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**MICROLINK GROUP OF COMPANIES **
ANTI-CORRUPTION POLICY FOR THIRD PARTIES

1.0 Introduction and Objectives

1.1 Introduction

Microlink Solutions Berhad (“MSB” and/or the “Company”) and its group of companies (collectively, the “MICROLINK Group”) are committed to conduct their business in an open, honest and ethical manner. In line with this commitment, the MICROLINK Group adopts a zero-tolerance approach to all forms of Bribery and Corruption.

All Third Parties (as hereinafter defined) must read, understand and comply with this Anti-Corruption Policy for Third Parties (“ACP” / “Policy”) as well as all relevant laws and regulations, including but not limited to, the Malaysian Anti-Corruption Commission (“MACC”) Act 2009 (Amendment 2018), the Penal Code (Act 574) (“Penal Code”) and the Anti-Money Laundering and Anti-Terrorism Financing Act 2001 (“AMLA 2001”).

1.2 Objectives

The objective of this Policy is to reiterate the MICROLINK Group’s commitment to comply with all laws relating to anti-bribery and anti-corruption in Malaysia by ensuring that all Third Parties it deals with carries the same values and principles as the MICROLINK Group in relation to anti-bribery and anti-corruption.

The Policy sets out the statements and guidelines in relation to improper solicitation, Bribery and other Corrupt activities and issues that may arise in the course of business and seeks to provide guidance to Third Parties to effectively understand, recognise, detect and avoid potential Corrupt practices not only in their dealings with the MICROLINK Group but also in their own business operations.

2.0 Definitions

For purposes of this Policy, the following definitions shall apply:

Bribery means the action of soliciting, receiving, giving or promising Bribes.

Bribes means Gratifications given specifically for the purpose of enticing winning favours or to influence the decision or behaviour of an individual or company to benefit a party or the organisation represented.

Conflict of Interest means a situation in which an individual or company with an obligation to the MICROLINK Group has a conflicting interest, or is in a position to take advantage for personal benefit, including the benefit for their family/household and friends.

Corruption means any unlawful or improper behaviour that seeks to gain an advantage through illegitimate means, and includes without limitation, Bribery, abuse of power, extortion, fraud, deception, collusion, cartels, embezzlement and money laundering. The word “**Corrupt**” shall be construed accordingly.

Directors means the directors of companies under the MICROLINK Group including all independent and non-independent directors, executive and non-executive directors, as well as alternate or substitute directors.

Employees are any persons who are in the employment of the MICROLINK Group, including but not limited to, permanent and temporary executives, non-executives, secretaries, secondees and individuals on direct hire including contract employees.

Gratification shall have the meaning ascribed to it under the MACC Act 2009 (Amendment 2018).

Third Parties means all third parties dealing with the MICROLINK Group, including but not limited to, customers, business partners, contractors, vendors and suppliers.

3.0 Gifts

3.1 No Gift Policy

The MICROLINK Group practices a “No Gift Policy” whereby, subject only to certain narrow exceptions, the MICROLINK Group’s Employees and Directors, and agents acting for or on behalf of the MICROLINK Group or its Employees and Directors, are prohibited from, directly or indirectly, receiving or providing gifts.

The “No Gift Policy” is intended to prevent any Conflict of Interest or the appearance of any Conflict of Interest for either party in on-going or potential business dealings between the MICROLINK Group and the Third Party, as a gift can be seen as a Bribe that may bring the MICROLINK Group’s reputation into disrepute or be in violation of anti-Bribery and anti-Corruption laws.

3.2 Exceptions to the “No Gift Policy”

Whilst the MICROLINK Group generally adopts a “No Gift Policy”, there are certain exceptions to the general rule whereby the receiving and provision of gifts are permitted in the following limited situations:

- (a) Exchange of gifts at a company-to-company level (e.g. gifts exchanged between companies as part of an official company visit/courtesy call and thereafter the said gift is treated as company property);
- (b) Gifts provided in conjunction with an official function, event or celebration (e.g. commemorative gifts or door gifts offered to all guests attending the event);
- (c) Festive hampers or other perishable items (e.g. fruits, flowers, cakes, etc.) of market value of **RM500** or less in total for the package given and received during festivals or special occasions not on a personal basis, to be shared and distributed to all employees of the recipient company; and
- (d) Souvenirs or token gifts of nominal or insubstantial value value (defined as less than **RM100**) bearing the donor’s company name or logo (e.g. t-shirts, caps/hats, stationeries, diaries, calendars, key rings, plaques and other small promotional items) that are given out to members of the public, business partners, customers, shareholders and other stakeholders, and form part of the company’s brand building or advertising activities.

3.3 Notwithstanding the above, Third Parties are expected to observe the general principles set out below in the handling of all gift activities:

- Conscientiously maintain the highest degree of integrity and professionalism;
- Always exercise proper care and judgment;
- Avoid Conflicts of Interest or the perception of it; and
- Comply with all applicable laws and regulations, and the MICROLINK Group's policies and procedures.

3.4 Under no circumstances may a Third Party offer to or receive from any Employee or Director of the MICROLINK Group, directly or indirectly, any gifts if they are provided with a view or can reasonably be construed by the Third Party to:

- influence the recipient to perform a relevant function improperly; or
- obtain favorable treatment from the recipient with respect to any current or prospective transactions, contracts or commercial deals.

3.5 Gifts in the form of cash, cash equivalents, kickbacks and loans are strictly prohibited under any circumstances.

3.6 For purposes of this ACP, 'gifts' may include but are not limited to consumables and non-consumables items and products such as:

- Food and beverages, including hampers and goodie baskets; or
- Admission tickets to entertainment and/or sporting events; or
- Electrical consumer products; or
- IT and telecommunication products, gadgets and computer peripherals; or
- Souvenirs (such as marketing premiums which may include stationeries, diaries notepads, key rings, calendars, and promotional items which may include caps/hats, t-shirts, bags); or
- Tokens which include but is not limited to items given as appreciation such as bouquets of flowers, or a memento of an event.

4.0 Entertainment and Corporate Hospitality

4.1 Entertainment

The MICROLINK Group recognises that providing modest entertainment is a legitimate way and a common practice within the business environment to foster good business relationships. As such, eligible Employees and Directors are allowed to offer reasonable acts of hospitality to external clients, and to receive modest level of entertainment

provided by Third Parties, as part of business networking to build good business relationships.

Third Parties are, however, strictly prohibited from providing or offering to provide entertainment for the purpose of improperly causing undue influence on any Employees or Directors of the MICROLINK Group, in exchange for some future benefit or result or to induce them to act contrary to the MICROLINK Group's interest. At the same time, under no circumstances may Third Parties or any of their family/household members accept entertainment from any Employees or Directors of the MICROLINK Group, in return for an exercise or non-exercise of their authority or any improper business advantage. Any acts of this nature, whether provided directly or indirectly through an intermediary, may be construed as an act of Bribery and a violation of the general principles of this ACP and anti-Bribery and anti-Corruption laws.

Entertainment may only be offered in conjunction with legitimate business meetings and events endorsed by the MICROLINK Group, and must not be extended to the recipient's family/household members or other invitees.

4.2 Corporate Hospitality

Corporate hospitality is accepted as a valid practice to network and build goodwill in business relationships. For purposes of this ACP, 'corporate hospitality' is defined as corporate events or activities organised by an organisation which involves the entertainment of Third Parties for the benefit of that organisation. Corporate hospitality usually comprises of meals, travel or transportation, accommodation and recreation.

There are no hard and fast rules as to what constitute legitimate vs. illegitimate forms of corporate hospitality. The question is whether there is any intention to influence or that may be perceived to influence the improper outcome of a business decision by providing the corporate hospitality.

The provision and receiving of corporate hospitality would be illegitimate in the following situations:

- If it provides an advantage to another person if offered; or
- If it is given with the intention of influencing the recipient to perform a relevant function improperly or obtaining any business advantage in return; or
- If there is knowledge that acceptance of the corporate hospitality would in itself be improper performance.

4.3 It is important to bear in mind that this is an area where perception is often regarded as more important than facts. As such, even the appearance of any of the above situations is sufficient reason to reject the receipt of or refuse to provide the corporate hospitality.

4.4 Third Parties should always exercise proper care and judgment when providing or receiving entertainment or corporate hospitality to ensure compliance with anti-Bribery and anti-Corruption laws, and to avoid any allegations of impropriety or undue influence.

4.5 Third Parties should act in a manner consistent with the following basic principles with regards to all forms of entertainment and corporate hospitality:

- The entertainment or corporate hospitality must be proportionate and not too excessive. In addition, the entertainment or corporate hospitality must be commensurate with the recipient's official capacity and not be provided to the recipient in his/her personal capacity;
- The entertainment or corporate hospitality is reasonable and not lavish; and
- The entertainment or corporate hospitality must be bona fide, whereby the offer and/or provision of the entertainment or corporate hospitality is done with good and legal intentions.

5.0 Dealing with Public Officials

5.1 Third Parties are expected to exercise extra caution when dealing with public officials. Providing gift, entertainment or corporate hospitality to public officials or their family/household members is generally considered a 'red flag' situation and should be avoided.

5.2 Any gift, entertainment or corporate hospitality to a public official must not be excessive and lavish, and must be commensurate with his/her official designation and not be provided to the public official in his/her personal capacity.

5.3 No gift, entertainment or corporate hospitality must be given to public officials on behalf of the MICROLINK Group under any circumstances.

6.0 Sponsorships and Charitable Donations

As a responsible corporate citizen, the MICROLINK Group is committed to contributing to the wellbeing of the people and the nation in line with the tenets, missions and values of the Anaho Foundation. However, in accordance with the MICROLINK Group's principles of integrity and transparency, all requests for sponsorships and donations will be carefully examined for legitimacy and compliance with the following:

- It is permitted by applicable laws;
- It is to be made to a well-established organisation with adequate controls to guarantee proper administration of the funds;
- It is not to be used as a means to cover up an undue payment or Bribery, or to fund an illegal activity; and
- It is not to be made to an organisation which is affiliated with a public official or his/her relatives.

7.0 Facilitation Payments

7.1 Third Parties must never, directly or indirectly, offer, promise, give, request, accept or receive anything which might reasonably be regarded as a facilitation payment. The

reason underlying this prohibition is that facilitation payment is seen as a form of Bribery and Corruption.

7.2 Facilitation payments need not involve cash or other financial asset. They include any types of advantage with the intention to expedite an administrative process and/or to influence the recipients in their duties.

8.0 Political Contributions

The MICROLINK Group does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office, except in very limited circumstances where such contributions are expressly permitted under the law and is not made with any promise or expectation of favourable treatment in return. The MICROLINK Group expects its Third Parties to similarly abide by this principle.

9.0 Covenants by Third Parties

All Third Parties agree and covenant with the MICROLINK Group that they will:

- truthfully declare to the MICROLINK Group in the event they have been found guilty of any Bribery or Corruption related offences, or are subject to any investigation or inquiry by the relevant authorities of any suspected breach of anti-Bribery and anti-Corruption laws, whether within or outside Malaysia;
- not conspire or collude with any other individuals or organisations to preclude or compromise dealings with the MICROLINK Group;
- not engage in any Corrupt practices or act in a manner which is inconsistent with the ACP;
- not corruptly solicit or attempt to obtain from, or offer or provide to, any Employee or Director of the MICROLINK Group any Bribe or other form of Gratification; and
- notify and ensure that their employees, agents, directors and other representatives observe the provisions of this ACP.

10.0 Violations of the ACP

10.1 Any Third Parties who know of, or suspect, an actual or threatened violation of the ACP or any anti-Bribery and anti-Corruption laws are encouraged to whistle blow or report their concerns through the Whistleblowing Policy. The provision, protection and procedure of the Whistleblowing Policy for reporting such violations are available on the Company's website, www.microlink.com.my. No Third Party will be discriminated against or suffer any act of retaliation for reporting in good faith on violations or suspected violations of the ACP.

10.2 If any Third Party is found to be in breach of this ACP, the MICROLINK Group is entitled to immediately terminate any existing agreement(s) and business dealing(s) between the parties without any cost, penalty or liability to the MICROLINK Group.

10.3 Where applicable, the MICROLINK Group may also report any violation of this ACP to the relevant authorities, including but not limited to, the police and the Malaysian Anti-Corruption Commission. Third Parties are reminded that any violation of the relevant anti-Corruption laws, including but not limited to, the MACC Act 2009 (Amendment 2018), Penal Code and AMLA 2001 shall be punishable with imprisonment or fine or both under the respective statutes.

11.0 Review of the ACP

The ACP may be reviewed regularly by MSB’s Board of Directors to ensure that it continues to remain relevant and appropriate and will be published on the Company’s website, www.microlink.com.my.