



**AWANBIRU TECHNOLOGY BERHAD**  
[Reg. No. 201001038336 (922260-K)]  
(Incorporated in Malaysia)

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

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## **1. PURPOSE**

- 1.1 AwanBiru Technology Berhad, including its subsidiaries, related corporations, and affiliates (collectively referred to as “Awantec” or the “Group” upholds a zero-tolerance policy towards all forms of Bribery<sup>1</sup> and Corruption. This Policy sets fundamental standards and protocols to prevent and detect Bribery and Corruption within the Group’s operations; ensuring compliance with the Malaysian Anti-Corruption Commission Act 2009 and other relevant laws.
- 1.2 The Policy provides guidance on preventing, addressing, and combating Bribery and Corruption. It ensures the implementation of adequate procedures to prevent corrupt practices, in line with the Guidelines on Adequate Procedures issued under Section 17A (5) of the MACC Act 2009.
- 1.3 This Policy should be read in conjunction with other internal policies applicable to each department and subsidiary. Additional obligations for Directors and Employees are outlined in other Group policies, the Employee Handbook, or the Code of Conduct for Directors and Employees.

## **2. SCOPE OF APPLICATION**

- 2.1 This Policy applies to the Group’s Directors<sup>2</sup>, Employees<sup>3</sup>, Business Associates<sup>4</sup> acting on behalf of the Group, covering both internal dealings and external interactions with other businesses, organizations, local authorities, and government entities.
- 2.3 Business Associates engaged in business relationships with the Group must adhere to relevant sections of this Policy. Awantec's Business Associates will sign a separate agreement as needed to confirm their commitment to comply with this Policy. Non-compliance, including bribery, corrupt practices, or money laundering, may result in termination of the business relationship by the Group.

## **3. POLICY STATEMENT**

- 3.1 Awantec holds a zero-tolerance position against all forms of Bribery and Corruption.

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<sup>1</sup> Bribery shall mean the act of corruptly authorizing, giving, agreeing to give, promising, offering, soliciting, receiving, or agreeing to receive any gratification.

<sup>2</sup> Directors include all independent and non-independent directors, executive and non-executive directors of the Group and shall also include alternate or substitute directors.

<sup>3</sup> Employees shall mean all individuals directly contracted to the Group on an employment basis, including permanent and temporary employees and Directors.

<sup>4</sup> Business Associate shall mean the external party with whom the organization has, or plans to establish, some form of business relationship. This primarily includes Counterparties and Business Partners, i.e. clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries, and investors (ISO 37001 definition).

- 3.2 We are committed to conducting our business affairs with professionalism, fairness, and integrity; supported by robust systems to prevent Bribery and Corruption.
- 3.3 Employees and Business Associates are strictly prohibited from offering, promising, approving, authorizing, or providing anything of value that improperly influences recipients to favor Awantec or any other party. Using personal funds does not exempt individuals from complying with this Policy.
- 3.4 Bribery is a criminal offense carrying severe penalties, including imprisonment and significant fines, applicable to individuals, companies, or both.
- 3.5 Any violation of this Policy will result in severe disciplinary action, up to and including dismissal, as well as potential civil and criminal liability.
- 3.6 Awantec is committed to implementing adequate measures to ensure our business operations remain free from corruption. We diligently adhere to the provisions outlined in Section 17A of the amended MACC Act 2009.

For further details on types of corruption, refer to Appendix A.

#### **4. ANTI-BRIBERY AND ANTI-CORRUPTION COMPLIANCE**

- 4.1 The Board of Directors of Awantec (the “Board”) is collectively responsible for establishing and maintaining appropriate conduct and behaviors for the Board, Key Senior Management<sup>5</sup>, and Employees of the Group.
- 4.2 The Legal and Corporate Governance Department is responsible for developing, implementing, coordinating, and reporting on the Group's Anti-Bribery and Anti-Corruption efforts.
- 4.3 The Group Risk Management Committee (“GRMC”) shall periodically, or as instructed by the Risk Management Committee (“RMC”), initiate a Group-wide Corruption Risk Assessment<sup>6</sup> to identify Bribery and Corruption risks potentially affecting the Group.
- 4.4 The Head of the Legal and Corporate Governance Department shall periodically review the suitability and relevancy of the policies and procedures under this Policy, considering recent developments in relevant laws and evolving industry standards.

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<sup>5</sup> Key Senior Management shall mean the Chief Executive Officer, Chief Operating Officer, and Chief Financial Officer.

<sup>6</sup> The primary objectives of the bribery and corruption risk assessment (the “**Corruption Risk Assessment**”) are as follows: -

- (i) Identifying and analysing the internal and external corruption risks involved in the Group's daily transactions.
- (ii) Evaluating all factors that might increase the level of corruption risks.
- (iii) Documenting the risk assessment and its conclusions for further review by the senior management and to be presented to the RMC.
- (iv) Adopting the practice of having a thorough assessment of the corruption risks of the Group on a periodic basis.

4.5 In carrying out the above, Awantec is committed to the following guidelines:

- (i) plan, establish, implement, and maintain a risk assessment programme, which covers the scope, frequency, and methods for review;
- (ii) identify and/or appoint a competent person(s) to conduct an internal audit, concerning the Group's Anti-Bribery and Anti-Corruption measures;
- (iii) consistently evaluate and seek improvements on the Group's policies and procedures concerning Anti-Bribery and Anti-Corruption;
- (iv) ensure that the external audits conducted every financial year also evaluate whether the Group is operating in compliance with its policies and procedures for Anti-Bribery and Anti-Corruption;
- (v) consistently communicate updates on Anti-Bribery and Anti-Corruption policies and procedures to employees to ensure their understanding and compliance with the Company's stance in their respective roles and functions; and
- (vi) when necessary, conduct disciplinary proceedings against Employees found to be non-compliant with this Policy.

4.6 The results of the Corruption Risk Assessments and audits carried out by the external auditors shall be reported to the senior management and the RMC for consideration and implementation of such recommendations.

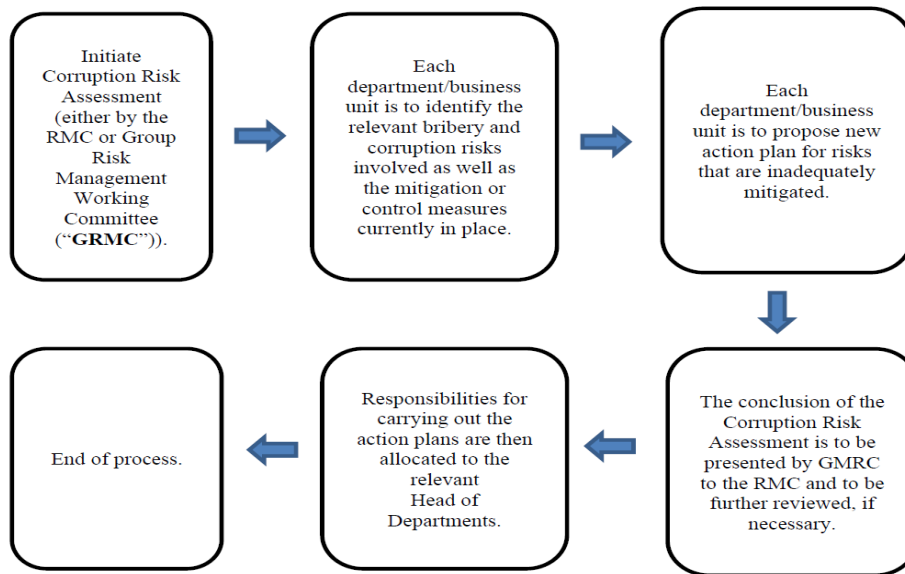
## 5. **CORRUPTION RISK ASSESSMENT METHODOLOGY**

5.1 The Corruption Risk Assessment must be conducted periodically, as directed by the RMC, with at least one comprehensive assessment and review every three years with intermittent assessments conducted when necessary.

5.2 The Corruption Risk Assessment must include the following: -

- (i) financial transactions that may disguise corrupt payments.
- (ii) business activities with countries or sectors posing higher corruption risks.
- (iii) non-compliance of external parties acting on behalf of the Group regarding legal and regulatory requirements related to anti-corruption.
- (iv) relationships with third parties in the group's supply chain that could expose the group to bribery and corruption.
- (v) opportunities for bribery and corrupt practices due to weaknesses or gaps in existing policies and procedures.

## 6. CORRUPTION RISK ASSESSMENT PROCESS FLOW



\*\*If necessary, the Committee may seek external professional or technical assistance to conduct the corruption risk assessment, with the associated costs to be borne by the Group.

## 7. CONFLICT OF INTEREST

- 7.1 All Employees, including the Directors, must act in the best interest of the Group.
- 7.2 Conflict of interest arises when personal interests could potentially compromise objectivity in fulfilling duties or exercising judgment on behalf of the Group. To uphold integrity, Directors, and Employees must avoid situations where personal interests conflict with professional responsibilities. They are strictly prohibited from using their position, official working hours, Group resources, assets, or confidential information for personal gain or to the detriment of the Group.
- 7.3 In cases of actual or potential conflict, Directors, and Employees must promptly disclose the actual or potential conflict and complete a Declaration Form for submission to the Legal and Corporate Governance Department. These disclosures along with actions that were taken to mitigate the conflict will be recorded in the conflict of interest register, which must be maintained and regularly updated.

Please also refer to the Group's Conflict of Interest Policy for further information and guidance.

## 8. GIFTS AND BENEFITS

8.1 The Group has established a "Gift and Benefit" policy detailed in the Gifts and Benefits Policy and Procedure (G&BPP). To uphold transparency and prevent conflicts of interest or their appearance, Employees and Business Associates are discouraged from giving or receiving gifts.

8.2 The G&BPP categorizes gifts and benefits into the following:

- i. Facilitation payments and kickbacks
- ii. Entertainment and corporate hospitality
- iii. Sponsorships, donations, and contributions

8.3 In situations where declining a gift could be perceived as impolite or contrary to local customs, Employees may accept gifts under conditions outlined in the G&BPP. Any uncertainty regarding the appropriateness of a gift should be addressed by consulting the Human Resource Division ("HRD").

### 8.3.1 Facilitation Payments & Kickbacks

Awantec prohibits all facilitation payments as they are bribes. Facilitation payments are payments made to either secure or expedite a routine function that one person shall be or is responsible for performing as part of his/her daily roles and responsibilities. The payments are usually small in amount and are typically paid to government officials or relevant authorities unofficially to expedite routine administrative processes on matters such as document processes, permits, licenses, and customs clearance. Employees of the Group are expected to immediately notify their Head of Department or the HRD when they encounter any requests for facilitation payment.

### 8.3.2 Entertainment & Corporate Hospitality

The Group acknowledges that engaging in appropriate entertainment and corporate hospitality is a standard business practice. Employees must ensure such activities are conducted reasonably and moderately, with careful consideration to safeguard the Group's reputation against any allegations of impropriety or corruption.

Eligible employees may entertain third parties as part of networking and goodwill efforts, adhering strictly to the guidelines outlined in the Employee Handbook for entertainment expense claims. Similarly, if employees are recipients of entertainment or corporate hospitality from third parties, they must exercise caution to ensure that such gestures do not create a conflict of interest or improperly influence their professional decisions.



### 8.3.3 Sponsorships, Donations & Corporate Social Responsibility (CSR)

Given the nature of our business, the Group frequently receives requests to support social investment activities in our operational areas. To maintain our commitment to integrity and transparency, all donations, sponsorships, and CSR activities must adhere to the following guidelines: -

- Compliance with applicable laws.
- Obtaining all necessary internal and external authorizations.
- Directing donations to well-established entities with robust organizational structures to ensure proper fund management.
- Accurate recording of all transactions in the Group's accounting books and records.
- Ensuring that donations are not used as a cover for undue payments for Bribery or Corruption.

Directors and Employees must exercise caution to prevent CSR activities, donations, and sponsorships from being used to circumvent, avoid, or evade laws or regulatory requirements. No CSR activities, donations, or sponsorships shall be made without adhering to the approved limits and budget. Approval must be obtained from the Chief Operating Officer or Chief Executive Officer. The HRD is responsible for maintaining records of all charitable contributions.

Any red flags must be resolved before committing any funds to a program. Examples of red flags include:

- (i) The proposed recipient/organization has affiliations with government officials, or their relatives are involved.
- (ii) The contribution is made on behalf of a government official.
- (iii) There is a risk of perceived improper advantage for the Group.
- (iv) The proposed recipient is based in a high-risk country; the request comes from a high-risk country, or the activity takes place in a high-risk country.

## 9. FINANCIAL CONTROLS AND SEPARATION OF DUTIES

9.1 Financial controls refer to the establishment of policies and procedures by an organization to manage its financial resources and operate efficiently, which is essential for the prevention of any fraud or theft.

9.2 Awantec requires all necessary financial controls to be in order to ensure that financial transactions involving the Group are properly processed and recorded to prevent the occurrence of Bribery and Corruption. Every purchase requisition must be accompanied by complete

documents such as letters of appointment, quotations, invoices, signed contracts, or receipts.

- 9.3 Awantec requires separation of duties so that the same person cannot both initiate and approve a payment. All signatories and powers of approval are governed by Awantec's Limit of Authority ("LOA").
- 9.4 All transactions are subject to approval procedures and limits as stipulated under the LOA. The transacting departments/business units are required to also adhere to the approval requirements under the LOA and due diligence under this Policy prior to entering into any transaction.

## **10. POLITICAL CONTRIBUTIONS**

- 10.1 As a matter of general policy, Awantec maintains a stance of political neutrality and refrains from making any monetary or in-kind contributions to political parties, political party officials, candidates for political office, or any non-governmental organizations (NGOs) associated with political entities.

## **11. DEALING WITH BUSINESS ASSOCIATES**

- 11.1 The Group expects all Business Associates to strictly refrain from Bribery and Corruption. If Bribery or Corruption is suspected in dealings with any Business Associate, the Group will seek an alternative provider and terminate the relationship.
- 11.2 All dealings with prospective or existing Business Associates must be carried out in accordance with the Group's policies and procedures. This would include carrying out an appropriate level of pre-engagement due diligence or evaluation to understand the business and background of the Business Associates before entering into any business arrangements.

## **12. DUE DILIGENCE ON BUSINESS ASSOCIATES**

- 12.1 To ensure alignment with the Group's zero-tolerance policy on bribery and corruption, due diligence on the Business Associates will involve background checks, document verification, and interviews conducted both pre-engagement and throughout the relationship.
- 12.2 Before entering into contractual agreements, the Group Procurement Department must assess the Business Associate's background, reputation, and financial standing.
- 12.3 New vendors/customers must register with Awantec by completing and signing the Business Partner Registration Form, Anti-Bribery and Anti-Corruption Declaration Form, and Related Party

Transaction Declaration Form provided by the Group Procurement Department (**template as per Appendix B**) or made available on the Company's internal portal.

- 12.4 All relationships with Business Associates must be documented in approved, signed contracts. Details of the contract must be reviewed by the Legal and Corporate Governance Department to ensure the contract accurately describes the relationship, tasks, and services, and includes contractual provisions protecting the Group's interests.
- 12.5 All employees are expected to exercise reasonable care and good judgment in evaluating the integrity and ethical business practices of a Business Associate and should seek guidance or clarification from the Legal and Corporate Governance Department whenever any doubt in relation to the proposed engagement of a Business Associate arises.

### **13. DEALINGS WITH PUBLIC OFFICIALS**

- 13.1 Awantec strives to build transparent and fair relationships with government agencies and Public Officials<sup>7</sup>. Employees and Directors must exercise caution in these dealings and take appropriate actions to comply with the Policy and applicable Bribery and Corruption laws in Malaysia.
- 13.2 Apart from appropriate entertainment and corporate hospitality as outlined in the Group's policies, payments for any expenses related to Public Officials and/or their family members or associates are not allowed.
- 13.3 Guidance on appropriate dealing with Public Officials, including protocol, should be sought from the respective Heads of Division, and, where relevant, the HRD or the Legal and Corporate Governance Department.

### **14. TRAINING AND AWARENESS**

- 14.1 The Group shall conduct an awareness program for Directors and Employees to communicate its commitment to anti-corruption, bribery prevention, integrity, and ethics. Training sessions will be provided during their induction and periodically thereafter. The training will be tailored to their specific roles and responsibilities and shall include the latest developments on relevant laws, compliance issues, and relatable examples of possible corruption scenarios.
- 14.2 The depth and breadth of training will be commensurate with the Bribery and Corruption risks associated with each position. Employees in high-risk roles will receive more extensive training to

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<sup>7</sup> Public Officials include officers to Public Bodies, candidates for public office, officials of any political parties and officials of any state-owned enterprises whether locally or abroad.

effectively identify and mitigate risks. To ensure ongoing compliance, the Legal and Corporate Governance Department may at any time recommend that certain training be repeated to any Employee if deemed necessary based on specific situations.

- 14.3 The Legal and Corporate Governance Department shall conduct an Anti-Bribery and Anti-Corruption Training once every financial year and if necessary, conduct refresher training within the same year, based on circumstantial requirements.
- 14.4 The HRD will maintain comprehensive training records, including attendance and completion status, to ensure all relevant employees receive the necessary training.
- 14.5 The Policy shall be accessible to all Business Associates. Business Associates must acknowledge acceptance and compliance with the Policy as part of their engagement, ensuring alignment with the Group's Anti-Bribery and Anti-Corruption standards.

## **15. RECORD KEEPING AND DOCUMENTATION**

- 15.1 The Group must maintain complete and accurate records of all financial transactions, including the giving and receiving of payments and gifts, in compliance with relevant gift and entertainment policies and procedures. Detailed financial records and appropriate internal controls must document the business reasons for these transactions.
- 15.2 Employees must ensure that all expense claims related to hospitality, gifts, or other expenditures are submitted according to Awantec's policies. These claims must specifically record the reason for the expenditure and comply with this policy.
- 15.3 Records related to due diligence checks, company searches, conflicts of interest declarations, reports, and other confidential documents must be kept in a secure location and backed up regularly.
- 15.4 The Head of the Legal and Corporate Governance Department is responsible for document control and record keeping of Anti-Bribery and Anti-Corruption related documents.

## **16. RESPONSIBILITY FOR THE POLICY**

- 16.1 The Awantec Board of Directors takes a strong stance against Bribery and Corruption by endorsing this Policy. Together with the Awantec Management team, they champion ethical conduct by providing leadership and ensuring the Policy's effectiveness across all business units.

16.2 The Awantec Management team ensures the Policy's implementation and oversees all communication and training activities, to ensure that every employee understands and adheres to this Policy.

## **17. SYSTEMATIC REVIEW & MONITORING**

17.1 Awantec recognizes that maintaining an effective Anti-Bribery and Anti-Corruption programme demands continuous effort and systematic evaluation.

17.2 The Group commits to monitoring legal and regulatory developments across all operational locations. Regular assessments of this Policy, including related manuals and training sessions, will be conducted to ensure that policies, procedures, and controls effectively mitigate Bribery and Corruption risks faced by the Group.

## **18. REPORTING CHANNEL**

18.1 Suitable reporting channels have been established for receiving information from the Employees and/ or external parties regarding violations of this Policy. This section of the Policy shall be read together with the Whistleblowing Policy.

18.2. Employees of the Group who encounter actual or suspected violations of this Policy are highly urged to report their concerns. Any suspected Bribery and Corruption incidents must be reported promptly. Awantec has set out secured whistleblowing channels for all employees such as below:

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- Whistleblowing e-Form at:  
<https://www.awantec.my/whistleblowing>
- Email:  
whistleblowing@awantec.my
- Letter:  
Block 11B, Star Central,  
Lingkar Cyber Point Timur,  
Cyber 12, 63000 Cyberjaya,  
Selangor Darul Ehsan.

18.3 All reports made in good faith shall be treated with strict confidentiality and promptly investigated by the Whistleblowing Committee. Whistleblowers are protected from any reprisals under the Whistleblower Protection Act 2010 such as Bank Negara Malaysia (BNM), Malaysia Anti-

Corruption Commission (MACC), Association of Banks Malaysia (ABM), Police, etc provided the report was made through appropriate channels and in good faith.

Whistleblowers are encouraged to provide their identities or contact details to facilitate clarity and further information during the investigation process.

Reports may be made on an anonymous basis. Anonymous whistleblowing reports will be considered at the discretion of the Audit Committee. In exercising this discretion, the Audit Committee will consider: -

- a. the seriousness of the issues raised,
- b. credibility of the whistleblowing report; and
- c. likelihood of confirming the allegation from the relevant sources.

## **19. ANTI-RETALIATION**

19.1 Awantec is dedicated to upholding a workplace environment that is free from harassment, intimidation, discrimination, and retaliation. The Group strictly prohibits any retaliatory actions against Employees who, in good faith, raise concerns, report incidents, participate in investigations or refuse to engage in suspected improper or wrongful activities. Any employee found to have intentionally retaliated against individuals who have reported violations of this Policy in good faith may face disciplinary measures or legal consequences as deemed necessary by the Company.

This provision is to be read in conjunction with Awantec's Human Rights Statement.

## **20. SANCTIONS FOR NON-COMPLIANCE**

20.1 The Group regards acts of Bribery and Corruption with utmost seriousness. Non-compliance may lead to disciplinary action against offending Directors and Employees, as outlined in the Employee Handbook, up to and including termination of employment. If the Group's interests have been harmed as a result of non-compliance, further legal action may also be taken.

20.2 For external parties, non-compliance can result in penalties, including contract termination. The Group may also pursue further legal actions against the external party if deemed necessary.

20.3 Where notification to the relevant regulatory authorities has been done, the Group shall provide full cooperation to the said regulatory authorities, including further action that such regulatory authority may decide to take against convicted Employees.

## **21. COMMUNICATION & AUTHORITY**

- 21.1 If there is any uncertainty regarding practices related to this Policy, Employees must seek advice from their Head of Division. The Head of Division should consult the Legal and Corporate Governance Department for further clarification if needed.
- 21.2 The RMC, through the Head of Legal and Corporate Governance, shall strive to ensure that communications regarding the anti-bribery and corruption measures are done internally and externally throughout the business operations of the Group. This includes encouraging the use of Awantec's whistleblowing channel for reporting real or suspected corruption incidences or non-compliance with the ABC Manual.
- 21.3 The medium of communication may include, but not limited to: -
- (i) Awantec Related Party Transaction Policies & Procedures;
  - (ii) Awantec Code of Conduct;
  - (iii) Awantec Vendors Code of Conduct;
  - (iv) Messages and announcements via Group-wide email blasts;
  - (v) Anti-Bribery and Anti-Corruption Training; and
  - (vi) Town hall sessions.

## **22. REVIEW OF THE POLICY**

- 22.1 This Policy shall be reviewed periodically by the Audit Committee following the needs of the Company, from time to time, or when changes to regulatory requirements necessitate a revision, but at least once every three (3) years.

## APPENDIX A

### Types of Corruption

The United Nations Handbook on Practical Anti-Corruption Measures for Prosecutors and Investigators lists the more commonly encountered forms of corruption, which include:

- **Petty Corruption**

Also known as administrative corruption, it involves the exchange of very small amounts of money and the granting of small favours.

- **Grand Corruption**

Spreads through the highest levels of government, bringing about major abuses of power, disobedience of the rule of law, economic instability, and the breakdown of good governance.

- **Active and Passive Corruption**

The former refers to the act of offering or paying a bribe (where the payment of a bribe has taken place) and the latter refers to the request or receiving of a bribe.

- **Bribery**

The most common form of corruption is described as the act of conferring a benefit in order to improperly influence an action or decision. It comes in the form of cash, company shares, inside information, sexual or other favours, entertainment, employment, or future benefits such as a retirement job. The benefit can pass directly to the person bribed, or indirectly to a third party such as a friend, relative, associate, favourite charity, private business, political party, or election campaign. Once bribery has occurred, it can lead to other forms of corruption.

- **Embezzlement, Theft and Fraud**

Involves stealing by an individual exploiting his or her position of employment. Fraud involves the use of false or misleading information to induce the owner of the property to part with it voluntarily. Theft is universally regarded as falling within corruption definitions where it occurs, carrying with it as it does, a breach of fiduciary duty.

- **Extortion**

Relies on coercion to induce cooperation, such as threats of violence or the exposure of sensitive information.

- **Abuse of Function**

Performance of or failure to perform an act by a public official, in violation of the law, to obtain an undue advantage for himself/herself or for another person or entity.



- **Favouritism and Nepotism**

Involve abuses of discretion, usually do not involve a direct personal benefit to an official but promote the interests of those linked to the official, be it through family, political party, tribe, or religious group.

- **Creating and Exploiting Conflicting Interests**

Most forms of corruption involve the creation or exploitation of some conflict between the professional responsibilities of an individual and his or her private interest. The offering of a bribe creates such a conflict where none may have existed hitherto. In both the public and private sectors, employees and officials are routinely confronted with circumstances in which their personal interests conflict with their responsibility to act in the best interests of the state or their employer. Well-run organizations have systems to manage these situations, usually based on clear codes of conduct.

- **Political Donations/Contributions**

We do not make or offer monetary or in-kind political contributions to political parties, political party officials, or candidates for political office. Donations made with the intention or expectation that the party will, once in office, unduly favour the interests of the donor, are tantamount to the payment of a bribe.

**APPENDIX B - Business Partner Registration Form**



AWANTEC GROUP VENDOR  
REGISTRATION FORM

VRF\_2024\_V1

TO FILL UP BY REQUESTER [AWANTEC GROUP]			
Type of Request:  New Registration  Information Update	Purpose of Registration:  Trade/Business/Partner  Non Trade/Payment	Requested By:	
		Dept:	
		Reason/Justification:	

**Section A: Vendor General Information**

1	Vendor Name (Company / Individual):			
2	Business Registration No. (for Company) MyKad Identification No. (for Individual) Passport No. (for Foreigner)	SST Reg. No.:		
3	Incorporation Date:	Date of Operation:		
4	Tax Identification No. (TIN):	MSIC Code:		
	Tourism Tax Registration No. :			
5	Businesss Address:			
	Postcode:	Tel No.:		
	E-mail Address: (to received E-Invoice notification)			
	Web Site:			
6	Contact Person Name:	H/P No:		
		Email:		
7	Type of Organisation: [please √]			
	Sole Proprietor	Co-operative	Association	Foreign Company
	Sdn Bhd	Berhad	Government	Others (please state)
8	Product/Service offered:			
	Product/Service	Description/Specification		
9	Authorised Capital:	Paid-Up Capital:		
10	Bank Name:			
11	Account No.:	Currency:		

12	<i>Company Status:</i>	Bumiputera	Non-Bumiputera	Foreign
13	<i>Shareholding:</i>	% Bumiputera	% Non-Bumiputera	% Foreign
14	<i>List of Directors:</i>			
		<i>Pls. attach if more than (5) five</i>		
15	<i>List of Shareholders</i>			%
				%
				%
				%
				%

Section B: Documentation Required For Vendor Registration (For Foreign Company to submit the equivalent document)		
No.	Description	Tick where applicable
1	Latest/Updated Company Profile (Organisation Chart, Product/Service Offered)	
2	Latest Company's Particulars from Suruhanjaya Syarikat Malaysia (SSM) e-info (printed out)	
3	The latest two (2) years of Audited Account/Management Account	
4	The latest two (2) months of Bank Statement	
5	Form 9/Section 17 (Certificate of Incorporation), Form D, Form E (Perakuan Pendaftaran Syarikat), Form 13 (changes of company name)	
6	Form 49/Section 14/Section 58 (Latest particulars of directors, managers and secretaries and changes of particulars)	
7	Letter Approval for Sales and Service Tax (SST) from CUSTOMS. (if applicable)	
8	*Any relevant documentation related with sustainability initiatives involvements, both current & future.	

\* Example - Sustainable policies, green product and building certifications, ISO compliance, GHG calculations, statements or other related materials.



## APPENDIX B - Vendor ABAC Declaration Form



### Vendor ABAC Declaration Form

I/We, \_\_\_\_\_(Company Name), (which includes its Directors, Officers and Employees who intend to conduct business transaction(s) with **AwanBiru Technology Berhad** ("Awantec") and its subsidiaries, hereinafter referred to as "Awantec Group") hereby to confirm that:

- a. A copy of the Awantec Anti-Bribery and Corruption Policy was provided and we have read and understood the policy (A copy of the policy is available on <https://www.awantec.my/about-us>). We agree and undertake to abide by all the terms and condition of the Anti-Bribery and Corruption Manual at all times, including but not limited to the Malaysian Anti-Corruption Commission Act 2009 ("Relevant Requirements").
- b. I/We shall have and shall maintain in place throughout the business relationship our own policies and procedures, including but not limited to adequate procedures to ensure compliance with the Relevant Requirements. It is agreed that we nor any party representing us will engage in any activity or practice which constitutes an offence under the Relevant Requirements including not to offer, pay, consider or authorise , either directly or indirectly any payment, gift, promise, advantage, inducement or reward of any kind for any services, or possible services in relation to our business for personal gratification or with the intent to induce or to secure business or an advantage for and on behalf of us or where such act will breach the Relevant Requirements. Breach of this clause shall be deemed a material breach of the business relationship and may render our registration invalid.
- c. I/We have not been convicted nor are we subject of any investigation, inquiry or enforcement proceedings by the relevant authorities of any actual or suspected bribery and corruption activities.
- d. If we have reasonable grounds to suspect any actual or suspected breach to the Relevant Requirements, we shall report such act to Awantec at [whistleblowing@awantec.my](mailto:whistleblowing@awantec.my) as soon as reasonably practicable.
- e. In the event that we are in breach of the Relevant Requirements, Awantec Group may immediately terminate the contract / agreement entered without any liability whatsoever on the part of Awantec Group to us. This is without prejudice to any other rights or remedies that Awantec Group may have or any other appropriate action which Awantec Group may seek under the terms of the applicable contract / agreement or the applicable rules and regulations.
- f. We shall indemnify you against any and all liability, loss, damages, costs, legal costs and other expenses of any nature whatsoever incurred or suffered by you whether direct or consequential arising out of any breach of the Relevant Requirements herein by us i.e. any dispute, claims or proceedings brought against you by a third party or authority against you by reason of any action by us.

Yours sincerely,

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Name of Company Director (or Equivalent):  
Name of  
Company:  
Company  
Stamp:  
Date

## APPENDIX B – Related Party Transaction Declaration Form



### Vendor Related Party Transaction Declaration Form

#### Notification of Potential or Existing Related Party Transaction of AwanBiru Technology Bhd

I/We, ..... (NRIC No. / Company Registration No. ....) as the vendor of **AwanBiru Technology Bhd** and/or its subsidiaries ("Awantec"), hereby give notification to Awantec of the following potential or existing related party transaction ("RPT"), pursuant to Awantec Related Party Transaction Policies and Procedures.

For the purposes of this declaration, a RPT is a transaction entered into between Awantec or its subsidiaries and a person connected. "Person connected" has the meaning as stated in Chapter 1 of the Bursa Main Market Listing Requirements (Please refer to page 3 of this Form for the definition of "person connected" under the Main Market Listing Requirements). Please disclose the relevant information in the table below.

Description of dealing or transaction in which RPT may arise	
Nature of Relationship with Party giving rise to RPT	
Name of Related Party	
Amount/Value of RPT transaction	
Date RPT will arise	
Is transaction one off or ongoing?	
Any other material information	

AND I/We MAKE THIS SOLEMN DECLARATION conscientiously believing the same to be true and in the event of any false declaration made herein, Awantec shall be entitled to terminate and withdraw the transaction/contract/award made in favour of the Vendor and to further exercise all or any of its rights and remedies under the law.

Signed by:

Date:

Under **Chapter 1 of the Main Market Listing Requirements**, “person connected” is defined as follows:-

in relation to any person (referred to as “said Person”) means such person who falls under any one of the following categories:

- (a) a family member of the said Person;
- (b) a trustee of a trust (other than a trustee for a share scheme for employees or pension scheme) under which the said Person, or a family member of the said Person, is the sole beneficiary;
- (c) a partner of the said Person;
- (d) a person, or where the person is a body corporate, the body corporate or its directors, who is/are accustomed or under an obligation, whether formal or informal, to act in accordance with the directions, instructions or wishes of the said Person;
- (e) a person, or where the person is a body corporate, the body corporate or its directors, in accordance with whose directions, instructions or wishes the said Person is accustomed or is under an obligation, whether formal or informal, to act;
- (f) a body corporate in which the said Person, or persons connected with the said Person are entitled to exercise, or control the exercise of, not less than 20% of the votes attached to voting shares in the body corporate; or
- (g) a body corporate which is a related corporation of the said Person.

Note:

“family members” would include the spouse, parent, child, including adopted child and stepchild, brother, sister and the spouse of the person’s child, brother or sister.