



RGT BERHAD

Registration No. 198101004909 (71024-T)
(Incorporated in Malaysia)

ANTI BRIBERY & CORRUPTION POLICY

Revision History

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NEW			Board of Directors	19 May 2020
Rev 1	Lim Yi Wen	Lam Kim Goon	Board of Directors	24 May 2024

1. Introduction

RGT Berhad (“**RGTBHD**” or the “**Company**”) has adopted a zero-tolerance policy against all forms of fraud, Bribery and Corruption throughout the Company and its subsidiaries (“**RGTBHD Group**” or “**Group**”) the Group. RGTBHD’s Code of Conduct & Ethics for Directors has set out RGTBHD’s core principles in this regard.

RGTBHD’s Anti-Bribery & Anti-Corruption Policy (hereinafter referred to as the “**ABC Policy**” or “**Policy**”) elaborate upon those principles, providing guidance to all parties as stated in Section 2 below (“**stakeholders**”) on how to deal with improper solicitation, bribery and other corrupt activities and issues that may arise in the course of business.

This ABC Policy is not intended to provide definitive answers to all questions regarding Bribery and Corruption. Rather, it is intended to provide stakeholders, particularly employees with a basic introduction to how RGTBHD combats Bribery and Corruption in furtherance of RGTBHD’s commitment to lawful and ethical conduct all the time. Please contact RGTBHD’s Human Resource (“**HR**”) Team immediately if you need clarifications about the scope of applicable laws or the application of RGTBHD’s policies concerning the fight against Bribery and Corruption.

Engaging in bribery or corrupt practices can have severe consequences for you and for RGTBHD Group. You may face dismissal, fines and imprisonment, and the company may face damage to reputation, financial loss and disbarment from business and other negative consequences.

Any person who commits an offence under the MACC Act, shall on conviction be liable to imprisonment for a term not exceeding twenty years; and a fine not less than five times the sum or value of the gratification which is the subject matter of the offence, or ten thousand ringgit, whichever is the higher, or a combination of both.

A commercial organisation commits an offence if a person associated with the commercial organisation corruptly gives, agrees to give, promises or offers to any person any gratification whether for the benefit of that person or another person with intent to obtain or retain a business for the commercial organisation or to obtain or retain an advantage in the conduct of the business for the commercial organisation.

On conviction, a commercial organisation can be liable to a fine of not less than 10 times the sum or value of the gratification which is the subject matter of the offence, or RM1,000,000, whichever is higher or to imprisonment for a term not exceeding twenty years, or a combination of both.

This ABC Policy is published on the Company’s website at www.rgtberhad.com.

2. Scope of Application

This ABC Policy is intended to apply to:

- (a) the Group and all of its Employees and intermediaries;
- (b) the Group's business dealings with private and public sector entities, including their Employees and intermediaries; and
- (c) all the jurisdictions in which the Group operates.

Although this ABC Policy is specifically written for the Group's Employees, RGTBHD expects that contractors, sub-contractors, distributors, suppliers, customers, associates / contacts / partners, consultants, advisers, agents, representatives and others performing work or services for or on behalf of the Group will comply with it where relevant when performing such work or services.

This Policy should be read together with RGTBHD's CCE and Whistleblowing Policy and the MACC Act. If a law conflicts with this ABC Policy, you should comply with the law. If you have any questions about any of these conflicts, please consult the HR Team.

The above scope of application is not exhaustive.

3. Definitions

For the purpose of this ABC Policy, the following definitions are adopted:

"Act" refers to Companies Act 2016 and any statutory modification, amendment or re-enactment thereof for the time being in force.

"Associate" is an external party with whom the Group has established or plans to establish some form of business relationship. Associate may be an individual, enterprise, or any form of incorporated legal entity by whatever name who does not have an employment relationship with RGTBHD but some degree of involvement in RGTBHD's business dealings. Associates provide services to or on behalf of RGTBHD and include but not limited to suppliers, appointed distributors, agents, contractors, sub-contractors, agents, logistics service providers, information technology or information system vendors, event management companies, external company secretaries, lawyers and consultants.

Associate (in relation to a person) is defined in the MACC Act to mean the following:-

- (a) any person who is a nominee or an employee of such person;
- (b) any person who manages the affairs of such person;
- (c) any organisation of which such person, or any nominee of his, is a partner, or a person in charge or in control of, or has a controlling interest in, its business or affairs;

- (d) any corporation within the meaning of the Act, of which such person, or any nominee of his, is a director or is in charge or in control of its business or affairs, or in which such person, alone or together with any nominee of his, has or have a controlling interest, or shares to the total value of not less than thirty per centum of the total issued capital of the corporation; or
- (e) the trustee of any trust, where— (i) the trust has been created by such person; or (ii) the total value of the assets contributed by such person to the trust at any time, whether before or after the creation of the trust, amounts, at any time, to not less than twenty per centum of the total value of the assets of the trust.

“Audit Committee” or **“AC”** or **“Committee”** refers to the Audit Committee of RGTBHD.

“Board” refers to the Board of Directors of the Company.

“Bribery and Corruption” is defined as any action which would be considered as an offence of giving or receiving gratification under the MACC Act.

“CEO” refers to the Chief Executive Officer.

“CCE” refers to Code of Conduct & Ethics for Directors.

“Company” or **“RGTBHD”** refers to RGT Berhad.

“CSR” refers to Corporate Social Responsibility.

“Director” is a director (executive and non-executive) of the companies within the Group, except otherwise stated in this ABC Policy.

“Donation” refers to charitable contributions made in cash or in kind to support the community.

“Employee(s)” or **“You”** means all Directors, executive officers, members of management, regular employees and contractual employees having employment relationships with the Group, as well as temporary staff and seconded employees working under the control and supervision of the Group.

“Executive Directors” or **“ED”** are Directors of the Company primarily responsible for the business activities and operations of the Group’s core business and principal subsidiaries and includes the CEO when the CEO is a Director.

“Family member(s)” are as defined in the Act and the MMLR.

“Gratification” is defined in the MACC Act as:

- (a) Money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
- (b) Any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- (c) Any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- (d) Any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- (e) Any forbearance to demand any money or money’s worth or valuable thing;
- (f) Any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and
- (g) Any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).

“Group” or **“RGTBHD Group”** refers to RGTBHD and its subsidiary(ies) from time to time.

“Group Companies” mean the companies or entities within the Group and **“Group Company”** shall mean any one of them.

“GEHT” collectively refers to Gifts, Entertainment, Hospitality and Travel.

“MACC Act” refers to the Malaysia Anti-Corruption Commission Act 2009 and any statutory modification, amendment or re-enactment thereof for the time being in force.

“MMLR” refers to the Main Market Listing Requirements of Bursa Malaysia Securities Berhad.

“Public Official” refers to the definition under the Appendix (iv) and (v) of the Guidelines on Adequate Procedures issued by the Prime Minister’s Department, as adopted by RGTBHD.

“Sponsorship” refers to the provision of financial support to sports, arts, entertainment or other causes for business objectives and usually for brand or reputation management purposes.

“SOP” refers to Standard Operating Procedures.

“Third Party” refers to any individuals or organisation that an Associate may come into contact with during engagement with RGTBHD and may include actual and potential clients, customers, suppliers, vendors, business contacts, agents, advisors, government and public bodies including their advisors, representative and officials.

4. Conflict of Interest

RGTBHD expects all Employees of the Group to act in accordance with the highest standards of personal and professional integrity in all aspects of their duties and employment.

RGTBHD's CCE and Conflict of Interest Policy set out the general conduct and behaviour of the Employees in respect of Conflict of Interest in discharging their functions and duties as follow:-

- (a) The Group expects all Employees to give their fullest attention, dedication and efforts to their duties and the Company at all times.
- (b) Employees are prohibited from using their position or knowledge gained directly or indirectly in the course of their duties and responsibilities or employment for private or personal advantage.
- (c) In this respect, an Employee who may have a potential or actual conflict of interest is obliged to disclose the conflict promptly to the CEO (in the case of any Director) or RGTBHD's Head of HR function or Employee's Head of Department (in all other cases) so that a determination can be made to the existence and seriousness of an actual conflict. When in doubt, Employees shall adopt the highest standard of conduct.

Even if refusal of the gift and / or hospitality is considered disrespectful or may offend the other party, the gift must be politely returned with a note of explanation of the Group's "**no gift**" policy if there is a potential conflict of interest situation.

5. Gift, Entertainment, Hospitality and Travel

RGTBHD's Employee Handbook set out the general conduct and behaviour of Employees in respect of GEHT in discharging their functions and duties as follow:-

- (a) Employee should not give or accept gifts or any other benefit or privilege that would in any way influence or appear to influence any business decision or gain an unfair advantage.
- (b) The situation in which the GEHT is received or given should not be connected with contractual negotiations, tender awards or similar circumstances.

The intention behind the GEHT should always be considered, so that it does not create an appearance of bad faith and impropriety and should not be misunderstood by others to be a bribe.

The Group should not solicit any GEHT benefits from any Associate directly or indirectly, should avoid from offering and / or accepting GEHT from Public Officials without prior approval from any of the ED.

6. Corporate Social Responsibility, Donations and Sponsorships

The Group is committed to contributing to the well-being of the people and the local communities where it operates. It is however important that all CSR initiatives, donations and sponsorships are made in accordance with RGTBHD's policies and upon approval by any of the ED.

Corporate Social Responsibility

As part of our commitment to CSR and sustainable development, RGTBHD supports CSR initiatives as part of our contribution to the communities and the environment in which we operate in. However, requests for such contribution must be carefully examined and not to be made to improperly influence a business outcome or secure a business advantage.

The proposed recipient must be a legitimate organisation and appropriate due diligence must be conducted in particular to ascertain whether any Public Officials are affiliated with the organisation.

Any red flags must be resolved before committing any funds to the programme. Even requests determined to be legitimate must be carefully structured to ensure that the benefits reach their intended recipients.

Donation & Sponsorship

Employees must ensure that all donations and sponsorships are not used as a subterfuge for bribery or used to circumvent or avoid any of the provisions of the Employee Handbook.

In accordance with the Group's commitment to contribute to the community coupled with its values of integrity and transparency, all donations and sponsorships must be in good faith and in compliance with RGTBHD's Employee Handbook and this ABC Policy.

All donations and sponsorships must comply with the following:

- (a) ensure all donations and sponsorships are allowed by applicable laws;
- (b) obtain all the necessary internal authorisation and / or external authorisation, if required;
- (c) be made to well-established entities having an adequate organisational structure to guarantee the proper administration of the funds;
- (d) be accurately stated in the company's accounting books and records;
- (e) not to be used as a means to cover up an undue payment or bribery.

7. Political Contributions

In addition to the policy and guidelines set out in the Employee Handbook as a matter of general policy, the Group does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office.

In very limited circumstances, if any contribution is to be made, it must be approved by any of the ED, permissible under applicable laws and must not be made with any promise or expectation of favourable treatment in return and must be accurately reflected in the contributor's accounting books and records.

8. Facilitation Payment

A facilitation payment is defined as payments made to secure or expedite the performance by a person performing a routine or administrative duty or function. Facilitation payments need not involve cash or other financial assets; it can be any sort of advantage with the intention to influence the other party in his duty.

RGTBHD prohibits accepting or obtaining, either directly or indirectly, facilitation payments from any person for the benefit of the Employee himself or for any other person who is subject to the Employee Handbook. The reason underlying this prohibition is that facilitation payment is seen as a form of Bribery and Corruption.

All Employees subject to the CCE must not offer, promise, give, request, accept or receive anything which might reasonably be regarded as a facilitation payment. If you receive such a request or if you are offered facilitation payments, you must report to your respective Heads of Department.

An exception to making facilitation payment

However, there are certain situations or circumstances where you are faced with having to make facilitation payments in order to protect your life or liberty. In dangerous situations like this, you are allowed to make payments but you must immediately report to any of the ED. Making facilitation payment in such a situation is the only exception which can be used as a defence when faced with allegations of Bribery and Corruption.

9. Dealing with External Parties

The Group's dealings with its Associate, joint venture partners, introducers / government intermediaries, Public Officials and others, must be carried out in compliance with all relevant laws and consistent with the values and principles of the CCE. As part of this commitment, all forms of Bribery and Corruption are unacceptable and will not be tolerated.



RGTBHD expects that all external parties acting for or on the Group's behalf to share its values and ethical standards as their actions can implicate the Group legally and tarnish its reputation. Therefore, where we engage with external parties, we are obligated to conduct appropriate counterparty due diligence to understand the business and background of any prospective business counterparties before entering into any arrangements with them to ensure that we are dealing with counterparties that subscribe to acceptable standards of integrity in the conduct of their business. The selection consideration and criteria are guided by SOP established by the respective operating companies.

To help ensure that we conduct business with external parties that share RGTBHD's standards of integrity, we must:

- (a) Conduct due diligence such as background checks on the person or entity, document verification or conducting interviews with the person or entity to be appointed, and not to enter into any business dealings with any external party reasonably suspected of engaging in bribery and improper business practices unless those suspicions are investigated upon and resolved.
- (b) Ensure all external parties are made aware of RGTBHD's ABC Policy and our expectations of them.
- (c) Continue to be aware of and to periodically monitor external party performance and business practices to ensure ongoing compliance.

If at any point during the due diligence exercise or in the dealings with an external party, there are conflicts of interest or "**red flags**" raised, these would warrant further investigation and must be sufficiently addressed before the engagement of the external party can progress.

Examples of common "red flags" involving external parties include:

- (a) The transaction involves a country known for a high incidence of corrupt payments.
- (b) Family member, business or other "special" ties with government or Public Officials.
- (c) A reference check reveals a flawed background or a reputation for getting "things done" regardless of the circumstances or suggests that for a certain amount of money, the external party can fix the problem.
- (d) Objection to Anti-Bribery and Anti-Corruption representations and warranties in commercial agreements or negative response when informed of such requirements.
- (e) Convoluting payment arrangements such as payment in cash, payment to another external party or to accounts in other countries or requests for upfront payment for expenses or other fees or structuring a transaction to evade normal record-keeping or reporting requirements.
- (f) Signs of not acting on own behalf but trying to conceal the true identity of true beneficial owner.
- (g) The external party requires that his / her identity not be disclosed as part of the business transaction.

- (h) Refusal to abide by this ABC Policy or does not demonstrate adequate internal anti-corruption policies and procedures in place.
- (i) Refusal to provide or provide insufficient, false, or inconsistent information in response to due diligence questions.
- (j) Inadequate credentials for the nature of the engagement or lack of an office or an established place of business.

All Associate are required to adhere to industry best practice and accepted standards of behaviour and are required to execute the Anti Bribery and Anti-Corruption Declaration Form as set out in Appendix I.

RGTBHD requires its Employees to use good judgment and common sense in assessing the integrity and ethical business practices of external parties and has provided the above precautions as a guideline.

Employees should seek advice from any of the ED or the HR function whenever any questions arise relating to external parties that the Group has appointed or is considering appointing.

Dealing with Contractors and Suppliers

In line with the general principles of the CCE, the Group is committed to upholding the highest standard of ethics and integrity in all aspects of its procurement activities. The Group should avoid dealing with any contractors or suppliers known or reasonably suspected of corrupt practices or known or reasonably suspected to pay bribes.

The Group must ensure that all procurement activities are in line with the SOP of the respective operating companies, which include:

- (a) Due diligence of contractors and suppliers is undertaken before they are registered / licensed with the Group.
- (b) Contractors and suppliers are made aware of and understand the CCE and this ABC Policy and that they will comply accordingly. This is communicated through the ABC Declaration Form.

Monitor contractors and suppliers as part of their regular review of the performance of the external party.

Screening should be conducted on the company, its directors and top management as part of the due diligence process and procedures established in the company. The scope and extent of the due diligence required will vary depending upon the circumstances of each transaction, any red flag identified and the result of the corruption risk assessment process.

The Group should also monitor significant contractors and suppliers as part of their regular review of the performance of the external party. The Group has the right to terminate their services in the event that these external parties pay bribes or act in a manner which is inconsistent with RGTBHD's CCE and this ABC Policy.

If any red flags are raised, these issues must be resolved. If it is not possible then the company must be barred from being on the list of registered or licensed contractors / suppliers and /or disqualified from participating in any of the Group's tender / purchasing activity.

Due Diligence Checklist for Contractors and Suppliers

RGTBHD's procurement function must follow the following procedures when dealing with contractors and suppliers:

- (a) Perform a risk assessment;
- (b) Undertake due diligence on the Third Party / Associate depending on the result of the risk assessment performed; and
- (c) Preparing and maintaining appropriate written documentation of the due diligence and risk assessment performed.

Significant Investments, Acquisitions or Mergers

The Group undertakes due diligence in evaluating investments, acquisitions or mergers to ensure compliance with Anti-Bribery and Anti-Corruption laws. The guidelines for companies on undertaking Anti-Bribery and Anti-Corruption due diligence in the course of investments, acquisitions or mergers are as follows:

- (a) Anti-bribery due diligence is considered on a proportionate basis for all investments but on a risk-based approach, with the level of due diligence being proportionate to the investments and the perceived likelihood of risk of bribery.
- (b) The level of Anti-Bribery and Anti-Corruption Due Diligence for the transaction commensurate with the bribery risks.
- (c) Anti-Bribery and Anti-Corruption Due Diligence starts sufficiently early in the due diligence process to allow for adequate due diligence to be carried out and for the findings to influence the outcome of the negotiations or stimulate further review if necessary.
- (d) The partners or the Board to provide commitment and oversight to the due diligence reviews.
- (e) The information gained during the Anti-Bribery and Anti-Corruption Due Diligence is conveyed efficiently and effectively to the company's management.

What to look for in an Anti-Bribery and Anti-Corruption Due Diligence:

- (a) Has bribery taken place historically?
- (b) Is it possible or likely that bribery is currently taking place?
- (c) If so, how widespread is it likely to be?
- (d) What is the commitment of the Board and top management of the targeted party to countering bribery?
- (e) Does the targeted party have in place an adequate Anti-Bribery and Anti-Corruption programme to prevent bribery?

- (f) What would the likely impact be if bribery, historical or current, were discovered after the transaction had completed?

Dealing with Vendors or Agents

The Group undertakes due diligence in evaluating the appointment of Vendors / Agents to ensure compliance with Anti-Bribery and Anti-Corruption laws and the provision of this ABC Policy. The guidelines for companies prior to entering into a contract / agreement with Vendors / Agents are as follows:

- (a) There is a valid business case for appointing Vendors / Agents and the appointment must be approved by the management of the respective operating companies.
- (b) The fees paid to Vendors / Agents are reasonable and justifiable in relation to the services rendered.
- (c) Payment will only be paid to the appointed Vendor / Agent and not to another third-party organisation or individual.
- (d) Vendors / Agents are made aware of and understand the CCE and this ABC Policy and that they will comply accordingly.
- (e) The Group will have the right to terminate the Vendor's / Agent's agreement if the Vendor / Agent has acted in a manner inconsistent with the provisions of this ABC Policy.

Dealing with Public Officials

- (1) In general, all Employees are to ensure that the GEHT benefits provided to / accepted from the Public Official is not excessive, lavish, commensurate with the official designation of the Public Official and not for / from his / her personal capacity.
- (2) RGTBHD's Employee Handbook sets out the general conduct and behaviour of Employees in respect of GEFT in discharging their functions and duties.
- (3) All Employees are prohibited from paying for non-business travel and hospitality expenses for any government official or his / her family member / household members without prior approval from any of the ED.

10. Financial and Non-Financial Controls

The Group has already in place the financial and non-financial controls to address various business processes and payments to Third Parties / Associate.

Some of the key controls that must be strictly complied with and enforced are:

Financial Controls

- (a) **Authority Limits**
RGTBHD's Procurement Policy sets out RGTBHD's authority limits in this regard.

(b) **Bank Signatories & Signing Limits**

Any request for the opening of a new bank account, the closing of account and revision of authorised signatories / signing limits are subject to the approval of the Board of the Company upon verification by the Chief Financial Officer.

(c) **Payment for Completed Works / Services / Supplies**

Payment can only be made to the contracting party and not any other Third Party or individual.

Proper segregation of duties, verification, authorisation, approval and supporting documents must be in place in the following processes before payment can be made:

- (i) Approved Purchase Order / Agreement / Contracts,
- (ii) Certified work done, services rendered or goods of the right specifications / quality are received by the company,
- (iii) Valid and original invoices from the Associate with quantity and unit price reconciled and matched to (i) and (ii) above via system or manual control.

Non-Financial Controls

(a) **Pre-qualification process**

A pre-qualification and approval processes are in place to evaluate the potential Third Party / Associate in terms of their capacity to undertake the work, company / directors / shareholders' background, potential conflicts of interest and the risk / likelihood of their participation in unethical business practices / corruption such as forming a cartel to inflate and fix the prices.

This due diligence should be undertaken prior to entering into a contract with the Associate. The scope and extent of the due diligence required will vary depending on the circumstances / nature of each transaction, any red flag identified, the result of the risk assessment process and audit issues highlighted by Internal Audit.

(b) **Fair competitive process**

A fair competitive process is in place where several qualified Associates are invited to compete on price, terms, technical, delivery and quality aspects. A minimum number of pre-qualified Associate invited to quote or tender must be established in order to reduce the risk of corruption or forming a cartel among them. In the event of non-compliance with the policy such as a single source, sole source or less than minimum 3 quotations, exceptional approval by management must be obtained with proper written justifications.

RGTBHD is also expected to continuously explore and develop other potential sources of supply in the market in order to widen the existing pool of qualified Associate. In addition, the procurement process must also take into consideration the integrity of the tenders / quotations and other price-sensitive information by restricting access to authorised personnel only such as usage of sealed envelope and / or tender box under dual lock and key.

(c) **Payments to be made to Associates are reasonable and proportionate to the work, services or supplies to be carried out**

Reasonable and proportionate steps are taken (such as via fair competitive process or benchmarking to the market) to ensure that we are not paying unusual or unexplained payment to an Associate which could possibly indicate a corrupt transaction.

This is particularly important where there is a risk that the Associate may use part of the payment made to pay a bribe on behalf of or for the benefit of RGTBHD.

Some of the examples of potential **red flags or areas of high corruption risk** may include but are not limited to:

- (a) Unreasonable, unjustifiable or unsupported **variation orders**, an extension of time, changes of specifications after tender, project payments.
- (b) The operating company may be requested by the Associate to **appoint a preferred supplier nominated by the Associate** at higher than market price and / or without a valid business reason.
- (c) An unusually high amount of **commission / fees** (such as beyond the market / norm) paid or given to an Associate.
- (d) Refusal to sign a commission or fee agreement or insists on the use of a side-letter relating to the payment of funds or refusal to provide an invoice or receipt for a payment, or the Group receive an invoice or receipt that appears to be non-standard or customised.
- (e) Requesting for or offering of unusually generous gift or lavish benefits or entertainment before committing or continue to sign up a contract.

11. Recruitment of Employees

RGTBHD, being a diversified business group, provides equal opportunity for any qualified and competent individual to be employed by the Group from multicultural and multiracial backgrounds, sourced either externally or locally.

The recruitment of Employees should be based on an approved selection criterion to ensure that only the most qualified and suitable individuals are employed. This is crucial to ensure that no element of corruption is involved in the hiring of employees. In line with this, detailed background checks such as bankruptcy and reference checks will be conducted when hiring employees for management positions, as they would be tasked with decision-making obligations.

Please contact the Head of HR function if you need further clarification.

12. Whistleblowing Policy

RGTBHD encourages openness and transparency in its commitment to the highest standard of integrity and accountability.

Employees and Associate who encounter actual or suspected violations of this Policy are required to report their concerns. The parties are responsible to ensure that suspected Bribery and Corruption incidents are reported promptly via the procedures set out in the Whistle Blower Policy which is made available in the Company's website.

If you make a report or disclosure about any actual or perceived bribery or corruption in good faith, belief, without malicious intent, that a breach or violation as aforesaid may have occurred or is about to occur, you will be accorded the protection of confidentiality, to the extent reasonably practicable, notwithstanding that, after investigation, it is shown that you were mistaken. In addition, employees who whistle blow internally will also be protected against detrimental action for having made the disclosure, to the extent reasonably practicable.

Such reports would be addressed in a timely manner and without incurring fear of reprisal regardless of the outcome of any investigation. Further details can be found under the following documents:

- (a) Whistleblowing Policy
- (b) CCE and/or
- (c) Employee Handbook

Any alleged or suspected improper conduct must be disclosed using the procedures provided for in the RGTBHD Whistleblowing Policy, a copy of which is available from the HR function or RGTBHD's website at www.rgtberhad.com.

Any Employees and Associate with a concern or complaint may submit their concern or complaint directly in writing to the AC at:

Email whistleblowing@rgt.com.my

13. Record Keeping

The Group shall maintain a register to record all GEHT, Donations or Sponsorships for audit purposes. Such register should state the gift's nature, its value, the name of the provider, name of the recipient, reason or occasion for the gift.

Appropriate internal controls are in place to safe-keep, archive, retrieve, retain and store these records and substantiate the business reason for making payments to Associate. All accounts, invoices, documents and records relating to dealings with Associate must be prepared, updated in a timely manner and maintained with accuracy and completeness together with its supporting documents in accordance with statutory and regulatory requirements. No accounts are to be kept “off-book” to facilitate or conceal improper payments.

All registers should be recorded in a prompt, accurate and timely manner when the transaction is received / made and in reasonable detail. In addition, all records pertaining to the ABC Policy / Framework / Programme and Adequate Procedures related discussion, decision and activities must also be properly retained such as minutes of the meeting.

14. Managing and Improving on ABC Framework

RGTBHD will take continuous steps to review and improve the ABC programme in order to ensure that the programme is adequate to manage the corruption risks and ensure that the programme is being implemented effectively.

In respect of this ABC Policy, it will be reviewed at least once in every three (3) years or as and when there is any change to the prevailing Laws and Regulations or operating environment of the Group.

On-going review and improvement

The HR function is to monitor and assess on an ongoing basis whether the Anti-Bribery and Anti-Corruption programme is:

- (a) adequate to manage effectively the corruption risks faced by the Group; and
- (b) being implemented effectively.

In doing so, the HR function should take into account any weaknesses, deficiencies or recommendations for improvement in the programme reports from any other departments and the Board’ review. The HR function will provide a written report at regular intervals to the Board on the adequacy and implementation of the ABC programmes.

Periodic audit

The HR function’s on-going review will help to ensure that their action plans are the complementary and able to cover a wider scope of coverage particularly on areas of high corruption risk.

Board review

The Board will:

- (a) review regularly the HR function’s report and other relevant reports related to corruption risks.

- (b) ensure that appropriate actions are taken to:
 - (i) rectify any weaknesses or deficiencies identified,
 - (ii) implement appropriate improvements to the programme.

15. Communication and Training

Communication of ABC Policy and Programmes

- (1) The ABC Policy shall be communicated to all Employees and Associates and be published on RGTBHD's website at www.rgtberhad.com. All Employees are also required to sign a document that they have received, read and understood the ABC Policy and shall comply with it.
- (2) The communication of this ABC Policy and programmes to all Employees and Associates can be conducted in a variety of formats and mediums. These may include, but are not limited to:
 - (a) messages on RGTBHD's website;
 - (b) emails, newsletters, posters;
 - (c) CCE and Employee Handbook;
 - (d) seminars or messages; and
 - (e) town-hall sessions.

Training

- (1) RGTBHD will provide appropriate Anti-Bribery and Anti-Corruption training on a regular basis to all relevant Employees to make them aware of the types of corruption they could encounter, the risks of engaging in corrupt activities, the ABC Policy and procedures and the reporting channel.
- (2) The training can be conducted in a variety of formats, which may include but not limited to:
 - (a) induction programmes for new recruits featuring anti-corruption elements;
 - (b) refresher trainings / briefings for existing employees;
 - (c) corporate training programmes, seminars, videos and in-house courses; and
 - (d) intranet or web-based learning programmes.

16. Deeming Provision

The provisions under this ABC Policy have been drafted in a manner to also incorporate the provisions under the MACC Act and other statutes, regulations and guidelines applicable. In the event the applicable provisions of the MACC Act and / or relevant governing statutes, regulations and guidelines relating thereto are from time to time amended, modified or varied, such amendments, modifications and variations shall be deemed inserted herein whereupon this ABC Policy shall be read and construed subject to and in accordance with the amended, modified or varied MACC Act, statutes, regulations and guidelines.

17. Revision to the ABC Policy

This ABC Policy shall be reviewed by the AC at least every three (3) years. All amendments to this ABC Policy must be approved by the Board.

Upon the Board's approval, the said revision or amendment shall form part of the ABC Policy and the ABC Policy shall be considered duly revised or amended.

The Group reserves the right to amend or modify this ABC Policy in whole or in part, at any time necessary so to do. Amendment or modification shall be binding on all Employees and Associates when the same is notified to all Employees or Associates in manner outlined under section 15 in this ABC Policy.

18. Approval

This Policy was approved and adopted by the Board on 24 May 2024.