

POLICY ON CORRUPTION AND BRIBERY

For Employees, Consultants, Subcontractors and Third Parties

Bernard Business Consulting Sdn. Bhd. (“BBC”) has a zero-tolerance policy towards bribery and corruption. All employees, directors, consultants, subcontractors, vendors, agents, business partners and third parties engaged in relation to any matter on behalf of BBC must never engage in such practices.

Corruption is broader than bribery. It may include improper conduct, the abuse of entrusted power for private gain, or giving someone an improper advantage, whether or not the conduct amounts to bribery.

A bribe is the offering, promising, giving, accepting or soliciting of money, gifts or any other advantage as an inducement or reward for doing something that is illegal, unethical, improper or a breach of trust.

A bribe is not limited to cash payments. A bribe can be anything of value and may take many forms, including:

- Consultancy fees, commissions or payments to parties that are not genuinely performing services;
- Payments in kind, including travel, hospitality, entertainment, employment opportunities, gifts or other benefits;
- Employment or engagement of family members of clients, government officials or business partners outside the normal hiring or procurement process;
- Sponsorships, donations or contributions made for an improper purpose;
- Preferential treatment, favours or business opportunities intended to influence a decision.

All BBC employees, directors, consultants, subcontractors, agents, vendors and business partners must be aware of and comply with all applicable anti-bribery and anti-corruption laws, including relevant Malaysian laws, and the policy guidance set out below.

During the period of employment, engagement or business relationship with BBC, all relevant parties must at all times:

1. Not solicit, accept, offer, promise or pay a bribe or improper payment, whether directly or through another party. This includes giving or receiving preferential treatment that may be perceived as a bribe, particularly in dealings with government officials, employees of state-owned entities, clients, suppliers or their relatives.
2. Not make facilitation payments, also known as “speed payments” or “grease payments”, to encourage or influence officials or other parties to perform or accelerate routine actions.
3. Not accept or receive anything of significant value from a client, supplier, business partner or third party that may compromise, or appear to compromise, integrity, independence or objectivity.
4. Not offer or provide excessive gifts, hospitality, entertainment or benefits that may be intended, or perceived, to influence business decisions, contract awards, approvals, evaluations or professional judgement.
5. Not enter into arrangements with competitors or other organisations, whether formally or informally, to unlawfully restrict competition, fix prices, allocate clients, divide markets, manipulate tenders or limit services.

6. Not provide any service or enter into any business relationship that may involve BBC, directly or indirectly, in money laundering, terrorist financing or other unlawful financial activities.
7. Know the identity of clients, vendors, subcontractors and business partners with whom BBC conducts business, and take reasonable steps to ensure that such relationships are legitimate and ethical.
8. Not conduct activities in breach of applicable economic sanctions, or provide services that assist clients, customers, vendors or other parties in breaching applicable sanctions laws.
9. Identify and report any actual, potential or perceived conflicts of interest that may impair, or appear to impair, BBC's objectivity, independence, professional judgement or reputation.
10. Identify, evaluate and manage bribery and corruption risks, including risks arising from third parties, subcontractors, agents, consultants, vendors or project partners engaged in relation to BBC's work.
11. Require equivalent standards from subcontractors and third parties engaged to perform work for or on behalf of BBC.
12. Maintain accurate books, records, invoices, expense claims and supporting documents for all business transactions, payments, reimbursements, gifts, hospitality, sponsorships and donations.
13. Report in a timely manner all suspected instances of bribery, corruption, improper payments, conflicts of interest or breaches of this policy to BBC Management or the appointed Compliance Lead.

When in doubt, employees, consultants, subcontractors or third parties must seek guidance from BBC Management before proceeding with any transaction, engagement, payment, gift, hospitality, sponsorship or business arrangement.

Failure to report a related issue or breach of this policy may result in disciplinary action, termination of employment, termination of contract, termination of business relationship, or further legal action where applicable.

Facilitation Payments

Facilitation payments are unofficial payments of small monetary value, whether in cash or in kind, made to government officials or other parties to encourage them to perform or accelerate routine, non-discretionary functions that they are otherwise required to perform.

Examples include payments to speed up licences, permits, approvals, documentation, visas or other administrative processes.

Facilitation payments do not include legitimate administrative fees or official fast-track service fees paid to an organisation, provided that such fees are lawful, transparent, properly receipted and paid through official channels.

BBC strictly prohibits facilitation payments.

Gift Limits

BBC employees, consultants and representatives must not give or receive gifts that may influence, or appear to influence, business judgement or decision-making.

As a general guideline, gifts should be modest, reasonable, infrequent, transparent and properly recorded. Cash, cash equivalents, vouchers, personal loans or luxury gifts are prohibited.

Any gift, hospitality or benefit that may create a conflict of interest or the perception of improper influence must be declined or reported to BBC Management.

Reporting Channel

Any concern or suspected breach of this policy should be reported to:

Designated Contact: Bernard Eng
Email: ethics@bernardbc.com
Phone: +60 8081 9069

BBC will treat reports seriously and, where possible, confidentially. BBC does not tolerate retaliation against any person who raises a concern in good faith.

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Yours Sincerely,



Bernard Eng
Founder and CEO