

ANTI-BRIBERY & CORRUPTION POLICY



SEALINK INTERNATIONAL BERHAD

REGISTRATION No. 200701042948 (800981-X)

Revised on 28 February 2023

1.0 INTRODUCTION

Sealink International Berhad ("Sealink" or the "Company") and its subsidiaries (the "Group" or "Sealink Group") are committed to conducting business dealings with integrity. This means avoiding practices of bribery and corruption of all forms in the Company's daily operations. Sealink Group has adopted a zero tolerance approach against all forms of bribery and corruption and takes strong stance against such act. Employees who refuse to pay or receive bribes or participate in acts of corruption will not be penalised even if such refusal may result in the Company losing its business. Sealink Group will ensure its businesses or any transactions do not participate in corruption activity for its advantages or benefits.

In line with this commitment, Sealink Group has developed its Anti-Bribery and Corruption Policy ("ABCP" or "Policy"), and this Policy shall complement with the core principles set out in the Code of Conduct and Directors' Code of Ethics, as included in the Group Employee Handbook and Board Charter.

2.0 OBJECTIVES

This Policy set out the Group's position on bribery in all forms and matters of corruption that might confront the Group in its day to day operations.

3.0 SCOPES

- (i) This Policy is applicable to Sealink Group, including all Directors, Employees and Crews ("Personnels").
- (ii) It is also applicable to clients, contractors, sub-contractors, suppliers, vendors, agents, consultants, advisers, representative and service providers of any kind performing work or services, for or on behalf of Sealink Group ("Business Associate").
- (iii) Joint Ventures Companies is which Sealink is a shareholder or partner (whether controlling or otherwise) and associated companies are encouraged to adopt these or similar principles ("JV Partner").

4.0 DEFINITIONS

"Bribery" is defined as any action which would be considered as an offence of giving or receiving 'gratification' under the Malaysian Anti-Corruption Commission Act 2009 ("MACCA"). In practice, this means offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person who is in a position of trust within an organisation.

Bribery may be 'outbound', where someone acting on behalf of Sealink attempts to influence the actions of someone external, such as a Government Official or client decision-maker. It may also 'inbound', where an external party is attempting to influence someone within Sealink such as a senior decision-maker or someone with access to confidential information.

“Gratification” is defined in the MACCA to mean the following:

- (i) 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;
- (ii) Any office, dignity, employment, contract of employment or service, and agreement to give employment or render service in any capacity;
- (iii) Any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- (iv) Any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- (v) Any forbearance to demand any money or money’s worth or valuable thing;
- (vi) Any other services 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 exercises or the forbearance from the exercise of any right or any or any official power or duty; and
- (vii) Any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraph (i) to (vi).

“Corruption” generally the act of soliciting or receiving; or offering or giving any gratification for the purpose of improperly influencing a business decision in relation to a dealing or secure advantage in the transaction.

“Donation & Sponsorship” means charitable contributions and sponsorship payments made to support the community. Examples include sponsorship of educational events supporting NGOs, and other social cause.

“Entertainment / Hospitality” means an event or activity held for the employees, clients or stakeholders, which may include meals, drink, lodging, travel or other expenses incurred in order to create or enhance a business relationship.

“Gifts” means something given from one individual to another with the intention to create or enhance a personal relationship, which may include cash, cash equivalents, any other forms or discount or commission or any other valuable items.

“Facilitation Payment” means payment made to secure or expedite the performance by a person performing a routine or administrative duty, function or responsibility. It can be cash or other financial assets, including any sort of advantage with the intention to influence them in their duties or function.

5.0 ANTI BRIBERY AND CORRUPTION POLICY

- 5.1 All forms of bribery and corruption are prohibited. The Group upholds a zero tolerance approach. In addition to bribery, Personnels must not participate in any corrupt activity such as extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.
- 5.2 Bribery may take the form exchange of money, goods services, property, privilege, employment position of preferential treatment. Personnels shall not therefore, whether directly or indirectly, offer, give, receive or solicit any item of value, in the attempt to illicitly influence the decisions or actions of a person in a position of trust within an organisation, either for the intended benefit the group or the persons involved in the transactions.
- 5.3 This Policy applies equally to its business dealings with commercial ('private sector') and Government ('public sector') entities, and includes their directors, personnel, agents and other appointed representatives. Even the possible appearance of bribery or corruption is to be avoided, in particular when dealing with Government official.
- 5.4 This Policy applies to all countries worldwide, without exception and without regard to regional customs, local practices or competitive conditions.
- 5.5 No Personnels will suffers demotion, penalty or other adverse consequences for refusing to pay or receive bribes or other illicit behavior, even is such refusal may result in the company losing business or experiencing a delay in business operations.
- 5.6 Sealink Group is also committed to conducting due diligence checks on prospective personnel, particularly as it relates to appointments to positions where a more than minor bribery or corruption risk has been identified.

6.0 DONATIONS AND SPONSORSHIP

- (a) Our Personnels and Business Associates must never use donations or sponsorships to obtain business or advantage of any kind or unduly influence the outcome of a business decision or cause others to perceive it as such. Donations and sponsorships are permitted in accordance with Sealink's Group Limit of Authority ("LOA") to ensure acceptability, on a case-by-case basis.
- (b) Party/ person seeking donation or sponsorship to fill a Declaration Form (Appendix II) as undertaking that such request is above board. However, the Declaration Form shall only be applicable for donation/ sponsorship of more than RM1000.00. Amount of RM1000.00 and below shall follow existing Limit of Authority ("LOA") Approval process.

7.0 POLITICAL CONTRIBUTIONS

- (a) The fund or resources of the Group must not be contributed, either directly or indirectly, to any political party, candidate or campaign.
- (b) Sealink Group may in very limited circumstances, make political contributions in countries where such contributions are permitted under applicable laws. Such political contributions, if made, must be approved by at least two (2) Directors.
- (c) The Personnels are not restricted to make personal political contributions in their own capacity, as appropriate within the limits set under the applicable laws. However, they must make clear of their individual political views and/or actions are personal and not reflective of the Group.
- (d) The Group must not reimburse any personal political contribution to the Personnels.

8.0 GIFTS, HOSPITALITY AND ENTERTAINMENT

8.1 Gift

A. Providing Gift

- (a) “Corporate Gift” normally bears the Company’s name and logo and are of nominal / appropriate value such as diaries, table calendars, pen, notepads and plaques. “Festive or ceremonial gifts” are traditional treated or gifts customary to the occasion such as red packets (without cash or cash equivalent), oranges, dates, indigenous produce like rice, local fruits and food stuff.
- (b) Corporate gifts, festive or ceremonial gifts may be given to our Business Partners or other parties it fulfils all of the following conditions:
 - (i) Made for the right reason – it should be clearly given as an act of appreciation or common courtesy associated with festive seasons or other ceremonial occasions;
 - (ii) No obligations – it must not be used to cause or induce the receiver to improperly or illegally influence any business action or inaction or cause others to perceive an improper influence;
 - (iii) No expectation – there must not be any expectation of any favour or improper advantage from the receiver;
 - (iv) Made openly – if made secretly and undocumented then the purpose will be open to question;

- (v) Reasonable value – the type of gift and its value must commensurate with the occasion and in accordance with general business practice;
- (vi) Legal – it complies with applicable laws; and
- (vii) Documented – the expense must be approved in accordance with and complies with Sealink’s LOA.

B. Accepting Gift

- (a) Sealink Group recognises that exchange of gifts is a very delicate matter where, in certain cultures or situations, gift giving is customary, a tradition or central part of business etiquette.
- (b) Our Personnels are expected to decline (or avoid accepting) gifts with the exceptions being:
 - (i) Corporate gifts of nominal / appropriate value;
 - (ii) Festive or ceremonial gifts of appropriate value during festive seasons or other ceremonial occasions;
 - (iii) When refusing the gift is likely to offend and harm Sealink’s business relationship with the giver; or
 - (iv) Gifts given during invitation to speak at conferences or work related conferences.
- (c) Our Personnels and Business Associates must not directly or indirectly solicit for gifts from any party for themselves or for on behalf of Sealink. Our Business Associates should not give gifts to our personnel.
- (d) Our designated personnel will record in the Gift Register any gift received that is sent to the office premise.

8.2 Entertainment and Hospitality

(a) Receiving Entertainment and Hospitality

- (i) The Personnels shall not accept any form of gratuitous entertainment or hospitality from any of the Group’s Business Associates and/or JV Partner or any party with whom the Group has or may have business dealings with, in order to avoid potential conflict of interest.
- (ii) However, under very limited circumstances, whereby refusing the entertainment and/or hospitality is likely to offend and/or sever the business relationship with the external parties including Business

Associates and/or JV Partner the acceptance of the entertainment and/or corporate hospitality is subject to the following procedures:

- Prior verbal approval must be obtained from the reporting Head of Department or any One (1) Executive Director;
 - Declare entertainment and/or hospitality accepted to reporting Head of Department or Executive Director in formal record through the use of Declaration Form for Gifts, Entertainment and Corporate Hospitality; and
 - Head of Department or Executive Director shall acknowledge the acceptance of the entertainment and/or corporate hospitality.
- (iii) The Personnels must be able to exercise proper care and judgement before accepting the entertainment and/or hospitality from a third party including the Business Associates and/or JV Partner to avoid allegation of bribery and corruption.

(b) Providing Entertainment and Hospitality

- (i) Sealink Group, as a business entity, recognised that providing modest entertainment and/or hospitality is a legitimate way to foster and build good business relationship with its Business Associates and/or JV Partner. Accordingly, eligible Personnels are allowed to claim job-related entertainment and/or hospitality, provided the claims must be verified by the Head of Department and approved accordingly as per Sealink's LOA. The purpose of expenses, name of person(s) entertained, his/her position and their Company must be stated clearly in the reimbursement claim form.
- (ii) The Personnels are strictly prohibited in providing entertainment and/or hospitality with the intention of:
- Inducing the recipient to award a contract to the Group (even if the Group is not awarded with the contract);
 - Obtaining advantageous treatment (for example, on tax, customs, permits, license, and/or etc) that would not otherwise be available to the Group; or
 - Circumventing or causing non-enforcement of certain laws or regulations applicable to the Group.

9.0 FACILITATION PAYMENT

- (a) Sealink Group strictly disallows and prohibited offering, promising, paying, requesting, accepting or receiving facilitation payments, either directly or indirectly. In this respect, all the Business Associates and/or JV Partner must be informed of this policy and they must undertake not to do the same prior to establishing any business relationship with the Group.
- (b) All Personnels are required to notify their reporting Head of Department or Executive Directors, of any requests for facilitation payment.
- (c) Any individual with any suspicion, concerns or queries regarding a payment made on behalf of the Group that may be perceived to be a facilitation payments, he or she should report to the Group via whistleblowing channel.

10.0 DEALING WITH BUSINESS ASSOCIATES / JV PARTNER

- (a) Business Associates and/or JV Partner will be made aware of this policy. The Group shall encourage all its Business Associates and/or JV Partner to submit an Anti-Bribery and Corruption Declaration or Confirmation on similar terms prior to establishing any business relationship with Sealink Group.
- (b) The responsible employee and/or Head of Department is required to continue to be aware of business practice of Business Associates and/or JV Partner to ensure on-going compliance of this Policy via official news reporting in the Country of any violation of corrupt act.
- (c) Sealink Group shall include standard clause in all contracts with business associates enabling the Group to terminate or be indemnified for the contract in the event that bribery or an act of corruption has been reported or charged against Business Associate.

11.0 DEALING WITH GOVERNMENT AND PUBLIC OFFICIALS

- (a) Sealink Group is committed to conduct business with government and public officials in a fair, transparent and ethical manner.
- (b) The Personnels are required to exercise caution in dealing with public officials and ensure strict compliance with this policy to avoid perception or allegations of bribery and corruption.
- (c) The Personnels must not or attempt to exert / exercise improper or illegal influence to any public officials, either directly or indirectly.
- (d) Any improper or secret payments, by the Group or its Business Associates and/or JV Partner including facilitation payments to any public officials is strictly prohibited.

12.0 RECORD SAFEKEEPING

All records should be in proper filing to be maintained with accuracy and completeness for all payments made to third parties in the ordinary course of business which is prove as evidence that such payments not linked to corrupt and/or unethical manner.

All Personnels are encouraged to voluntarily record / fill in the Gift Register for any gift, hospitality or entertainments they shall receive while performing their duties during the course of employment in the Company.

13.0 DECLARATIONS

- (i) All Personnels shall certify in writing that they have read, understood and agreed to abide by this Policy at all times. A copy of this declaration shall be documented and retained by the Human Resources. New recruit will acknowledge this undertaking in the Orientation Checklist Form.
- (ii) Sealink Group reserves the right to request the Personnels to declare information on his or hers assets in the event that such Personnels is suspected to be implicated, in any bribery and corruption-related accusation or incident.

14.0 TRAINING AND COMMUNICATIONS

- (i) Sealink Group shall conduct awareness trainings for relevant Personnels to introduce and refresh awareness of this Policy and to promulgate ethical conduct and integrity continuously.
- (ii) Training shall be provided on a regular basis, in accordance with the level of bribery and corruption risk related to the position. Training should be provided by Human Resources Department to:
 - (a) Personnels; and
 - (b) Appointed to or currently holding an exposed position.
- (iii) Human Resources Department shall maintain records to identify which Sealink's Personnel who have received the aforesaid training.
- (iv) Sealink Group's approach of zero tolerance to bribery and corruption must be communicated to all Business Partners and JV Partners at the outset of the business relationship with them and as appropriate thereafter.
- (v) This Policy shall be published on Sealink's website at all times.

15.0 REPORTING

The Personnels should report any cases of wrongdoing or a violation of the Policy in encouraged to report using Whistleblowing Policy. Employee produce genuine report on the violations or suspected violations will not be discriminated against or suffer any sort or manner of retaliation. Report will be treated confidentially.

16.0 MONITORING AND REVIEW

- (i) Sealink Group recognises that anti-bribery and corruption program is a continuous process, thus a systematic review and monitoring process is vital to ensure its objective are being met;
- (ii) The Risk Management Committee and Audit Committee is responsible to oversee the compliance with this Policy and review the effectiveness of internal control systems through the assistance from the Group's Internal Auditors; and
- (iii) Sealink Group shall conduct periodically risk assessment to identify, evaluate, monitor and manage bribery and corruption risks, as guided by the Group's Risk Management Framework and Policies; and the risk assessment shall be performed on a half-yearly basis, as a minimum requirement.

17.0 REVIEW AND REVISION

On an annual basis, the Risk Management Committee and Audit Committee shall review and assess the continuing relevance and effectiveness of the Policy. Any requirement for amendment shall be deliberated by the Committees and any recommendations for revisions shall be proposed for approval by the Board.

This revised policy is adopted by the Board of Directors on 28th February 2023.

-----END OF DOCUMENT-----

APPENDIX I

ANTI CORRUPTION ACKNOWLEDGEMENT FORM

To: Sealink International Berhad

I / We _____(Company Name) _____
(Registration No.) / NRIC/Passport No), _____ (address) hereby
acknowledge that I / We have read and fully understand the content of Sealink Anti Bribery and
Corruption Policy (“ABC Policy”) and commit to comply with the same in the course of business
with Sealink.

Authorised Signatory,

Name :

Position :

Date :

APPENDIX II

DONATION/ SPONSORSHIP REQUEST DECLARATION FORM

Name/ Organisation Name:

NRIC/ Passport No.:

Do hereby solemnly affirm and declare the following:-

No.	Criteria	YES	NO
1.	I/ We are a legitimate and legal charitable organisation in the country.		
2.	I/ Our organisation has in place Anti-Corruption & Bribery Policy and procedures.		
3.	My/ Our organisation do not engage in any lobbying or involve in political activities.		
4.	I/ We in the organisation and our senior management, principals or trustees are not connected to public officials.		
5.	Our organisation and our senior management are not being prosecuted or investigated of allegation of corruption.		
6.	Our organisation and our senior management, principals or trustees are not involved or being reported in any possible illegal or unethical conduct in our dealings.		

*Where you have ticked 'NO', please provide explanation.

Explanation for items ticked 'NO'	
No.	Explanation

.....
(Signature)
Name:
Date: