



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. Policy Statement

- 1.1 Shinyou Elevator MFG Sdn Bhd (“Company”) and its subsidiaries (collectively, the “Group”) have adopted a zero-tolerance policy against all forms of bribery and corruption. The Group is committed to maintaining the highest standards of governance, integrity, accountability and transparency in all business dealings.
- 1.2 This Anti-Bribery and Anti-Corruption Policy (“Policy”) shall be read in conjunction with the Group’s Code of Conduct and Ethics, Whistleblowing Policy and Procedures and other relevant internal manuals.
- 1.3 This Policy shall also be read in conjunction with the Malaysian Anti-Corruption Commission Act 2009 (“MACC Act”), and any applicable anti-corruption laws in the jurisdictions where the Group operates.
- 1.4 The Group takes its legal obligations to comply with all applicable law including the MACC Act or any amendments thereto seriously. Any violations of this Policy will result in disciplinary action including termination of employment.

2. Objective

The objective of this policy is to provide clear guidance to the Group’s Directors, employees and business associates including partners, vendors, suppliers, contractors and any other third party performing services on behalf of the Group (“**Associates**”) regarding bribery, corruption and related issues that may arise in the course of business.

3. Scope

This Policy applies to Directors, employees and Associates acting on the Company’s behalf and it reflects the standards to which the Company expects of its Directors, employees and Associates.

4. Gifts, Entertainment and Hospitality

- 4.1 The Group acknowledges that gifts and hospitality are high risk areas. As such, the Group has adopted a “No Gift” Policy.
- 4.2 Directors and employees are prohibited from offering or receiving, directly or indirectly, any gift, reward, or favour that could influence business decisions.

- ☐ A-5-09, Blok A, Oasis Ara Damansara, No.2, Jalan PJU 1A/7A, Ara Damansara, 47301 Petaling Jaya, Selangor Darul Ehsan, Malaysia.
Tel: 603-6148 0230, 603-6148 0236
- ☐ D’Piazza Mall, 70-1-32 Jalan Mahsuri, 11950 Bayan Baru, Penang, Malaysia.
Tel: 604-611 9466, 604-637 4199
- ☐ 58-01, Jalan Setia Tropika 1/7, Taman Setia Tropika, 81200 Johor Bahru, Johor Darul Takzim, Malaysia.
Tel: 6016-769 2629



4.3 Notwithstanding the “No Gift” policy, the Group recognise that exchanging modest business courtesies such as gifts, hospitality and entertainments (including meals or invitations to festive and promotional events) is a customary practice for building goodwill and strengthening commercial relationships. These are permitted only if they are

- Reasonable and proportionate to the occasion;
- Consistent with the Group’s business practice; and
- Offered in connection with legitimate business meetings or sponsored events.

4.4 Under no circumstances shall courtesies be lavish, intended to improperly influence a recipient or capable of being perceived as an inducement. If the appropriateness of a gift or hospitality is unclear, employees must seek guidance from the Management.

5. Facilitation Payments & Kickbacks

5.1 “Facilitation Payments” are small payments made to secure or expedite routine administrative actions. “Kickbacks” are payments made in exchange for business favour or advantage.

5.2 The Group strictly prohibits making or accepting facilitation payments or kickbacks of any kind.

5.3 Any request for a facilitation payment must be refused and reported immediately to an immediate superior. If a payment is made, whether under duress or where the nature of the payment is uncertain, it must be reported and recorded transparently in the Group's accounts.

6. Donations, Sponsorship and Political Contributions

6.1 Donations must be transparent, approved by Management or the Board, and made only to well-established, official entities. Due diligence must ensure donations are not used as a conduit for bribery or money laundering.

6.2 The Group’s funds and resources must not be used to make any direct or indirect political contributions to political parties, political party officials or candidates for political office. Any appearance of political affiliation by the Group must be avoided.

7. Dealing with Associates & Public Officials

7.1 The Group shall perform risk-based background checks on prospective Associates (vendors, suppliers, etc.) to assess their integrity before entering into a contract.

7.2 Interactions with government agencies and public officials must be conducted with extreme caution. Employees must ensure all dealings are transparent and comply with the MACC Act.

7.3 The Group will refrain from dealing with any party suspected of corrupt practices.

8. Conflict Of Interest

8.1 A conflict of interest arise in situations where there is a personal interest that might interfere with that person's objectivity in performing duties or exercising judgement on behalf of the Group.

8.2 Key areas of conflict may include:

- Dealing with suppliers or customers owned by family/friends.
- Holding external employment or board seats that conflict with Group duties.
- Participating in the hiring or promotion of family members.

8.3 Employees must disclose any potential or actual conflict to Management immediately. Failure to disclose is a breach of this Policy.

9. Reporting and Whistleblowing

9.1 Every employee and Associate is required to report any suspected or actual violations of this Policy.

9.2 The Group maintains an "open-door" policy. Concerns may be raised through the following channels:

1. Your immediate supervisor or Head of Department.
2. If reporting to a supervisor is not possible or appropriate, reports may be made to Human Resources Department.
3. Confidential or anonymous reports can be sent to the Chairman of the Audit Committee via Email: audit.committee@fuji-shinyou.com

9.3 The Group is committed to protecting whistleblowers. No individual will suffer dismissal, demotion, or any adverse consequence for reporting a concern in good faith, even if the report results in a loss of business for the Group.

10. Records

10.1 All accounts, invoices and contracts must be filed with strict accuracy and completeness. No "off-book" accounts are permitted.

10.2 All expenses claim from employees involving third parties should be approved by the Head of Department and include a clear business justification.

10.3 Documentation for all payments made to third parties must serve as evidence that the transaction was legitimate and not linked to corrupt and/or unethical purposes.

11. Training and Awareness

11.1 Management is responsible for ensuring that all personnel are trained under this Policy.

11.2 The Human Resources Department shall maintain records of all training and communication initiatives as evidence of the Group's compliance effort.

12. Review

12.1 The Board of Directors and Audit Committee shall oversee the effectiveness of the Policy.

12.2 The Policy will be reviewed at least once every three years (or annually) to ensure it remains compliant with prevailing laws and business needs.