

1. ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Crest Builder Holdings Berhad (“the Company”) and its subsidiary companies (“the Group”) has a zero-tolerance policy towards bribery and corruption. This Anti-Bribery and Anti-Corruption Policy (“the Policy”) sets out the policy statements and other relevant parameters against bribery and corrupt practices by the directors (“Directors”) and employees (“Employees”) of the Group.

2. OBJECTIVE

The Group's Anti-Bribery and Anti-Corruption Policy aims to maintain trust and confidence in its operations by promoting transparency and good corporate governance. It is developed to enhance and safeguard the interests of all in Directors, Employees, and Third Parties from committing acts in contravention of the Malaysian Anti-Corruption Commission Act 2009 (“MACCA”). The policy provides guidelines for reducing potential bribery and corruption risks in high-risk business areas.

In the event of any conflict or inconsistency between the provisions of this Policy and other policies issued by the Group from time to time, the stricter one shall prevail.

3. SCOPE AND APPLICABILITY

This policy applies to all Directors, Employees, and Third Parties, including vendors, suppliers, contractors, consultants, agents, and representatives, who perform work, goods, or services for the Group.

4. NON-COMPLIANCE

The policy mandates compliance by all Directors, Employees and Third Parties, and violations of the MACCA can lead to disciplinary action, termination, and reporting to authorities.

5. REPORTING VIOLATIONS (WHISTLEBLOWING)

Whistleblowers, including Directors, employees, and the public, are encouraged to report any violations of this policy using the whistleblowing channel set out in the Group's Whistleblowing Policy and Procedure document, provided that it is done in good faith.

6. MONITORING AND REVIEW

The Group is committed to continuously improving anti-bribery and anti-corruption policies, with the Legal Department monitoring and reporting all matters related to this Policy to the Audit Committee. The policy is reviewed annually and enforced by each Head of Department.

7. GRATIFICATION

The definition of 'Gratification' is provided for in the MACCA.

The Corporate Liability provision of MACCA (S17A) specifically refers to "Outbound" bribery, and the Group's Anti-Bribery and Anti-Corruption Policy aims to mitigate these risks. Despite the various forms of gratification, the MACCA remains a comprehensive and effective anti-corruption measure.

8. CODE OF CONDUCT

The Group is committed to professional and legal conduct, promoting zero-tolerance against bribery and corruption. All Directors and Employees are required to adhere to these standards, as failure may result in termination if necessary.

9. CONFLICT OF INTEREST

The company Group's policy emphasizes avoiding conflicts of interest from personal investments, competing entities, and gainful employment. Employees must disclose any conflicts promptly and seek guidance from their Head of Department, Legal Department, or Human Resources Department. The Group reserves the right to take disciplinary action against employees who breach its rules, policies, procedures, and accepted practices.

10. GIFTS, HOSPITALITY AND ENTERTAINMENT REGISTER

Gifts

The Group has a strict "NO GIFT" policy, prohibiting Directors, Employees, and their family members from receiving or providing gifts to Third Parties in business dealings. However, the Group acknowledges that the exchange of gifts can be sensitive and delicate, and allows exceptions as outlined in Section 13.4 of the Policy.

Hospitality & Entertainment

The Group prohibits Directors and Employees from accepting extravagant hospitality or entertainment, but acknowledges occasional hospitality as a legitimate way to foster healthy business relationships. Pursuant to this, the Group has capped limits for the Hospitality and Entertainment that can be given or received.

All gifts, hospitality, and entertainment must be recorded in the Gifts, Hospitality, and Entertainment Register, managed by Human Resources.

11. FACILITATION PAYMENT AND KICKBACKS

Facilitation payments, also known as "Duit Kopi" in Malaysia, are illegal benefits given to expedite administrative duties, considered bribery. Companies strictly disallow these payments, even in extreme circumstances.

However, in extenuating circumstances, individuals may make self-protection payments, but they must inform the Head of Department, Legal Department, Executive Director, or Human Resources before making any such payment.

12. DUE DILIGENCE

The Group aims for zero-tolerance against bribery and corruption, expecting stakeholders to share this vision. They perform due diligence on new or high-risk stakeholders to identify potential risks.

13. FINANCIAL AND NON-FINANCIAL CONTROLS

The Group ensures fair business practices and minimizes potential conflicts of interest by separating duties for both financial and non-financial transactions.

Financial

Financial controls prevent bribery and corruption by managing transactions accurately, requiring tiered authority for payment approval, restricting cash, monitoring claims, and implementing strict sanctions for false claims.

Non-Financial

Non-financial controls oversee procurement, operational, commercial, and other non-financial activities, awarding contracts through competitive bidding, duty separation, and multiple levels of checking to ensure compliance.

14. TRAINING AND COMMUNICATION

The Group recognizes the importance of training and communicating its Anti-Bribery and Anti-Corruption policies to ensure the understanding and commitment of all Directors, Employees and Third Parties.

The Group aims to improve its anti-bribery and anti-corruption awareness programs for Directors, Employees, and Third Parties to protect themselves and the company from corruption. Training will cover topics like gift limits, reporting bribery, and maintaining relationships.

15. RECORDKEEPING

The Legal Department is responsible for document control and record keeping of anti-bribery and anti-corruption materials, including policies, with HODs responsible for their safekeeping.