ANTI-BRIBERY AND ANTI-CORRUPTION POLICY ("ABAC")

IFCA MSC BERHAD | No. 19, Jalan PJU 1/42A, Dataran Prima, 47301 Petaling Jaya, Malaysia

Introduction

IFCA MSC Berhad ("IFCA" or the "Company") has adopted a zero-tolerance policy against all forms of bribery and corruption. IFCA is committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices. It is IFCA policy to conduct all its business activities with honesty, integrity and the highest possible ethical standards to enforce its good business practices.

This Policy is applicable to anyone who is employed by or work at IFCA (whether permanent, temporary or contract basis), directors and company secretaries. It is also applicable to contractors, sub-contractors, consultants, agents, representatives and service providers of any kind performing work or services, for or on behalf of IFCA (Business partners).

The Policy are intended to provide guidelines for employees and other business associates with a basic introduction on how the Company combats bribery and corruption. It also provides a basic outline on understanding the risk associated with corruption and your responsibility to deter its occurrence. However, this policy is not intended to provide definite solutions regarding corruption.

If you have any doubt or concern on the Company policy on the fight against bribery and corruption, you should contact the relevant Risk Management Department immediately.

"ALWAYS ASK WHENEVER IN DOUBT"

Engaging in bribery or corrupted practices can have severe consequences for you and for the Company. 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.

Anti-Bribery and Anti-Corruption

Bribery is associated with corruption which is an act of offering, giving, promising, asking, agreeing to receive and accepting a gratification or any other forms of advantages with the intention of gaining unfair advantage. Form of bribery includes kickbacks, inflated commissions, expensive gifts, political donations, excessive or inappropriate entertainments and facilitation payments.

This Policy prohibits all forms of bribery and corrupt practices and are applicable to all ranks in the hierarchy of the Company including the Business partners and Company Secretary.

Bribery is illegal. All Personnel and Business Partners must not engage in any form of bribery and shall at all times remain vigilant and do not directly or indirectly offer or promise any gratification to the public official and customers to gain any unfair advantage or preferential treatment.

Gifts and Hospitality

Employees or member of their immediate families should not provide, solicit or accept cash or its equivalent, entertainment, favours, gifts or anything of substance to or from current or potential vendors, suppliers, and customers of IFCA. Nothing should be accepted, nor should the employee have any outside involvement, that could impair, or give the appearance of impairing, an employee's ability to **perform duties to exercise business judgement in a fair and unbiased manner**.

"Gift" means something that is given to another person including but not limited to cash, vouchers or any item (e.g.: pens, hampers, concert tickets) having any cost or financial value, including food or beverages (e.g: supplier or sub-contractor sponsored meals and entertainments) as well as any items of value.

No gifts of any kind that are offered by vendors, suppliers, customers, potential vendors and suppliers or any other individual or organisation, no matter the value, will be accepted by any employee or their family members, at any time, on or off the work premises.

Exemptions from this No Gift Policy are gifts such as t-shirts, pens, goodies bags including cards, thank you notes, certificates or other forms of thank you and recognition that employee obtain as members of the public at events such as seminars, conferences, training events etc that is offered equally to all participants of the event.

Gifts of food that may arrive during the holidays, and at other times of the year when gift giving is traditional, belong to the entire staff even if addressed to a single employee. Under no circumstances may an employee take a food gift home; food gifts must be shared with and distributed to all staff, with email notice, during work hours, in a central, worksite location.

Gift Declaration

ALL GIFTS required to be **declared** to Risk Management Department and we will keep a written record of the amount and reason for the hospitality or gifts accepted, all gifts and hospitality are subject to management review.

If there are any doubt against the type of gifts received, you should contact Risk Management Department for clarification. To be on a safe side, do not accept any gifts will be the best way to eliminate the risks.

Facilitation Payments

Facilitation payment are form of payments made to secure or expedite the performance by a person performing a routine or administrative duty or function. Offering, promising or requesting facilitation payments are prohibited and illegal in Malaysia. Facilitation payments need not involve cash or other financial asset; it can be any sort of advantage with the intention to influence them in their duties.

Our Personnel and Business Partners are strictly prohibited **to** offer or **from** receiving any form of facilitation payment directly or indirectly.

However, there are certain situations where you are forced to make facilitation payments in order to protect your life, limb or liberty. In such circumstances, you must immediately report to your Head of Department to consult the next course of action. Making facilitation payment in such situation is the only exception which can be used as a defence when faced with allegations of bribery and corruption.

Conflicts of Interest

Conflicts of interest arise where there is personal interest that can be considered to have potential interference with objectivity in performing duties or exercising judgement for or on behalf of IFCA. Our Personnel must avoid situations in which their personal interest would conflict with their duties and responsibilities. Our Personnel must not use their position, office working hours, IFCA's resources and assets, or information available to them for personal gain or to IFCA's disadvantage.

In situations where conflicts of interest arise, our Personnel are required to immediately declare the matter to their immediate supervisor, or Head of Department.

Charitable Contributions

IFCA accepts and indeed encourages the act of donating to charities, whether through services, time, or direct financial contributions (cash or otherwise) and disclose all charitable contributions it makes. IFCA will ensure that all charitable donations made are legal and ethical under local laws and practices, and the donations are not offered/made without the notice of Board of Directors. All employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

Business Relationship/Vendor/Supplier

IFCA expects all Third Parties doing business with IFCA to approach issues of bribery and corruption in a manner that is consistent with the principles set out in this Policy. IFCA requires all Third Parties to cooperate and ensure compliance with these standards, to continue the business relationship.

In order to maintain the highest standard of integrity, IFCA will conduct the following to ensure Third Party shares the same standard and integrity:

- Conduct due diligence enquiries to review the prospective business counterparties
- All third parties are made aware of IFCA Anti Bribery-Anti Corruption Policy
- Continue to be aware of and to periodically monitor third party performance and business practises to ensure ongoing compliance

IFCA Staff Responsibility

As an employee of IFCA, you must ensure that you read, understand and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information given.

All employees are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. When an employee has reasonable ground to believe there is any instances of malpractice or improper conduct, he/she may report the matter via the following channels or may refer to Attachment 1 for the forms of report: -

Name	**Audit Committee**	**Board of Directors**	***Email***
Eng Kim Haw	Chairman	Independent Non-Executive Director	engkh1966@yahoo.com.my or whistleblower@ifca.com.my
Fung Kam Foo	Member	Independent Non-Executive Director	alankffung@gmail.com
Norliza Binti Rasool Khan	Member	Independent Non-Executive Director	norlizakhan@gmail.com
			Or by postage to: 19, Jalan PJU 1/42A, Dataran Prima, 47301 Petaling Jaya, Selangor.

Monitoring and Review

IFCA will establish and put in place appropriate performance measures and reporting system to monitor performance against metrics and compliance with the relevant policies, procedures and controls.

Risk Management Department will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

The Anti-Bribery and Anti-Corruption Policy has been adopted by the Board on 15 May 2020.

ATTACHMENT 1

ANTI-BRIVERY AND ANTI-CORRUPTION REPORT

The Reporting Individual (if not anonymous)

Name : .....

Contact Number : .....

Email : .....

Company/Department : .....

Date : .....

The Report

Parties Involved (kindly use a separate sheet if more space is required)

Date of Incident : .....

Means of Discovery : .....

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Other Witness / Source : .....

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Evidence / Reference : .....

Documents : .....

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