



**SC ESTATE BUILDER BERHAD**  
(Company No. 200401017162(655665-T))  
(Incorporated in Malaysia)

## **ANTI- BRIBERY AND CORRUPTION POLICY**

## 1. INTRODUCTION

SC Estate Builder Berhad (“SCBUILD/0109”) and its subsidiaries (collectively referred to as the “scbuild/0109 or Group”) conduct its business in a legal, honest and ethical manner.

The Group takes zero-tolerance approach to bribery and corruption. The Group is committed to take reasonable and appropriate measures to ensure no bribery and corruption activities in all its business dealings.

This Anti-Bribery and Corruption Policy (“Policy”) sets out the parameters to prevent the occurrence of bribery and corrupt practices in relation to the businesses of the Group. This Policy is supplemental to, and shall be read in conjunction with the Code of Ethics and Conduct of SCBUILD.

This Policy is also intended to support the Group's sustainability governance and reporting obligations as a listed issuer on Bursa Malaysia, including the disclosure of anti-corruption practices, risk assessment, training and confirmed incidents in the Sustainability Statement and any prescribed reporting format required by Bursa Malaysia.

## 2. DEFINITION OF BRIBERY AND CORRUPTION

“Bribery & Corruption” means any action which would be considered as an offence of giving or receiving ‘gratification’ under the Malaysian Anti-Corruption Commission Act 2009. 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 who is in a position of trust within an organisation.

Bribery may be ‘outbound’, where someone acting on behalf of the Group attempts to influence the actions of someone external, such as a Government official or client decision-maker. It may also be ‘inbound’, where an external party is attempting to influence someone within the Group such as a senior decision-maker or someone with access to confidential information.

For the purpose of this Policy, “Business Associates” include contractors, subcontractors, consultants, agents, intermediaries, vendors, suppliers, joint venture partners, project partners and any other persons or entities performing services for or on behalf of the Group.

“Corruption-related risk” includes any risk of bribery, kickbacks, facilitation payments, conflicts of interest, bid-rigging, false claims, misuse of charitable contributions or sponsorships, improper gifts or hospitality, and any improper advantage connected with the Group's operations or business relationships.

### 3. OBJECTIVE

This Policy sets out the Group's overall position on bribery and corruption with the objective to provide information and guidance to the Directors and Employees on standards of behaviour to which they must adhere to and how to recognise as well as deal with bribery and corruption.

### 4. SCOPE

The Policy is applicable to all Directors and Employees of the Group. The Group expects its Business Associates to observe standards consistent with this Policy, particularly where they act for or represent the Group, participate in procurement, deal with public officials, or support construction, renewable energy, infrastructure, property development or related project activities.

**"Directors"** - include all independent and non-independent directors, executive and non-executive directors of the Group and shall also include alternate or substitute directors.

**"Employees"** - include all individuals directly contracted to the Group on an employment basis, including permanent and temporary employees and Directors.

### 5. GUIDANCE ON COMMON FORMS OF BRIBERY AND CORRUPTION

#### 5.1 Gifts and Hospitality

This Policy does not prohibit normal business hospitality, so long as it is reasonable, appropriate, modest and bona fide corporate hospitality.

Some examples of acceptable gifts and/or benefits are as follows:-

- (a) Token gifts offered in business situations or to all participants and attendees for example, work related seminars, conferences, trade and business events;
- (b) Gifts presented at work-related conferences, seminars and/or business events;
- (c) Gifts given in gratitude for hosting business events, conferences and/or seminars;
- (d) Refreshments or meals during meetings or as participants of work-related conferences and/or seminars; and
- (e) Meals for business purposes.

As a general principle, the Directors and Employees should not accept or give a gift to a third party if it is made with the intention of influencing the third party to obtain or retain business, or in exchange for favours or benefits. In addition, lavish or unreasonable gifts or hospitality should not be accepted as such gifts or hospitality may be perceived or interpreted as attempts by the Directors or Employees to obtain or receive favourable business treatment for personal benefits.

The Directors and Employees should be mindful in giving or receiving gifts or hospitality as it could be perceived as a way of improperly influencing the decision making of the recipient. Hence, the intention behind the gifts or hospitality should always be considered.

## 5.2 Facilitation Payments

Facilitation payments are unofficial payments made or other advantages given to secure or expedite the performance of a routine action by an officer or person in-charge of Public Body.

Directors or Employees shall not promise or offer, or agree to give or offer, facilitation payment to an officer of any Public Body.

“Public Body” – as defined in Section 3 of Malaysian Anti-Corruption Act 2009.

## 5.3 Charitable Contribution

Charitable contributions and donations are acceptable, whether of in-kind services 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.

## 5.4 Political Contributions

The Group shall not make political donations or contributions, whether directly or indirectly, unless permitted by applicable law, approved in accordance with the Group's authority limits, properly recorded, and not made to obtain or retain business or secure an improper advantage.

## 5.5 Sponsorships, Donations and Community Investment

All sponsorships, donations and community investments must be transparent, supported by proper documentation, approved before commitment, and subject to due diligence proportionate to the corruption-related risk. Payments must be made to legitimate organisations and not to personal accounts or through unofficial intermediaries.

## 5.6 Conflicts of Interest and Procurement

Directors and Employees must promptly declare any actual, potential or perceived conflict of interest, including personal, family or financial interests in suppliers, contractors, subcontractors, customers, consultants or project partners. Procurement and tender decisions must be based on objective criteria, properly documented and free from improper influence.

## 5.7 Due Diligence on Business Associates

The Group may conduct due diligence on Business Associates, and any relevant parties prior to entering into any formalized relationship.

The methods may include, but are not limited to, background screening of the individual or entity, verification of relevant documents, or interviews with individuals proposed for appointment to key positions where corruption risk has been identified.

## **6. RECORD-KEEPING**

It is important that proper and complete records be maintained of all payments made to third parties in the usual course of business as these would serve as evidence that such payments were bona fide, and not linked to corrupt and/or unethical conduct. All accounts, invoices, documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with accuracy and completeness.

Directors and Employees must declare all hospitality or gifts accepted or offered, and submit details to the person in-charge who is assigned by the respective Division/Department for recording into a register. Employees must also ensure that all expense claims relating to hospitality, gifts or expenses incurred to third parties are approved by the Head of Division/Department and must be specifically recorded the reason for such expenditure.

## **7. BURSA MALAYSIA SUSTAINABILITY REPORTING AND DISCLOSURE**

The Group shall collect, verify and maintain information required for anti-corruption disclosures in its Sustainability Statement and any prescribed format required by Bursa Malaysia. The disclosure process shall cover, where applicable, Bursa Malaysia anti-corruption indicators including:

- (a) Percentage of employees who have received training on anti-corruption by employee category;
- (b) Percentage of operations assessed for corruption-related risks; and
- (c) Confirmed incidents of corruption and action taken.
- (d) The relevant Head of Division/Department, together with the personnel responsible for sustainability reporting, shall compile the above data annually for the relevant financial year, ensure that the basis of preparation and reporting boundary are documented, and submit the information for management review before inclusion in the Sustainability Statement or Bursa Malaysia prescribed reporting output.
- (e) Where Bursa Malaysia requires the use of a prescribed reporting format or platform, including the Centralised Sustainability Intelligence (CSI) Platform or any replacement platform, the Group shall ensure that the generated prescribed format is reviewed for completeness and disclosed in accordance with Bursa Malaysia requirements without unauthorised alteration.
- (f) The Board and/or the relevant Board Committee shall oversee the Group's anti-bribery and corruption framework, including the adequacy of training, corruption-risk assessment, incident reporting, remedial action and sustainability disclosures relating to anti-corruption.

## **8. COMPLIANCE WITH 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.

The Group shall also take into account the Malaysian Anti-Corruption Commission (Amendment) Act 2018, including the corporate liability provision under Section 17A of the Malaysian Anti-Corruption Commission Act 2009, and Bursa Malaysia listing and sustainability reporting requirements applicable to the Group.

## **9. REPORTING OF VIOLATIONS OF THE POLICY**

Report or disclosure under this Policy can be made through e-mail at [whistleblowing@scestatebuilder.com.my](mailto:whistleblowing@scestatebuilder.com.my) or mailing address as follow:

Mailing Address:

SC Estate Builder Berhad  
C-09-03, Block C, Level 9, Capital 3, Oasis Square No. 2, Jalan PJU 1A/7A, Ara Damansara 47301 Petaling Jaya Selangor Darul Ehsan Malaysia

Employees who have raised concerns internally will be informed of who is handling the matter, how they can make contact with them and if there is any further assistance required.

The Group prohibits retaliation against any person who raises a concern in good faith or assists in an investigation. Reports shall be assessed objectively, investigated where appropriate, and escalated to management, the Board and/or the relevant Board Committee where the matter is significant, involves senior personnel, or may affect the Group's Bursa Malaysia anti-corruption disclosure.

Confirmed incidents of corruption, together with action taken, shall be recorded and reported through the Group's sustainability reporting process in accordance with Bursa Malaysia requirements, subject to applicable confidentiality, legal privilege and regulatory obligations.