

SCOPE INDUSTRIES BERHAD

[Company No.: 200201023713 (591376-D)]

Anti-Bribery and Corruption Policy

1. Introduction

Scope Industries Berhad (“Scope” or “the Company”) and its subsidiaries (“the Group”) are committed to maintain a high standard of code of conduct and business ethics to create an environment of mutual trust whilst increasing the confidence of our stakeholders, shareholders and most importantly, the public at large.

The objective of this Anti-Bribery and Corruption Policy (“ABC Policy”) is to provide information and guidance to all employees (including full time, probationary, contract and temporary staff) (“Employees”) and Directors on standards of behaviour to which they must adhere to and how to recognize as well as deal with bribery and corruption. The Employees and Directors are collectively referred to as “Persons” or “Officers” throughout the ABC Policy.

We adopt a zero tolerance approach to bribery and corruption of any form as set out in the ABC Policy. This Policy is to be read in conjunction with the Company’s Code of Ethics, Code of Conduct and Whistle Blowing Policy.

All Officer are responsible in ensuring that they always comply with all laws and regulations, in particular, to the Malaysian Anti-Corruption Commission (“MACC”) Act 2009. No excuses or exceptions will be acceptable for non-compliance of any domiciled laws and regulations where the Group conducts its businesses.

2. Scope and Application

The Policy is applicable to all Officers of the Group, and external parties such as consultants, contractors, sub-contractors, agents, representatives, sponsors, suppliers, customers, or any other person or persons associated with the Group (including third parties) (collectively referred to as “Associate Third Parties”).

3. Definitions

For the purpose of this Policy, the terms listed below represent its respective definitions and shall exclude food and drinks, flowers and contribution/sponsorship to the Group official events:

“Benefits”	:	Any form of bribe, gift, reward, consideration, favour or any other advantages or profits (whether material or immaterial) gained by the Officers and the Associated Third Parties.
“Bribery”	:	Offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to that person’s duties, action or decision.
“Corruption”	:	The provision or receipt of monetary or non-monetary bribe or reward of high value for performing in relation to the Officers and the Associated Third Parties’ duties. This includes misuse of a public office or power for private gain or the misuse of private power in relation to business outside the realm of government.

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“Entertainment”	:	a) The provision of recreation; or b) The provision of accommodation or travel in connection with or for the purpose of facilitating entertainment of the kind mentioned in item (a) above, with or without consideration paid whether in cash or in kind, in promoting or in connection with a trade or business activities and/or transactions.
“Facilitation Payments”	:	Small sums or bribe, unofficial payment made to secure or expedite the performance of a routine action by the Officer(s) and the Associated Third Parties.
“Kickbacks”	:	Any forms of payment intended as compensation for favorable treatment or other improper services. This includes the return of a sum already paid or due as a reward for awarding of furthering business.
“Gifts”	:	Any form of monetary or non-monetary such as goods, services, cash or cash equivalents, fees, rewards, facilities, or benefits given to or received by an Officer and the Associated Third Parties, his or her spouses or any other person on his or her behalf, without any or insufficient consideration known to the Officer(s) and the Associated Third Parties.

4. **Corruption, Gifts, Benefits and Entertainment**

All Persons who are subject to this ABC Policy shall NOT:

- (a) offer, give, or promise to give a bribe or anything which may be viewed as a bribe to secure or award an improper business advantage;
- (b) offer, give, or promise to give a bribe or anything which may be viewed as a bribe to a government official, agent or representative to facilitate, expedite, or reward any action or procedure;
- (c) request or receive a bribe or anything which may be viewed as a bribe from a third party knowing or suspecting it is offered with the expectation that it will obtain a business advantage for them; or
- (d) engage in any activity that might lead to a breach of this Policy.

All Officers who are subjected to this ABC Policy are advised against accepting or receiving Gifts, Benefits and/or Entertainment from a third party or stakeholder of the Group that might create a sense of obligation and compromise their professional judgement or create appearance of doing so.

All Persons who are subjected to this ABC Policy shall take into consideration the impact of their actions with regards to how their actions are perceived (such as influencing their decision) and its impact towards the business operations of the Group prior to giving or accepting any Gifts, Benefits and/or Entertainment.

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We encourage the use of good judgement when giving or accepting the Gifts, Benefits and Entertainment. All the Benefits including Gifts and Entertainment must be:-

- (a) reasonable in value;
- (b) infrequent in nature;
- (c) transparent and open;
- (d) not given to influence or obtain an unfair advantage; and
- (e) respectful and customary

5. Facilitation Payment and Kickbacks

We do not make, and will not accept Facilitation Payments or Kickbacks of any kind. All associates must avoid any activity that might lead to Facilitation Payments or Kickbacks being made or accepted.

Any individual with any suspicious, concerns or queries regarding a payment made on our behalf or improper business practices, he or she should raise these by reporting to the Company via the channel as outlined in the Group's Whistle-Blowing Policy.

6. Political Contribution

Subject to any prevailing law that govern political contribution, the Group may make contribution to political parties or candidates. All political contributions require approval from the Managing Director. The records of all political contributions shall be kept by the Company.

7. Charitable Contribution

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, all Officers must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. No donation can be offered or made without the prior approval in accordance with the Group's internal control policy. The records of all charitable contributions shall be kept by the Group.

8. Record-keeping

It is the responsibility of the Officers to ensure that all benefits which are received are fully and accurately reflected in the Company's books and records.

The internal auditor shall have the respective right to inspect such records as and when they deem appropriate to ensure compliance with the ABC Policy.

9. Training and Awareness

It is one of the requirements of all new employees of the Group to receive instructions on this ABC Policy as part of the induction process. Employees will further receive regular, relevant training on how to adhere to the ABC Policy, and where deemed necessary.

The ABC and the Board's zero-tolerance stance on bribery and corruption activities in the Group business operations and dealings will be clearly communicated and emphasized to Associated Third Parties at the outset of any business relationships with such parties, and as appropriate thereafter.

The Directors will ensure that relevant training will be provided to all levels of employees where it is felt that knowledge on how to comply with this ABC Policy and with the relevant laws and regulations on the matter needs to be enhanced, and where there is a high risk or potential risk of facing bribery or corruption in undertaking their responsibilities.

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10. Reporting of Violations of the Policy

Any Officer who knows of, or suspects, a violation of the Policy, is encouraged to whistle blow or report the concerns via the channel outlined in the Whistle-Blowing Policy. No individual will be discriminated against or suffer any sort or manner of retaliation for raising genuine concerns or reporting in good faith on violations or suspected violations of the Policy. All reports will be treated confidentially.

11. Review of the Policy

The Board will monitor compliance with the Policy and review the Policy regularly to ensure that it continues to remain relevant and appropriate.