

Anti-Corruption and Anti-Bribery Policy

1. Introduction

OCK GROUP BERHAD (“**the Company**” or “**OCK**”) and its subsidiaries (collectively referred to as the “**OCK Group**”) has established and adopted this Anti-Corruption and Anti-Bribery Policy (“**Policy**”). OCK Group is committed to conducting its business ethically, as well as in conformity with all applicable laws, which include compliance with the Malaysian Anti-Corruption Commission Act 2009 and the Malaysian Anti-Corruption Commission (Amendment) Act 2018 and any of its amendments or re-enactments that may be made by the relevant authority from time to time.

OCK Group is committed to a zero-tolerance approach in its efforts to prevent corrupt and bribery practices. All of OCK Group’s business dealings are conducted in an ethical and transparent manner. In order to ensure the continued efficiency in the enforcement of corrupt and bribery practices within OCK Group, the Company has taken the following steps:-

- (a) Implementation of this Policy;
- (b) Conduct of comprehensive corruption and bribery risk assessment across OCK Group when appropriate, to mitigate such risks by ensuring that adequate procedures and safeguards have been implemented;
- (c) Implementation of training programs for personnel of OCK Group operating in areas which are at high risk of exposure to corrupt and bribery practices; and
- (d) Undertaking periodic review and update to this Policy in line with the latest developments of anti-corruption laws in Malaysia.

This Policy provides principles, guidelines and requirements on how to deal with corrupt and bribery practices that may arise in the course of daily business and operation activities within OCK Group.

Unless otherwise stated, any references to “we”, “us” and “our” in this Policy are to our Company and our subsidiaries collectively.

2. Purpose

The purpose of this Policy is to set out the responsibilities of OCK Group and the personnel working for OCK Group to comply with laws against corruption / bribery and to further provide information and guidance to all personnel working for OCK Group on how to recognize and deal with corruption and bribery issues.

3. Definitions

- (a) “**Benefit**” means any advantage or benefit that may be considered of value that constitute, or derive from funds or assets belonging to OCK Group or to third parties.
- (b) “**Board**” means the board of directors of OCK.
- (c) “**Bribe**” (“**Gratification**”) means money, donation, gift, any valuable thing of any kind, any forbearance to demand any money or money’s worth or valuable thing, any other service or favour of any kind, or any offer, undertaking or promise of any such gratifications.
- (d) “**Business Transaction**” means the business dealings entered into between the Company and/or OCK Group with any Third Parties including but not limited to tenders, quotations, contracts, letter of awards and purchase orders.
- (e) “**Corruption**” means the act of giving or receiving of any gratification or reward in the form of cash or in-kind of high value for performing a task in relation to his/her job description.

- (f) **“conflicts of interest”** means the situation in which commercial, economical, familial, political or personal interests may interfere with the decision-making capacity of individuals during the performance of their duties for OCK Group.
- (g) **“Due Diligence”** means the assessment of the risk of corruption and bribery in relation to: specific operations, projects, activities of Third Parties or personnel.
- (h) **“Employees”** means all employees, senior managers, managers and individuals working for OCK and all companies within the OCK Group, of all levels and positions (whether full time, part-time, contract or temporary);
- (i) **“Entertainment”** means the provision of recreation or provision of accommodation, travel arrangement in relation to the purpose of facilitating recreation (with or without consideration) made in the promotion of any trade or Business Transactions.
- (j) **“Facilitation Payments”** means unofficial payments of modest value, made in order to expedite, favour or ensure routine activities of public officers and/or Third Parties that has a business relationship with OCK Group.
- (k) **“Third Parties”** means any legal or natural person outside OCK Group, that has a business relationship with OCK Group, including non-financial relationships which may include but not limited to system integrator (SI) partners, content / digital solution providers, suppliers, contractors, agents, consultants, outsourced personnel, distributors, advisers, government and public bodies including their advisors, representatives and officials.

4. Scope

This Policy applies to all individuals working for the Company and all companies within the OCK Group of all levels and positions.

This includes the Board, Employees and any Third Parties associated with us.

5. Gifts and Entertainment

The Board, Employees, family members or agents acting for or on behalf of the Employees or the Board or their family members are prohibited from, directly or indirectly:-

- (a) receiving gifts and/or entertainment from any Third Parties that have Business Transaction with OCK Group; or
- (b) providing gifts and/or entertainment to Third Parties that have Business Transaction with OCK Group.

This objective of this is to avoid conflicts of interest or the appearance of conflicts of interest for either party in the ongoing or potential Business Transaction between OCK and Third Parties as such gifts can be construed as bribe or gratification, in violation of anti-corruption and anti-bribery laws.

The Board and Employees are to refuse or return gifts and/or entertainment received from Third Parties.

Generally, Employees are not allowed to provide gifts and/or entertainment to Third Parties unless it is in accordance with the following:-

- (a) be provided in relation to actual business purposes;
- (b) reasonable and in good faith;
- (c) comply with the Company’s applicable rules and procedures, including the relevant authorisation process;
- (d) be recorded and supported by appropriate documentation;
- (e) not intended to improperly influence any person to take action in favour of OCK Group or otherwise; and
- (f) shall never be in cash.

6. Facilitation Payments

The Board and Employees do not make, and will not accept any form of Facilitation Payments. All Third Parties must also avoid any activity that might lead to Facilitation Payments being made or accepted.

Any individual with suspicions, concerns or information relating to Facilitation Payment being made or potentially made on behalf of OCK Group or any instances of improper business practices, are encouraged to report such issues to OCK Group via our whistleblowing platform as outlined in our Whistleblowing policy and procedure, available on our website.

7. Political Contributions

The Board and Employees do not make any form of charitable donations or contributions (directly or indirectly) to political parties or movements, or their representatives or candidates on behalf of OCK Group unless made solely in their personal capacity and with prior notice to the Board or the group managing director / group chief executive officer.

All form of charitable donations or contributions made in the Board's and/or Employees' personal capacity will not be reimbursed by OCK Group.

8. Charitable Contributions

All charitable contributions or donations made by OCK Group to any community projects or charities shall first be approved by the Board and need to be made in good faith (in compliance with the Company's Code of Business Conduct and Ethics, this Policy and internal procedures governing such contributions).

Charitable donation which breaches or perceived to breach the anti-corruption laws in Malaysia and/or this Policy is strictly prohibited.

9. Relationship with Third Parties and Due Diligence

In carrying out its Business Transaction with Third Parties and in consideration of the varying degrees of relationships OCK Group have with such Third Parties, there will undoubtedly be risks of non-compliance with anti-corruption laws.

In order to minimise and mitigate the potential risks relating to the above, OCK Group has implemented the following:-

- (a) Procurement and selection process of Third Parties that adheres to the system of internal controls / guidelines and such process shall not be based on any receipt of Gratification, Benefit or Entertainment;
- (b) Procurement and selection process will be conducted in a transparent manner and open to all qualified Third Parties;
- (c) Selection of Third Parties shall be subjected to (past, present and future) compliance to this Policy and the Code of Business of Conduct and Ethics of the Company by the Third Parties;
- (d) Conduct of Due Diligence by OCK Group on the Third Parties to ascertain the existence of sound business reason for the Business Transaction AND the absence of any specific risk factors relating to corruption and bribery activities in the relationship with the Third Parties; and
- (e) Requirement for all Third Parties who intend to conduct Business Transactions with OCK Group to sign an 'integrity pledge' which ensure compliance by the Third Parties with the

relevant anti-corruption and anti-bribery policies and shall provide for the right of OCK Group to terminate the Business Transaction in the event of any breach of anti-corruption laws.

10. Role and Responsibilities

The Board has oversight of this Policy and the group chief executive officer and other officers within OCK Group in leadership positions, are responsible for ensuring the due compliance with this Policy. All Employees are required to be familiar with and comply with this Policy.

Any violation of this Policy will be taken seriously and result in thorough investigation / inquiry and disciplinary action, including dismissal and termination where appropriate, in accordance with prevailing law. All Employee if found guilty of paying bribes / gratifications or authorizing, assisting, abetting or conspires with anyone in breach of this Policy and/or the anti-corruption or anti-bribery laws will be held individually liable.

Any individual or Employee with suspicions, concerns or information relating to the breach or potential breach of this Policy and any instances of improper business practices, are encouraged to report such issues to OCK Group via our whistleblowing platform as outlined in our Whistleblowing policy and procedure, available on our website.

11. Record Keeping

All financial records and proper documentations trail of OCK Group with Third Parties will be properly kept and we will have appropriate control measures in place to evidence, substantiate and justify for the business reason of any making of payments to, and receiving of payments from Third Parties.

All expenses and claims relating to any gifts or entertainment made to Third Parties will be subjected to rigorous screening process in accordance with OCK Group's internal reimbursement procedures in order to minimise the risk of financial outflow in contravention of anti-corruption or anti-bribery laws.

All documents, accounts and records relating to Business Transactions with Third Parties will be prepared and maintained with strict accuracy and completeness. No documents (as aforementioned) are to be kept "off-book" to facilitate or conceal any improper payments.

12. Confidentiality and Reporting

OCK Group encourage openness and will provide support to any individuals who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.

We are committed in ensuring that no individuals are subject to any form of detrimental treatment by virtue of their refusal to partake in corruption / bribery activities, any form of activities that may contravene against the law or because of concerns in reporting wrongdoings as prescribed in this Policy.

Thus, all reports made to OCK Group pursuant to the Whistleblowing policy and procedure are kept confidential and we will not divulge any details and identities of the individuals who made such reports.

13. Selection, hiring and management of Employees

The process of selection, hiring and management of Employees shall comply with internal procedures and applicable laws, specifically with respect to, assessment of reputational and conflicts of interest risks in the hiring stage.

In this regard, OCK Group provides strengthened anti-corruption controls in particular:-

- (a) update of the conflicts of interest assessment either on actual or potential situations, including personal relations with government and public officers;
- (b) periodic self-declaration on compliance with the Code of Business Conduct and Ethics, this Policy and anti-corruption / anti-bribery laws;
- (c) conduct of specific training activities and programmes; and
- (d) conduct of proper background checks including past convictions and misdemeanours in previous employment relating to any corrupt and bribery practices.

14. Monitoring and Review

All Employees and Third Parties are responsible for the success of this Policy and should ensure adherence to this Policy and use it to disclose any suspected wrongdoing.

All internal control systems and procedures will be subject to periodic reviews and audits to ensure the continued effectiveness in preventing corrupt and bribery practices within OCK Group. We will also ensure continual improvement of the suitability, adequacy and effectiveness of this Policy from time to time.

Any amendments to this Policy shall be approved by the Board.

Date: 1st JUNE 2020