



ANTI-CORRUPTION AND BRIBERY

1 INTRODUCTION

- 1.1** QES Group Berhad (“the Company”) and its subsidiaries (“the Group”) conduct its business in a legal and ethical manner. The Company requires Directors and employees of the Group to commit to act professionally with integrity in all its businessdealings.
- 1.2** This Anti-Corruption and Bribery Policy is aimed to prevent the occurrence of bribery and corrupt practices in relation to the business of the Group. The Company will alsotake appropriate and reasonable measures to ensure its business does not involve incorrupt activities.
- 1.3** This policy applies to all companies within the Company, including all directors, employees, consultants, trainees, agents, suppliers, customers, any third party and other associated.
- 1.4** This policy must be in accordance to the Code of Ethics & Conduct Policy.

2 OBJECTIVES

- 2.1** The intended objectives of this policy are:
- i. To provide information and guidance to the directors and employees on how to recognize and deal with corruption and bribery.
 - ii. To set out the guideline for the directors and employees to adhere to or comply with all applicable laws, rules and regulations to which they are bound to observe in the performance of their duties.

3 DEFINITION OF CORRUPTION AND BRIBERY

- 3.1** Corruption and Bribery
- i. Any person/agent who corruptly solicits/accepts/agrees to accept **gratification** as an inducement of a reward to do or not to do an act in relation to a transaction or any official act of his principal or employer.

- ii. Any person/agent who corruptly offers/gives **gratification** as an inducement or a reward for any person/agent to do or not to do an act in relation to a transaction or any official act of his principal or employer.

3.2 Gratification can take the form of cash, gifts, financial benefits, rights in action, property, privilege, emolument, loans, fees, rewards, courtesies or any other similar advantages.

4 GIFT, ENTERTAINMENT AND HOSPITALITY

4.1 This policy does not prohibit normal business hospitality, and encourage the use of good judgement, discretion and moderation when giving or accepting gifts or entertainment in business settings.

4.2 Gift giving and entertainment practices may vary in different cultures; however, any gifts and entertainment given or received must be in compliance with the law, must not violate the giver's and/or receiver's policies on the matter, and be consistent with local custom and practice.

4.3 All benefits given or received must be:

4.3.1 Reasonable in value

4.3.2 Infrequent in nature

4.3.3 Transparent and open

4.3.4 Not given to influence or obtain an unfair advantage

4.3.5 Respectful and customary

4.4 As a general principle, the directors and employees should not accept or give a gift to a third party with the intention of influencing the third party to obtain or retain business or in exchange for favours or benefits. In addition, lavish or unreasonable gifts or hospitality should not be accepted as such gifts or hospitality may be perceived or interpreted as attempts by the Directors or Employees to obtain or receive favourable business treatment for personal benefits.

5 CHARITABLE DONATION

5.1 Charitable donations and contributions are acceptable whether of in-kind services, knowledge, time or direct financial contributions. However, Directors and employees must ensure that the donations and contributions are not used as a scheme to conceal acts of corruption. All donations and contributions made must be pre-approved by the Group Managing Director.

6 THIRD PARTIES AND AGENCIES

6.1 All third parties, including suppliers, vendors, agents and customers should be made aware of this policy. All type of arrangements with third parties and agents must be in clear contractual terms which requires them to comply with the standards and procedures relating to anti-bribery and anti-corruption.

7 RECORD KEEPING

- 7.1** Complete and proper records will be maintained on all payments made to third parties, such as customers, suppliers and business contacts. All document and records including invoices, accounts which are related to dealing with third parties should be prepared and maintained with strict accuracy and completeness.
- 7.2** Employees must declare all gifts or hospitality accepted or offered, and submit the details to their respective Head of Department for recording.
- 7.3** Employees must ensure all expenses claims related to gifts, hospitality or expenses incurred to third parties are approved by the Head of Department and must be specifically recorded in reason for such expenditure in monthly claim submission.

8 COMPLIANCE TO THE LAW

- 8.1** The Company will comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions within which the Company operates. Directors and employees are expected to understand and comply with the Malaysian Anti-Corruption Commission Act 2009, including any amendment thereof. The Company reserves the right to report any actions or activities suspected of being criminal in nature to the police or other relevant authorities.
- 8.2** Employee will be accountable whether he/she pays a bribe himself/herself or whether he/she authorizes, assists or conspires with someone to violate the anti-corruption and bribery law. Employee as an individual will be liable for any violation in law which may include imprisonment, probation, mandated community service and significant monetary fines.

9 REPORTING OF VIOLATION

- 9.1** Any employee who knows of, or suspects, a violation of the policy, is encouraged to whistle blow or report the concerns through the mechanism set out under the Company's Whistle Blowing Policy.
- 9.2** All reports will be treated as confidentially.

10 REVIEW OF POLICY

- 10.1** This policy will be reviewed regularly to ensure it remains relevant and appropriate.