

RAPID SYNERGY BERHAD

Registration No.: 199401040248 (325935-U)

ANTI-BRIBERY AND CORRUPTION POLICY

1. INTRODUCTION

RAPID SYNERGY BERHAD (“RAPID SYNERGY BERHAD”) and its subsidiaries (“Group”) are committed to conducting business dealing with honesty, integrity and transparency.

This Anti-Bribery and Anti-Corruption Policy (“Policy”) set out the appropriate measures and guidance to ensure that the Directors and all Employees will adhere to all applicable laws, regulations and rules including and not limited to the Malaysian Anti-Corruption Commission Act 2009 concerning on how to deal with improper solicitation, bribery and other corrupt activities and issues that may arise in the course of business.

2. BRIBERY AND CORRUPTION

Bribery is defined as any action which would be considered as an offence of giving or receiving ‘gratification’ under Malaysian Anti-Corruption Commission Act 2009 (MACCA).

In practice, this means offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person a position of trust within an organisation.

The Transparency International definition of corruption is ‘the abuse of entrusted power for personal gain.’ For the purpose of this policy, corruption, is defined primarily as any action which would be considered as an offence of giving or receiving ‘gratification’ under the MACCA (‘Bribery’ as defined above). In addition, corruption may also include acts of extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.

3. OBJECTIVE

The objective of this policy is to set out the Group’s position and guidance on how to deal with improper solicitation, bribery and other corrupt activities and issues that may arise in the course of business and its day to day operations.

4. APPLICABILITY

This The Policy is applicable to all Directors and Employees of the Group. Each Employee has a duty to read and understand the Policy. Violation of any of the Policy’s provisions may result in disciplinary action, including termination of employment. If a Director requires further clarification on the Policy, the Director may liaise with the Chairman of the Board or the Executive Director (“ED”), whereas for an Employee, the Employee may refer or highlight any concerns to the immediate superior or Head of Department.

5. GUIDANCE ON BRIBERY AND CORRUPTION

This Policy does not prohibit meals and refreshments (limited to RM50 per meal per person) which are fair and reasonable, bona fide, in accordance with the proper corporate authority limit, commensurate with the position and circumstances and common industry practice such as to foster goodwill and strengthen working relationships with stakeholders.

All such Gratuities must not be lavish and extravagant, inappropriately frequent and excessive with the intention of influencing the decision making and judgement of the stakeholders or recipient to obtain or receive favourable business benefits and advantage.

6. THIRD PARTIES AND AGENCIES

All third parties, including agents, suppliers and joint venture partners should be made aware of this Policy and the arrangements with them shall be subject to clear contractual terms, including specific provisions requiring them to comply with minimum standards and procedures relating to bribery and corruption.

7. CHARITABLE CONTRIBUTION

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, Directors and Employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery.

We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that no donation can be offered or made without the prior approval of the Executive Director.

8. EMPLOYEE RESPONSIBILITIES

Every employee of the Group has an independent obligation to ensure that any and all interaction with the Group's customers, suppliers, contractors and Government Officials complies with all relevant laws and regulations, including this Policy.

All employees of the Group are expected to –

- behave honestly and trustworthy;
- make sure that their behaviour comply with this Policy;
- not engage in any acts of corruption;
- not pay or accept bribes;
- make a clear distinction between the interest of company and private interests; and
- avoid possible conflict (including accepting gifts, invitations or other advantages conflicting with this principle).

If the employees have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the Group's management.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. The Group has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

9. TRAINING AND COMMUNICATION

The Group will provide relevant anti-bribery and corruption training to employees, etc., where we feel their knowledge of how to comply with the MACC Act 2009 on anti-bribery and corruption needs to be enhanced.

The Group's Anti-bribery & Corruption Policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners and any third parties at the outset of business relations, and as appropriate thereafter.

10. RECORD KEEPING

The Group shall keep detailed and accurate financial records, and shall have appropriate internal controls in place to act as evidence for all payments made. We shall declare and keep a written record of the amount and reason for gifts, entertainment, hospitality and travel accepted and given, and understand that such expenses are subject to managerial review.

11. REPORTING OF VIOLATIONS OF THE POLICY

Any Employee who knows of, or suspects, a violation of the Policy, is encouraged to whistle blow or report the concerns to the Human Resource Executive or the Executive Director. The Group is committed to ensuring that all employees have a safe, reliable and confidential way of reporting any suspicious activity. All reports will be treated confidentially.

12. COMPLIANCE TO THE LAW

The Group will comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions within which the Group operates. Directors and Employees are expected to understand and comply with the Malaysian Anti-Corruption Commission Act 2009 (including any amendment thereof). The Group reserves the right to report any actions or activities suspected of being criminal in nature to the police or other relevant authorities

13. REVIEW OF THE POLICY

The Group is committed to continually improving its policies and procedure relating to anti-bribery and anti-corruption and review the policy regularly to ensure that it continues to remain relevant and appropriate.