing effective systems to counter bribery and corruption. Both bribery and corruption are punishable offences under the Malaysian Anti-Corruption and Commission Act 2009 and its amendments.
- 5.2 EPIC Group's anti-bribery and corruption stances are as follows:
- a) The Group adopts a "Zero Tolerance" approach against all forms of bribery and corruption.
 - b) All directors and employees must not offer, promise, give, solicit or accept any bribe and/or other improper gratifications in order to achieve any business or personal advantage for themselves or others, or engage in any transaction that contravenes any applicable anti-bribery or anti-corruption laws.

- c) The Group holds a “No Gift” Policy, although certain exceptions are allowed.
- d) Dealing with third parties including clients, joint ventures partner, outsourcing providers, contractors, consultants, suppliers, vendors, advisors, agents, distributors and representatives must be carried out in compliance with all relevant laws and must be consistent with the values and principles of the Group’s Code of Business Ethics (“COBE”). The Group encourages its employees or other stakeholders to make any disclosures openly and honestly, and those concerns or complaints raised will be treated fairly and properly.

6.0 ANTI-BRIBERY AND CORRUPTION FRAMEWORK



6.1 Top Level Commitment

- a) The Group's Board, Management and relevant functions are responsible to ensure adequate procedures are in place. The respective key responsibilities are as follows:

| Function | Roles and responsibilities |
|-----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Board of Directors | <ul style="list-style-type: none"> I. Determining the Group stances on anti-bribery and corruption. II. Overseeing the establishment, maintenance and review of EPIC Group's ABC policy. III. Promoting a culture of Integrity including managing corruption risk of the Groups. |
| Management | <ul style="list-style-type: none"> I. ABC Policy need to be implemented to all level of organization within the company and set the right "tone at the top". II. To assign a competence person(s) with adequate resource to be responsible for the implementation and operation of the ABC Policy. III. Review an anti-corruption compliance program, which includes clear policies and objectives that adequately address corruption risks. IV. Promote a culture of integrity within the Group. |
| Integrity & Governance Unit | <ul style="list-style-type: none"> I. Ensuring the implementation of ABC Policy. II. Provide advice and guidance to the Group and business associates on the ABC policy and issues related to bribery and |

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| | <p>corruption.</p> <ul style="list-style-type: none"> III. Assist the BOD and the Management in promoting integrity culture. IV. Reporting to the Board any significant anti- bribery and corruption issues. V. Ensure the establishment and performance of an internal control system which provides reasonable assurance that the corruption risks are managed. VI. Conduct Enhanced Due Diligence (if required). VII. Provide employees with adequate training to ensure they're thoroughly understanding of the organization's anti-corruption position, especially their role within or outside the Group. V. To assist the BOD in conducting special review/investigations as and when requested. |
| Group Human Resource & Admin | <ul style="list-style-type: none"> i. Perform background checks for all new hires. The purpose is to establish a standard for hiring and promoting the qualified individuals with emphasis on prior work experience, past accomplishments and evidence of integrity and ethical behaviour, demonstrate an entity's commitment to competent and trustworthy people. ii. To ensure implementation of appropriate disciplinary actions in accordance with applicable Guidelines and Regulations. |
| Company Secretary | <ul style="list-style-type: none"> i. Perform background checks for all new |

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| | hires of Board Members. The purpose is to establish a standard for hiring and promoting the qualified individuals. |
| Corporate Strategic & Communication | i. To conduct due diligence before making a commitment to a sponsorship & donation requested by external stakeholders to ensure that the requests are legitimate and that any red flags raised are resolved prior to committing to the activity or funds. |
| Group Supply Chain Management | i. To conduct due diligence on any relevant parties i.e. vendors, contractors, supplier, consultant (if require). |
| Legal & Secretarial | i. To provide legal advice as and when requested by respective parties with regards to anti-corruption and bribery. |
| Risk Management | i. To assist risk identification and assessment of risk associated with corruption. |
| Group Internal Audit | i. To assess the performance, efficiency and effectiveness of anti-corruption program and ensure program is enforced. ii. To assist the BOD and the Management in conducting investigations. iii. To report to the BOD and the Management on the internal control assessments, audit observations, investigations and related activities. |

- b) To the Group to effectively address and manage the bribery and corruption risk, all employee at any level is expected to understand and comply with this policy. The roles and responsibilities of employees are as follows:

| Function | Roles and responsibilities |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Employee | <ul style="list-style-type: none"> I. To adhere to the standards and restrictions imposed by applicable laws and EPIC Group's rules and regulations. II. To have a basic understanding of corruption and bribery and be aware of the red flags. III. To support EPIC Group in managing corruption and bribery by reporting any suspected and/or real corruption incidents or non-compliance to the ABC policy. IV. To read and understand policies and procedures with regards to anti-corruption compliance (i.e., Anti-corruption & bribery handbook, No gift policy, Code of Business Ethics and Whistleblowing Policy). |

6.2 Corruption Risk Assessment

- a) Corruption Risk Assessment process helps the Group to structural weakness that may facilitate bribery or corruption.

- b) The Group should establish a process of identification, evaluation and management of corruption risk.
- c) The Group should conduct bribery and corruption risk assessment periodically and when there is change in law or circumstance of the business.

6.3 Undertake Control Measure

- a) Due Diligence
 - i. Due diligence is a process to screen internal and third parties and obtain the necessary information to assess these parties including identifying any red flags that may indicate potentially higher risks with regards to possible integrity or bribery risk.
 - ii. Due diligence may include a search through relevant databases, checking for relationships with public officials, self-declaration, etc. The results of the due diligence process must be documented and retained for at least seven (7) years; to be produced on request by the custodian of the process.
- b) Anti-bribery and Corruption Policies

The current EPIC Group's set of policies and framework provides the foundation to support the culture of good governance and Integrity. This includes but not limited to:

 - i. Code of Business Ethics ("COBE")

It sets out principles, practices, and standards of personal and corporate behavior. The Group COBE among others describes broad guidelines on the following:

 - Employee responsibilities
 - Business practice.

- Conflict of Interests.
- Abuse of Information and Insider Trading.

ii. No Gift Policy

Giving or receiving gifts is often an important part of maintaining and developing business relationships. EPIC Group hold a “No Gift” Policy, although certain exceptions are allowed. Any allowable gifts shall be authorized, processed, and recorded in accordance with the Group No Gift Policy.

iii. Sponsorship & Donation Policy

Improper or excessive donation and sponsorship may perceived as a form of bribe and corruption, may have negative impacts on the Groups such as legal consequences, financial losses or reputational damage. Directors and employees must ensure that all sponsorships and donations are not used as a subterfuge for bribery and corruption. EPIC Group has established a sponsorship & Donation Policy which sets out the principles and specific prohibition on donation and sponsorship made by the Group.

iv. Whistle-Blowing Policy

EPIC Group strongly encourages reporting of real and suspected cases or suspicious activities of bribery and corruption without the fear of retaliation or reprisal. Any alleged or suspected improper conduct of bribery and corruption can be disclosed using the following channel:

- Secured email address at whistleblowing@epicgroup.com.my and the designated director's email (if any).
 - By writing or to meet in person with the Head of Integrity & Governance Unit at level 1, Annexe Building, Kemaman Supply Base, Teluk Kalong, 24007 Kemaman, Terengganu.
- v. The Group has identified certain area which are also susceptible to corruption risk as follows:

- Facilitation Payment

EPIC Group adopts a strict of disallowing the use of any facilitation payments. Facilitation is a payment received or made to a decision maker or an administrative staff (in either public or private sector) to speed up a process or secure licenses/permits, etc.

The only exceptional situation for making a facilitation payment is when employees are in peril; facilitation payment is allowed for the safety of employees. However, employees must immediately report the event to the Group Human Resource or Head of IGU.

- Support Letter

EPIC Group awards contracts and employee positions purely on a merit basis.

Therefore, support letters in all forms shall not be recognized as part of any decision- making process.

- Recruitment of Employee

EPIC Group recognizes the value of integrity in its employees.

The Group's recruitment, training, performance evaluation, remuneration, recognition and promotion for all employees, including management, shall be designed and regularly updated to recognize integrity.

Candidates will be selected based on the selection criteria as prescribed by the recruitment policy and procedure of the respective company.

The selection criteria shall include background searches to ensure that the candidate has not been convicted in any bribery or corruption case(s).

- Anti-Money Laundering ("AML")

AML is a process of converting cash or property derived from criminal activities to give it a legitimate appearance.

Directors and employees are prohibited from engaging, either directly or indirectly, in any transaction that involves proceeds from criminal activities, including inversion, concealment, receipt, use or disposal of such proceeds.

6.4 Systematic Review, Monitoring and Enforcement

- a) Internal Audit shall monitor and evaluate the performance, efficiency and effectiveness of ABC policy and program. Improvement opportunities could arise when a weakness is detected during the review.
- b) Integrity & Governance Unit shall monitor the performance of the Group in relation to anti-bribery and corruption compliance and will report to the Board on Quarterly basis.

- c) EPIC Group may consider any independent third party at least once every three years to obtain assurance that the Group is operating in compliance with policies and procedure in relation to corruption.
- d) EPIC Group have the right to take disciplinary action against any employee found to commit a breach of this policy. Further to disciplinary taken, any employee who commits a bribery or corruption risks violating MACC Act 2009 and shall on conviction, be liable to penalty as stipulated under the ACT.

6.5 Training And Communication

- a) The objective of training and communication is to ensure the Group's anti-bribery and corruption stances are conveyed to all employees and third parties.
- b) Employee training and awareness may include anti-bribery and corruption related policies, consequences of non-compliance, roles and responsibilities or any changing circumstances which may be relevant.
- c) EPIC Group may consider providing specific training to some business associates that may expose the Group to a higher risk, as any bribery or corruption actions conducted by the business associates with intent to obtain or retain business or a business advantage for the Group may cause the Group to bear a corporate liability in relation to Section 17A, Malaysian Anti-Corruption and Commission Act 2009 and its amendment.

7.0 REFERENCES

This shall be read together with any other applicable existing policies of the Group:

- a) Group Code of Business Ethics.
- b) Group No Gift Policy.
- c) Group Whistleblowing Policy.
- d) Handbook with Terms & Conditions of Service (TACOS)
(Amendment 2021)