

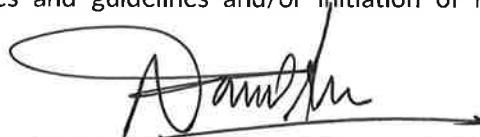
ANTI- BRIBERY & CORRUPTION POLICY

AVANGAAD BERHAD ("Avangaad") has adopted zero-tolerance towards bribery and corruption by implementing ISO 37001:2025 Anti-Bribery Management Systems (ABMS). Avangaad promotes the value of good governance and integrity in carrying out business operations. This is consistent with Avangaad's missions as a local shipping company focuses and exemplifies attributes of SAFETY, QUALITY, ENVIRONMENT, and SECURITY CULTURE.

Avangaad is committed to;

- maintaining the greatest standards of uprightness, integrity, and accountability, along with an effort to outlaw all types of bribery, corruption, and unethical behaviour;
- comply and abide by the provision of Malaysian Anti-Corruption Act 2009 (Act 694) and the applicable laws, rules, regulations, policies and procedures by inculcating integrity, transparency and accountability in all aspects of its businesses;
- promote an anti-bribery culture, the principles of integrity and sound corporate governance in all business dealings in keeping with the mission of the organization;
- develop and review a framework for achieving the ABMS Objective within the context of business environment;
- prohibit all forms of bribery including facilitation payments, and strictly regulate gifts, hospitality, donations, and sponsorships as detailed in the Avangaad Gift Policy;
- establish and maintain a comprehensive system for managing conflicts of interest, supported by robust financial and non-financial internal controls to ensure transparency and accountability across all business operations;
- encourage transparency, good ethical conduct and undertaking appropriate due diligence procedures on personnel, business associates and business operations to satisfy the ABMS requirements;
- provide mechanism to raise concerns and reporting of any suspected corrupt practices in good faith to all employees and business associates via Avangaad's Whistleblowing Procedure in compliance with the Whistleblower Protection Act 2010 (Act 711) without fear of retaliation or reprisal;
- maintain, retain and periodically review the effectiveness of the manual, policy, its objectives and shall continuously improve the ABMS effectiveness and efficiency; and,
- establish an independent Risk & Governance Department (RGD) which have prompt access to the Board of Directors on any matter or on any party proven to be guilty of being involved in corrupt practices, furthermore accountable for organising and overseeing ABMS compliance.

Avangaad shall ensure the board of directors, personnel, business associates and any party who performs jobs or services for or on behalf of Avangaad to engage, read, understand and comply to this Policy. Non-compliance with or violation to the Policy may result in disciplinary action in accordance with its policies, procedures, directives and guidelines and/or initiation of legal proceeding against those involved.



Nasrul Asni Bin Muhammad Dain
Chief Executive Officer (CEO)
Rev. 7.0 | 1st April 2026