INFOMINA BERHAD

Registration No. 200701018579 (776590-U)

ANTI-BRIBERY AND ANTI-CORRUPTION

Policy and Guidelines

Document Title:	ABAC Policy & Guidelines		
Ref No:	Infomina/ABAC		
Originator:	Corporate Office	Applicable To:	Infomina Group
Revision No:	3.0	Effective Date:	22 July 2026
Approved by:	Board of Directors		

infomina

Table of Contents

1.0 Objectives 2
1.1. General Information 2
1.2. Policy & Guidelines Objectives 2
2.0 Key Definition 2
2.1. Anti-Bribery and Anti-Corruption Policy & Guidelines 2
2.2. Bribery 3
2.3. Board of Directors 3
2.4. Chief Executive Officer 3
2.5. Code of Ethics and Conduct 3
2.6. Corporate Hospitality 3
2.7. Corruption 3
2.8. Donation 3
2.9. Employee 3
2.10. Extortion Payment 4
2.11. Facilitation Payment 4
2.12. Gift 4
2.13. Guideline on Adequate Procedure 4
2.14. ISO 37001:2016 4
2.15. Limits of Authority 4
2.16. Management 4
2.17. Audit & Risk Management Committee 4
2.18. Sponsorship 5
2.19. Whistleblower 5
2.20. Whistleblowing Policy & Guidelines 5
3.0 Responsibility 5
3.1. Board of Directors 5
3.2. Chief Executive Officer 5
3.3. Executive Director (Contract and Administration) 6
3.4. Employee 6
3.5. Amendments to Policy & Guidelines 6
4.0 Corruption Risk Assessment Approach 6
5.0 Gift and Corporate Hospitality 7
5.1. Purchase of Gift and Corporate Hospitality 8
5.2. Gift Acceptance 8
5.3. Entertainment Acceptance 9
6.0 Corporate Social Responsibility 9

6.1 Donation and Sponsorship 10
6.2. Education Sponsorships 10
7.0 Facilitation and Extortion Payments 11
7.1. Facilitation Payment 11
7.2. Exception to Facilitation Payment (Extortion Payment) 11
8.0 Due Diligence Procedures and Dealing with External Parties 12
8.1. Dealing with Vendors or Agents 13
8.2. Dealing with Customers 13
8.3. Dealing with Business Partners 14
8.4. Dealing with Public Officials 15
8.5. Dealing on Recruitment of Employees 15
9.0 Reporting Procedures on Suspected Bribery or Corruption Activities 16
9.1. What to Report 16
9.2. How to Report 16
10.0 Internal / External Assessment 18
11.0 Training and Awareness Programme 18
12.0 Record-Keeping and Documentation 18

Abbreviations

In this Policy & Guidelines, the following abbreviations shall have the following meaning unless otherwise stated:

ABAC	Anti-Bribery and Anti-Corruption		CSR	Corporate Social Responsibility
ARMC	Audit & Risk Management Committee		KSM	Key Senior Management
BOD	Board of Directors		LOA	Limits of Authority
CEO	Chief Executive Officer		MACC	Malaysian Anti-Corruption Commission
CoCE	Code of Conduct & Ethics		SSM	Suruhanjaya Syarikat Malaysia
HR	Human Resources		ERM	Enterprise Risk Management

1.0 Objectives

1.1. General Information

The Anti-Bribery & Anti-Corruption ("ABAC") Policy & Guidelines (hereinafter referred to as "Policy & Guidelines") defines the policies and procedures for Infomina Berhad ("Infomina") and its subsidiaries (collectively known as "Infomina Group" or "the Group"). Rules (including Circulars and Letters) from the regulators shall automatically supersede the existing operating policies and procedures herein stated.

The Policy & Guidelines are applicable to the following stakeholders:

a. Directors of Infomina, both executive and non-executive, unless otherwise stated in this Policy & Guidelines;
b. every employee within the Group; and
c. suppliers, sub-contractors, consultants, agents, representatives and others performing work or services for or on behalf of the Group.

It is the intention of the Board of Directors ("BOD") of Infomina to ensure that these procedures serve as our commitment to prohibit bribery and corruption in the business conduct within the Group.

1.2. Policy & Guidelines Objectives

The main objectives of this Policy & Guidelines are as follows:

- To ensure the policies, guidelines and practices are oriented towards embedding ABAC stance organisation-wide, with guidance from the Guidelines on Adequate Procedures and the requirements of Malaysian Anti-Corruption Commission ("MACC") Act 2009 (amended 2018), introduced via Section 4 of the MACC (Amendment) Act 2018;
- To ensure that adequate and standardised ABAC policies and guidelines are consistently applied across the Group by all relevant staff; and
- To ensure that all business operations within the Group strictly adhere to the ABAC Policy & Guidelines.

2.0 Key Definition

2.1. Anti-Bribery and Anti-Corruption Policy & Guidelines

This refers to the ABAC Policy & Guidelines established by Infomina.

2.2. Bribery

ISO 37001:2016 defines bribery as offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties.

2.3. Board of Directors

This refers to the BOD of Infomina.

2.4. Chief Executive Officer

Defined as the highest-ranking executive in a company, responsible for executing corporate policies established by the Board, and serving as the primary point of communication between the BOD and the corporate's operations.

2.5. Code of Ethics and Conduct

This refers to the formal set of principles and standards governing ethical and professional conduct within the Group.

2.6. Corporate Hospitality

This refers to any act of considerate care extended to guests, where all related expenses are fully borne by the company. It includes but not limited to, the provision of refreshments, accommodation and entertainment at restaurants, hotels, clubs, resorts and other venues.

2.7. Corruption

As defined by Transparency International, corruption is the abuse of entrusted power for private gain.

2.8. Donation

This refers to any gift or contribution made by the Group for charitable purposes, humanitarian aid or to support local community welfare, whether in-kind or in the form of financial assistance.

2.9. Employee

This refers to any individual employed by the Group, including but not limited to executives and non-executives, contract personnel.

2.10. Extortion Payment

This refers to money or other forms of payment that are forcibly extracted from the Group or its employees due to actual or perceived threats to health, safety or liberty. Such payments are made involuntarily and typically under duress.

2.11. Facilitation Payment

This refers to illegal or unofficial payment made in return for services that the Group is legally entitled to receive without making such payment. For example, a payment made to government official or a person with certifying or approval authority to expedite the necessary action in the capacity of abovementioned person.

2.12. Gift

This refers to any item given or received by the Group to or from a third party without any expectation of payment or benefit in return. For example include, but not limited to, vouchers, gift cards, Company branded merchandise or promotional items, hampers, and festive gifts (i.e., mooncake, mandarin oranges, Christmas gifts).

2.13. Guideline on Adequate Procedure

This refers to the document issued by the Prime Minister's Department in December 2018, pursuant to Section 17A (4) and (5) of the MACC Act 2009 (amended 2018).

2.14. ISO 37001:2016

This refers to the international standards on requirements and guidance for establishing, implementing, maintaining, reviewing and improving an anti-bribery management system.

2.15. Limits of Authority

This refers to the approved documents stipulating the approving authority and authority limits allowed for the Board and management at Infomina.

2.16. Management

This refers to the management team of the Group, including Chief Executive Officer ("CEO") and Key Senior Management ("KSMs").

2.17. Audit & Risk Management Committee

This refers to the Audit & Risk Management Committee ("ARMC") of Infomina, which provides oversight of ERM and corruption risk assessment activities of the Group.

2.18. Sponsorship

This refers to support provided either financially or by way of product and/or services for events or activities organised by profit or non-profit organisations, local communities, government departments or agencies, primarily aimed at raising awareness of the Group's profile.

2.19. Whistleblower

This refers to any person (internal or external) raising or reporting concerns of wrongful activities or wrongdoings as defined in the Whistleblowing Policy & Guidelines Document of Infomina.

2.20. Whistleblowing Policy & Guidelines

This refers to the Whistleblowing Policy & Guidelines of Infomina, which governs the procedures and protections related to the reporting of misconduct within the Group.

3.0 Responsibility

3.1. Board of Directors

The Board of Directors shall be responsible for the following:

a. Setting the Group's commitment towards the prohibition of bribery and corruption in its business conduct;
b. Approving the ABAC Policy & Guidelines;
c. Ensuring the alignment of the ABAC Policy & Guidelines with the Group's overall strategy;
d. Maintaining oversight on ABAC governance by ensuring that an effective ABAC management system is established, implemented, maintained and periodically reviewed to address the Group's bribery and corruption risks, including the Policy & Guidelines; and
e. Promoting an appropriate ABAC culture within the Group.

3.2. Chief Executive Officer

The Chief Executive Officer shall be responsible for the following:

a. Providing overall direction for the establishment, implementation, and periodic review of the ABAC Policy & Guidelines;
b. Ensuring the integration of ABAC Policy & Guidelines requirements into key organisation functions such as human resource management, procurement and finance, and enhancing the underlying controls within these key functions to support ABAC compliance;
c. Supporting the resource allocation and investment in a robust and effective ABAC Policy & Guidelines;

d. Supporting adequate training and awareness programmes for the employees of the Group;
e. Communicating the ABAC Policy & Guidelines, both internally and externally;
f. Promoting an appropriate ABAC culture within the Group; and
g. Supporting other relevant management personnel in the prevention and detection of bribery and corruption.

3.3. Executive Director (Contract and Administration)

The Executive Director (Contract and Administration) shall be responsible for:

a. Ensuring that the ABAC Policy & Guidelines are adhered to within the Group;
b. Reporting non-compliance cases to the ARMC, including the status of follow-up actions;
c. Attending to inquiries about Infomina's ABAC Policy & Guidelines and its practices within the Group; and
d. Facilitating periodic corruption risk assessment.

3.4. Employee

All employees shall be responsible for:

a. Implementing the ABAC Policy & Guidelines, including strengthening controls over functions under their responsibility, as elaborated in this Policy & Guidelines;
b. Complying with the requirements of the ABAC Policy & Guidelines; and
c. Reporting any suspected bribery or corruption via the whistleblowing channel of Infomina.

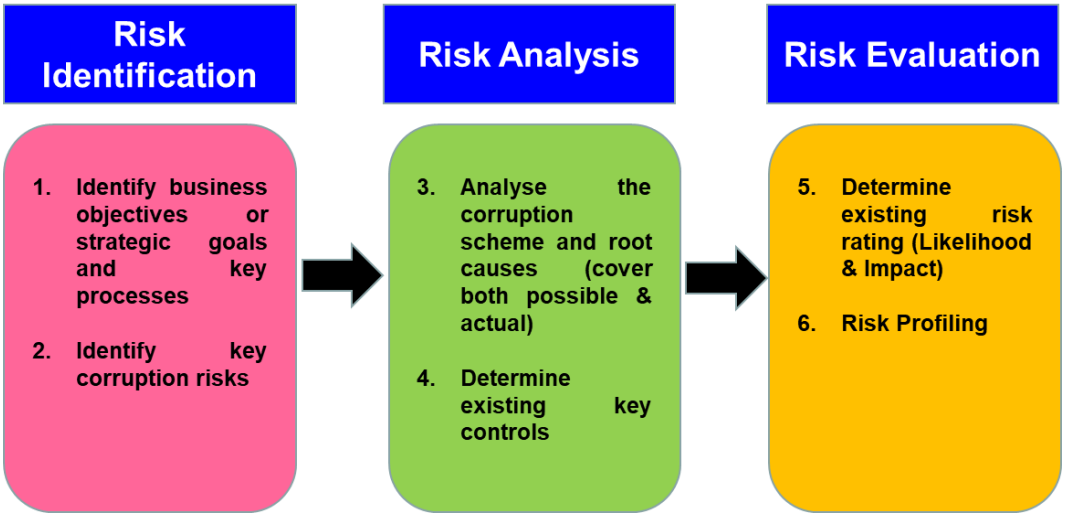
3.5. Amendments to Policy & Guidelines

Any requirement to update, improve, and/or amend this Policy & Guidelines shall be submitted for endorsement and approval by the CEO. Key changes, including the introduction of new policies or procedures or the deletion or revision of existing ones shall be clearly indicated for version control purpose.

4.0 Corruption Risk Assessment Approach

a. Infomina has established a Corruption Risk Management Framework guided by ISO 37001:2016 and the Guidelines on Adequate Procedures. The framework outlines the governance, structure, policies, assessment processes, and the integration of risk management into the Group's operational activities to support continuous monitoring of identified corruption risks.

The corruption risk assessment process is depicted in the diagram below:



b. The BOD, through the ARMC, which comprises of Independent Non-Executive Chairman, Independent Non-Executive Directors, Chief Executive Officer and Executive Directors shall oversee and ensure accountability for identified corruption risk and the implementation of corresponding controls.

c. The risk parameters (i.e., financial impact, customer relationships, and reputation/ media) are established to assess the consequences of each risk. This includes evaluating the likelihood of occurrence and the severity of impact, based on Infomina's risk appetite.

d. A Risk Register is maintained to document potential corruption scheme(s), possible root causes, existing key controls, and the impact of each risk across the Group. These risks are evaluated based on their likelihood of occurrence and severity of impact (i.e., Low, Medium, High, and Extreme) forming the basis for Management's strategic decision-making and corruption risk mitigation efforts.

e. The ARMC shall conduct regular corruption risk assessments at least annually and/or when there are changes in laws or circumstance of the business to ensure that identified corruption risks remain relevant and that adequate mitigating controls are discussed and implemented.

f. A specific anti-corruption plan shall be identified by the respective KSM and submitted to the CEO for review and ongoing monitoring.

5.0 Gift and Corporate Hospitality

Infomina recognises the importance of giving and acceptance of gifts, corporate hospitality, donation and sponsorship activities to maintain good rapport with its vendors, customers and government officials. However, the policies and procedures set out below are intended to safeguard the Group's reputation and to protect its employees from allegations of bribery, corruption, or exercising undue influence over external parties for personal gain.

5.1. Purchase of Gift and Corporate Hospitality

a. Purchase requisitions pertaining gift and corporate hospitality must be for a reasonable amount, subject to the approval of the CEO and in accordance with the Group's LOA. Such purchases must satisfy **ALL** of the following conditions prior to approval:

   i. They are intended to maintain good rapport with the vendors, customers, or government officials;
   ii. They are limited in value, customary and lawful under the circumstances;
   iii. They do not have, nor are they perceived to have, any influence on the action(s) or decision(s) of the receiving party;
   iv. There shall be no expectation of any specific favour, benefit, or advantage from the intended recipients;
   v. There shall not be any corrupt / criminal intent; and
   vi. The giving out of gift or corporate hospitality shall be transparent.

b. Subject to compliance with Clause 5.1(a), the purchase of gifts or corporate hospitality, is permitted only for HOD and above within the Group.

c. Any purchases of gifts or corporate hospitality exceeding RM1,000.00 requires a second-level approval from an Executive Director.

d. Purchase requisition pertaining to gifts and corporate hospitality for public sector officials shall be restricted to statutory limits of the respective jurisdictions. However, gifts in the form of cash or cash equivalents are strictly prohibited and shall never be given or offered to any public or government official.

e. All purchase requisitions for gifts or corporate hospitality must clearly state the purpose of the request, including the client or vendor name and the name(s) of the recipient(s).

f. In the event of any dispute and discrepancy between this ABAC Policy & Guidelines and any existing internal practices, policies, or procedures established prior to its commencement, the **provision of** Section 5 of this ABAC Policy & Guidelines shall prevail.

5.2. Gift Acceptance

a. Under no circumstances shall an employee of the Group accept or solicit for personal gifts from external parties.

b. Although the general principle is to immediately refuse or return such gifts, acceptance of a gift on behalf of Infomina may be permitted only in exceptional circumstances, such as when refusal would cause serious offence and potentially harm Infomina's business relationship with the Third Party.

However, under no circumstances may an employee, director, or any of their family or household members accept gifts in the form of cash or cash equivalents. Non-monetary items such as festive hampers, fruits, or food received or shared with other employees in the office are generally acceptable.

c. Any gifts received by an employee from an external party with a value exceeding RM1,000.00 must be declared to the CEO and HR Manager.

5.3. Entertainment Acceptance

a. Employees of the Group shall exercise proper care and sound judgment prior to accepting any form of entertainment from an external party. This is essential to safeguard the Group's reputation and to prevent any perception or allegation of bribery, corruption or undue influence.

b. Any entertainment received by an employee of the Group from external parties with a value exceeding RM1,000.00 must be declared to the CEO and HR Manager.

6.0 Corporate Social Responsibility

a. All Corporate Social Responsibility ("CSR") related sponsorships and donations shall be made in accordance with Infomina's policies with prior approval by authorised personnel in line with the LOA.

b. Given the nature of Infomina's business, government agencies, or local authorities may occasionally request sponsorship and/or donations for CSR events. As part of Infomina's commitment to CSR and sustainable development, Infomina may provide such support where appropriate, and in a manner that is transparent, lawful, and aligned with internal policies.

c. All such requests shall be examined for legitimacy and must not be made with the intend to improperly influence any business decision or outcome. The proposed recipient shall be a legitimate organisation and appropriate due diligence shall be conducted in particular to identify any affiliations with public officials. Any red flags identified during the due diligence process must be resolved prior to committing any funds to the programme. Even where requests are deemed legitimate, contributions must be structured to ensure that the intended beneficiaries receive the support.

d. Where any employee or Director is uncertain as to whether a proposed charitable contribution or social benefit is appropriate, Management shall seek legal consultation before proceeding.

6.1 Donation and Sponsorship

a. As set out in the Code of Conduct & Ethics ("CoCE"), employees shall ensure that all sponsorships and donations are not used as a subterfuge for bribery nor as a means to circumvent or avoid any provisions of the CoCE, including in particular, the prohibition on bribery. Infomina needs to be certain that donations to foreign-based charities or beneficiaries are not disguised illegal payments to government officials and shall ensure that such charity does not serve as conduit for illegal activities in violation of international anti-money laundering, anti-terrorism financing, or other applicable laws.

b. In line with Infomina's commitment to integrity, transparency, and community contribution, all sponsorships and donations must comply with the following:

- Be permitted under all applicable laws and regulations;
- Receive the necessary internal and external approvals;
- Be made only to well established entities with adequate organisational structure and governance to manage the funds properly;
- Be accurately recorded in Infomina's accounting books and financial records; and
- Not be used to conceal an improper payment or act of bribery;

Examples of red flags to look out for include:

- The proposed recipient or organisation has affiliations with a Public Official or their relatives ;
- The contribution is made on behalf of a Public Official;
- There is a risk of a perceived improper advantage for Infomina; or
- The proposed recipient is based in, the request originates from, or the activity is conducted in a high-risk country.

c. Infomina requires employees to exercise sound judgment and common sense in assessing such requests. When in doubt, employees shall seek legal advice or escalate the matter to the CEO to determine the authenticity of such requests.

d. Donation and sponsorship are only permissible with prior approval from the CEO. All donations and sponsorship payment shall be supported with an official letter of request from the requesting external party and proof of receipt.

e. Donation or sponsorship exceeding RM10,000.00 are subject to approval by the BOD of Infomina.

6.2. Education Sponsorships

Infomina has a sponsorship programme with the objective to provide educational opportunities to deserving students to enable them to realise their potential and in turn, contribute to the growth of Infomina and the nation.

The awarding of scholarships shall be governed by strict internal guidelines and due diligence procedures to ensure that only qualified and deserving candidates are selected. This is crucial to prevent any element of bribery, favouritism, or undue influence in the sponsorship process. The selection of sponsorship recipients shall be based on pre-approved and objective criteria including but not limited to academic achievements, qualifications and assessment results.

The entire selection process must be transparent and all decisions shall be properly documented and justified..

In cases where sponsorships involves foreign public officials or individuals associated with such officials, additional caution shall be exercised to ensure compliance with applicable local and international laws. Any such awards shall adhere strictly to Infomina's Sponsorship Policy & Guidelines and must not be used to improperly influence business decisions or gain unfair advantage.

7.0 Facilitation and Extortion Payments

a. Facilitation payment to external party, in particular, government officials, is strictly prohibited under this Policy as they constitue a form of bribery and corruption. Extortion payment to external party, on the other hand, may be treated differently due to the coercive nature of the situation. While such payments are not encouraged, they are recognised under this Policy only in extreme cases involving imminent harm. Such instances must be reported immediately and are not to be construed as legitimate business practices.

b. The Chief Finance Officer ("CFO") shall maintain a proper record of any reported facilitation and extortion incident and ensure the matter is reported to the appropriate internal authorities and, if necessary, to law enforcement or relevant authority.

7.1. Facilitation Payment

a. Facilitation payment to external party, in particular, government officials, is strictly prohibited as it is seen as a form of bribery and corruption, unless it can be proven that such payment is legitimate and supported by an official receipt.

b. Facilitation payment shall not in any way or form be disguised or translated as part of personnel remuneration package.

c. Subject to the fulfilment of criteria in Clause 7.1(a), facilitation payment request may be approved by the CEO.

7.2. Exception to Facilitation Payment (Extortion Payment)

a. Extortion payment to any party shall not be made unless the employee(s) and / or their families health, safety, and or liberty are threatened.

b. Subject to the fulfilment of criteria in Clause 7.2(a), extortion payment request may be approved by the CEO.

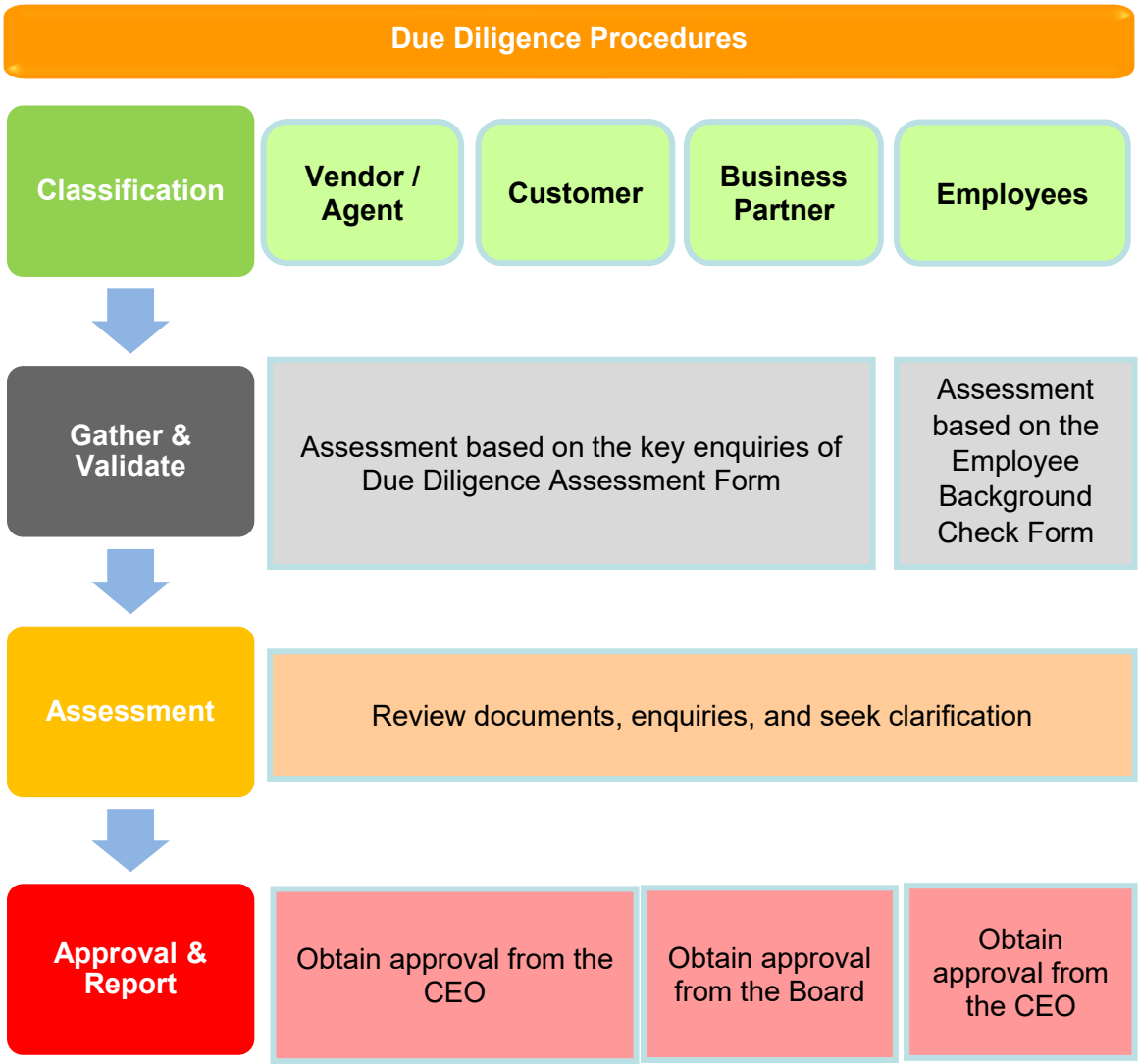
8.0 Due Diligence Procedures and Dealing with External Parties

Infomina recognises the objective of due diligence procedures on customers, business partners, vendors, and employees to assess the risk of bribery and corruption associated with these parties. This process serves as a key basis for decision making, on whether to proceed with any contractual arrangement or business engagement.

The Group shall apply due diligence procedures to the following key stakeholders:

i. Vendors or agents;
ii. Customers;
iii. Business partners; and
iv. Employees.

The diagram below illustrates the due diligence process flow:



8.1. Dealing with Vendors or Agents

a. Infomina is committed to upholding the highest standard of ethics and integrity in all aspects of its procurement activities by:

   i. Adhering to the Group's procurement policies and procedures;
   ii. Avoiding engagement with any vendor, sub-contractors, or agents known or reasonably suspected to be involved in corrupt practices;
   iii. Ensuring that all new vendors, sub-contractors, or agents undergo background assessments and conflict of interest checks prior to registration and engagement;
   iv. Communicating the requirements of this ABAC Policy & Guidelines to all vendors, sub-contractors, or agents (refer to ***Appendix A***: ***Third Party ABAC Declaration Form***);
   v. Ensuring all contracts or agreements with vendors, sub-contractors, or agents include a provision granting Infomina the right to audit their compliance with this Policy & Guidelines; and
   vi. All agents shall be required to declare their adherence to the requirements of this Policy & Guidelines via the ***Third Party ABAC Declaration Form (Appendix A)***.

b. A Due Diligence Assessment Form shall be used to guide Infomina employees in conducting assessment of vendors', sub-contractors', or agents' backgrounds and reputations, including checks for potential conflict of interest (refer to ***Appendix B***: ***Due Diligence Assessment Form***). The key components of the due diligence procedure may include, but not limited to the following:

   i. Corporate profile;
   ii. Company search via Suruhanjaya Syarikat Malaysia ("SSM") or equivalent authority in the country of operation;
   iii. Financial background;
   iv. Directorship information;
   v. History of criminal, bribery, or corruption related offences; and
   vi. Potential conflicts of interest involving existing employees or Director of the Group.

c. The findings of the due diligence assessment, including any concerns identified, shall be communicated and reported to and approved by the CEO prior to the commencement of any formal engagement or contractual relationship.

8.2. Dealing with Customers

a. To ensure that Infomina's dealings with customers comply with applicable laws, regulations, and the requirements of this Policy & Guidelines, the following safeguards shall be observed:

   i. All new customers are subject to background assessment and conflict of interest checks prior to entering into any business relationship; and

ii. A standard ABAC clause shall be incorporated in all contracts and agreements with customers, granting Infomina the right to terminate the contract in the event of any proven bribery or corruption.

b. A Due Diligence Assessment Form shall be used to guide Infomina employees in conducting assessment of customers' backgrounsd and reputations, including identifying any potential conflicts of interest (refer to ***Appendix B***: ***Due Diligence Assessment Form***). Key components of the customers' due diligence process may include, but are not limited to:

i. Corporate profile;
ii. Company search via SSM or equivalent authority in the relevant jurisdiction;
iii. Financial background;
iv. Directorship information;
v. History of criminal, bribery, or corruption related offences; and
vi. Potential conflicts of interest involving existing employees or Director of the Group.

c. The results of the due diligence assessment, including any concerns identified, shall be communicated and reported to the CEO for review and approval before establishing any business relationship. However, government entities and major financial institutions (such as licensed banks and stock exchanges) shall be exempted from the due diligence requirement, provided that the applicable contracts include the standard ABAC clause.

8.3. Dealing with Business Partners

a. In order to strengthen the integrity of business relationships, a due diligence process shall be conducted for any business partner intending to enter into a long term relationship with Infomina.

b. The due diligence assessment aims to ensure that the prospective business partner is not likely to engage in bribery and corruption activities in the course of its partnership with Infomina. A conflict of interest check shall also be carried out and any such conflict shall be declared to the Board during the evaluation process. (refer to ***Appendix B***: ***Due Diligence Assessment Form***). The key components of the due diligence process for business partners include, but not limited to:

i. Corporate profile;
ii. Company search via SSM or the relevant authority in the country of operation;
iii. Financial background;
iv. Directorship information;
v. History of criminal, bribery or corruption related offences; and
vi. Potential conflicts involving existing employees or Directors of the Group.

8.4. Dealing with Public Officials

The term 'public or government official' is defined in the CoCE which includes, without limitation, candidates for public office, officials of any political parties, and officials of state-owned enterprises other than Infomina. Extra caution shall be exercised when dealing with public officials. Providing gifts, entertainment, or corporate hospitality to public officials or their family or household members is generally considered a 'red flag' under most anti-bribery and corruption laws and may exposed the Group to reputational or legal risk.

Infomina shall not provide non-business related travel and hospitality to any government official or their family or household members without the prior written approval of the CEO, and such approval shall be given only after consultation with legal counsel.

All employees must also comply with Infomina's prevailing policies and procedures on gifts, entertainment, and corporate hospitality which are available from the Human Resources Department.

If approval is granted to provide gifts, entertainment or corporate hospitality to public officials, Management shall ensure that the value does not exceed the applicable statutory limit.

8.5. Dealing on Recruitment of Employees

a. Background screening on shortlisted candidate(s) is required during the evaluation stage of recruitment process (refer to ***Appendix C***: ***Application Form*** and ***Appendix D***: ***Interview Evaluation Form)***.

b. Key considerations prior to acceptance of shortlisted candidate(s) include:

   i. Any past criminal records (if any);
   ii. Involvement in fraud, bribery, or corruption in previous organisation;
   iii. Verification of past employment or academic qualifications, where applicable; and
   iv. Potential conflicts of interest, such as familial or close relationship with any employee, vendor, customer or Director of the Group.

c. The due diligence results shall be reviewed and vetted by the CEO prior to acceptance of the candidate.

d. Newly recruited employees shall undergo an onboarding programme, which includes a briefing on Infomina's ABAC Policy & Guidelines and CoCE.

e. All Infomina Group employees shall declare their adherence to the ABAC Policy & Guidelines via ***Appendix E: Employee ABAC Declaration Form***.

9.0 Reporting Procedures on Suspected Bribery or Corruption Activities

Reference shall be made to the *Whistleblowing Policy & Guidelines Document* pertaining to reporting procedures on suspected bribery or corruption activities.

Whistleblowers are encouraged to report in good faith any attempted, suspected, or actual bribery or corruptions activities that are in violation of this Policy & Guidelines at the earliest opportunity.

Upon making a disclosure in good faith, based on reasonable grounds and in accordance with the procedures outlined in the *Whistleblowing Policies & Guidelines Document*, the whistleblower shall be protected from any form of retaliation, discrimination or detrimental treatment within the Group.

9.1. What to Report

The key information or documentation below are to be provided by the whistleblower to facilitate further investigation, if required:

a. Whistleblower's contact information
   i. Full Name (*)
   ii. Designation
   iii. Contact Number
   iv. Email Address (*)

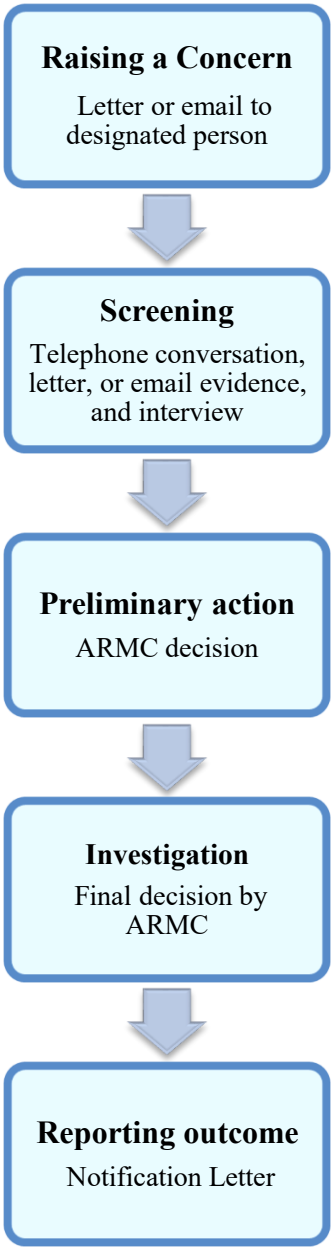
b. Suspect's information
   i. Full Name
   ii. Designation
   iii. Contact Number
   iv. Email Address

c. Details of Complaints / Concerns
   i. Incident date
   ii. Parties involved /Affected
   iii. Incident or event location
   iv. Supporting documentation (where applicable)
   v. Other details or information which may assist the investigation

* *May leave the information blank if the whistleblower wishes to remain anonymous*

9.2. How to Report

Whistleblowers shall report their concerns using the reporting channels as stated in the *Whistleblowing Policies & Guidelines Document*, which is available on the Infomina website.


Raising a Concern
Letter or email to designated person
Screening
Telephone conversation, letter, or email evidence, and interview
Preliminary action
ARMC decision
Investigation
Final decision by ARMC
Reporting outcome
Notification Letter

10.0 Internal / External Assessment

a. As part of the internal monitoring process, the Executive Director (Contract and Administration) shall review the underlying controls of ABAC and identify any non-compliance incidents on a quarterly basis.

b. If any of Infomina Group's key stakeholders, as defined in Clause 8.0, are found to have breached any ABAC rules and regulations or any provision of this Policy & Guidelines, including willful non-disclosure of suspected bribery or corruption, appropriate action may be taken as follows:

Key stakeholders	Actions taken
Employee	Disciplinary action by Infomina Group in accordance with the CoCE of Infomina which may include termination of employment.
Vendor / agents / customers / business partners	i. Subject to BOD's approval, retain business dealings; ii. Discontinue business dealings with immediate effect; iii. Terminate contract with immediate effect; or iv. Initiate legal proceedings if necessary.

b. Infomina shall engage an independent consultant to review and assess the adequacy and implementation of this Policy & Guidelines on a regular basis at least once every three (3) years.

11.0 Training and Awareness Programme

a. An annual training and awareness programme on ABAC shall be provided to Infomina's employees and key stakeholders as defined in Clause 8.0, as appropriate to their roles and taking into account the bribery risk assessment.

b. Updates on this Policy & Guidelines with regards to its content as well as regulatory requirement affecting the ABAC practices shall be communicated to Infomina's employees and key stakeholders, defined in Clause 8.0.

12.0 Record-Keeping and Documentation

a. All accounts, invoices, documents, and records relating to dealings with third parties, including clients, suppliers, and business contacts, shall be prepared and maintained accurately, completely, and in compliance with all relevant regulatory or statutory requirements.

Proper and complete records must be maintained for all payments to and from third parties in the ordinary course of business. These records serve as evidence that the payments are bona fide, and not linked to any corrupt or unethical conduct.

b. Infomina is committed to upholding the highest ethical standards and accountability by maintaining accurate and complete records.

   The Group shall ensure that all information documented in its records and maintained through its record-keeping processes shall not:

   i. Contain any false or misleading entries;
   ii. Be altered to conceal improper conduct;
   iii. Be destroyed prematurely or without proper authorization, especially when subject to any ongoing audit, investigation or legal proceeding.

This policy was reviewed and approved by the Board on 22 July 2026 and is made available for reference on the Company's website at https://infomina.co/.

Appendix A – Third Party ABAC Declaration Form

Third Party ABAC Declaration Form

Our company, _____ (Company Name), (which includes its Directors, officers and Employees who intend to conduct business transaction(s) with the Infomina Berhad and its subsidiaries, here-in-after referred to as the "Infomina Group") hereby to confirm that:

a. A copy of the ABAC Policy & Guidelines was provided, and we have read and understood the policy (A copy of the policy is available on www.infomina.co). We agree and undertake to abide by all the terms and condition of the ABAC Policy & Guidelines at all times.

b. We have not been convicted nor are we subject of any investigation, inquiry or enforcement proceedings by the relevant authorities of any actual or suspected bribery and corruption activities.

c. If we have reasonable grounds to suspect any actual or suspected breach to the ABAC Policy & Guidelines, we shall report such act to Infomina as soon as reasonably practicable.

d. In the event that we are in breach of the ABAC Policy & Guidelines, the Infomina Group may immediately terminate the contract / agreement entered without any liability whatsoever on the part of the Infomina Group to us. This is without prejudice to any other rights or remedies that the Infomina Group may have or any other appropriate action which the Infomina Group may seek under the terms of the applicable contract / agreement or the applicable rules and regulations.

Yours sincerely,

_____
Name of Company Director (or Equivalent):
Name of Company:
Company stamp:

Appendix B – Customer Due Diligence Assessment Form

	Infomina Berhad Due Diligence Assessment Form	Ref. No: Infomina-DD-00

1.0 Company Background Information			
Company Name		**Registration Number**	
Date of Incorporation		**Country / location of Operations**	
Principal Business			

Please list the shareholders or owners who have interest in the Company's business

Name	Shareholders/ Director	% of Shares		Any interest within Infomina Group (Y/N)
		Number	Percentage	

2.0 Financial Performance			
Description	**Current year**	**Previous Year**	**Remarks**
Revenue			
Gross margin			
Profit / (Loss)			

3.0 General checklist			
Description	**Yes**	**No**	**Remarks (if Yes)**
1. Within the last three (3) years, did any of the shareholders, directors, or senior management, ever been found involved into any criminal, bribery, or corruption cases?			
2. Does the Company allow facilitation payment practice in its business dealings?			
3. Does the Company have any channels in place to allow reporting of any misconduct?			
4. Does the Company rely on agents or intermediaries for its business operation?			
5. Does the Company have a code of conduct or any form of formalised ABAC policy and guidelines?			
6. Does the Company have any policy to govern gift, corporate hospitality, and entertainment giving and acceptance?			

Appendix B – Customer Due Diligence Assessment Form (Cont'd)

	Infomina Berhad **Due Diligence Assessment Form**	Ref. No: Infomina-DD-00

3.0 General checklist			
Description	**Yes**	**No**	**Remarks (if Yes)**
7. Do any shareholders, directors, or Senior Management of the Company have connections with government official / politician (including immediate family member)?			

Attachments required:

1. Form 49 equivalent or SSM search report
2. CTOS report
3. Company's code of conduct (if any)
4. Company's ABAC Policy & Guidelines (if any)
5. Any other background research / news

Assessed by:

Signature
Name:
Date:

Reviewed by:

Signature
Name:
Date:

Appendix C - Application Form

INFOMINA BERHAD (776590-U)

APPLICATION FOR EMPLOYMENT

Position Applied For				**Date**	
APPLICANT INFORMATION					
Full Name as per National ID				**National ID No**	
Please enter your full name in proper sentence case (e.g., John Doe and not JOHN DOE). Avoid using ALL CAPS					
Address	*Please enter your current residential address in proper sentence case (e.g., 123 Jalan SS15). Avoid using ALL CAPS*			**Country**	
State		**City**		**Postcode**	
Nationality		**Date of Birth**		**Marital Status**	
E-Mail Address		**Mobile No.**	**Office No.**	**Gender**	
MEDICAL DECLARATION					

Do you have any medical conditions or disabilities?		(If yes, please specify)
Have you ever been diagnosed with a chronic illness or medical conditions (includes but not limited to diabetes, heart disease, high-blood pressure, asthma, mental illness, depression, anxiety, insomnia, contagious illness, allergy)?		(If yes, please specify)
Does any of your close family members have any of the above?		(If yes, please specify)
Are you currently pregnant or planning to become pregnant within 1st 6 month during your employment?		(If yes, please specify)
Did you recently given birth and if yes, how old is your child?		(If yes, please specify)
Would you be willing to undergo a pre-employment medical examination or health screening, if required?		(If no, please specify)

CRIMINAL DECLARATION

Do you have any past and/or on-going criminal record, or any Industrial Relation case?		(If yes, please specify)
Do you consent to a criminal background check if required?		(If no, please specify)

OTHERS DECLARATION

Have you been declared bankruptcy?		(If yes, please specify)
Do you own or operate any other business, including online platforms, part-time work, or side business?		(If yes, please specify)
Do you have close friends or relatives working in Infomina, or its vendors/customers?		(If yes, please specify)
Are you a member of any political parties?		(If yes, please specify)
Are you a smoker or do you vape?		(If yes, please specify)
Are you an alcohol drinker?		(If yes, please specify)
Do you consent to a reference background check as part of the hiring process?		(If no, please specify)

REFEREE

Please provide 2 referees for our reference (Referees must not be your next-of-kin)

Name		**Name**	
Tel. No.		**Tel. No.**	
Occupation		**Occupation**	
No. of years known		**No. of years known**	

Willing To Travel		**Notice Period**	
Current Salary		**Expected Salary**	

ADDITIONAL INFORMATION

Please state additional information which may be important in support of your application. Include any special talents, personal qualities, or achievements not otherwise stated in your resume.

Acknowledgement / Declaration

I hereby declare that all the information given by me in the job application is correct and true. I understand and accept that if I am employed, and any of the information is subsequently found to be incorrect or untrue, I am liable to be dismissed from the company.

Refer to the Personal Data Protection Act (PDPA) 2010, I understand, am agreeable, and consent to the Company collecting, using, or disclosing and processing my personal data, including without limitation, for the purposes incidental and associated with the employment with the Company.

This is a computer-generated acknowledgment form. No signature is required

Full Name	
NRIC	
Date	

Appendix D - Interview Evaluation Form

Interviewer	Click here to enter text.	**Date & Time of Interview**	
Candidate Arrival Time		**Interview Start Time**	
Candidate Name		**Position**	

The interviewer should complete this evaluation form to assess the candidate's overall qualifications for the applied position. All fields are mandatory. Kindly indicate a rating for the candidate. Comments are optional, except for the Final Verdict section

Scale:	**5** – Exceptional	**4** – Above Average	**3** – Average	**2** – Satisfactory	**1** – Unsatisfactory

Assessment	**Rating**				
	5	**4**	**3**	**2**	**1**
Prior Work Experience – Has the candidate acquired the required skills or qualifications for this role through past work experience? **Comments**:	☐	☐	☐	☐	☐
Job Adaptation – How long do you estimate it will take this candidate to fully adapt to the role? *(Please provide an estimate in weeks)* **Comments**:	_____ weeks				
English Verbal Communication – How was the candidate's English proficiency during the interview? **Comments**:	☐	☐	☐	☐	☐
Candidate Interest – How much interest did the candidate show in the position and the organization? **Comments**:	☐	☐	☐	☐	☐
Knowledge of Organization – How well did the candidate demonstrate knowledge of our company prior to the interview? **Comments**:	☐	☐	☐	☐	☐
Team Player/Interpersonal Skills – Did the candidate demonstrate, through their answers, good team player/interpersonal skills? **Comments**:	☐	☐	☐	☐	☐
Initiative – Did the candidate demonstrate, through their answers, a high degree of initiative? **Comments**:	☐	☐	☐	☐	☐

Task Priority – Did the candidate demonstrate, through their answers, a strong ability to prioritise tasks? **Comments**:	☐	☐	☐	☐	☐
Adaptability – Did the candidate demonstrate, through their answers, they are capable to thrive during a time of change or when faced with new challenges? **Comments**:	☐	☐	☐	☐	☐
Critical Thinking– Did the candidate demonstrate, through their answers, a high level of critical thinking abilities? **Comments**:	☐	☐	☐	☐	☐
Educational / Certification Background – Does the candidate have the appropriate educational / certification qualifications or training for this position? **Comments:**	☐	☐	☐	☐	☐

Summary

What is your overall rating of this candidate?

Scale: 1 being lowest and 10 being highest

☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
1	2	3	4	5	6	7	8	9	10

Final Verdict

***Please indicate your decision (Proceed, KIV, or Reject) and provide a reason in the comments** **Overall Impression and Recommendation** – Summary of your perceptions of the candidate's strengths/weaknesses. Final comments and recommendations for proceeding with the candidate. **Comments:**	**Proceed**	**KIV**	**Reject**
	☐	☐	☐

Appendix E - Employee ABAC Declaration Form

Employee ABAC Declaration Form

I, _____ understand and agree to give consent to the following:

a. A copy of the ABAC Policy & Guidelines was provided, and I have read and understood the policy (A copy of the policy is available on www.infomina.co). I agree and undertake to abide by all the terms and condition of the ABAC Policy & Guidelines at all times.

b. I have not been convicted nor am I subject of any investigation, inquiry, or enforcement proceedings by the relevant authorities of any actual or suspected bribery and corruption activities.

c. If I have reasonable grounds to suspect any actual or suspected breach to the ABAC Policy & Guidelines, I shall report such act to the Board or Management of Infomina Berhad ("Infomina") as soon as reasonably practicable.

d. In the event that I am in breach of the ABAC Policy & Guidelines, Infomina may take disciplinary action against me, in accordance with Infomina's Code of Conduct & Ethics and / or immediately terminate employment without any liability whatsoever on the part of Infomina to me. This is without prejudice to any other rights or remedies that Infomina may have or any other appropriate action which Infomina may seek under the terms of the applicable employment contract or the applicable rules and regulations.

Yours sincerely,

_____

Name:
NRIC:

Appendix F – Vendor Due Diligence Assessment Form

INFOMINA BERHAD

VENDOR DUE DILIGENCE DECLARATION

1. Thank you for considering Infomina Berhad as your business partner. In order to best facilitate our business dealings with you, we appreciate if you could furnish all information requested in this document.

2. This document consists of 2 sections: (1) the Vendor Application Form ("**Form**"); and (2) Annex A: Contract & Purchase Terms and Conditions (Products & Services) ("**Terms (Products & Services)**")

3. Please return the duly signed copy of the Form and applicable terms and conditions to: -

Infomina Berhad
BO3-C-12-1 & BO3-C-13-1, Menara 3A, No. 3, Jalan Bangsar, KL Eco City, 59200 Kuala Lumpur, Malaysia

Infomina Contact Person (if any): _____

TO BE COMPLETED BY NEW PARTNER ONLY	
PART I: GENERAL INFORMATION	
Registered Business Name:	
Business Registration Number:	
SST Registration Number:	
SST Taxable Group:	
Taxable Service(s):	
Business Organization Type*:	☐ Sole Proprietorship ☐ Partnership ☐ Private Limited Company (Sdn. Bhd.) ☐ Public Limited Company (Berhad or Bhd.) ☐ Limited Liability Partnership (LLP) ☐ Foreign Company
Country of Incorporation:	
Registered Business Address:	
Business website / Business E-mail Address:	
Contact Name & Email Address	

Contact Number	Tel Number:	Fax number:	Mobile Number:
Is your company listed on stock market?	☐ Yes ☐ No If yes, 1. Which market is it listed? _____ 2. What is your stock code? _____		
Is your company subsidiaries listed on stock market?	☐ Yes ☐ No If yes, 1. What is the business subsidiaries name? _____ 2. Which market is it listed? _____ 3. What is the stock code? _____		
Number of Branches / Outlets:			
Number of Employees in Organization:			
Nature of Business:			
Paid Up Capital:			
Name(s) of all related companies (e.g., subsidiaries, holding companies, etc.):			
Name(s) of all Owner(s) / Shareholder(s) (Major 3 with the percentage):			
Name(s) of all Director(s) (Major 3 signatories):			

PART II: FINANCIAL INFORMATION	
Name / Title of Person to Contact for Payment:	
E-invoice Registration Number:	
Credit Line Offered:	
Credit Term Offered:	☐ 30 days ☐ 45 days ☐ 60 days ☐ 90 days ☐ Others, please state:
Bank Information [Primary Banker(s)]	

PART III: SUPPORTING DOCUMENTS

Documents required to be submitted with this Form:

(1) Copy of the business registration certificate issued by the Companies Commission of Malaysia (Suruhanjaya Syarikat Malaysia or SSM), or the foreign equivalent, showing the full particulars of the business, including the registered business name, registration number, and names of all directors/owners/shareholders.

(2) Copy of the latest financial statement (Balance Sheet and Income Statement). If unaudited financial statements are provided, a duly authorized officer of the business must sign and date such financial statements.

PART IV: DECLARATION

Is there currently a pending court case against the business*? If "YES", please furnish details of the following:	☐ Yes ☐ No
Is there currently a pending court case against the director of the company*? If "YES", please furnish details of the following:	☐ Yes ☐ No
Case number (e.g. MC Suit No. 123/2012):	
Name of Claimant:	
Date proceedings were commenced:	
Brief description of the case:	
Is there currently a pending court case against the director of the company*? If "YES", please furnish details of the following:	☐ Yes ☐ No
Case number (e.g. MC Suit No. 123/2012):	
Name of Claimant:	

Date proceedings were commenced:	
Brief description of the case:	
Is there any of your staff have relationship with any Infomina's staff? If "YES", please provide their name with the relationship;	

PART V: APPLICABLE TERMS AND CONDITIONS

By signing on this Form,

(1) You certify that all information stated in this Form is true and correct.

(2) You agree to promptly inform Infomina Berhad ("**INFOMINA")** in writing of any changes to the information provided in this Form, in particular (but not limited to), changes in owners/shareholders, directors, and related companies.

(3) You agree to the applicable Terms (Products & Services), the latest version of which is appended herein and available upon request. These terms may be amended by INFOMINA from time to time.

AGREED TO:

Signature/Company Stamp: _____

Name / Title: _____

Date:_____

NOTE: This Form and the applicable Terms must be signed by a duly authorized registered director of the company (for incorporated entities) or the legal owner of the business (for other entities).