SCOPE INDUSTRIES BERHAD

[Company No.: 200201023713 (591376-D)]

(Incorporated in Malaysia)

Anti-Bribery and Anti-Corruption Policy

Reference No:	Revision No.:	Board of directors' approval date:
		28 November 2024

Definitions

Unless the context otherwise requires, the following definitions shall apply throughout this policy:

"Act"	:	Malaysian Anti-Corruption Commission (Amendment) Act 2018 (Act A1567) cited together with Malaysian Anti-Corruption Commission Act 2009 (Act 694)
"Scope" or "the Company"	:	Scope Industries Berhad
"Scope Group" or the Group"	:	Scope Industries Berhad and its subsidiaries
"Board of Director	:	Board of directors of Scope
"Audit Committee	:	Audit Committee of Scope
"Business Associate"	:	An external party with whom the organisation has, or plans to establish, some form of business relationship. This may clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors.
"Director" or "Directors"	:	Directors include all independent and non-independent directors, executive and non-executive directors of the Group and shall also include alternate or substitute directors.
"Employee" or "Employees"	:	Any person who is employed by the Group, either part time, full time or on contract, not limited to the Directors (executives and non-executives), secondees and any individuals on direct hire.
"Benefits"	:	Any form of bribe, gift, reward, consideration, favour or any other advantages or profits (whether material or immaterial) gained by the Employees and Business Associate.
"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 Employees and Business Associate's 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.
"Hospitality"	:	the considerate care of guests, which may include refreshments, accommodation and entertainment at a restaurant, hotel, club, resort, convention, concert, sporting event or other venue such as the Group's offices, with or without the personal presence of the host. Provision of travel may also be included, as may other services such as provision of guides, attendants and escorts; use of facilities such as a spa, golf course or ski resort with equipment
"Facilitation Payments"	:	Small sums or bribe, unofficial payment made to secure or expedite the performance of a routine action by the Employees and Business Associate.
"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 Employees and Business Associate, his or her spouses or any other person on his or her behalf, without any or insufficient consideration known to the Employees and Business Associate.

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SCOPE INDUSTRIES BERHAD
200201023713 (591376-D)

Anti-Bribery and Anti-Corruption Policy

1. Introduction

The Group are committed to maintain a high standard of code of conduct and business ethics to create an environment of mutual trust whilst increasing the confidence of our stakeholders, shareholders and most importantly, the public at large.

2. Objective

The objective of this Anti-Bribery and Anti-Corruption Policy ("ABC Policy") is to provide information and guidance to all Employees on standards of behaviour to which they must adhere to and how to recognize as well as deal with bribery and corruption.

We adopt a zero tolerance approach to bribery and corruption of any form as set out in the ABC Policy. This Policy is to be read in conjunction with the Company's Code of Ethics, Code of Conduct, Whistle Blowing Policy, and other relevant policies, framework, procedure, standard, rules and regulations

All Employees are responsible in ensuring that they always comply with all laws and regulations, in particular, to the Act. No excuses or exceptions will be acceptable for non-compliance of any domiciled laws and regulations where the Group conducts its businesses.

3. Scope and Application

The policy applies equally to all Employees and Business Associates of the group, in all countries worldwide, without exception and regardless of regional customs, local practices, or competitive conditions.

4. Anti-Bribery and Anti-Corruption Policy

All Employees and Business Associate who are subject to this ABC 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 employees and Business Associate will not suffer discrimination, demotion, penalty or other adverse consequences in retaliation for refusing to pay or receive bribes or participate in other illicit behaviour

5. Gifts, Benefits and Entertainment

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) within threshold RM1,000;
(b) infrequent in nature;
(c) transparent and open;
(d) not given to influence or obtain an unfair advantage; and
(e) respectful and customary

Some examples of the above conditions as follows:

i) Exchange of gifts or the corporate gifts at the company-to-company level (for example: gifts exchanged between companies as part of official visit);
ii) Festive or ceremonial gifts during festive seasons or other ceremonial occasions;
iii) Gifts given to external organisations or individual in relation to company official function, work-related conferences, corporate events and activities (for example: door gifts or commemorative gifts to all that attending the events);
iv) Corporate gifts bearing the Company's name and logo; and
v) Entertainment of or by external parties through reasonable Hospitality for the purpose of business networking and as a measure of goodwill towards the recipients (e.g. Company events, refreshments or meals for business purposes)

Any Gifts, Benefits, or Entertainment exceeding the threshold of RM1,000 should be declared by Employees and register in the book.

6. 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.

7. Political Contribution

Subject to any prevailing law that govern political contribution, the Group may make contribution to political parties or candidates. All political contributions require approval from the Managing Director. The records of all political contributions shall be kept by the Company.

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 Employees 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 Director. The records of all charitable contributions shall be kept by the Group.

9. Conflict of interest

Conflicts of interest arise in situations where there is a personal interest that might be considered to interfere with that person's objectivity when performing duties or exercising judgement on behalf of the Scope Group. Employee should avoid or deal appropriately with situations in which personal interest could conflict obligations or duties. Employee must not use their position, official working hours, resources and assets for personal gain or to the Scope Group's disadvantage.

The existence of any real, apparent, or potential Conflict of Interest shall be declared by filing up Conflict of Interest Declaration Form before any contract is entered into or any transaction is carried out.

Further details about conflicts of interest are outlined in the Conflict of Interest Policy, which is available on Scope's website.

10. Recruitment and Promotion

The Group recognises the value of integrity in its Employees and Business Associates. The Group's recruitment, training, performance evaluation, remuneration, recognition and promotion for all Employees, including management, shall be designed and regularly updated to recognise integrity. The group awards contracts and employee positions purely based on merits. Support letter in all forms shall not be recognized as part of the business decision making process.

11. Record-keeping

It is the responsibility of the Employees to ensure that all benefits which are received are fully and accurately reflected in the Company's books and records.

The internal auditor shall have the respective right to inspect such records as and when they deem appropriate to ensure compliance with the ABC Policy.

12. Training and Awareness

All new Employees shall undergo a formal briefing and training on ABC policy as part of their induction and onboarding process. Employees will further receive regular, relevant training on how to adhere to the ABC Policy, and where deemed necessary.

Directors will ensure that relevant training will be provided to all levels of employees where it is felt that knowledge on how to comply with this ABC Policy and with the relevant laws and regulations on the matter needs to be enhanced, and where there is a high risk or potential risk of facing bribery or corruption in undertaking their responsibilities.

13. Reporting of Violations of the Policy

Any Employee 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 which available in Scope's website. 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.

14. Disciplinary action

The Group has a clear framework to deal with instances where employee is not incompliance with the code of conduct as stipulated in the Employee Handbook. It seeks to ensure prompt, consistent and fair treatment for all employees.

The Group have the rights to take disciplinary action against any employee found to have committed a breach of the Companies' policies and procedures.

Further to disciplinary actions taken by the Companies', any employee who commits an act of bribery or corruption risks violating the Act and shall on conviction, be liable to penalty as stipulated under the Act.

15. Review of the Policy

This policy has been endorsed by the Board of Directors and is available for reference on Scope's corporate website.

It will be reviewed periodically to assess its effectiveness, and in any case, at least once every three years by the Board of Directors. Any amendments to this policy must be approved by the Board of Directors, based on recommendations from the Audit Committee.

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