



TEAMSTAR BERHAD

REGISTRATION NO.: 202501005743 (1607157-X)

**ANTI-BRIBERY AND
ANTI-CORRUPTION POLICY &
PROCEDURES**

1. Policy Statement

Teamstar Berhad and its subsidiaries (“**Teamstar Group**”) is committed to conducting business ethically, transparently, and in compliance with all applicable laws and regulations under the Constitution of Malaysia. As part of this commitment, we maintain a strict policy of zero tolerance towards bribery and corruption in any form. This Anti-Bribery and Anti-Corruption Policy (the “**Policy**”) sets forth the principles and procedures that all employees must adhere to in order to prevent, detect, and address bribery and corruption.

2. Scope

This Policy applies to all employees, directors, officers, consultants, contractors, and any other individuals or entities acting on behalf of Teamstar Group (hereinafter referred to as “**Employees**”).

3. Definitions

- **Bribery:** Offering, giving, receiving, or soliciting anything of value as a means of influencing the actions of an individual or entity in a way that is improper or unethical.
- **Corruption:** The abuse of power, position, or resources for personal or financial gain, including bribery and other illegal or unethical acts.
- **Facilitation Payments:** Small payments made to expedite or secure routine government actions, such as processing paperwork or providing necessary services, which are illegal in most jurisdictions.

4. Prohibited Conduct

Employees are strictly prohibited from:

- Offering, giving, soliciting, or receiving bribes in any form, whether directly or indirectly.
- Engaging in any form of corrupt activity or assisting others in doing so.
- Offering or accepting gifts, entertainment, or hospitality where the purpose is to improperly influence decisions or gain an unfair advantage.
- Making facilitation payments to government officials or other parties.
- Using company resources for any illegal or unethical activities.

5. Gifts and Hospitality

Employees may provide or accept modest gifts or hospitality, but only if the following conditions are met:

- The gift or hospitality is proportionate, reasonable, and consistent with normal business practices.
- It is not given or received with the intention to influence or gain an improper advantage.
- It complies with local laws and regulations.
- It is disclosed to the appropriate line manager or compliance officer.

Appropriateness testing on gifts and hospitality will be conducted if needed.

6. Political and Charitable Donations

Employees are prohibited from using company resources or funds for political contributions or donations to political parties or candidates. Charitable donations made on behalf of the company must be transparent, properly documented, and made to legitimate, non-political organisations. Any donation made must be in line with the company’s values and goals.

7. Reporting and Whistleblowing

Employees must report any suspicious activity or breach of this Policy. This includes concerns about potential bribery, corruption, or unethical behaviour.

- Reports can be made anonymously if necessary.
- The company encourages Employees to report concerns in good faith, and all reports will be investigated thoroughly.
- Retaliation against any employee who reports a violation or cooperates in an investigation is strictly prohibited.

8. Investigation and Consequences of Violations

All reported concerns will be thoroughly investigated, and appropriate actions will be taken. Any employee found to have violated this Policy will be subject to disciplinary action, up to and including termination of employment, legal action, and reporting to the relevant authorities.

The severity of the disciplinary action will depend on the nature and extent of the violation and whether it was intentional or reckless.

9. Due Diligence

The company will conduct appropriate due diligence when engaging with third parties such as agents, contractors, suppliers, or business partners to ensure they comply with anti-bribery and anti-corruption laws. This includes:

- Vetting third parties for their integrity and ethical standards.
- Ensuring contractual clauses requiring compliance with anti-bribery and anti-corruption laws.

10. Training and Awareness

All employees will receive mandatory training on anti-bribery and anti-corruption practices, including how to identify and handle situations that may involve bribery or corruption. Annual refresher training will also be provided to ensure compliance with this Policy.

11. Recordkeeping

Employees must maintain accurate and complete records of all business transactions, gifts, hospitality, and donations in accordance with company policies. This includes:

- Maintaining transparent and thorough documentation of any transactions that could be perceived as potentially involving bribery or corruption.
- Ensuring that no false or misleading records are created.

13. Enforcement and Monitoring

The Company appoint a Compliance Officer, and will regularly monitor compliance with this Policy and undertake periodic internal audits to ensure that anti-bribery and anti-corruption measures are being followed. The company reserves the right to amend or update this Policy as necessary to ensure ongoing compliance with applicable laws and regulations.

14. Compliance with Laws and Regulations

Employees must comply with all applicable anti-bribery and anti-corruption laws and regulations in the countries in which the company operates, including but not limited to:

- **MALAYSIAN ANTI-CORRUPTION COMMISSION ACT 2009**

15. Review and Amendments

This Policy will be reviewed annually by the company's Compliance Officer and updated as needed to ensure it remains in line with legal and regulatory changes. Risk assessment will also be conducted annually and reviewed by Key Senior Management team.

[The rest of this page has been intentionally left blank]