



VITROX CORPORATION BERHAD

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ANTI-BRIBERY MANAGEMENT SYSTEM POLICY STATEMENT

ViTrox Corporation Berhad and all its subsidiaries ("ViTrox") advocate sustainable business developments by keeping a balance between the social, economic, and environmental concerns. Furthermore to that, we firmly believe in conducting our business in a fair, transparent, ethical and with integrity. Beyond complying with the relevant legal and regulatory requirement, ViTrox also promises to conduct ourselves in the highest degree of integrity in all of our business dealings and relationships.

The Board and Management are committed to cultivating the **FIVE (5)** fundamental principles throughout the entire group. These 5 core values, also known as The Power of 5 can be illustrated as below:-

- I - Integrity
- A - Accountability
- C - Courage
- T - Trust and Respect
- G - Gratitude and Care

We adopt a zero-tolerance approach to all forms of corruption. Hence, in addition to the cultivation of the 5 core values, stringent processes have been established in ViTrox's Anti-Bribery Management System ("ABMS") to effectively prevent, detect and mitigate the bribery and corruption risks.

The essence of the implemented ABMS signifies that we shall abide by the following:-

- Prohibited from receiving or soliciting bribes, gifts or any other item of value that was received/given in the view of influencing business decisions to all of our employees and associated third parties acting on or behalf of ViTrox without exception.
- Any employees who are found to have any form of bribery and corruption acts will be subjected to appropriate disciplinary actions, including termination of employment. Penalties involving termination of contracts and legal proceedings may be initiated to external parties who are implicated in such actions.
- Any employees or associated third parties who refused to participate in soliciting and receiving of bribes or any other illicit activities shall not be penalised.
- Reporting channels shall be established and maintained for all parties to raise their concerns or incidents of any improper conduct in ViTrox, such as our long-standing Whistleblowing Policy.
- All prospective employees and associated third parties shall be subjected to reasonable due diligence checks prior to or throughout their engagement with ViTrox.
- Business dealings and contracts shall be granted based on principles of meritocracy.
- Our stance in endorsing a corruption-free business environment shall be clearly communicated and continuously instilled in all related parties through leadership by example approach.
- Periodic reviews shall be conducted by Company's compliance function to ensure the functionality, effectiveness and improvement to the ABMS.

All members and associated third parties of ViTrox are expected to read, understand and comply with the requirements illustrated in the ABMS. No compromises will be granted to any party who has committed or is found to be involved in the act of bribery and corruption.

Date : 1 June 2020