VANZO HOLDINGS BERHAD
[Registration No.: 202301051922 (1545836-M)]

ANTI-BRIBERY AND CORRUPTION POLICY

1. INTRODUCTION

The anti-bribery and corruption policy provides guidance to employees on how to recognise and deal with improper solicitation, bribery and any other corruption activities and issues that may arise in the course of business.

The policy is intended to provide employees with a basic introduction on how to always avoid and combat bribery and corruption in furtherance of Vanzo Holdings Berhad ("**the Company**") and its subsidiaries' ("**Group**") commitment to lawful and ethical behavior. The Group is committed to conducting its business ethically and in compliance with all applicable laws and regulations in the countries where it does business.

These laws include but are not limited to the Malaysian Penal Code (revised 1977) (and its amendments), the Malaysian Anti-Corruption Commission Act 2009 and its amendments, the Companies Act 2016 and Anti-Money Laundering and Anti-Terrorism Financing Act. These laws prohibit bribery and acts of corruption, and mandate that companies establish and maintain accurate books and records and sufficient internal controls.

In cases where there is a conflict between mandatory laws and the principles contained in this and other policies, the law shall prevail.

In formulating this policy, the Company has considered the requirements contained in the ACE Market Listing Requirements of Bursa Malaysia Securities Berhad to ensure compliance with the obligations imposed.

The anti-bribery and corruption policy apply to all employees and directors (executive and non-executive) under Vanzo Holdings Berhad and its subsidiaries, including their immediate family members and relatives. Additionally, the policy extends to all contractors, subcontractors, consultants, representatives including agents, franchisees and any other external parties performing work or services for or on behalf of the Group (the "**employees and associates**").

2. SCOPE

This policy is applicable to all the Group's Directors, Employees, suppliers, and Business Associates of the Group. The term "Director" includes a director of the Company or its subsidiaries.

The term "Employee" means any person at all levels and grades, including senior managers, managers, executives, non-executives, workers, and employees, whether full time, part time, contract or temporary.

The term "Business Associate" means any persons performing services for or on behalf of the Group, apart from the Group's Employees, including consultants, contractors or subcontractors, trainees, seconded staffs, volunteers, interns, agents, sponsors, service providers, associates, and business partners.

"Supplier" refers to the Group's suppliers of trade and non-trade goods.

Joint-venture companies in which the Company is non-controlling or co-venture and associated companies are encouraged to adopt these or similar principles. External Providers are also expected to comply with this policy in relation to all work conducted with the Company or on behalf of the Company.

3. RECOGNITION OF LOCAL AND INTERNATIONAL LEGISLATION

The Company is committed to conduct its business ethically and in compliance with all applicable laws and regulations in the countries where it operates its business.

These laws include but are not limited to the Malaysian Penal Code (revised 1977) (and its amendments), the Malaysian Anti-Corruption Commission Act 2009 and its amendments, the Companies Act 2016, the US Foreign Corrupt Practices Act 1977 (amended 1998), Anti-Money Laundering and Anti-Terrorism Financing Act and the UK Bribery Act 2010. These laws prohibit bribery and acts of corruption, and mandate that companies establish and maintain accurate books and records and sufficient internal controls.

In cases where there is a conflict between mandatory laws and the principles contained in this and other policies, the law shall prevail.

4. THE GROUP'S ANTI-BRIBERY AND ANTI-CORRUPTION STANCE

The Group has a zero-tolerance policy towards bribery and corruption as well as in line with the relevant anti-corruption laws and regulations, throughout its businesses, regardless of country of operations.

The Group prohibits its Directors, Employees, Suppliers or Business Associates from undertaking any bribery conduct when conducting business with, for, or on behalf of the Group.

The prohibition on bribery extends broadly to include:-

a) Bribes: When one party giving or offering or receiving or soliciting another party, either directly or through a third party, of anything of value, advantage, or benefit of any kind in order to influence the making or not making, or implementation of a decision or act by the party concerned such as to retain or obtain business or a business advantage. This also includes giving, promising to give or offering a payment, gift or entertainment to a third party to 'facilitate' or expedite routine procedures.

b) Anything of value may include but is not limited to cash, cash equivalents, discounts, donations, travel expenses, entertainment, stocks or gifts.

c) Facilitation Payments, also known as grease payments, are unofficial and improper payments or benefits provided to secure or expedite a routine or necessary action to which the Group is legally entitled.

5. DOING BUSINESS WITH INTEGRITY

The Group believes in conducting business with parties who uphold the same values and standards of business ethics and integrity as the Group. This includes its business relationships with its Directors, Employees, Suppliers, and Business Associates.

6. GIFTS, ENTERTAINMENT, AND CORPORATE HOSPITALITY

The Company has adopted a "No Gift" Policy whereby, subject only to specified exceptions, all employees and associates acting for or on behalf of the Company are prohibited from, directly or indirectly receiving and/or providing gifts.

It is the responsibility of Employees and Directors of the Group to inform external parties involved in any business dealing with the Company and its subsidiaries that our Group practices a "No Gift Policy" and to request the external party for their understanding and attentiveness for and adherence to this policy.

Gifts, entertainment, or corporate hospitality which may influence or be perceived to be able to influence business decisions or outcomes may be construed as bribes and they must not be given or received by the Group's Directors, Employees, Suppliers, or Business Associates when in the conduct of the Group's business. Similarly, gifts, entertainment, or corporate hospitality shall be avoided where a conflict of interest situation is present. Generally, the Group's practice for giving and receiving gifts are

limited to the following situations (in the following situations, an "Organisation" may refer to the Group or an external party):-

(a) gifts given by the Group to Employees and Directors and/ or their family members in relation to an internal or externally recognised function, event, or celebration of the Group (e.g. in recognition of an employee's/ director's service to the Group);

(b) exchange of gifts at Organisation-to-Organisation level (e.g. gifts exchanged between companies as part of an official company visit/ courtesy call and thereafter said gift is treated as company property);

(c) gifts to external institutions or individuals in relation to an Organisation's official functions, events and celebrations which is commonly given in public (e.g. commemorative gifts or door gifts offered to all guests attending the event);

(d) token or corporate gifts of nominal value, normally bearing a corporate logo (e.g. t-shirts, pens, diaries, calendars and other small promotional items), that are given out equally to members of the public, delegates, customers, partners, or stakeholders attending events such as conferences, exhibitions, training, trade shows, etc. and deemed as part of an Organisation's brand building or promotional activities; and

(e) gifts to external parties who have no business dealings with the Group (e.g. monetary gifts or gifts in-kind to charitable organisations).

(f) token or corporate gifts must not affect the independent business judgement of the intended recipients.

(g) There must not be any corrupt/criminal intent involved for giving or receiving the gifts.

(h) Nominated employees, employees on duty and directors who are eligible to participate in the Company inspection trips and/or incentive tours (local or overseas) and the expenses are sponsored by the Group.

(i) Hotel accommodation in conjunction with the Company's events and trips whereby the expenses are fully sponsored by the Company and its subsidiaries.

The Group's Employees are not allowed to provide gifts to third parties or customers unless they obtain prior approval from the Management.

Apart from the above-mentioned situations, the Group's Directors and Employees are discouraged from receiving gifts from parties who have business dealings with the Group. If such situations are unavoidable, established policies and procedures of the Group in relation to receiving gifts must be complied with. Notwithstanding, in no circumstances may gifts in the form of cash or cash equivalent be accepted.

7. DONATIONS, SPONSORSHIPS, AND POLITICAL CONTRIBUTION

The Group does not make donations or contributions to political parties, nor does it sponsor any political events. This, however, does not prohibit any individual from making donations or sponsorships under their personal capacity provided that the donations or sponsorships must not be associated with the Group.

Contributions or donations made by the Group need to be made in good faith and in compliance with the Group's Code of Conduct and Ethics Policy, this Policy and all relevant Group's policies and procedures.

8. PROCUREMENT PROCESS

The Group has established policies and procedures addressing the selection of Suppliers and Business Associates. The selection of Suppliers and Business Associates is based on merits such as quality, pricing, capability, track record, and experience, and it shall be in the best interest of the Group.

Due diligence forms part of the Group's selection of new suppliers and Business Associates and due diligence review may also be performed on existing suppliers and Business Associates from time to time.

Suppliers and Business Associates may be required to provide written acceptance and acknowledgment of the Group's applicable policies.

9. COMPLIANCE AND REPORTING A CONCERN

The Group takes combatting corruption and bribery very seriously. Any violation of this Policy will be regarded as a serious matter by the Group and is likely to result in a review of relationship, including disciplinary action, dismissal, or termination, consistent with applicable laws and regulations.

All the Group's Directors, Employees, Suppliers, and Business Associates are required to be familiar with and comply with this Policy.

An Employee must notify his or her superior as soon as possible if he or she believes or suspects that a breach of this Policy has occurred or may occur. Alternatively, the Employee may raise his or her concerns through the Group's Whistle-Blowing Policy.

The Group's Directors, Suppliers, and Business Associates or members of the public may also raise their concerns regarding any known breaches or suspected breaches of this Policy through the Group's Whistle-Blowing Policy, which is available on the Group's corporate website. Whistleblowers shall be accorded the protection as set out in the Whistle-Blowing Policy.

10. RECORD-KEEPING

The Group must keep financial records and have appropriate internal controls in place which will provide evidence and support for any legitimate payments to third parties. The Group must ensure all expenses claims relating to hospitality, gifts or entertainment incurred to third parties are submitted in accordance with the Group's relevant policies. All accounts, invoices, and other documents and records relating to dealings with third parties, such as customers, suppliers and business contacts, should be prepared and maintained with accuracy and completeness.

11. TRAINING AND COMMUNICATION

From time to time and as determined by the Group, Directors, Employees, Suppliers, and Business Associates, especially those operating in areas that are exposed to high bribery risk, shall be provided with relevant training on how to implement and adhere to this Policy.

Our zero-tolerance approach to bribery and corruption must be communicated to all Directors, Employees, Suppliers, and Business Associates at the outset of our relationship with them and as appropriate thereafter.

The Company recognises the value of integrity in its Directors, Employees and Business Associates. The Company's recruitment, training, performance evaluation, remuneration, recognition and promotion for all the Company's Employees, including management, shall be designed and regularly updated to recognise integrity.

The Company does not offer employment to prospective personnel in return for their having improperly favored the Company in a previous role.

12. MONITORING AND REVIEW

All the Group's Directors, Employees, Suppliers, and Business Associates are responsible for the success of this Policy and should ensure they use it to disclose any suspected unethical business practices or wrongdoing. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

13. REVIEW OF THIS POLICY

The Board shall review and assess the relevance and effectiveness of this Policy periodically to assess their effectiveness, and in any event, at least once every 3 years, the Board deem necessary or as and when require to ensure its relevance and effectiveness in keeping with the Group's changing business environment, administrative or operational needs as well as changes to legislations.

The Human Resource Department ("**HR Department**") shall be the custodian of this Policy and shall be responsible for developing, communicating and modifying the Policy.

14. REVISION OF THIS POLICY

The provisions of this Policy can be amended and supplemented from time to time by a resolution of the Board.

15. PUBLISHED AT THE WEBSITE

This Policy must be made available on the Company's website.

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-Reviewed and revised on 21 August 2026-