

**VASTIQ SOLUTIONS SDN BHD**

*A Digital Integrator Company*

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**ANTI-BRIBERY &  
CORRUPTION POLICY**

Anti-Bribery Management System (ABMS)

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Document Reference: VASTIQ-ABMS-POL-01

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## Document Control

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<b>Approved By</b>	Managing Director (on behalf of the Board of Directors)
<b>Next Review</b>	Annually, or upon material change

## 1. Introduction

VASTIQ SOLUTIONS SDN BHD (“VASTIQ” or “the Company”) applies a zero-tolerance position towards bribery, corruption, abuse of power and misappropriation in every part of its business. As a digital integrator serving government, critical infrastructure and commercial clients across Malaysia and the region, our reputation rests on the trust our clients, partners and the public place in us.

This Anti-Bribery & Corruption Policy (“the Policy”) sets out the principles, expectations and controls that govern how everyone connected with VASTIQ must act to prevent bribery and corrupt practices that may arise in the course of daily work. It supports the Company’s Anti-Bribery Management System (ABMS), which is aligned with the requirements of the Malaysian Anti-Corruption Commission Act 2009 (Act 694), including the corporate liability provision under Section 17A, and is informed by the principles of MS ISO 37001 Anti-Bribery Management Systems and the Guidelines on Adequate Procedures issued under Section 17A(5).

The Policy reflects VASTIQ’s commitment to conducting business with integrity, transparency, fairness and accountability, and to embedding a corruption-free culture throughout the organisation.

## 2. Application

This Policy applies to all individuals working for or on behalf of VASTIQ at every level and grade, including directors, management, permanent and contract employees, interns, and personnel seconded to the Company. It also extends, so far as is reasonable, to third parties acting for or on behalf of VASTIQ, such as agents, consultants, sub-contractors, suppliers, distributors, joint-venture partners and any other business associate.

Every person to whom this Policy applies is responsible for reading, understanding and complying with it. Ignorance of the Policy or of the relevant law is not an acceptable excuse for non-compliance.

## 3. Definitions

For the purposes of this Policy, the following terms carry the meanings set out below.

### 3.1 Bribery

Bribery means offering, promising, giving, soliciting, agreeing to receive or accepting any gratification as an inducement or reward for a person improperly performing, or refraining from performing, a function or activity, or otherwise to gain an improper business or personal advantage. "Gratification" follows the wide meaning given under Act 694 and includes money, gifts, services, positions, discounts, favours and anything of value, whether received directly or indirectly.

### 3.2 Corruption

Corruption means the abuse of entrusted power or position for private gain. It is broader than bribery and may take the form of, among others, embezzlement, extortion, abuse of discretion, trading in influence, nepotism, collusion or the misuse of confidential information.

### 3.3 Other key terms

- **Gift** – any item of value given or received, such as cash or cash equivalents (vouchers, coupons, shares), property, travel, tickets, hampers, ornaments, souvenirs or similar, that could be perceived by a reasonable third party as intended to improperly influence a decision.
- **Hospitality** – entertainment, meals, refreshments, accommodation, recreation or similar treatment that could be perceived as intended to improperly influence a business decision.
- **Facilitation payment** – a typically small, unofficial payment made to secure or speed up a routine action to which the payer is already entitled. Facilitation payments are prohibited under this Policy.
- **Kickback** – the return of a sum already paid or due, as a reward for awarding or retaining business or for any other improper favour.
- **Conflict of interest** – a situation in which a person's private interest interferes, or appears to interfere, with the interests of the Company. A conflict of interest is not corrupt in itself, but corruption may arise where it is not disclosed and properly managed.
- **Business associate** – any external party with whom VASTIQ has, or plans to establish, a business relationship, including clients, suppliers, sub-contractors, agents, consultants, distributors and partners.
- **Public official** – any officer of a public body, including officers of government ministries, departments, agencies, statutory bodies, government-linked companies and local authorities.

## 4. Policy Statement and Scope

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To promote a culture of transparency, fairness and accountability, VASTIQ does not tolerate any form of bribery or corruption, whether committed by its personnel or by third parties acting on its behalf. No employee or business associate will be penalised or suffer any adverse consequence for refusing to pay or receive a bribe, even if such refusal results in the Company losing business or experiencing a delay.

In its continuing effort to combat the risk of bribery and corruption, VASTIQ is committed to:

- providing and maintaining a working environment that is free from bribery and corruption for all employees and business associates;
- complying with all applicable laws, in particular the Malaysian Anti-Corruption Commission Act 2009 (Act 694) and its subsidiary legislation, and conducting business honestly wherever the Company operates;

- providing an avenue for, and encouraging, the raising of concerns about bribery and corrupt conduct through the Company's Whistleblowing Policy;
- communicating this Policy to all personnel and relevant business associates, and providing training and awareness appropriate to their roles;
- monitoring, reviewing and continually improving the Anti-Bribery Management System; and
- taking firm and consistent disciplinary or other action against any breach of this Policy.

This Policy covers VASTIQ's operations at its headquarters in Kelana Jaya, its Northern Region branch in Butterworth, and all project and site locations where the Company carries out work.

## 5. ABMS Objectives

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VASTIQ is committed to developing a bribery-free culture within the organisation by:

- promoting zero tolerance towards bribery and corruption at all levels;
- identifying, assessing and managing bribery and corruption risks across the Company's activities and relationships;
- establishing clear, proportionate and risk-based controls, including in procurement, tendering, contracting and the engagement of third parties;
- ensuring leadership commitment, employee involvement, effective training and sustained co-operation across the Company; and
- setting measurable objectives and reviewing performance to drive continual improvement.

## 6. Bribery Offences and the Law

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All personnel must be aware that bribery and corruption are serious criminal offences in Malaysia. The Malaysian Anti-Corruption Commission Act 2009 (Act 694) provides, among others, for the following offences. The summaries below are provided for awareness only and do not replace the statute itself.

- **Soliciting or receiving gratification (Section 16)** – corruptly soliciting, receiving or agreeing to receive any gratification as an inducement or reward.
- **Giving or accepting gratification by an agent (Section 17)** – an agent corruptly accepting, obtaining or agreeing to obtain gratification, or any person corruptly giving or offering gratification to an agent.
- **Deceiving a principal (Section 18)** – using a false, erroneous or defective document with intent to deceive a principal.
- **Bribery of an officer of a public body (Section 21)** – offering or giving gratification to a public official to influence the performance of their duties.
- **Duty to report bribery transactions (Section 25)** – any person to whom gratification is offered or given in contravention of the Act must report it to the authorities. Failure to report, without reasonable excuse, is itself an offence.
- **Corporate liability (Section 17A)** – a commercial organisation commits an offence if a person associated with it corruptly gives, agrees to give, promises or offers gratification with intent to obtain or retain business or an advantage for the organisation. It is a defence for the organisation to prove that it had in place adequate procedures designed to prevent such conduct.

Penalties under the Act are severe and may include substantial fines, imprisonment, or both, for individuals, and significant fines for commercial organisations. Directors, controllers, officers, partners or managers may also be held personally liable under Section 17A unless they can show due diligence and that the offence occurred without their consent and that they exercised reasonable care.

## 7. Gifts and Hospitality

### 7.1 No-Gift Position

VASTIQ adopts a No-Gift position. As a general rule, employees must not solicit or accept any gift from a third party where the gift may have, or be perceived to have, a direct or indirect influence on a business decision, or where it may give rise to a conflict of interest. Cash and cash equivalents (such as vouchers, coupons or shares) must never be solicited, given or accepted in any circumstances.

A gift that breaches the No-Gift position must be politely declined or, where it has already been received and cannot be returned, surrendered and declared in accordance with this Policy, accompanied by a brief explanatory note referring to VASTIQ's No-Gift position.

### 7.2 Receiving and Providing Gifts

Where declining a gift would cause unintended offence or damage a legitimate business relationship, a modest, occasional gift may be given or received only if it satisfies all of the following conditions:

- it is not cash or a cash equivalent;
- it is of nominal value (as a guide, worth less than RM500, or USD250 for gifts exchanged overseas, per item);
- it is exchanged at a company-to-company level or as a token of appreciation at an official function or public event;
- it is not frequent and does not reflect a pattern of acceptance from the same person or organisation;
- it does not create an impression of an attempt to influence a business decision; and
- the recipient would be comfortable having the gift known to management and the public.

All gifts given or received must be reported to the relevant Head of Department or the Integrity Unit and recorded in the Company's Gift Register. Management may then decide whether the recipient may keep the gift, whether it should be displayed publicly, shared among employees, donated to charity, or otherwise disposed of.

### 7.3 Receiving and Providing Hospitality

Reasonable and proportionate hospitality that is customary, infrequent and given openly for a genuine business purpose – such as an occasional working meal – is generally acceptable. Hospitality must never be lavish, must not be offered or accepted to influence a decision, and must not be provided around the time of a tender, contract award or other sensitive decision. Hospitality involving public officials requires particular caution and prior approval, as special rules apply.

## 8. Donations and Sponsorship

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VASTIQ may make charitable donations or provide sponsorship where these are lawful, transparent and consistent with the Company's values. All donations and sponsorships must be properly approved, supported by appropriate documentation, paid to a verified recipient, and never used as a subterfuge for bribery or to secure an improper advantage. Requests for donations or sponsorship that appear linked to the award or retention of business must be declined and reported.

## 9. Political Contributions

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VASTIQ maintains political neutrality and does not make contributions, whether in cash or in kind, to political parties, candidates or office-holders for the purpose of obtaining or retaining business or any improper advantage. Employees must not give the impression that any personal political activity is carried out on behalf of, or with the support of, the Company.

## 10. Dealing with Business Associates

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Third parties can expose the Company to bribery and corruption risk. Before engaging an agent, consultant, sub-contractor, supplier or other business associate, appropriate, risk-based due diligence must be carried out to assess the party's integrity and track record. Contracts with business associates should, where appropriate, include anti-bribery obligations, audit and termination rights, and a requirement to comply with this Policy. Payments to business associates must be legitimate, properly documented and proportionate to the goods or services provided.

## 11. Conflicts of Interest

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Personnel must avoid any situation in which their personal, family or financial interests conflict, or may appear to conflict, with the interests of VASTIQ. Any actual, potential or perceived conflict of interest must be declared promptly to one's superior or the Integrity Unit and managed appropriately. Company property, information and opportunities must never be used for personal gain.

## 12. Responsibilities of Employees

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Every employee and person acting on behalf of VASTIQ must:

- comply with this Policy and all applicable anti-corruption laws;
- never offer, promise, give, solicit or accept a bribe, facilitation payment or kickback;
- declare gifts, hospitality and conflicts of interest as required by this Policy;
- exercise care and good judgement when dealing with clients, public officials and business associates;
- report any actual or suspected bribery or corruption through the Whistleblowing channel; and
- co-operate fully and honestly with any investigation.

Management and Heads of Department carry additional responsibility for leading by example, ensuring their teams understand this Policy, and implementing the controls relevant to their areas, including in procurement and contracting.

### 13. Infringement of the Policy

Any breach of this Policy is treated as a serious matter. Employees who breach this Policy may face disciplinary action up to and including termination of employment, in accordance with the Company's disciplinary procedures, and may also be subject to criminal prosecution. Business associates that breach equivalent contractual anti-bribery obligations may have their engagement terminated. The Company will, where appropriate, report criminal conduct to the relevant authorities.

### 14. Whistleblowing Protection and Channel

VASTIQ encourages anyone who becomes aware of actual or suspected bribery, corruption or other wrongdoing to speak up without fear of reprisal. Reports made in good faith are treated as confidential, and the Company will not tolerate any form of retaliation, victimisation or detriment against a person who raises a genuine concern. Concerns may be raised through the channels set out in the Company's Whistleblowing Policy and Guidelines and summarised below.

### 15. Inquiries and Reporting

Questions about this Policy, and reports of actual or suspected bribery or corruption, may be directed to the VASTIQ Integrity Unit:

<b>By Email</b>	integrity@vastiqsolutions.com (general enquiries: info@vastiqsolutions.com)
<b>By Post</b>	Private & Confidential, VASTIQ Integrity Unit, VASTIQ Solutions Sdn Bhd, Lot A-03A-3A, Plaza Glomac, Jalan SS7/19, Kelana Jaya, 47301 Petaling Jaya, Selangor Darul Ehsan, Malaysia
<b>By Phone</b>	+60 (3) 7887 9400

This Policy will be reviewed at least annually, or whenever there is a material change to the Company's operations or to applicable law, and updated as necessary. It is approved and endorsed by the Management of VASTIQ Solutions Sdn Bhd.

**Approved by:** \_\_\_\_\_

Name: \_\_\_\_\_

Designation: Managing Director

Date: 1 June 2026