



**SOLARVEST HOLDINGS BERHAD**  
[Registration No. 201701033607 (1247778-U)]  
(Incorporated in Malaysia)

## **ANTI-BRIBERY AND CORRUPTION POLICY**

### **1. INTRODUCTION**

- 1.1 The introduction of Section 17A of the Malaysian Anti-Corruption Commission Act 2009 (“MACC Act 2009”), which took effect on 1 June 2020, governs the offence of corruption committed by a commercial organisation and associated persons.
- 1.2 Integrity and governance are the two solutions to the ultimate cure of corruption. There will be no corruption if humans were to act with integrity, that is, consistently doing the right thing even when nobody is watching their actions.
- 1.3 The purpose of this policy is to foster the development of a business environment that is free of bribery and/or corruption. In addition to that, to uphold and comply with all applicable anti-bribery and corruption laws in Malaysia to ensure the business runs in an ethical, honest and transparent manner.
- 1.4 This Anti-Bribery and Corruption Policy (“ABC Policy”) shall be read in conjunction with the Code of Conduct and Ethics of the Company and other policies and procedures, such as the Anti-Bribery and Corruption Framework by MACC.

### **2. SCOPE**

- 2.1 This Policy applies to the Company and its subsidiaries (collectively referred to as the “the Group”) including its Directors (executive and non-executive), Company Secretaries, Officers, and employees (including full time, probationary, contract and temporary staff) (“Employees”). It is also applicable to contractors, sub-contractors, consultants, agents, actual and potential clients, customers, joint-ventures, joint-venture partners, consortium partners interns, representatives and service providers of any kind performing work or services, for and/or on behalf of the Group and any other person associated with us (collectively known as “Business Associates”).
- 2.2 The Group will not tolerate bribery and corruption and is firmly opposed to any bribery and corruption in all forms. We are committed to conduct our business in accordance with the highest ethical standards as the success of an organisation is built on the trust of all stakeholders and this is earned by demonstrating ethics and integrity in all business practices.

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**3. DEFINITIONS**

- 3.1 Bribery and Corruption is 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 under MACC Act 2009.
- 3.2 Bribery, in practice, means offering, giving, receiving or soliciting something of value in an attempt to influence the decisions or actions of a person in position within an organisation.
- 3.3 Corruption also include acts of extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.
- 3.4 Gratification is defined in the MACC Act 2009 as follows:
- (a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
  - (b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
  - (c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
  - (d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
  - (e) any forbearance to demand any money or money's worth or valuable thing;
  - (f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and
  - (g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).
- 3.5 Facilitation payment to an external party, in particular, public officials, to expedite a routine service that the official is obliged to perform without receiving such payment.

**4. GIFTS AND HOSPITALITY**

- 4.1 As part of maintaining ordinary business relationship, gift-giving and hospitality given to or received from during festive celebrations, upon achievement of the Group's milestone or for genuine and justifiable occasions is acceptable if the value is reasonable, not excessive and not made with the intention of influencing another person to obtain/retain business advantage, or to reward the provision/retention of business advantage, or in explicit/implicit exchange for benefits.
- 4.2 Generally, employees are not allowed to provide gifts to third parties or customers unless getting the approval from the management.
- 4.3 Directors and employees are expected to exercise proper judgment in handling gift activities and act with the highest degree of integrity to avoid conflict and comply with applicable laws/regulations, Company's rules and regulations and code of conduct.

**5. DONATIONS**

- 5.1 The Group only makes charitable donations if they are legal, ethical and made in good faith in accordance with the Group's policy and in compliance with laws. All donations shall be supported with an official letter of request from the requesting external party and proof of receipt.

**6. FACILITATION PAYMENTS**

- 6.1 The Group prohibits the use of facilitation payments in its business conduct. Any request of such payment shall be reported immediately to the Managing Director or Group Chief Executive Officer.

**7. RESPONSIBILITIES OF EMPLOYEES**

- 7.1 Employees are responsible to fully understand and comply with this Policy. An employee must notify his or her superior expediently for guidance on next course of action if he or she believes or suspect that a breach with this Policy has occurred, or may occur.

**8. RECORD-KEEPING**

- 8.1 The Group shall keep detailed and accurate financial and other records, and ensure appropriate internal controls are in place as evidence of all payments made for gifts, hospitality, donations, and expenses of similar nature, and understand that such expenses are subject to management review.

**9. REVIEW AND MONITORING**

- 9.1 The Directors will monitor compliance of this Policy and review this Policy regularly to ensure that it continues to remain relevant and appropriate. Internal control systems and procedures will be designed to prevent bribery and corruption to provide assurance that there are effective in countering bribery and corruption.

**10. TRAINING AND AWARENESS**

- 10.1 The Group will conduct training and awareness programme for all employees in area perceived as high risk on how to implement and adhere to this Policy.

**11. REPORTING PROCEDURES**

- 11.1 The Group encourages reporting (whistleblowing) of real or suspected cases of bribery and corruption without fear of retaliation or reprisal. Any employee who reports on bribery or corruption shall be accorded the protection as set out in the Company's Whistleblowing Policy.

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