

Anti-Bribery and Corruption Policy

ANTI-BRIBERY AND CORRUPTION POLICY

1. Introduction

Kinergy Advancement Berhad and its Group of Companies ("Kinergy" or "the Group") as established and adopted this Anti-Bribery and Corruption Policy ("AB&C Policy"). Kinergy is committed to conducting its business ethically and in compliance with all applicable laws, including the Malaysian Anti-Corruption Commission Act 2009, the Malaysian Anti-Corruption Commission (Amendment) Act 2018, and any subsequent amendments or re-enactments that may be made by the relevant authority from time to time.

This AB&C Policy sets out the principles, guidelines, and requirements on how to address bribery and corrupt practices that may arise in the course of Kinergy's daily business and operational activities.

Unless otherwise stated, any references to "we", "us", and "our" in this AB&C Policy refer to Kinergy as a whole.

2. Objective

This AB&C Policy is established under the Anti-Bribery Management System ("ABMS") to cultivate a bribery-free culture within Kinergy by:

- 2.1 Conducting an annual review of bribery risk assessments.
- 2.2 Organising at least one (1) anti-bribery related training session.

This objective will be achieved through strong commitment and support from management, active involvement of employees, and cooperation from stakeholders in upholding the values of transparency and good corporate governance within the organisation.

3. Purpose

The purpose of this AB&C Policy is to:

- 3.1 Define our responsibilities in complying with laws relating to bribery and corruption; and
- 3.2 Provide information and guidance to those working for Kinergy on how to recognise and deal with issues involving bribery and corruption.

We will carry out a bribery and corruption risk assessment across our business, where appropriate, to understand the risks faced and to ensure that adequate procedures are in place to address them.

4. Scope and Application

This AB&C Policy applies to all individuals working for Kinergy and all companies within Kinergy at all levels and grades.

This includes employees, directors, engineers, senior managers, managers, site supervisors, and all individuals working at any level or grade (collectively referred to as the "Employees"), as well as the Board (whether full-time, part-time, contract, or temporary) and any third parties associated with us.

For the purposes of this AB&C Policy, "Associated Third Parties" refers to any individual or organisation that an employee or associate may come into contact with during the course of their engagement with Kinergy. This may include, but is not limited to, suppliers, contractors, agents, consultants, outsourced personnel, distributors, advisers, government and public bodies, including their advisors, representatives, and officials.

5. Definitions

For the purposes of this AB&C Policy, the terms listed below represent their respective definitions and exclude food and beverages, flowers, and contributions or sponsorships for Kinergy's official events.

"Benefits"	: Any form of advantage or profit gained by the Board, the Employees, or Associated Third Parties.
"Bribery"	: Offering, promising, giving, accepting, or soliciting an undue advantage of any value (whether financial or non-financial), directly or indirectly, in violation of applicable law, as an inducement or reward for a person to act, or refrain from acting, in relation to their duties, actions, or decisions.
"Corruption"	: The provision or receipt of a monetary or non-monetary bribe or reward of significant value in connection with the duties of the Board, Employees, or Associated Third Parties. This includes the misuse of public office or authority for private gain, as well as the misuse of private power in relation to business activities outside the sphere of government.
"Entertainment"	a. The provision of recreation; or b. The provision of accommodation or travel in connection with, or for the purpose of facilitating, entertainment of the kind mentioned in item (a) above, whether or not consideration is paid in cash or in kind, in the promotion of, or in connection with, trade, business activities, or transactions.
"Facilitation Payments"	: Small sums or bribes, or any unofficial payments made to secure or expedite the performance of a routine action by the Board, Employees, or Associated Third Parties.
"Kickbacks"	: Any form of payment intended as compensation for favourable treatment or other improper services. This includes the return of a sum already paid or due, as a reward for awarding or furthering business.
"Gifts" or "Present"	: Any form of monetary or non-monetary item, such as goods, services, cash or cash equivalents, fees, rewards, facilities, or benefits, given to or received by the Board, Employees, or Associated Third Parties, their spouses, or any other person on their behalf, without any, or with insufficient, consideration known to the Board, Employees, or Associated Third Parties.

6. Our Principles

- i. We adopt a zero-tolerance approach towards bribery and corruption.
- ii. We conduct all our business in an honest and ethical manner. We are committed to acting professionally, fairly, and with integrity in all our relationships and business dealings, in accordance with our Code of Conduct and Ethics Policy, and to implementing and enforcing effective systems to prevent bribery.
- iii. We will uphold all laws relevant to the prevention of bribery and corruption. We remain bound by the laws of Malaysia, including the Malaysian Anti-Corruption Commission Act 2009, the Malaysian Anti-Corruption Commission (Amendment) Act 2018, and any subsequent amendments or re-enactments that may be made by the relevant authorities from time to time, in respect of our conduct both domestically and internationally.
- iv. To address these risks, we have undertaken the following measures:
 - a. Implement this AB&C Policy;
 - b. Conduct regular corruption risk assessments on our operations and review the findings;
 - c. Take steps to implement training programmes for all individuals working in areas of the organisation identified as high risk; and
 - d. Regular review and update this AB&C Policy.

7. Corruption, Gifts, Benefits and Entertainment

- i. All individuals subject to this AB&C Policy must NOT:
 - a. Offer, give, or promise to give a bribe or anything which that may be perceived as a bribe, to secure or obtain an improper business advantage;
 - b. Offer, give, or promise to give a bribe or anything that may be perceived as a bribe, to a government official, agent or representative to facilitate, expedite, or reward any action or procedure;
 - c. Request or receive a bribe or anything that may be perceived as a bribe from a third party knowing or suspecting it is offered with the expectation of obtaining a business advantage for them; or
 - d. Engage in any activity that could lead to a breach of this AB&C Policy.
- ii. All individuals subject to this AB&C Policy are prohibited from accepting or receiving gifts, benefits, and/or entertainment from any third party or stakeholder of Kinergy that might create a sense of obligation, compromise their professional judgement, or give the appearance of doing so.
- iii. All individuals subject to this AB&C Policy must not accept or receive any gifts, benefits, and/or entertainment from a third party or stakeholder of Kinergy, except where such gestures are considered legitimate contributions and are given in good faith. The gifts, benefits, and/or entertainment must have a monetary value not exceeding RM500 and may only be offered, whether directly or indirectly, as a result of, or in connection with, the Board's, Employees', or Associated Third Parties' position or performance of duties within Kinergy, or for the purpose of fostering good business relationships.
- iv. All individuals subject to this AB&C Policy shall exercise proper care and judgement with respect when giving or receiving any gifts, benefits, and/or entertainment, on a case-by-case basis.
- v. All individuals subject to this AB&C Policy shall consider the impact of their actions, including how such actions may be perceived (for example, as influencing their decisions), and the potential effect on Kinergy's business operations, before giving or accepting any gifts, benefits, and/or entertainment.

- vi. The KA-GC4 Gift Record (Incoming) and KA-GC5 Gift Record (Outgoing) forms shall be used when receiving and giving gifts, respectively, to ensure comprehensive documentation and compliance with this AB&C Policy.

8. Facilities Payment and Kickbacks

- i. We do not make, and will not accept, Facilitation Payments or Kickbacks of any kind. All associates must avoid any activity that could result in Facilitation Payments or Kickbacks being made or received.
- ii. Any individual who has any suspicious, concerns, or queries regarding a payment made on our behalf, or any improper business practice, should report the matter to Kinergy through the channels outlined in our Ethics and Compliance Whistleblowing Policy.

9. Associated Third Parties and Procurement Process

- i. We have established processes and adhere to the system of internal controls for vendors selection. The selection of vendors must never be influenced by the receipt of gifts, benefits, or entertainment.
- ii. The bidding process is open to all qualified bidders, and no parties shall have an unfair advantage through separate, prior, close-door negotiations for a contract.
- iii. The selection of vendors shall subject to clear adherence to this AB&C Policy and compliance with Kinergy's Code of Conduct and Ethics Policy.
- iv. Appropriate assessments shall be conducted on individuals or third parties to ensure that the business and background of potential business partners are free from elements of bribery or conflict of interest prior to procurement process.

10. Political Donations and Contribution

- i. The Group maintains a strict policy of political neutrality and does not permit political contributions of any kind – whether monetary, in-kind, or through services – made on its behalf.
- ii. Employees, directors, and business partners may participate in political activities only in their personal capacity. Such activities must not involve the Group's resources, occur during working hours, or suggest that the Group endorses any political party, position, or individual.
- iii. Any requests for support, contributions, or activities from political entities must be promptly reported to the Whistleblowing Committee and must not be acted upon without formal written approval from Management. The Group also prohibits the use of intermediaries or third parties to channel political support on its behalf.

11. Charitable Contributions and Donations

- i. The Group may support charitable causes, community initiatives, and social development programmes that align with our values and commitments. All donations and contributions must comply with applicable laws, internal policies, and established approval processes. The Group does not allow any donation that could improperly influence decision-making, create a conflict of interest, or be perceived as an attempt to obtain business advantage.

- ii. All donations must be documented and approved through the Management.

12. Responsibilities

- i. The Board has oversight of this AB&C Policy. The Management, and Heads of Department are responsible for ensuring the compliance with this AB&C Policy. All managers and employees are required to be familiar with and adhere to this AB&C Policy.
- ii. We adopt a zero-tolerance approach to bribery and corruption. Any breach of this AB&C Policy shall be treated as a serious matter and may result in disciplinary action, including dismissal or termination, in accordance with local law.
- iii. Any individual or employee who has any suspicious, concerns, or beliefs that a breach of this AB&C Policy has occurred or may occur in the future, should raise the matter and report it to Kinergy through the channels outlined in our Ethics and Compliance Whistleblowing Policy.
- iv. An employee shall be held individually accountable, whether they personally pay a bribe or whether they authorise, assist, or conspire with someone else to breach this AB&C Policy and/or any anti-corruption or anti-bribery law. Penalties for violating the law apply to the individual and may include imprisonment, probation, mandated community service, monetary fines, or other sanctions, which will not be borne by Kinergy.
- v. Further indicators that may suggest corruption or bribery ("Red Flags") are set out in Section 17 of this AB&C Policy below.

13. Record Keeping

- i. We must maintain all financial records and have appropriate internal controls in place, which will provide evidence, substantiate, and justify that business rationale for making payments to, and receiving payments from, third parties.
- ii. We must ensure that all expenses claim relating to gifts or entertainment provided to third parties are submitted in accordance with Kinergy's reimbursement procedures and/or applicable policies, and that the reason for such expenditure is clearly recorded. All parties must further ensure that all expenses claim comply with the terms and conditions of this AB&C Policy.
- iii. All documents, accounts and records relating to dealings with third parties, such as customers, vendors and business contract, must be prepared and maintained with strict accuracy and completeness. No accounts should be kept "off-book" to facilitate or conceal improper payments.

14. Confidentiality and Protection

- i. Individuals who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, may sometimes worry about possible repercussions. We encourage openness and will support anyone who raises genuine concerns in good faith under this AB&C Policy, even if those concerns later prove to be mistaken.
- ii. We are committed to ensuring that no one suffers any detrimental treatment as a result of refusing to engage in corruption, or for reporting concerns under this AB&C Policy in good faith. Detrimental treatment includes dismissal, disciplinary action, threatened or any other unfavourable treatment related to raising a concern.

15. Communication and Training

- i. Kinergy will be on an ongoing basis, provide specific and regular training on this AB&C Policy, on anti-corruption and bribery laws, and on how to implement and comply with this AB&C Policy, for all new and existing employees.
- ii. Our zero-tolerance approach to bribery and corruption must be communicated to all Associated Third Parties at the outset of our business relationship with them, and as appropriate thereafter. Wherever possible, all Associated Third Parties should be provided with a copy of this AB&C Policy at the start of the business relationship or should always be referred to the version of this AB&C Policy published on Kinergy's website.

16. Monitoring and Review

- i. All Employees and Associated Third Parties are responsible for the success of this AB&C Policy and must ensure adherence to it, using it to report any suspected risks or wrongdoing.
- ii. Internal control systems and procedures will be subject to regular audits to ensure they are effective in preventing bribery and corruption.
- iii. This AB&C Policy does not form part of an associate's contract of employment and may be amended at any time by Kinergy. However, all Employees and Associated Third Parties are welcome to provide comments on this AB&C Policy and suggest ways in which it might be improved.
- iv. This AB&C Policy is subject to periodic review and refinement to ensure ongoing relevance, effectiveness and alignment with emerging regulatory requirements, industry best practices and stakeholder expectations. This AB&C Policy was approved by the Management of Kinergy on 24th November 2025.

17. Red Flags

- i. The following is a non-exhaustive list of possible red flags (for illustrative purposes only) that may arise for an individual while working for Kinergy and which could give rise to concerns under various anti-corruption and anti-bribery laws.
- ii. If the Board, Employees, or Associated Third Parties encounter any of these red flags or believe they may potentially occur while working for Kinergy, they must report the matter promptly in accordance with the procedures set out in our Ethics and Compliance Whistleblowing Policy.
 - a. Become aware that a third party is engaging in, or has been accused of engaging in, improper business practices or conduct, or has a reputation for offering or demanding bribes;
 - b. A third party demands gifts, benefits, commission or fees before agreeing to, or continuing with, a contract;
 - c. A third party requests that payment be made to a country or geographic location different from where the third party resides or conducts business;
 - d. A third party refuses to provide or provide insufficient, false, or inconsistent information in response to due diligence enquiries;
 - e. A third party requests the use of an agent, intermediary, consultant, distributor or supplier that is not normally used by or known to us, or a shell entity serves as a middleman particularly when domiciled in secrecy jurisdiction;

- f. There are indications that the third party is not acting on his own behalf, but is attempting to conceal the identity of the true beneficial owner's;
- g. A third party has a reputation of having a "special relationship" with a government, political party or other public official or has been specifically requested by a public official;
- h. A third party refuses to sign a commission or fee agreement or insists on using a side-letter relating to the payment of funds;
- i. A third party requests an unusually large or inappropriate commission, retainer, bonus or other fee or an unexpected additional fee or commission to "facilitate" a service;
- j. A third party requests payment in cash or cash equivalents, such as money order, and refuses to provide an invoice or receipt;
- k. A third party refuses to provide an invoice or receipt for a payment, or provides an invoice or receipt that appears to be non-standard or customised;
- l. A third party requests that a transaction be structured to evade normal record-keeping or reporting requirements;
- m. A third party refuses to comply with this AB&C Policy or fails to demonstrate that it has adequate internal anti-corruption and bribery policies and procedures in place;
- n. Being offered and unusually generous gift, or lavish benefits or entertainment, by a third party.

18. Reporting

Employees and third parties are encouraged to report any actual or suspected cases of bribery or corruption to the Whistleblowing Committee through the designated reporting channels.

Any incidences or suspected incidences of bribery or corruption must be reported through the confidential channels provided in the Ethics and Compliance Whistleblowing Policy (KA-ABMS-POL-03) to the individuals mentioned above:

- a. Through open door discussion
- b. By email to whistleblowing@kinergyadvancement.com or by completing the e-Whistleblowing Form (*click here to access to the [e-form](#)*)
- c. By dialling the Ethics Helpline **+603-2709 2380**
- d. By post to the following mailing address:

KINERGY ADVANCEMENT BERHAD
28-01, Level 28, Menara Vista Petaling,
137 Jalan Puchong, 58200
Kuala Lumpur, Malaysia