

# **Synergy House Bhd.**

## **Anti-Corruption Policy**

## 1.0 Purpose

- 1.1 This Anti-Corruption Policy outlines Synergy House Berhad Group of Companies' (hereinafter referred to as "SHB" or "the companies") commitment to upholding the highest standards of integrity and accountability.
- 1.2 This policy is in accordance with the **Malaysian Anti-Corruption Commission Act 2009 (MACC Act)** and other relevant regulations, aiming to prevent bribery and corruption in all forms.

## 2.0 Scope

- 2.1 This policy applies to all:
  - 2.1.1 Employees
  - 2.1.2 Directors
  - 2.1.3 Officers
  - 2.1.4 Agents
  - 2.1.5 Contractors & Consultants
  - 2.1.6 Any other parties representing the companies, whether operating locally or internationally.

## 3.0 Commitment

- 3.1 SHB has a **zero-tolerance stance** against all forms of bribery and corruption. We are committed to complying with all applicable anti-corruption laws and ensuring that business is conducted in an ethical, honest, and transparent manner.

## 4.0 Definition of Bribery and Corruption

- 4.1 The term "bribery" refers to the offering, giving, receiving, or soliciting of something of value (e.g., money, gifts, services, or advantages) as an inducement or reward to influence the actions of an individual in a position of power or responsibility.
- 4.2 Under Section 17 of the MACC Act, bribery entails:
  - 4.2.1 **Gratification:** This includes money, gifts, loans, services, positions, employment, contracts, discounts, or any other benefit.

4.2.2 **Intent:** The intention to induce or reward an individual to act improperly in the performance of their duties.

4.3 Corruption is the abuse of power or position for personal gain, encompassing bribery and other related offenses. The Act broadly categorizes corruption as acts that include:

4.3.1 **Soliciting or Receiving Gratification:**

- Section 16: It is an offense for any person to solicit or receive gratification as an inducement or reward for doing or forbearing to do something in relation to their duties.

4.3.2 **Offering or Giving Gratification:**

- Section 17: It is an offense to offer or give gratification to influence another person's actions, decisions, or behaviours.

4.3.3 **Corrupt Acts by Public or Private Officers:**

- Section 23: Public or private sector officers who use their positions for any form of gratification commit an offense.

4.3.4 **False Claims:**

- Section 18: Submitting false claims or documents with corrupt intent is considered a form of corruption.

## 5.0 Prohibited Activities

### 5.1 Bribery and Kickbacks

5.1.1 Offering, giving, soliciting, or accepting any bribe or improper advantage is **strictly prohibited**.

### 5.2 Facilitation Payments

5.2.1 Payments made to expedite routine governmental actions are **strictly forbidden**.

### 5.3 Gifts, Hospitality, and Entertainment

5.3.1 Gifts, hospitality, or entertainment may only be offered or accepted if they are modest, appropriate, and consistent with **Clause 6 of the Company's Conflict of Interest Policy**.

## 5.4 Donations and Sponsorships

- 5.4.1 Contributions must not be made to gain improper business advantages. All charitable donations or sponsorships **must be pre-approved** by senior management and properly documented.

## 6.0 Consequences of Non-Compliance

- 6.1 Any breach of this policy will result in disciplinary action, as follow

6.1.1 **Warnings or reprimands**

6.1.2 **Suspension**

6.1.3 **Termination of employment**

- 6.1.4 **Legal action**, where applicable, for breaches that result in financial loss or reputational damage to the SHB.

- 6.2 Disciplinary actions taken against this policy, once reviewed and approved by **Executive Directors**, will be securely documented by the **Human Resource Department**.

## 7.0 Responsibilities

### 7.1 Employees

- 7.1.1 All employees must adhere to this policy and report any suspected corruption or misconduct.

### 7.2 Management

- 7.2.1 Management is responsible for implementing and monitoring compliance with this policy.

## 8.0 Reporting and Whistleblowing

- 8.1 Employees are encouraged to report any concerns about bribery or corruption through the [whistleblower@synergy-house.com](mailto:whistleblower@synergy-house.com). Reports can be made anonymously, and SHB ensures protection against retaliation.

## 9.0 Training and Awareness

- 9.1 The companies will provide regular training to ensure all employees aware, understand and comply with this policy.

### 10.0 Monitoring and Review

10.1 This policy will be reviewed every January or as needed to ensure adherence to laws, regulations, and best practices. Regular reviews will be conducted by the Internal Control Manager to ensure its effectiveness and compliance.

### 11.0 Approval

11.1 This policy is approved by the Board of Directors on **26/02/2025**.

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### Appendix A: Acknowledgment of Anti-Corruption Policy

By signing below, I confirm that I have read and understood SHB's Anti-Corruption Policy. I agree to comply with its rules and will report any concerns regarding bribery or corruption as soon as possible.

Name : \_\_\_\_\_  
Position : \_\_\_\_\_  
Signature : \_\_\_\_\_  
Date : \_\_\_\_\_