

MSB GLOBAL GROUP BERHAD

[Registration No. 202101037864 (1438164-U)]
(Incorporated in Malaysia under the Companies Act 2016)

ANTI-BRIBERY AND CORRUPTION POLICY

INTRODUCTION

MSB Global Group Berhad (“**MSB Global**” or “**the Company**”) and its subsidiaries (“**the Group**”) are committed to maintaining the highest standards of ethical behaviour in all business activities. Corruption in any form is strictly prohibited and undermines the company's reputation, financial performance, and social responsibility. This Anti-Bribery and Anti-Corruption Policy (“**Policy**”) is an initiative to contribute toward anti-corruption efforts in Malaysia.

We remain bound by the laws of Malaysia, including the Malaysian Anti-Corruption Commission Act 2009 and the Malaysian Anti-Corruption Commission (Amendment) Act 2018 and any of its amendments or re-enactments that may be made by the relevant authority from time to time in respect of our conduct in both Malaysia and abroad.

SCOPE

The Policy is applicable to all Directors and Employees (including full-time, part-time, probationary, contract and temporary staffs) of the Group and should also include consultants, contractors, trainees, seconded staff, volunteers, interns, agents, sponsors, suppliers, customers, any third party and any other person associated with the Group. Each Director or Employee, as well as persons associated with the Group, has a duty to read and understand the Policy.

DEFINITIONS

For the purpose of this Policy:-

“**Corruption**” means the act of abuse of entrusted power for private gain.

“**Bribery**” means the offering, giving, receiving, or soliciting of anything of value to influence or obtain an improper advantage.

“**Extortion**” means the use of threats or force to obtain an improper advantage.

“**Embezzlement**” means the theft or misappropriation of funds or property by a person in a position of trust.

“**Kickbacks**” means the payment of money or other things of value in exchange for a business advantage.

“**Money laundering**” means the process of concealing the origin, ownership, or destination of illegally obtained funds.

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PROHIBITIONS

MSB Global Group prohibits all forms of corruption, including but not limited to:

- Offering, giving, receiving, or soliciting bribes or kickbacks;
- Making or receiving payments or gifts that could influence or appear to influence business decisions;
- Offering or receiving inappropriate entertainment, hospitality, or gifts;
- Making or receiving political contributions that violate local laws or company policy;
- Using company assets or resources for personal gain;
- Making false or misleading statements to regulators or auditors; and
- Engaging in any activity that could be considered money laundering.

COMPLIANCE AND REPORTING

All employees, contractors, suppliers, and third parties acting on behalf of MSB Global Group are required to comply with this policy and procedure. Any suspected or actual violation of this policy must be reported through the designated reporting channel to the Chairperson of the ARMC via email at whistleblowing@msbglobal.com.my.

MSB Global Group is committed to ensuring that no individual suffers any detrimental treatment as a result of refusing to participate in corruption or for reporting concerns under this policy in good faith.

DUE DILIGENCE

MSB Global Group will conduct due diligence on all business partners, including suppliers, contractors, and third parties, to ensure they are not engaged in corrupt activities. Due diligence will include background checks, financial reviews, and compliance assessments. MSB Global Group will only engage with business partners who meet the Company's anti-corruption standards.

TRAINING AND AWARENESS

MSB Global Group will provide regular training and awareness programs to all employees to understand the content of the Group's Anti-Bribery and Corruption Policy. Training and awareness programs will cover the risks and consequences of corruption, the Company's policies and procedures, and best practices for preventing corruption.

The Group will also issue a circular on the Anti-Bribery and Corruption Policy to all parties including employees, contractors, suppliers, and other stakeholders.

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INVESTIGATIONS AND SANCTIONS

MSB Global Group will investigate all suspected or actual violations of this policy and procedure. Investigations will be conducted promptly, impartially, and confidentially. Sanctions for violations may include disciplinary action, termination of employment or contracts, civil or criminal penalties, and referral to law enforcement authorities.

CONTINUOUS IMPROVEMENT

MSB Global Group will review and update this policy and procedure periodically to ensure it remains effective and relevant. The company will incorporate feedback from stakeholders and incorporate best practices for preventing corruption.

PUBLICATION ON THE CORPORATE WEBSITE

In line with the Listing Requirements, a copy of this Policy is available on the Company's corporate website.

EFFECTIVE DATE

This Policy has been adopted by the Board on 19 July 2024.

END.

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