

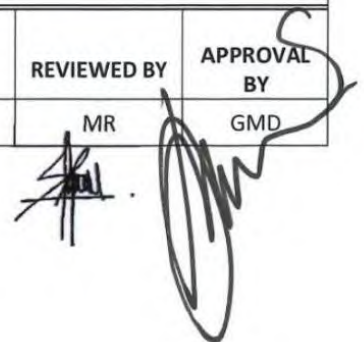
INTEGRATED MANAGEMENT SYSTEM
ISO 37001:2025

ANTI – BRIBERY AND ANTI – CORRUPTION POLICY

TSB – IMSM – 002
ISSUE 1
REV 00

Provision of Engineering, Procurement, Construction, Commission for Mechanical, Electrical, Civil and Structure.
Provision of Maintenance Repair and Overhaul for Mechanical and Electrical.

REVISION HISTORY				
S/N	DATE	DESCRIPTION	REVIEWED BY	APPROVAL BY
1. Rev 00	1/9/2026	New Issuance	MR	GMD



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1.0 INTRODUCTION**1.1 Purpose**

The Board of Directors of TECHNOFIT Sdn. Bhd. (**"the Company"**) and its subsidiaries has a zero tolerance against all forms of bribery and corruption.

This means that all of the Company's employees, business associates and parties engaged with the Company are committed to conducting business in a fair, transparent and ethical manner which include:

- a) Declaration of conflict of interest on a periodic basis and where actual, potential or perceived conflicts arises.
- b) Adopt a "No gift" policy, prohibit offering or accepting hospitality subject to certain limited exceptions.
- c) Allowing charitable donations and sponsorships for legitimate reasons only; Political donations are prohibited.
- d) Prohibit any receiving, giving or promising of facilitation payments.
- e) Conduct due diligence, review internal controls and conduct risk assessment, in particular where there is significant exposure to bribery and corruption risk.
- f) Encourage reporting (whistleblowing) of real or suspected cases of bribery and corruption without fear of retaliation or reprisal.

This Anti-Bribery and Anti-Corruption (**"ABAC"**) Policy is developed to provide an overview of the key principles outlined in ABAC policies and procedures, which is in line with the applicable laws and regulations in Malaysia. The ABAC Policy intends to fulfill the requirements set forth in the Guidelines on Adequate Procedures pursuant to Section 17A(5) of the Malaysian Anti-Corruption Commission Act 2009 (**"MACC Act"**) (**"Guidelines"**).

All of the Company's Directors, Employees, Business Partners and parties engaging with the Company are expected to read, understand and comply with the requirements set out in the ABAC Policy. No waivers or exceptions will be granted for practices that deviate from ABAC principles.

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1.2 What is Bribery and Corruption?

In line with the MACC Act and the Guidelines, the Company has developed and implemented a comprehensive set of measures to combat bribery and corruption of all forms related to the Company's operations.

Bribery

Under the MACC Act, "gratification" or more commonly known as "bribery" means offering, giving, receiving or soliciting something of value (for example money or information) in an attempt to illicitly influence the decisions or actions of a person with a position of trust within an organisation.

Corruption

Corruption means any action which would be considered as an offence of giving or receiving "gratification" under the MACC Act and may also include acts of extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.

Gratification

Gratification is defined in the MACC Act to mean the following:

- 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

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- 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).

1.3 Scope and Application

This ABAC Policy is intended to apply to:

- a) All Board of Directors of the Company
 - Including executive and non-executive directors ("**Directors**").
- b) All Employees of the Company
 - Including permanent and on contract employees ("**Employees**") regardless of their position or role.
 - All Employees must comply with the ABAC Policy, the Business Ethics and all other policies / Standard Operating Procedures / guidelines in the course of employment.
 - Anti-Bribery Function (ABF) of each unit is responsible to communicate and ensure compliance to this ABAC Policy within their respective departments.

For the purposes of this ABAC Policy, all the Company's Board of Directors and its Employees will be collectively referred as "**Personnel**".

- c) All Business Partners of the Company
 - This includes vendors, contractors, sub-contractors and consultants.
 - The Employees, regardless of their position or roles, are responsible to communicate this ABAC Policy to their Business Partners.
- d) All Parties engaging with the Company
 - This also applies to all Employees and Business Partners of the Company.

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- The Company will endeavor to use its influence in good faith to require these parties to understand and implement policies and procedures similar to the Company.

In the event of conflict between the content of the ABAC Policy and any applicable law, the applicable law shall prevail and the Employees and Business Partners shall comply with applicable law.

1.4 Understanding and Declaration

All Personnel and Business Partners must read, understand, comply and declare their acceptance and compliance with this ABAC Policy by completing the Personnel Integrity Pledge or Third-Party Integrity Pledge as appropriate.

We also expect all parties that are engaging with the Company to read, understand and comply with this ABAC Policy.

1.5 Lead by Example

Head of Departments (HODs) must communicate this ABAC Policy to their team members, Business Partners and any other parties they engage with. Head of Departments (HODs) must show respect and maintain open, honest and constructive two-way communication with their team members. This means encouraging them to ask question, make suggestions and report concerns or possible violations of this ABAC Policy.

We must also encourage our Business Partners and other parties to report any concerns or possible violations of ABAC policies and procedures via whistleblowing channel.

1.6 Consequences and Implication

Engaging in bribery and corruption is illegal according to both local and international legislation. Under MACC Act, if you participate in bribery and corruption, you may be subject to:

- a) Imprisonment up to 20 years; and**
- b) A fine of not less than ten (10) times the sum or value of the relevant bribe (gratification) or RM1.0 million/-, whichever is higher.**

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Failure for Personnel to comply with this ABAC Policy will result in disciplinary action, up to and including termination of employment or dismissal.

Since our principles are based on legal requirements, violating them could subject the Company and its Personnel to penalties including fines, imprisonment and other criminal or civil sanctions.

These violations may also result in high costs, personal reputational damage or loss of professional accreditation and severely damage the reputation of the Company.

Failure for Business Partners to comply with this ABAC Policy may result in the termination of the business relationship with the Company.

1.7 Dealing with Difficult Situations

Dealing with situations that may potentially involve bribery and corruption can be difficult. If you are not sure whether an act may be considered as a bribe, then ask yourself these following questions:

- a) Is this a bribe? Are you being pressured to provide something that you are not comfortable with?
- b) Is this legal? Are there any laws/regulations/company policies that address this situation?
- c) Will your act have a negative impact on the Company's reputation/business?
- d) How would you feel if your decision(s) are highlighted in the media?

2.0 DECLARING CONFLICT OF INTEREST

Personnel and its Business Partners shall declare conflicts of interest on a periodic basis and/or where actual, potential or perceived conflicts arises.

2.1 What is Conflict of Interest?

A "conflict of interest" arises in a situation where you are or maybe in a position to take advantage of your role by using power, confidential information, assets or intellectual property for the benefit of yourself or a closely related person.

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2.2 Who is a Closely Related Person?

A “Closely Related Person” is someone you are related to (e.g. relative or immediate family), have a personal friendship/relationship with, or anyone living in the same household as you.

Based on the MACC Act, ‘relative’ includes:

- Spouse;
- Siblings [brother(s)/sister(s)];
- Spouse’s siblings;
- Direct line of ascendant (parent/grandparents) or descendant (children/grandchildren) including your spouse’s and your siblings;
- Uncle, aunt or cousin; or
- Son-in-law or daughter-in-law.

2.3 Types of Conflict of Interest

There are three (3) types of conflicts of interest:

a) Actual conflict of interest

When you face a real, existing conflict. This would be the case if you can influence decisions that are to be made by the Company with respect to dealings with a business, enterprise or entity owned or partially owned by you, your family/household members, associates or friends.

b) Potential conflict of interest

When you are in or could be in a situation that may result in a conflict, but this has not fully materialized.

c) Perceived conflict of interest

When you are in or could be in a situation that may appear to be a conflict, even if this is not the case.

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2.4 When do We Declare?

Employees are required to make their declarations through the Conflict-of-Interest Declaration Form on an **annual basis, during the onboarding process or as and when they are taking up a new position** in the Company.

Employees must also make a declaration through the Conflict-of-Interest Declaration Form if they become aware of a conflict at any other time (an 'ad hoc' declaration). This will be made to their Head of Department who will record the declaration and determine the next course of action.

The Group Managing Director and Directors are required to make their declarations through the same Conflict of Interest Declaration Form on an annual basis.

Business Partners are required to declare prior to onboarding or when there is a change of circumstances by completing the Conflict-of-Interest Declaration Form.

3.0 NO GIFT POLICY AND HOSPITALITY**3.1 No Gift Policy**

Personnel, including their closely related person(s) are prohibited from directly or indirectly, giving and receiving gifts that may influence good judgement and decision making, subject to certain limited exceptions.

3.1.1 Giving

Generally, Personnel including their Closely Related Person(s) are not allowed to give, provide gift to Business Partners and other parties engaging with the Company, with the exceptions of the following:

- a) A gift worth less than RM300/- per item, features the Company's logo or brand;
- b) The gift is exchanged at a company-to company level (e.g. for official events or launches);
- c) The gift is a token of appreciation at an official function or public event;

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- d) The gift is given as part of the Company's Corporate Social Responsibility ("CSR") programme; or
- e) The gift is offered in conjunction with any festive or occasion and in such an event, the gift must not exceed RM300/-.

The Corporate Department shall maintain and monitor a Gift Giving Log to ensure compliance with this Policy."

3.1.2 Approval Process for Exceptions

In a situation where a gift is required to be given but it does not fall within the exceptions listed above, a request can be made by completing the Gifts, Hospitality and Sponsorship Provided Declaration Form. If the gift has a value above RM300/-, approval must be obtained from the Chief Executive Officer.

In the event that the Chief Executive Officer and Directors are providing the gift and it does not fall within the exceptions listed above, they shall obtain the approval of the Board of Director.

Once the application is approved, the application will be submitted to Finance to approve payment provided that the application is supported by relevant documentation.

Even with the exceptions listed above, all Personnel, including their Closely Related Persons are expected to exercise proper care and judgement in handling gift activities and are strictly prohibited from giving the following:

- a) Any gift of cash;
- b) Any gifts to parties engaged in a tender or competitive bidding exercise;
- c) Any gifts that come with a direct/indirect suggestion, hint, understanding or implication that some expected or desirable outcome is required in return for the gift;
- d) Any gift which is lavish and/or excessive or may adversely tarnish the reputation of the Company;
- e) Any gift that would be illegal or in breach of applicable laws on bribery and corruption.

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3.1.3 Receiving Gift

If you are offered or receive a gift from an external party or where there is a conflict of interest, you are required to politely refuse or return the gift and inform the giver with a polite notification of the Company's "No Gifts" Policy. Except for items valued at RM150 or below, provided they are not intended to influence any business decision.

3.1.4 Approval Process for Exceptions

However, where it is not possible to refuse or return a gift, or the refusal is likely to cause serious offence, you are advised to take the necessary steps:

- a) Record the gift in the Gifts, Hospitality and Sponsorship Received Declaration Form.
- b) Report the gift to your Head of Department who will make note of it in their Gifts Log and decide if the gift can be accepted with the limited exceptions.
- c) If approved, the application will be forwarded to the Chief Executive Officer for final approval.

For the Chief Executive Officer and Directors, they shall report the gift to the Board Director, who will decide whether to approve the acceptance of the gift.

Where the relevant approvers approve the acceptance of the gifts, he/she must also determine the next course of action is required whether:

- a) Donate the gift to charity; or
- b) Hold it for departmental display; or
- c) Share the gift with the others in the department; or
- d) Permit it to be retained by the employees.

In determining the above, the relevant approvers are expected to exercise good judgement and proper care in each case taking into consideration pertinent circumstances including the character of the gift, its purpose, the position/seniority of the person receiving the gift, business context, reciprocity applicable laws and cultural norms

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3.1.5 What if Gifts are Received Out of Office?

If you or your Closely Related Person(s) receive a gift off-site (e.g. your home) from a Business Partner or other parties engaged in business with the Company, you must refuse and report the incident to your Head of Department.

If you are unable to refuse, you must then report to your Head of Department immediately. If you are unsure, you should make a declaration through the Gifts, Hospitality and Sponsorship Received Declaration Form.

3.2 Hospitality

Hospitality comes in many forms, consisting of travel or transportation, accommodation, entertainment and recreation (leisure activities) and meals.

The Company strictly prohibits the giving and receiving of hospitality in the following situations:

- a) Any hospitality provided or received with a view to improperly cause undue influence on any party in exchange for some future benefit or result;
- b) Any hospitality provided or received with a direct/indirect suggestion, hint, understanding or implication that some expected or desirable outcome is required;
- c) Any hospitality during specific time periods, such as parties engaged in a tender or competitive bidding exercise (where you are involved in the exercise) or contract negotiations (except for normal meals during or after contract negotiation sessions provided it is not lavish or excessive);
- d) Any hospitality provided or received that would be illegal or in breach of any applicable laws;
- e) Any hospitality provided or received that would be perceived as lavish or excessive or may adversely tarnish the reputation of the Company; or
- f) Any hospitality offered or accepted frequently with the same party.

Personnel are required to exercise proper care and judgement before accepting hospitality offered or provided by third parties or Business Partners. This is not only to safeguard the Company's reputation, but also to protect the Personnel from allegations of impropriety or undue influence.

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When in doubt, you should either politely decline the offer or seek advice from your Head of Department.

3.2.1 Travel, transportation and accommodation

You are prohibited from offering or accepting hospitality in the form of travel, transportation and accommodation.

Personnel travelling for the Company's business shall be paid for by the Company unless otherwise specified in the relevant work or service contract.

Any waiver requires the approval from the Chief Executive Officer.

3.2.2 Providing Entertainment / Meals

You are allowed to offer entertainment/meals to Business Partners and other parties engaged with the Company provided they fall within the following limited exceptions:

- a) It is business-related (i.e. only for those directly connected to the business operations);
- b) It is not for spouses and other non- business guests; or
- c) The cost of the entertainment/meal does not exceed the thresholds below which provides a guidance on what is deemed to be reasonable:

Job Grade/ Position	Per Receipt: Malaysia
Executive and Engineer	RM250
Manager and above Up	RM750

Employees would be required to spend within the above threshold/ limit set and declare in Gifts, Hospitality and Sponsorship Provided Declaration Form for approval. In the event the claims exceed the fixed threshold, the claims will need to be routed to the Group Managing director.

Thereafter, it should follow through with approval as per the Limits of Authority prior to reimbursement.



Once the application is approved, the application will be submitted to Finance to approve payment provided that the application is supported by relevant documentation.

All payments and claims made for any hospitality or entertainment along with the supporting documents must be recorded and kept.

It is important to note that when more than one (1) employee is present at a business meal, the employee with the highest-ranking job level should pay the bill.

3.2.3 Receiving Entertainment / Meal

The Company strictly prohibits its Employees and Directors from soliciting hospitality or entertainment or accepting hospitality or entertainment given in response to or in anticipation of a favourable business decision.

Employees and Directors are required to exercise proper care and judgement before accepting hospitality or entertainment offered or provided by third parties. This is not only to safeguard the Company's reputation, but also to protect Employees and Directors from allegations of impropriety or undue influence.

When in doubt, you should either politely decline the offer or seek advice from your Head of Department.

4.0 SPONSORSHIP AND DONATIONS

As a responsible corporate citizen, the Company is committed to contribute to the wellbeing of the communities. It is important that all CSR programmes, sponsorship and donations are made in accordance with the Company's policies and procedures and as permitted by existing laws and regulations. However, these activities may be misused or perceived as vehicles for bribery and corruption.

All these activities shall be made in accordance with the following:

- a) ensure such contributions are allowed by applicable laws;
- b) be made to legitimate entities having an adequate organizational structure for proper administration of the funds;
- c) be accurately stated in the Company's accounting books and records; and

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- d) not to be used in return of an improper business advantage or be used as a means to cover up a bribe.

For avoidance of doubt, donations and sponsorship are strictly prohibited in the following situations:

- a) Any sponsorship and donation request that comes with a direct/indirect suggestion, hint, understanding or implication that some expected or desirable outcome is required;
- b) Any sponsorship and donation that is illegal or in breach of any applicable laws;
- c) Any sponsorship and donation that is excessive or may otherwise tarnish the reputation of the Company; or
- d) Any sponsorship and donation that is used as a conduit to circumvent, avoid or evade the law or regulatory requirements.

All personnel are encouraged to use good judgement and common sense in assessing sponsorship and donation requests.

Due diligence must be conducted to ensure that the requests are legitimate and that any red flags are solved prior to committing the funds.

4.1 Approval process

All requests for CSR and non-CSR sponsorships and donations to be made to governmental/non-governmental bodies shall obtain the approval from the Chief Executive Officer for amount below RM5000 or Group Managing Director for amount of RM5000 and above.

4.1.1 Political Contributions

We do not make political donations (i.e. donations to politicians or political campaigns or candidates for political offices) and we do not allow the Company's resources to be used for this purpose.

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However, the Company encourages personnel to participate in the political election process by voting. Personnel may choose to make personal political contributions as appropriate within the limits established by the law.

4.2 Approval Authority

	Review by	Approver 1
Below RM300	HOD	N/A
More than Rm300	HOD	CEO
Within nominal value *Engineer: ≤ RM250 *Manager & Above: ≤ RM750	HOD	CEO
Above nominal value	HOD	GMD
Below RM5000	HOD	CEO
More than RM5000	HOD	GMD

5.0 DEALING WITH FACILITATION PAYMENTS

A “facilitation payment” is a payment received or made to a decision maker or an administrative staff (in either public or private sectors) to speed up a process or secure licenses/permits.

Facilitation payment is illegal under the MACC Act as it falls within the meaning of gratification or bribery.

Facilitation payments need not involve cash or other financial assets; it can be any sort of advantage with the intention to influence them in their duties.

5.1 Making Facilitation Payment

Identifying the difference between a legitimate request for payment in exchange for a service, and an illegal request for a bribe can be difficult.

If you face this problem, stop and ask yourself these questions:

- Am I able to obtain an official receipt for the payment?
- Am I being pressured to make the payment?

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If you are unable to obtain an official receipt, or feel pressured into making a payment, the officer or representative may ask you for a facilitation payment.

5.2 Managing Facilitation Payment Request**a) Employees**

If you receive requests for facilitation payment, you must refuse to pay and immediately report the incident to either MACC or the police. You must then immediately report the incident to your Head of Department.

If you are aware that an Employee has requested a facilitation payment from Business Partners, you should also report the matter through the whistleblowing channels.

b) Business Partners

Business Partners who receive request for facilitation payments from Employees, must decline to pay and report the issue via the whistleblowing channels.

6.0 TRAINING AND AWARENESS

The company shall conduct training or awareness programmes for all Employees on the Company's position and practices regarding anti-bribery and corruption, integrity, and ethics.

Business Associates assessed as medium or high risk shall also be provided with awareness of the Company's anti-bribery requirements.

7.0 VIOLATIONS AND INVESTIGATIONS

The company regards bribery and acts of corruption as serious matters and may lead to repercussions in the event of non-compliance with this policy. For Employees, non-compliance may lead to disciplinary action in accordance with the Employee Handbook including but not limited to termination of employment.

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For Business Associate, non-compliance may lead to repercussions including but not limited to termination of contracts. Further legal action may also be taken in the event that the Company's interests have been impacted by non-compliance by individuals and organizations.

8.0 WHISTLEBLOWING

We encourage openness, transparency and accountability in ensuring prompt action is taken where necessary, in order to mitigate any potential financial or reputation damage arising from serious forms of misconduct.

We also encourage reporting (whistleblowing) of real or suspected cases of bribery and corruption without fear of retaliation or reprisal.

We have in place a Whistleblowing Policy, which is available on the Company's corporate website at <https://ptt.com.my/tag/board-charter-and-policies/> which provides channels to secure reporting of concerns about instances of bribery and corruption and other forms of misconduct.

9.0 REVIEW OF THIS POLICY

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

Refer **Appendix 1**

10.0 EFFECTIVE DATE

This ABAC Policy is effective on 01st September 2026

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Appendix 1: ABAC Policy

TECHNOFIT**ANTI-BRIBERY POLICY**

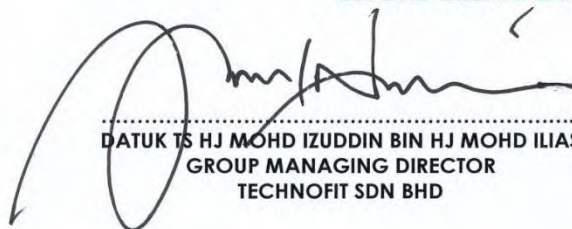
TECHNOFIT mission is to conduct our business activities ethically and honestly, with zero-tolerance for all forms of bribery and corruption, whether direct or indirect, public or private.

We strive to achieve excellence by:

- a) Prohibit all forms of bribery, whether direct or indirect, including offering, promising, giving, requesting, or accepting bribes.
- b) Comply with all applicable anti-bribery laws, regulations, and other requirements, including the Malaysian Anti-Corruption Commission (MACC) Act 2009.
- c) Implement, maintain, and continually improve the Anti-Bribery Management System to effectively manage bribery risks.
- d) Promote an anti-bribery culture of integrity, transparency, and accountability across all levels of the organization.
- e) Encourage raising concerns in good faith, or on the basis of a reasonable belief in confidence, without fear of reprisal to the Whistleblowing Committee.
- f) Take appropriate disciplinary action against any personnel who violate this policy or engage in bribery-related misconduct.
- g) Establishing independent and empowered anti-bribery functions to oversee ABMS effectiveness.

We shall ensure that ABMS Policies are established and that the ABMS Objectives are regularly reviewed to ensure their ongoing relevance and effectiveness. We use data-driven insights to identify areas for improvement and implement corrective actions as needed.

We shall ensure that this ABMS policy is communicated and understood by every employee, interested parties, and business associates. We will encourage their active participation in maintaining and enhancing the integrity in our services.

"BEYOND CLIENTS' EXPECTATION"


.....
DATUK TS HJ MOHD IZUDDIN BIN HJ MOHD ILIAS
 GROUP MANAGING DIRECTOR
 TECHNOFIT SDN BHD

DATE: 20th AUG 2026
 REVISION 00

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**ANTI-BRIBERY MANAGEMENT SYSTEM 37001: 2025**

TSB-IMSM-002 Issue No: 1 Rev 00

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Appendix 2: Anti Bribery Objective

TECHNOFIT**ANTI-BRIBERY OBJECTIVE**

Department	Objective	Action required	Resource required	Responsibility	Time frame	Measurement
Human Resources	To conduct at least 1 Anti-Bribery (ABMS) related training to all employees	- Establish training plan - Source for training provider	- HRA - Trainer	HRA Manager	Yearly	Training Attendance Record/ Certificate of Attendance
Anti-Bribery	To review the bribery risk assessment once a year	- Identify and assess bribery risks annually. - Evaluate changes in business operations and regulatory requirements. - Update the bribery risk assessment based on findings.	Anti-Bribery Steering Committee	All employees, suppliers and contractors	Yearly	Bribery Risk Assessment
All Department	Zero Bribery case	Conduct training on staff, business associate (Medium to high risk) on the bribery detection, gift policy, ethic and code of conduct.	- Training materials - Training for Staff & Business Associates. - Training materials (slides, handouts, case studies) - Trainer (internal or external expert) - Whistleblowing channel.	All Department	Yearly	Whistleblowing record

"BEYOND CLIENTS' EXPECTATION"


DATUK HJ MOHD IZUDDIN BIN HJ MOHD ILIAS
 GROUP MANAGING DIRECTOR
 TECHNOFIT SDN BHD

DATE: 20TH AUG 2026
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ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

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Appendix 3: Personnel Integrity Pledge

TECHNOFIT

Personnel Integrity Pledge

I, (employee's full name) from
 (Department / Project Site) with
 (NRIC No.), hereby pledge and undertake as follows:

- a. I will always comply with all relevant laws and regulations, including but not limited to the Malaysian Anti-Corruption Commission Act 2009 (and its amendments), the Penal Code of Malaysia (revised 1997) (and its amendments), the Companies Act 2016 (Malaysia), and the Whistleblower Protection Act 2010;
- b. I will not, either individually or in collaboration with any other parties:
 - i. Request, accept, or agree to receive, on behalf of myself or any other party; or
 - ii. Offer, promise, or give to any party, whether for their benefit or the benefit of others;
- c. I will not conspire with bidders, suppliers, or any other party in any form of practice, including obtaining the withdrawal of tenders through corruption, which could affect transparency and fairness in procurement activities or throughout the contract implementation period;
- d. I agree to properly safeguard all confidential information and documents related to any tender/quotation and/or contract;
- e. I will immediately declare the details to the Anti-Bribery Compliance Function if any of my family members or relatives (as defined under the Malaysian Anti-Corruption Commission Act 2009) has any interest in any bidder and/or supplier for the foreseeable future;
- f. I will report immediately to the Anti-Bribery Function if any party offers, gives, agrees, or promises to give any bribe as an inducement or reward for any matter or transaction related to any procurement activities, and acknowledge that failure to do so will be an offense under the Malaysian Anti-Corruption Commission Act 2009; and
- g. I will always comply with the Company's Code of Conduct and Ethics, Anti-Bribery and Anti-Corruptions Policy, and other related policies.

I agree that this declaration obligation will remain in effect throughout my service with the Company.

I fully understand that failure to comply with or breach of any of the terms of this declaration may result in criminal and/or civil proceedings and/or disciplinary action against me, including termination of employment or dismissal.

Employee's Signature**Witness's Signature**

Name: _____

Name: _____

Position: _____

Position: _____

Date: _____

Date: _____

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Appendix 4: Third Party Integrity Pact

TECHNOFIT**Third Party Integrity Pact**

Name of organisation ("Entity")	:	
Nature of business relationship with the Group	:	Contractors / Vendors / Suppliers / Solicitors / Agents / Consultants / Joint-venture partners / Introducers / Government intermediates / Others (pls specify): _____

I, _____ NRIC No. _____ on behalf of _____ (name of Company) with Company Registration No. _____, hereby declare that I, or any individual(s) representing this company shall not offer or give any bribes to any individual(s) in **TECHNOFIT SDN BHD** or any individual(s), in any form of gratifications as defined under the Malaysian Anti-Corruption Commission Act 2009 (Act 694), as inducement to be selected as **TECHNOFIT SDN BHD** registered vendor in any procurement process. I attach herewith a Letter of Authorization which empowers me, as representative of the abovementioned company to make this declaration.

2. If I, or any individual(s) representing this company attempts to offer bribes to any individual(s) in **TECHNOFIT SDN BHD** or any individual(s), in any form of gratifications for any procurement award, I hereby agree as the representative of the abovementioned company for the following actions to be taken:
 - 2.1 Suspension and/or removal as **TECHNOFIT SDN BHD** registered vendor and shall be blacklisted for future registration;
 - 2.2 Revocation of any award and/or contract offered OR any issued Purchase Order (PO);
 - 2.3 Termination of any existing award and/or contract OR any existing Purchase Order (PO) and
 - 2.4 Any other disciplinary actions according to **TECHNOFIT SDN BHD** rules and regulations that being in force.
3. In the event if there is any individual(s) who attempt to solicit bribes from me or any individual(s) related to this company in any form of gratifications during any procurement process, I hereby pledge to immediately report such act(s) to **TECHNOFIT SDN BHD** Anti-Bribery Function and lodge a report to Malaysian Anti-Corruption Commission (MACC)'s office or the nearest police station.

For and on behalf of the company,

Witnessed by,

 Name :
 NRIC No. :
 Date :
 Company Stamp :

 Name :
 NRIC No. :
 Date :

Remark: This Third Party's Integrity Pledge declaration must be submitted before approval as Approved Vendor.

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Appendix 5: Conflict of Interest Declaration 1/2

TECHNOFIT

Conflict of Interest Declaration

Name:			
Email:		Phone No.:	
Job Position:		Department:	

*I hereby declare all conflict-of-interest situations as follows:
(please tick whichever is applicable and provide details in Appendix II)*

No	Conflict of Interest Situation	Yes	No
1	Do you or your family member* hold equity ownership, or any position or interest (e.g. directorship and partnership) in entities that having any business relationship with the Company?		
2	Do you or your family member* have any interest, employment, business appointment or undertaking in the business of a competitor with or without business relationship with the Company?		
3	Do you hold other employment, business appointments or undertakings in any entities that are in non-competing business and not having any business relationship with the Company, that may interfere with the proper discharge of your official duties in the Company?		
4	Does the Company purchase, lease or enter into any contractual arrangement with you or your family member*?		
5	Do you use the Company's properties, information, position or opportunities to directly or indirectly benefit yourself or others or in a manner that could harm the Company?		

* Family member refers to:

- Spouse;
- Siblings [brother(s) or sister(s)];
- Spouse's siblings;
- Parents or grandparents;
- Uncle, aunt or cousin;
- Child or grandchild, including adopted child or step child;
- Son-in-law or daughter-in-law;
- Parents-in-law or grandparents-in-law.

Please fill up the details of Conflict of Interest if applicable.

No	Individual name which gives to conflict-of-interest situation	Nature of business	Individual position which gives to conflict-of-interest situation	Relationship

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Appendix 5: Conflict of Interest Declaration 2/2

TECHNOFIT

Conflict of Interest Declaration

Declaration:

I hereby declare that the information provided herein is true, complete and accurate. I further undertake to make a new declaration within thirty (30) days from the date of occurrence of any event at any time, that may affect the foregoing declaration or result in the existence of any new or potential conflict of interest.

Full Name:

NRIC No.:

Date:

FOR THE USE OF ANTI-BRIBERY FUNCTION

The Anti-Bribery Function and Directors have reviewed the conflict-of-interest disclosure and made the following decision:

Reviewed by:

Name:
(Anti bribery Function)
Date:

Approved by:

Name:
(Director)
Date:

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

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Appendix 6: Gifts, Hospitality and Sponsorship Provided Declaration Form

TECHNOFIT

Gifts, Hospitality and Donations **Provided** Declaration Form

Employee's Name		Department	
HOD's Name		Designation	

Intended Recipient's Details	Name: _____ Organization: _____ Designation: _____ Date Offered: _____		
Intended Recipient's Relationship with TECHNOFIT	☐ Existing Supplier ☐ Prospective Supplier ☐ Existing Customer ☐ Prospective Customer ☐ Government Official ☐ Non-profit Organization ☐ Others: Please specify _____		
Details of Gifts / Donations / Hospitality to be Given	☐ Festival/Seasonal Gifts ☐ Meals & Beverages ☐ Travel / Accommodation ☐ Fruit basket / Flower ☐ Obituary Contribution / Wreath Brief Description: _____		
Estimated Value of Gifts / Donation / Hospitality *	☐ RM1 – RM299.99 ☐ RM300 – RM999.99 ☐ RM1,000 – RM4,999.99 ☐ RM5,000 and above		
Justification	☐ Festive/Seasonal Celebration ☐ Periodic Relationship Building/Networking ☐ Business Discussions ☐ Corporate Social Responsibility Initiatives ☐ Sponsorship for corporate event ☐ Others, please specify: _____		
Frequency	☐ Once a year ☐ Twice a year ☐ Quarterly ☐ Monthly ☐ Weekly ☐ Rarely		

Recommendations & Authorization:

☐ Recommended ☐ Not Recommended _____ Immediate Superior/ HOD	☐ Approved ☐ Rejected _____ CEO
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* Value of hospitality is based on per person basis.

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Appendix 7: Gifts, Hospitality and Sponsorship Received Declaration Form 1/2

TECHNOFIT**Gifts, Hospitality and Donations Received Declaration Form**

Giver's Details	Name: _____ Organization: _____ Designation: _____ Date Offered: _____	
Relationship with TECHNOFIT Engineering	☐ Existing Supplier ☐ Prospective Supplier ☐ Existing Customer ☐ Prospective Customer ☐ Government Official ☐ Non-profit Organization ☐ Others: Please specify _____	
Details of Gifts / Donations / Hospitality Received	☐ Festival/Seasonal Gifts ☐ Meals & Beverages ☐ Travel / Accommodation ☐ Fruit basket / Flower ☐ Obituary Contribution / Wreath Brief Description: _____	
Estimated Value of Gifts / Donation / Hospitality*	☐ RM1 – RM299.99 ☐ RM300 – RM999.99 ☐ RM1,000 – RM4,999.99 ☐ RM5,000 and above	
Justification	☐ Festive/Seasonal Celebration ☐ Periodic Relationship Building/Networking ☐ Business Discussions ☐ Corporate Social Responsibility Initiatives ☐ Sponsorship for corporate event ☐ Others, please specify: _____	
Please circle your answers:	a) Was the gift(s) or benefit(s) offered during official duties? ☐ Yes ☐ No	
	b) Was the gift(s) or benefit(s) offered related to tender, contracts or negotiations? ☐ Yes ☐ No	

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

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Appendix 7: Gifts, Hospitality and Sponsorship Received Declaration Form 2/2



Gifts, Hospitality and Donations **Received** Declaration Form

Decisions & Authorization:

Declared By: Employee Name: Date:	Review ☐ Approved ☐ Rejected Immediate Superior/ HOD Name: Date:	Approval ☐ Approved ☐ Rejected Name: Designation: Date:
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Decision on Gift Treatment

(Please tick on the box below)

a) Donate the gift to charity	
b) Share the gift among the department employees	
c) Hold it for departmental display	
d) Permit it to be retained by the employee	
e) Return to the donor	
f) Others (Please State): 	

ANTI-BRIBERY POLICY

TECHNOFIT mission is to conduct our business activities ethically and honestly, with zero-tolerance for all forms of bribery and corruption, whether direct or indirect, public or private.

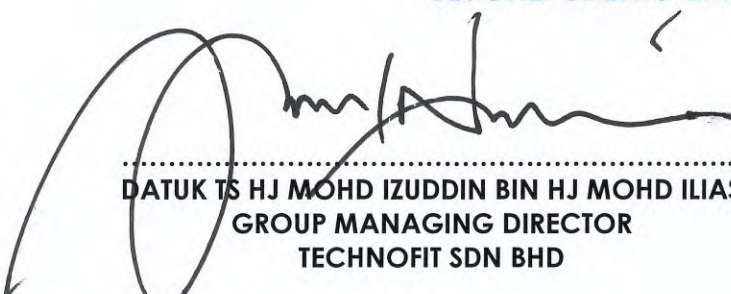
We strive to achieve excellence by:

- a) Prohibit all forms of bribery, whether direct or indirect, including offering, promising, giving, requesting, or accepting bribes.
- b) Comply with all applicable anti-bribery laws, regulations, and other requirements, including the Malaysian Anti-Corruption Commission (MACC) Act 2009.
- c) Implement, maintain, and continually improve the Anti-Bribery Management System to effectively manage bribery risks.
- d) Promote an anti-bribery culture of integrity, transparency, and accountability across all levels of the organization.
- e) Encourage raising concerns in good faith, or on the basis of a reasonable belief in confidence, without fear of reprisal to the Whistleblowing Committee.
- f) Take appropriate disciplinary action against any personnel who violate this policy or engage in bribery-related misconduct.
- g) Establishing independent and empowered anti-bribery functions to oversee ABMS effectiveness.

We shall ensure that ABMS Policies are established and that the ABMS Objectives are regularly reviewed to ensure their ongoing relevance and effectiveness. We use data-driven insights to identify areas for improvement and implement corrective actions as needed.

We shall ensure that this ABMS policy is communicated and understood by every employee, interested parties, and business associates. We will encourage their active participation in maintaining and enhancing the integrity in our services.

"BEYOND CLIENTS' EXPECTATION"



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DATUK TS HJ MOHD IZUDDIN BIN HJ MOHD ILIAS
GROUP MANAGING DIRECTOR
TECHNOFIT SDN BHD

DATE: 20th AUG 2026
REVISION 00