

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY STATEMENT

Dear Valued Clients,

Amanah Raya Berhad and its subsidiaries ("AmanahRaya") are committed towards ensuring the highest-level of integrity, accountability, and professionalism in its business activities. AmanahRaya adopts a zero-tolerance approach against all forms of bribery and corruption in all our business dealings and relationships.

The Amanahraya Anti-Bribery & Anti-Corruption Policy ("the Policy") was initiated based on the Adequate Procedures ("Guidelines") issued pursuant to section 17A(S) of the Malaysian Anti-Corruption Commission Act ("MACC Act"), which sets out adequate procedures a commercial organisation needs to have in place as a defence to a corporate liability charge under section 17A of the MACC Act 2009.

This Policy is applicable to all directors, employees of AmanahRaya and business partners which include clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries, and investors, and intended to supplement all the relevant applicable laws, rules, and other corporate policies and it is not intended to supersede any local laws.

ANTI-BRIBERY AND ANTI-CORRUPTION PRINCIPLES

Gifts

AmanahRaya is adopting "No Gift Policy" to avoid conflict of interest in ongoing or potential business dealings as it may tarnish reputation or be in violation of anti-bribery and corruption laws. Although, accepting or receiving a gift may be allowed only under limited circumstances that shall not influence a decision-making process.

Conflict of Interest

The Code of Business Ethics and AmanahRaya Conflict of Interest policy sets out the procedures to deal with arising in the conflicts of interests.

Charity, Donations and Sponsorships

Entertainment that may appear inappropriate that may appear to influence independent judgement or lavish shall be avoided.

Facilitation payments

AmanahRaya adopts a strict policy of disallowing the use of facilitation payments in its business. Offering, promising, or requesting facilitation payments is just as prohibited as actually paying or receiving facilitation payments.

Due Diligence

AmanahRaya is responsible to exercise background checks for any relevant parties (e.g., staff, corporate agents, vendors, contractors, supplier, and consultant) or who may act on behalf of AmanahRaya before entering into an agreement to mitigate the bribery risk.

Entertainment

Entertainment that may appear inappropriate that may appear to influence independent judgement or lavish shall be avoided.

DIRECTORS, EMPLOYEES AND BUSINESS PARTNERS RESPONSIBILITIES

Directors and employees are required to avoid any activities that could lead to, or imply, a breach of this Policy. As part of AmanahRaya's commitment on zero tolerance to bribery and corruption, AmanahRaya expects all business partners include clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors to refrain from corrupt practices and comply to all applicable laws, rules, and regulations.

Thank you

Best Regards

AMANAHRAYA TRUSTEES BERHAD

Date: 29 July 2025