

ANTI-BRIBERY & CORRUPTION POLICY

1. Introduction

CWG Holdings Berhad ("CWG" or "the Company") and its subsidiaries ("CWG Group" or "the Group") conduct its business in a legal and ethical manner. The Group requires all employees (including full time, probationary, contract and temporary staff) ("Employees") and Directors of the Group to be committed to acting professionally and with integrity in their business dealings.

The Group will take reasonable and appropriate measures to ensure that its businesses do not participate in corrupt activities for its advantage or benefit. This Anti-Bribery and Corruption Policy ("Policy") sets out the parameters to prevent the occurrence of bribery and corrupt practices that may arise in the course of daily business and operation activities within CWG Group. The Employees and Directors are collectively referred to as "Persons" or "Officers" throughout this Policy.

2. Objective

The objective of this Policy is to provide information and guidance to the Officers on standards of behaviour to which they must adhere to and how to recognize as well as deal with bribery and corruption.

The Policy is not intended to be exhaustive, and there may be additional obligations that Officers are expected to adhere to or comply with when performing their duties. For all intents and purposes, the Officers shall always observe and ensure compliance with all applicable laws, rules and regulations to which they are bound to observe in the performance of their duties.

3. Scope and Application

The Policy is applicable to all Officers of CWG Group.

In this Policy, the associated third parties shall refer to any individual or organization that an associate may come into contact during the course of his/her engagement with the CWG Group, which may include but not limited to suppliers, contractors, agents, consultants, outsourced personnel, distributors, advisers, government and public bodies including their advisers, representatives and officials ("Associated Third Parties").

Anti-Bribery & Corruption Policy (cont'd)

4. 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 CWG 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.
- "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.

Anti-Bribery & Corruption Policy (cont'd)

5. Principles and Responsibilities

We take a zero-tolerance approach to bribery and corruption. Any violation of this Policy will be regarded as serious matter and will result in disciplinary action, including dismissal and termination in accordance with the appropriate laws.

An Officer will be accountable individually whether he or she pays a bribes himself or herself or whether he or she authorizes, assists or conspires with someone else to violate this Policy and/or an anti-corruption or anti-bribery. Punishment for violating the law are against him/her as an individual and may include imprisonment, probation, mandated community service and monetary fines and others which will not be paid or borne by CWG Group.

CWG Group conducts its business in an honest and ethical manner. We are committed to acting professionally, fairly and with integrity in all our relationships and business dealings. The Board has oversight of this Policy. They are responsible for ensuring the compliance with this Policy. The Officers are required to be familiar with and comply with this Policy.

We will uphold all laws relevant to countering corruption and bribery. 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.

6. Corruption, Gifts, Benefits and Entertainment

All persons who are subject to this 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 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 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

7. 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.

8. 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.

9. Record-keeping

It is important that proper and complete records be maintained of all payments made to Associated Third Parties in the usual course of business as these would serve as evidence that such payments were bona fide, and not linked to corrupt and/or unethical conduct. All accounts, invoices, documents and records relating to dealings with third parties, such as customers, suppliers and business contacts, should be prepared and maintained with accuracy and completeness.

10. Training and Awareness

Training shall be provided on a regular basis, in accordance with the level of bribery and corruption risk related to the position. Training will be provided to personnel who are:

- (a) new to the Group;
- (b) appointed to or currently holding an exposed position

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As part of the job orientation program, all Employees shall be briefed by the personnel from Human Resources Department on the Policy. Additionally, a copy of the same is made available on the company website of CWG for their easy access and reference from time to time.

11. 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.

12. Document History

Version	Date of Board Approval	Implementation Date	Description
(1)	28 May 2020	1 June 2020	1 st version of the Policy

13. 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.

The Policy shall be made available on the corporate website.