
	<b>TITLE:</b>  <b>ANTI-BRIBERY AND CORRUPTION POLICY</b>	Policy. No	SSSB/CGRM/02
		First Issue Date	1 <sup>ST</sup> JANUARY 2024
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## **OBJECTIVES AND SCOPE OF THE POLICY**


Senari Synergy Group is committed to conducting its business professionally, ethically and with the highest standard of integrity. The Group practices a zero-tolerance approach against all forms of bribery and corruption and upholds all applicable laws in relation to anti-bribery and corruption.

This Anti-Bribery and Corruption Policy (“ABAC Policy”) provides a clear policy statement on the Group’s position regarding bribery and corruption. This ABAC Policy shall apply to the Directors, Employees and Business Associates of Senari Synergy Group. Any companies where Senari Synergy Sdn Bhd does not have any controlling interests are encouraged to adopt this ABAC Policy or similar principles and standards, whichever is more stringent.

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## 1.0 Definitions

Company	Senari Synergy Sdn Bhd
Senari Synergy Group	Senari Synergy Sdn Bhd and its subsidiary companies which includes Senari Synergy Ventures Sdn Bhd, Senari Synergy Port Sdn Bhd, Senari Synergy Facilities I Sdn Bhd, Senari Synergy Facilities II Sdn Bhd, Senari Synergy Facilities III Sdn Bhd, Senari Synergy Development Sdn Bhd, IOT Management Sdn Bhd, Tanjung Manis Oil Terminal Management Sdn Bhd, Tanjung Manis OGC Port Sdn Bhd, ASSAR Refinery Services Dua Sdn Bhd and any other new subsidiaries of the Company.
Employees	Full-time or permanent employees, part-time employees, employees on probation, trainees and interns, employees on secondment and on contract/fixed-term contracts.
Business Associate	External party with whom Senari Synergy Group has, or plans to establish, some form of business relationship including but not limited to clients, customers, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries, and investors.
Bribery	Offering, promising, giving, accepting, or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of

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applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties.

**Corruption**

Abuse of entrusted power by those in positions of authority, for personal gain or to gain an unfair advantage. It may involve the illicit use of resources, manipulation of processes, or the provision of unauthorized benefits or favors, such as bribes, kickbacks, embezzlement, fraud, nepotism, or other unethical actions that undermine the integrity and fairness of public or private institutions.

**Gratification**

Something of value that is offered, given, received, or solicited in exchange for influence or action. It typically refers to the benefit or advantage that the bribe-giver provides to the bribe-taker.

**Facilitation Payment**


Payment or other provision made to or received personally from a third party in control of a process or decision, in order to secure or expedite a routine or administrative duty or function.

**MACC Act**

Malaysian Anti-Corruption Commission Act 2009 (including its amendments).

**Conflicts of Interest**

Situations where there is personal interest that could be considered to have potential interference with objectivity in performing duties or exercising judgment on behalf of the Company.

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## PRINCIPLES ON ANTI-BRIBERY AND CORRUPTION

### 2.0 Conflict of Interest

- 2.1 All Directors and Employees must at all times avoid any conflict of interest or appearance of conflict of interest in any on-going or potential business dealings involving Senari Synergy Group. Employees must not use their position, official working hours, Company's resources and assets, or information available to them for personal gain or to the Company's disadvantage.
- 2.2 Directors and/or Employees are required to declare their interest before undertaking activities which may give rise to a conflict of interest and to abstain from decision making process.


### 3.0 Gifts and Hospitality

- 3.1 Any gift of cash or cash equivalent received from Business Associate is strictly prohibited.
- 3.2 Directors, Employees and their family members are prohibited from receiving or asking for (soliciting) gifts from Business Associate subject to the following exceptions:
- (a) Corporate gift received at official functions where gift giving is customary and deemed as offers to the Group.
  - (b) Gifts given at festival or special occasions.
  - (c) Gifts given during invitation to speak at conferences or work-related conferences.

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However, in applying the exceptions above all Directors and Employees to exercise highest degree of integrity and proper judgement to avoid any conflict of interest and violation of laws & regulation and this ABAC Policy.

- 3.3 All gifts with perceived value of exceeding RM500 in aggregate to be declared to the Human Capital Management or Company Secretary, whichever applicable, and recorded in the gift register.
- 3.4 Senari Synergy Group may give corporate gifts, i.e. bearing the corporate logo/ identity for the purposes of promotions/branding/marketing. Any gift-giving or event of hospitality is subject to approval according to Limits of Authority and must fulfil the following conditions:
- (a) They are limited, customary and lawful under the circumstances.
  - (b) They do not have or are perceived to have (by either the giver or the receiver), any effect on actions or decisions.
  - (c) There must be no expectation of any specific favour or improper advantages from the intended recipients.
  - (d) The independent business judgment of the intended recipients must not be affected.
  - (e) There must not be any corrupt / criminal intent involved; and
  - (f) The giving out of the gift and hospitality must be done in an open and transparent manner.

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#### **4.0 Entertainment**

4.1 Directors and Employees are allowed to offer or accept entertainment and recreation provided there is proper legitimate business purpose, and such entertainment does not give rise to conflict of interest and influence business decisions.

4.2 Employees are prohibited from either paying for or participating in any activities organized by Business Associate which are illegal and immoral.

#### **5.0 Donations and Sponsorships**

5.1 Senari Synergy Group strictly prohibits any kind of political donations to any political party, political party official or candidate running for political office.


5.2 Senari Synergy Group allows charitable donations and sponsorships for legitimate reasons and as permitted by existing laws and regulations.

5.3 All requests for charitable donations and sponsorships are subject to a due diligence check and subject to the approval of the Group Managing Director (“GMD”) of the Senari Synergy Group or person nominated by the GMD.

#### **6.0 Facilitation Payment**

6.1 Facilitation payment is classified as acts of bribery and corruption under the MACC Act and is illegal. Senari Synergy Group strictly prohibits accepting or giving, whether directly or through a third party, any facilitation payments, whether in cash or in kind, in return for any business advantage for the Company.

6.2 Only in the event when an employee’s security is at stake is it permitted to make the payment. The employee must immediately report the incident to their Head of Department

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and ABCF to record the details of the event.

## **7.0 Recruitment, Promotion and Support of Employees**

7.1 Senari Synergy Group recognizes the value of integrity in its Employees and will ensure Group's recruitment, training, performance evaluation, remuneration, recognition, and promotion for all Employees, including management, shall be designed and regularly updated to recognize integrity.

## **8.0 Business Associates**


8.1 Senari Synergy Group is committed to conduct business in a fair, transparent and ethical manner. Senari Synergy Group shall conduct business with entities or individuals that share the same values as the Group and uphold the principle of applying high ethical standards in business dealings.

8.2 Business Associates of the Group are expected to comply with this Policy and refrain from bribery and corruption.

## **9.0 Declarations**

9.1 Directors, Employees and Business Associates shall certify in writing that they have read, understood, and shall abide by this policy. A copy of the declaration shall be documented and retained by the Company. A sample declaration can be found in the Appendix of this Policy.



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## 10.0 Anti-Bribery and Corruption Compliance Function

10.1 The Company shall maintain an independent anti-bribery and corruption compliance function within the Corporate Governance & Risk Management Division to oversee the design, implementation, management, and improvement of the Group's anti-bribery and corruption policies and procedures.

10.2 The appointment of employees from respective divisions/ departments for the Anti-Bribery Compliance Function (ABCF) Senari Synergy Group for effective design and implementation of the Anti-Bribery Management System will be for a period of three years.

## 11.0 Training and Awareness


11.1 Senari Synergy Group shall conduct awareness programmes for all Employees on the Group's position and practices regarding anti-bribery and corruption, integrity, and ethics.

## 12.0 Whistleblowing

12.1 Senari Synergy Group encourages all its Employees and Business Associates to report any bribery or corruption practices. However, such report must be supported with evidence.

12.2 The Group **has** established an avenue for the reporting of bribery, corruption, and other forms of misconduct, including violations of this ABAC Policy through **a designated secure channel**.

12.2 The Group is committed to the enforcement of this policy and provides assurance that whistleblowers will be given the protection of confidentiality and will not suffer any detrimental action for making the report. This is provided that the report, complaint, or disclosure is made in good faith, belief and without malicious intent.

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**13.0 Audit and Compliance**

13.1 Senari Synergy Group shall conduct random audits to ensure compliance to this policy.

Such audits may be conducted internally by the Senari Synergy Group or by an external party. Audit documentation should include performance improvement action plans.

**14.0 Non-compliance to Policy**

14.1 The Group regards bribery and acts of corruption as serious matters and may lead to repercussions in the event of non-compliance with this policy. For Employees, non-compliance may lead to disciplinary action in accordance with the Employee Handbook, including but not limited to termination of employment.

14.2 For Business Associate, non-compliance may lead to repercussions including but not limited to termination of contracts. Further legal action may also be taken in the event that the Group's interests have been impacted by non-compliance by individuals and organizations.

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*2.0 Declaration Form by Employee*

## ANTI-BRIBERY AND CORRUPTION POLICY DECLARATION FORM

I,.....NRIC:....., hereby declare that I have read and understood **Senari Synergy Group’s Anti-Bribery and Corruption Policy**. I shall conduct myself with complete professionalism, integrity and be true to the spirit of the Policies. I hereby undertake to comply with the requirements and provisions set out in the Policies and any revisions thereto by the Company from time to time.

.....  
Name :  
Dept/Div/Co :  
Date :

**Note: Kindly return the original signed copy of this Declaration Form to GCS Division**

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*3.0 Declaration Form by Business Associate*

## ANTI-BRIBERY AND CORRUPTION POLICY

### DECLARATION FORM

We, ....., Company Registration No. ...., hereby declare our commitment to adhere to the principles set forth in **Senari Synergy Group’s Anti-Bribery and Corruption Policy**. We understand the importance of maintaining the highest ethical standard in all business transactions and interactions and we pledge to conduct our activities in strict accordance with these principles.

.....  
 Company’s Representative :  
 Company stamp :  
 Date :

**Note: Kindly return the original signed copy of this Declaration Form to the Division concerned.**