



HSS ENGINEERS BERHAD

Registration No. 201501003232 (1128564-U)

ANTI-BRIBERY POLICY

The Board of Directors of (“**the Board**”) of HSS Engineers Berhad (“**the Company**” or “**HEB**”) has adopted this Anti-Bribery Policy (“**the Policy**”) which is intended for the Company, its subsidiaries and associate companies (collectively referred to as “**the Group**”).

The Group is committed to conducting business transparently, honestly and with integrity. Hence, it is important that the Group conducts its business in accordance with applicable anti-bribery laws and anti-corruption laws.

This Policy sets out the parameters to prevent the occurrence of bribery and corrupt practices in relation to the Group’s businesses.

This Policy is to be read in conjunction with the Group’s

- Board Charter
- Code of Conduct and Code of Ethics of Directors;
- Whistle-Blower Policy;
- Gift, Hospitality and Donation Policy;
- Conflict of Interest Policy;
- Terms of Reference of Board Committees of the Company; and
- Applicable internal processes and procedures of the Group.

The Group is committed to implementing controls and continuous improvements through its systems and procedures. There is an authorised and independent committee responsible for monitoring compliance with the said systems and procedures and reporting to the respective Board of Directors and Executive Committee of HEB.

This Policy applies to directors, employees (permanent, contract, probationary and temporary), and third parties associated with or acting on behalf of the Group, such as consultants, contractors, suppliers, advisors and agents, wherever located (collectively, “**Representatives**”).

This Policy is not intended to be exhaustive, and the Representatives shall always observe and ensure compliance with all anti-bribery applicable laws, rules and regulations to which they are bound to observe.

It is the responsibility of each Representative to read, understand and comply with this Policy.

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Anti-Bribery Policy

All forms of bribery and corruption are prohibited. The Group takes zero tolerance to bribery and corruption.

The Group does not prohibit normal business hospitality, as long as it is reasonable, appropriate, modest and bona fide corporate hospitality. It must not be done with the intention of obtaining or retaining business or a business advantage, or to reward the provision or retention of business or a business advantage.

Charitable support and donations are acceptable but it must not be used as a scheme to conceal bribery.

Proper and complete records of all payments made to third parties in the usual course of business is important since these would serve as evidence that such payments are not linked to corrupt conduct. No accounts must be kept "off-book" to facilitate or conceal improper payments.

A situation of conflict of interest arise in situations where a personal interest that might be considered to interfere with a person's objectivity in performing or exercising duties/judgement on behalf of the Group.

The directors, employees and Representatives should avoid or deal appropriately with situations in which conflict of interest arise and they must not use their position to gain or to cause disadvantage directly or indirectly to the Group.

When directors or employees are faced with a conflict-of-interest situation, they are required to disclose their interest to their immediate superior and submit the necessary form to the Legal Department and subsequently be reviewed by the Audit and Risk Management Committee.

Any Representatives, who knows of, or suspects, a violation of this Policy, is encouraged to whistle-blow or report the concerns without fear and reprisal through the mechanism provided by the Group's Whistle-Blower Policy.

Any directors or employees of the Group who breaches this Policy will face disciplinary action which could result in dismissal for gross misconduct.

The Company reserves its right to terminate the contractual relationships with any third party if they breach this Policy. Bribery is a criminal offence and the Group reserves the right make a report to the relevant authorities of any actions or activities suspected of being criminal in nature.

This Policy will be reviewed regularly to ensure that it continues to remain relevant and appropriate.

(Approved by the Board of Directors on 27 February 2024)