	SAM ENGINEERING & EQUIPMENT (M) BHD	
TITLE: Anti-Bribery and Corruption Policy		

1.0 Title

1.1 Anti-Bribery and Corruption Policy

2.0 Objective

2.1 This Policy sets out the position of SAM Engineering & Equipment (M) Berhad (“SAMEE”) and its group of companies (collectively, the “**Group**”) pertaining to bribery and corruption in all forms and matters to which a Director or an employee of the Group may encounter in his/her day to day duties.

3.0 Scope


3.1 This policy applies to the Directors and all employees of the Group (inclusive of full time, contract and permanent part-time employees) (“**Stakeholders**”) .

4.0 Definition

4.1 “Bribery” is defined as an act of giving or receiving gratification to which would be considered an offence upon conviction in view of the Malaysian Anti-Corruption Commission Act 2009 (“**MACC**”) or such relevant anti-bribery and/or anti-corruption laws wherein the relevant company within the Group operates (as the case may be).

4.2 “Gratification”, unless provided otherwise by the MACC or such relevant anti-bribery and/or anti-corruption laws of the relevant jurisdiction wherein the relevant company within the Group operates, means 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 items.

4.3 “Corruption” is the act of giving or receiving of any ‘gratification’ in abuse of entrusted power or position.

4.4 “External Party” means any person (i.e., individual or organization) to which a Stakeholder may come across during the course of the Stakeholder’s work for or with the Company, which includes but is not limited to, existing or potential customers, suppliers, consultants, contractors, agents, brokers, donation or sponsorship beneficiaries, advisers, as well as any applicants for employment, Public Officials, and general public.

4.5 “Public Official” means:

4.5.1 Any person holding a legislative, administrative or judicial office of a country, government, state, province or municipality, whether appointed or elected;

4.5.2 Any person exercising a public function for a country, government, state, province or municipality, including for a government agency, board, commission, corporation, or other body or authority;

4.5.3 Any official or agent of a public international organisation; or


4.5.4 Any political party or official of a political party or a candidate for public office.

5.0 No Bribery Zero Corruption

5.1 All forms of bribery and corruption are prohibited. This includes accepting or soliciting any bribe from, or offering any bribe to, any person or organization.

5.2 The Group upholds a zero tolerance approach to all forms of bribery and corruption.

5.3 The said zero tolerance approach applies to the entire Group irrespective of jurisdiction, local practices, customs and/or competitive conditions.

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5.4 No employee shall suffer demotion, penalty or any other adverse consequence from the Group for refusing to pay a bribe or refusing to receive a bribe or refusing to participate in corrupt activities (including extortion, collusion, breach of trust, abuse of power, insider trading, embezzlement, fraud or money laundering) notwithstanding such refusal may cause the Group to suffer from losing business or experiencing a delay in business operations.

6.0 Gift, Entertainment, Travel and Hospitality

6.1 All Stakeholders are expected to comply with the Standards of Conduct, Business Ethics and Conflicts of Interest.

7.0 Donation and Sponsorship

7.1 Donations and sponsorships are part of the Group’s commitment to society and a way of contributing to worthy causes. Nonetheless, even legitimate donations and sponsorships sometimes have the risk of creating the appearance of bribery and corruption.


7.2 Stakeholders must ensure that all donations and sponsorships on behalf of the Group are given through legal and proper channels. Particular care must be taken in ensuring that the charities or sponsored organisations on the receiving end are valid bodies and are able to manage the funds properly.

7.3 All Stakeholders are expected to comply with the Group’s Corporate Social Responsibility (“CSR”) Policy.

8.0 Unofficial Facilitation Payments

8.1 Facilitation payments are generally payments paid to speed up routine administrative processes such as licenses, permits, or visas. Such payments may be official payments disclosed by the relevant authority or unofficial payments to persons.

8.2 The Group prohibits all forms of unofficial facilitation payments of any kind to any External Party.

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9.0 Dealing with Public Officials

- 9.1** Caution must be exercised when dealing with public officials as the laws of bribery and corruption in some countries are more stringent and provides for stricter punishments.
- 9.2** Prior approval (including full disclosure of the estimated value of such gift and/or entertainment) shall be sought from the Human Resource Department or the CEO prior to any gifting of any gifts, entertainment, or corporate hospitality to any Public Official by any Stakeholder on behalf of the Group.

10.0 Political Contributions

- 10.1** The Group may, in very limited circumstances, make political contributions in countries where such contributions are permitted under the law.
- 10.2** The authority to approve such political contributions is with the respective Board of Directors.
- 10.3** Under no circumstances, will any employee be compensated or reimbursed in any way by the Company for a personal political contribution.

11.0 Reporting Of Violations

- 11.1** Stakeholders are encouraged to report any bribery or corrupt practice or a real and genuine suspicion of the same via independent@sam-malaysia.com.
- 11.2** Any alleged or suspected improper conduct must be disclosed using the procedures provided for in the **Whistle Blowing Policy**.

12.0 Consequence of non-compliance

- 12.1** The Group regards bribery and corruption as a serious matter.
- 12.2** Non-compliance may lead to disciplinary action, inclusive of termination of employment. Further legal action may be pursued by the Group in the event that the Group's interests had been harmed as a result of the said non-compliance.
- 12.3** The Group may notify the relevant authority in the event of a discovery of any bribery or corruption incidents and will co-operate to the extent allowable by law to the said relevant authority.

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13.0 Deviations and Waivers

- 13.1** Any deviation or waiver from this policy must be approved by the Audit Committee of SAMEE.
- 13.2** This Policy is subject to periodic review by SAMEE Audit Committee. As and when necessary, there may be amendment or revision to this Policy. It is the obligation and responsibility of all stakeholders to keep themselves informed of the latest updates to this Policy.