



ADNEX GROUP BERHAD

Registration No. 202501003741(1605154-U)
(Incorporated in Malaysia)

ANTI-BRIBERY AND CORRUPTION POLICY

1. PURPOSE

The purpose of this Anti-Bribery and Corruption Policy is to establish a clear framework to prevent bribery and corruption within our organisation. We are committed to maintaining the highest standards of integrity and ethics in our business dealings.

2. SCOPE

This policy applies to all employees, contractors, consultants, and temporary staff of Adnex Group Berhad and its subsidiaries ("Group") across all locations and operations.

3. POLICY STATEMENT

Adnex Group Berhad has a zero-tolerance approach toward bribery and corruption. We do not tolerate any form of bribery, whether direct or indirect, and expect all employees to conduct business honestly and transparently.

4. DEFINITIONS

Bribery: Offering, giving, receiving, or soliciting anything of value to influence the actions of another party.

Corruption: Abuse of entrusted power for private gain.

5. PROHIBITED CONDUCT

Bribery: Offering or accepting bribes in any form is strictly prohibited.

Gifts and Hospitality

- (a) Employees must not accept gifts, hospitality, or entertainment that could influence business decisions or create a sense of obligation.
- (b) Gifts of nominal value may be accepted, provided they are transparently reported to management.

Political Contributions

- (a) Employees must not make political contributions on behalf of the organisation without prior written approval from management.

Note: Please refer to Appendix B for Anti-Bribery and Corruption Policy on Gifts and Hospitality (Malaysia)

6. RESPONSIBILITIES

All Employees

- (a) Understand and comply with this policy.
- (b) Avoid situations that may lead to bribery or corruption.
- (c) Report any suspected bribery or corruption immediately.

Board of Directors

- (a) Responsible for policy approval, including any revisions to the policy, and overseeing the effectiveness of the implementation of this policy as well as the enforcement of this policy.

Senior Management

- (a) Set precedents for policy compliance and ultimately monitor bribery and corruption issues.
- (b) Responsible for ensuring compliance with this policy and relevant anti-corruption legislation by business associations and/or external party.

7. REPORTING VIOLATIONS

How to Report - If you suspect bribery or corruption, report it immediately to the Chairperson of Audit and Risk Management Committee ("ARMC") through the following methods:

Whistleblowing channels

Email: whistleblowing@adnexinterior.com

Mail: Attention to:
Chairperson of Audit and Risk Management Committee
of Adnex Group Berhad

Address:
K03-13-3A, K03-13-05 & K03-13-06, Level 13,
Tower 3, UOA Business Park,
Jalan Pengaturcara U1/51A,
40150 Shah Alam,
Selangor, Malaysia

Confidentiality

All reports will be treated confidentially, and your identity will be protected to the extent possible.

8. INVESTIGATION PROCEDURES

- (a) Initial Assessment - All reports of suspected bribery or corruption will be assessed promptly.
- (b) Investigative Process - If necessary, an investigation will be conducted in a fair and impartial manner. Employees may be asked to provide information or cooperate during the investigation.
- (c) Outcome - Employees will be informed of the investigation's outcome, as appropriate, while maintaining confidentiality.

9. TRAINING AND AWARENESS

- (a) Training Programs - All employees will receive training on this policy and related procedures upon hire and periodically thereafter.
- (b) Resources - Employees are encouraged to review this policy regularly and seek clarification if needed.

10. CONSEQUENCES AND VIOLATIONS

Violations of this policy will result in disciplinary action, which may include termination of employment, legal action, and reporting to relevant authorities.

11. STAFF DECLARATION

All employees of the Company shall certify in writing that they have read, understand and will abide by this policy. A copy of this declaration shall be documented and retained by the HR for the duration of the employee's employment. A sample declaration can be found in Appendix A of this policy.

12. POLICY REVIEW

This Policy will be reviewed by the Board at least once every three (3) years to ensure its effectiveness and consistency with the governing legislation, the Board's objectives, responsibilities and standards of corporate governance and regulatory requirements, or more frequently should there be material changes to the said legislation and regulations or circumstance of the business, if any.

13. BOARD APPROVAL

This Policy (Version No. 1) was reviewed and approved by the Board on 18 June 2025. Any amendment(s) to this Policy shall be approved by the Board from time to time, when necessary.

APPENDIX A

STAFF ANTI-BRIBERY DECLARATION FORM

I, _____ NRIC No. _____
hereby declare that I have read and understood the contents of the Anti-Bribery and Corruption Policy of Adnex Group Berhad. I will abide by the requirements and provisions set out in the Policy, as required by my employment contract.

I further confirmed that:

- i) I shall be solely responsible for any breach of the Company's Anti-Bribery and Corruption Policy conducted by me; and
- ii) The Company and all its officers shall be absolved of any liability for any breach of the Company's Anti-Bribery and Corruption Policy conducted by me.

Signature

Name:
Designation:
Date:

APPENDIX B

Anti-Bribery and Corruption Policy on Gifts and Hospitality (Malaysia)

1. Compliance with Malaysian Law

- This policy adheres to the requirements of the **Malaysian Anti-Corruption Commission Act 2009 (MACC Act)**, particularly under **Section 17A**, which imposes corporate liability on companies for bribery committed by associated persons unless adequate procedures are in place.

2. General Principles for Gifts and Hospitality

- Employees and representatives of the company must not solicit, accept, or provide gifts, entertainment, or hospitality that could influence, or be perceived to influence, a business decision or violate the MACC Act.
- Gifts and hospitality must always comply with the **Guidelines on Adequate Procedures** issued under the MACC Act and the company's internal policies.

3. Monetary Value of Acceptable Gifts

- Non-cash gifts must not exceed **MYR 300** per individual gift.
- Any gift exceeding this value must be reported to the **Chief Operating Officer** or **Chief Financial Officer** for review and approval.
- Cumulative gifts from the same party within a year must not exceed **MYR 1,000**.

4. Acceptable Types of Gifts

- Token promotional items (e.g., pens, diaries, or calendars) with nominal value.
- Seasonal gifts during major cultural festivals (e.g., Hari Raya, Chinese New Year, or Deepavali) within the value threshold.
- Flowers, small hampers, or fruit baskets given for special occasions, such as congratulations or condolences.

5. Acceptable Meals and Hospitality

- Modest meals provided during legitimate business meetings, where the cost per person does not exceed **MYR 150**.
- Meals or refreshments provided at conferences, seminars, or training events.
- Hospitality related to business events, provided it is not extravagant or lavish (e.g., tickets to a local cultural or sporting event, not exceeding **MYR 500** per person).

6. Unacceptable Gifts and Hospitality

- Cash or cash equivalents, such as gift cards, prepaid cards, or checks.
- Lavish or extravagant gifts, including jewelry, high-value electronics, or luxury items.
- Sponsored travel or accommodation unrelated to business purposes or excessive in nature.
- Meals or entertainment that could be seen as excessive, frequent, or intended to unduly influence decisions.

7. Cultural Sensitivity Clause

- In situations where refusal of a gift may offend local customs (e.g., during cultural or festive occasions), employees must accept the gift on behalf of the company and report it to the **Chief Operating Officer**. The gift will be recorded in the **Gift and Hospitality Register (Appendix C)** and appropriately managed (e.g., shared among employees or donated).

APPENDIX B (Cont'd)

8. Reporting and Approval

- All gifts, meals, and hospitality exceeding the stated limits must be reported to the **Compliance Officer** within **5 working days** and recorded in the **Gift and Hospitality Register**.
- Employees are required to seek prior approval for any gifts, meals, or hospitality offered to public officials or regulators, regardless of the value.

9. Public Officials

- Gifts or hospitality offered to public officials (e.g., government officers or representatives) are strictly prohibited unless it involves token items of nominal value (e.g., company- branded items not exceeding MYR 100) and it legally permissible.

10. Training and Monitoring

- All employees will undergo mandatory anti-bribery training annually to ensure compliance with the MACC Act.
- Regular audits will be conducted to monitor adherence to this policy and review the Gift and Hospitality Register.

11. Disciplinary Action

- Non-compliance with this policy will result in disciplinary actions, up to and including termination of employment, as well as legal consequences under the MACC Act.

APPENDIX C

Gift & Hospitality Register

| Date | Employee Name | Position | Description of Gift / Hospitality | Estimated Value | Offered By / Received From | Reason for Gift / Hospitality | Accepted / Declined | Comments |
|------|---------------|----------|-----------------------------------|-----------------|----------------------------|-------------------------------|---------------------|----------|
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LEGEND :

1. **Date:** The date the gift or hospitality was offered or received.
2. **Employee Name:** Name of the employee who either received or offered the gift or hospitality.
3. **Position:** The employee's job title/position in the organisation.
4. **Description of Gift/Hospitality:** A brief description of the gift or hospitality (e.g., lunch, hotel stay, trade show tickets, branded merchandise, etc.).
5. **Estimated Value:** The estimated monetary value of the gift or hospitality.
6. **Offered By/Received From:** The name of the person or organisation offering or giving the gift or hospitality (e.g., a client, contractor, supplier).
7. **Reason for Gift/Hospitality:** Why the gift or hospitality was offered (e.g., project collaboration, business meeting, thank you for work completed, relationship-building, etc.).
8. **Accepted/Declined:** Whether the gift or hospitality was accepted or declined by the employee.
9. **Comments:** Any additional notes, such as whether the gift was within company policy, if approval was needed, or any other relevant details.