

# EFFICIENT E-SOLUTIONS BERHAD

## ANTI-BRIBERY AND CORRUPTION (“ABC”) POLICY

### I. COMMITMENT BY THE EFFICIENT GROUP OF COMPANIES (“The Group”)

The Group will not tolerate all forms of bribery and / or corruption and will undertake to act professionally and responsibly in ensuring all its business dealings and relationships with its stakeholders are free from any bribery and / or corruption.

### II. OBJECTIVE OF THIS POLICY

The objective of this policy is to:

- Set out the structure with respect to the Group’s Board and Management’s responsibilities in promoting and observing anti- bribery and corruption law, regulations and policies; and
- Guide stakeholders in responding to potential bribery and corruption issues.

### III. WHISTLEBLOWING

All directors, members of management and employees should adhere to and educate our business associates to adhere to this ABC Policy. Staff members, employees and business associates who are aware of, or suspect a violation of this Policy shall report the violations in accordance with the Group’s reporting procedures in the Whistleblowing Policy.

### IV. BOARD’S REPONSIBILITIES

In order to address the corruption risk exposure of the Group, the Board shall:

- a. Establish, maintain and periodically review the effectiveness and adequacy of its anti-bribery and corruption policies and programmes including but not limited to the current laws, regulations and internal Group requirements on anti-corruption;
- b. Oversee and assess the effectiveness of the anti-bribery and corruption compliance measures;

# EFFICIENT E-SOLUTIONS BERHAD

## ANTI-BRIBERY AND CORRUPTION (“ABC”) POLICY

- c. Ensure the Group’s ABC Policy is appropriately communicated to all stakeholders and made public;
- d. Maintain an accessible and trusted whistleblowing channel for stakeholders to raise concerns in relation to actual or suspected corruption incidents;
- e. Safeguard the identity of the whistleblower and protect the whistleblower from harassment and reprisal resulting from the whistleblowing;
- f. Periodically review the Group bribery and corruption risk exposure or when there is change in law, additional legal requirements, circumstance of the business and the profile of the stakeholders; and
- g. Ensure that all Board members and key stakeholders of the Group receive the essential training on anti-bribery and corruption on regular basis.

### V. MANAGEMENT’S RESPONSIBILITIES

Management is responsible to:

- a. Implement and enhance the Group’s ABC policy and measures as well as the financial, operational, organisational structure and procedures to control corruption risks;
- b. Communicate the Group’s policies and commitments on anti-bribery and corruption to both internal and external stakeholders via the corporate website, emails, briefing, seminars, and training sessions;
- c. Ensure all stakeholders which include but not limited to business partners, contractors, suppliers, purchasers, government authorities, agents, or any consultants make a declaration of compliance with all anti-corruption regulations annually; and
- d. Manage and ensure the adequacy and effectiveness of the Group’s systems in countering bribery and corruption.

# EFFICIENT E-SOLUTIONS BERHAD

## ANTI-BRIBERY AND CORRUPTION (“ABC”) POLICY

### VI. FACILITATION PAYMENT

Facilitation involves taking action to speed up process of application and approval by by-passing certain procedural requirement illegally or through abuse of power.

The Group prohibits any form of facilitation payment to or from any person.

All directors, management and employees of the Group should follow strict compliance of all internal and external ordinary and standard procedural requirements and shall not breach any of these procedural requirements to expedite application and approval processes for business dealings and transactions.

### VII. HOSPITALITY & ENTERTAINMENT

Corporate hospitality and entertainment are usually provided but with limits as set by internal policies and procedures as approved by the Board.

All hospitality and entertainment to / from business partners shall not exceed the limit as prescribed by the Board. Any hospitality and entertainment received or provided above the prescribed amount shall be approval by the CEO or the Board.

### VIII. GIFT

Gift giving and receiving are allowed for public presentation, ceremony, official functions, events, celebrations or for presentation of corporate souvenirs gifts bearing company’s logo of not more than the prescribed value.

Where gifts to be offered or received are more than the prescribed value, directors, employees, family members or agents working on behalf of the Group are obligated to obtain pre-approval from the CEO or Board. If approval is not obtained, the gift must be returned with a note of explanation about the Group’s Gift Policy.

# EFFICIENT E-SOLUTIONS BERHAD

## ANTI-BRIBERY AND CORRUPTION (“ABC”) POLICY

### IX. SPONSORSHIP AND DONATION

Sponsoring events, functions and activities and making donation in the form of monetary benefits or equivalent, equipment, or other benefits to charity causes are part of the Group’s corporate social responsibility (“CSR”).

All sponsorships and donations limits as set by internal policies and procedures as approved by the Board. In addition, management should obtain documentation and receipt for sponsorship and donation provided by the Group.

### X. SANCTIONS FOR NON-COMPLIANCE

Non-compliance as identified by the audit and any risk areas identified through this and other means should be reported to the top management and Audit Committee in a timely manner in accordance with the Group’s Whistleblowing Policy.

The Group regards bribery and acts of corruption as serious matters and will apply penalties in the event of non-compliance to this policy. For personnel of the Group, non-compliance may lead to disciplinary action, up to and including termination of employment and criminal charge.

For external parties, non-compliance may lead to penalties including termination of contract. Further civil and criminal legal action may also be taken in the event that the Group’s interests have been harmed by the results on non-compliance by individuals and organisations.

### XI. REVISION AND PUBLICATION OF THIS POLICY

This Policy will be reviewed by the Group and amendments, if needed will be made to ensure that this Policy remains consistent with the current regulation requirements and framework. Changes of the provisions in this Policy will be published and notified in the Group’s website.