SSF HOME GROUP BERHAD
(Registration No. 201501016707 (1142041-X))
(Incorporated in Malaysia)

Anti-Bribery And Corruption Management System

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MESSAGE FROM THE CHIEF EXECUTIVE OFFICER

SSF Home Group Bhd. ("**SSF**" or the "**Group**") recognizes the importance in establishing and upholding good corporate governance and is committed to conducting its business in accordance with the highest ethical standards in full compliance with all applicable laws, regulations and standards in all locations and jurisdictions in which the Company operates.

SSF adopts a "zero-tolerance" approach towards any form of bribery and corruption in its operations. The Company strictly forbids any acts of bribery and corruption regardless of its form as it has an adverse effect to the communities and businesses. Rampant bribery and corruption will further curtail a free and fair competition as well as tainting the culture of accountability of the Company in terms of reputation and governance.

In response to the development of the laws and regulations in relation to global fight against corruption, the Parliament of Malaysia passed the Malaysian Anti-Corruption Commission (Amendment) Act 2018 which introduced Section 17A of the Malaysian Anti-Corruption Commission Act 2009 ("**MACCA**"), which imposes liability on a commercial organisation for corruption committed by persons associated with the commercial organisation. Section 17A(5) of MACCA also introduces the Guidelines on Adequate Procedures ("**Ministerial Guidelines**") which include, amongst others, the five guiding principles –

T	**TOP LEVEL COMMITMENT** to ensure that SSF practices the highest level of integrity and ethics.
R	**RISK ASSESSMENT** to be carried out in SSF to detect any possible corruption risks involving its business activities and persons associated to the Company.
U	**UNDERTAKING CONTROL MEASURES** in preventing and combatting all forms of bribery and corruption.
S	**SYSTEMATIC REVIEW, MONITORING AND ENFORCEMENT** towards internal and external entities to ensure robust compliance to anti-corruption laws and regulations.
T	**TRAINING AND COMMUNICATION** to all relevant stakeholders on the Company's commitment in its "zero-tolerance" approach to corruption.

Yours sincerely,

Mr. Wong Choong Loong
[Chief Executive Officer]

Definition

For the purpose of the policies and procedures prescribed under this Policy:-

"**ABMS**" means the Company's Anti-Bribery Management System, which specifies anti-bribery policies and procedures implemented to prevent, identify, and deal with any bribery.

"Bribery" means offering, giving, soliciting or accepting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person for acting or refraining from acting in relation to objectivity and performance of that person's duties.

"Code of Conduct and Ethics" means the Company's Code of Conduct and Ethics.

"Corruption" means "the abuse of entrusted power for personal gain". In its wider sense, corruption includes bribery, extortion, fraud, cartels, abuse of power, embezzlement, and money laundering. It constitutes criminal offences in most jurisdictions with illegal profit to individuals / entities as their objectives.

"Business Associates" mean any individual or organisation which the Company comes into contact with during the course of work, and includes actual and potential clients, customers, suppliers, distributors, business contacts, contractors, sub-contractors, agents, advisers, joint-venture partners, government or public bodies (including their advisors, representatives and officials, politicians and political parties) and any entities performing work or services of any kind for or on behalf of the Company.

"Employee" means all individuals working at all levels and grades, whether permanent, fixed-term or temporary, including directors, managers, officers, executives, staff, consultants, trainees, seconded staff, casual workers and agency staff, volunteers, interns, agents, or any other person associated with the Company, or any of the Company's subsidiaries or their employees, wherever located.

"Facilitation payment" means a form of payment made personally to an individual in control of a process or decision with the purpose to secure or expedite the performance of a routine or administrative duty or function which includes influencing the timing or process or issuing of permits.

"Top-level management" means all Directors, Chief Executive Officer and Deputy Chief Executive Officer of the Company.

"**Public Officials**" means official of any governments, government agencies or any regulatory, statutory or administrative bodies, whether local or foreign.
The term "**SSF**", the "**Group**", "**we**", "**us**" or "**our**" when used in this Policy shall refer to SSF Home Group Berhad. and its subsidiaries and the term "**you**" or "**your**" shall refer to

each of our Employees or Business Partners individually and in the case of Business Partners, including any entity which is controlled by our Business Partners, unless the context indicates otherwise.

A. Scope & Application

This Anti-Bribery and Corruption Policy (this "**Policy**") sets out SSF's approach in combatting bribery and corruption as well as the responsibilities of all parties (whether internal or external) to comply with laws and regulations in relation to bribery and corruption. This Policy aims to provide guidance on how to recognize and deal with bribery and corruption issues to ensure the Company's businesses are conducted in honest, ethical and transparent manner.

SSF is committed to conducting its business in the utmost ethical manner and in compliance with all laws and regulations in jurisdictions it operates. These laws include but not limited to the Malaysian Penal Code, the Malaysian Anti-Corruption Commission Act 2009 and the Malaysian Companies Act 2016. These laws prohibit acts of bribery and corruption, and requires companies to establish and maintain adequate procedures to prevent bribery and corruption.

This Policy was developed with guidance from the Ministerial Guidelines and is applicable to all Employees and Business Associates. Any breach of this Policy or applicable local law could results in disciplinary action being taken and ultimately could result in dismissal for Employees and termination of contractual relation for Business Associates. Further legal action may be taken in the event the Company's interest has been harmed as a result of non-compliance and / or misconduct.

B. MACC Act 2009

Under the MACC Act 2009, giving and accepting any bribes constitutes as acts of corruption and are criminal offences resulting in legal consequences including a hefty fine and/or imprisonment of up to 20 years. A commercial organization, like SSF, commits an offence if an associated person corruptly gives any gratification with intent to obtain or retain business or an advantage in the conduct of business, for the commercial organization. "Gratification" in this context, means –

(a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
(b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
(c) any payment, release, discharge or liquidation of any loan, obligation or other liability;

(d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
(e) any forbearance to demand any money or money's worth or valuable thing;
(f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil, or criminal in nature; and
(g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).

C. Corruption Risk Assessment

A corruption risk assessment forms the basis of SSF's anti-corruption efforts. As such, the Company shall conduct internal and external corruption risk assessments annually and when there is a change in law or circumstance of the business. The risk assessment should be conducted by taking into account the following criteria -

- Assessment of existing risk by updating its rating of probability and impact;
- Identify of new risk, if any, and rating of its probability and impact;
- Assessment / update of control and management action plan relating to each risk; and
- Elimination of risk that is no longer relevant.

This risk assessment should be used to establish appropriate processes, systems and controls approved by the top-level management to mitigate the specific corruption risks the business is exposed to.

For this purpose, the Company shall conduct a comprehensive risk assessment, with intermittent assessments conducted when necessary. The assessment may include the following:

(a) opportunities for corruption and fraud activities resulting from weaknesses in the Company's governance framework and internal systems/ procedures;
(b) financial transactions that may disguise corrupt payments;
(c) business activities in countries or sectors that pose a higher corruption risk;
(d) non-compliance of external parties acting on behalf of the Company regarding legal and regulatory requirements related to anti-corruption. Note that, given the wide definition of an associated person, a commercial organization can be liable for the acts of such third parties; and
(e) relationships with third parties in its supply chain (e.g. agents, vendors, contractors, and suppliers) which are likely to expose the commercial organization to corruption.

The risk assessment for corruption is documented in SSF's Risk Management Report.

D. Conflict of Interest

"Conflict of interest" refers to circumstances whereby there is a personal interest that can be considered to have potential interference with objectivity in performing duties or exercising judgement on behalf of SSF. All Employees and Business Associates must avoid situations in which their personal interest would conflict with their duties and responsibilities. All Employees and Business Associates must not use their position, official working hours, SSF's resources and assets or information available to them for personal gain or to the Company's disadvantage. A conflict of interest can be intentional, perceived or potential. Conflict of interest is an act that leads to partial decision making which constitute the element of a corrupt conduct.

Conflict of interest may arise directly or indirectly through an intermediary, such as third party, friends or family. As such, the Company requires all employees to disclose / declare any actual or potential conflict of interest such as family relation, financial relation or other connection directly or indirectly related to their line of work on a regular basis.

All declaration of conflicts of interests shall be made in accordance to the Code of Conduct and Ethics.

E. Gifts, Entertainment and Hospitality

Gifts, entertainment and hospitality given and received as a reward, inducement or encouragement for any other advantage or inappropriate or dishonest conduct are strictly prohibited. If giving or receiving gifts, entertainment or hospitality is intended to influence normal decision making, the giver retains special advantage, this constitutes corruption. Employees must not directly or indirectly solicit or accept gifts, entertainment and hospitality in any forms that is excessive, inappropriate, illegal or given in response to, in anticipation of, or to influence a business decision.

Employees must exercise proper care and good judgement when providing or accepting gifts, entertainment and hospitality to or from external parties. If Employees unsure of how to consider the intention behind any gifts, entertainment and hospitality, they must always consult their immediate superiors to obtain advice and approval before proceeding.

"**Corporate Gift**" are gifts normally bears the company's name and/or logo and are of nominal / appropriate value which may include diaries, table calendars, pens, notepads and plaques.

"**Festive Gift**" are gifts normally given following a tradition, customs, festivity or occasion such as red packets (without cash or cash equivalent), hampers, oranges and dates.

"**Corporate Hospitality**" refers to corporate activities organized by an organization, which may involve entertainment of employees and/or other parties for the benefit of that organization. This may include seminars, workshops, talks, town hall sessions and meal events.

Providing Gift

Corporate Gift and Festive Gift may be given to Business Associates or other parties provided that if they fulfill the following conditions:

(a) Made for the right reason – it should be clearly given as an act of appreciation or common courtesy associated with festive seasons or other ceremonial occasions;

(b) No obligation – it must not be used to influence or induce anyone to obtain or retain a business or to obtain some forms of business advantage, whether it is for business or for Employees;

(c) Made openly – it must be done in an open and transparent manner;

(d) Reasonably valued – the gifts and its value must commensurate with the occasion and in accordance with general business practice;

(e) Legal – it complies with applicable laws; and

(f) Documented – it must be recorded and disclosed in the Gift Register properly, including the reason of the expenditure.

Accepting Gift

Act of accepting gifts are very delicate and sensitive matter where, in certain cultures or circumstances, gift giving is customary, tradition, central part of business etiquette or respectful.

Employees are expected to decline (or avoid accepting) gifts with the exceptions being –

(a) Festive or ceremonial gifts of appropriate value during festive season or other ceremonial occasions;
(b) Refusal of gift may jeopardise the relationship of the giver with SSF; or
(c) Gifts given during any work-related invitation events.

In the event the gifts ought to be given is doubtful, the gift must be refused.

All Employees and Business Associates must not directly or indirectly solicit gifts from any party for their personal gain or for or on behalf of SSF. Business Associates must not give gifts to our Employees.

All Employees must record any gift received, irrespective of value, in the Gift Register within five (5) working days of receipt. In no circumstances may our Employees (or anyone on their behalf) accept gift in the form of cash (except for in accordance to tradition and customs in modest amount during the relevant festive season) or cash equivalent from any party.

Gift Register

SSF shall maintain a Gift Register to record all gift received and given by/to Employees to /from any parties. The Head of Department / Company shall decide to approve the acceptance or require it to be returned. The gifts shall be distributed equally and fairly to all Employees but not only benefit certain employee. For instance, SSF received hampers from suppliers as an act of appreciation in conjunction of a festivity, a lucky draw should be conducted to distribute the hampers to all Employees in a reasonably just and fair manner.

Providing Entertainment & Hospitality

In a business environment, it is common to provide entertainment & corporate hospitality to foster business relationships. Nevertheless, entertainment & corporate hospitality provided shall be modest under appropriate and formal situations. Only authorized Employees may offer modest entertainment & corporate hospitality within their scope of work as part of business networking as well as a measure of goodwill towards the recipients. The entertainment & corporate hospitality provided must be always reasonable and legal. Any provision of entertainment & corporate hospitality to external parties, such as Public Officials shall be exercised with additional and proper care as well as judgement.

All Employees must not directly or indirectly provide or offer to provide entertainment & corporate hospitality with a view to cause undue influence or in exchange for favours or advantages. Such acts are considered corruption.

Accepting Entertainment & Corporate Hospitality

Acceptance of entertainment & corporate hospitality may be perceived as inducements or corruption at times if the entertainment & corporate hospitality received are not managed in utmost care and diligence. It is essential for Employees to exercise proper care and good judgement before accepting entertainment & corporate hospitality offered or provided by Business Associates or other parties. This is to preserve SSF's reputation and avoid allegations of impropriety or undue influence and corruption.

All Employees must conduct themselves with the highest integrity in relation to accepting entertainment & corporate hospitality from any party. All Employees or any of their family members and friends must not accept entertainment & corporate hospitality in exchange for the act of doing or not doing any of their job function or activity in proper manner.

F. Donations, Sponsorship and Charitable / Educational Contributions

Employees are strictly prohibited from receiving or giving donations and sponsorships to obtain a business or advantage of any kind or unduly influence the outcome of business decision. SSF will only provide charitable or educational donations and public welfare sponsorship if they are ethical and legal under applicable laws. Any donations, sponsorships and charitable contributions must be approved by the Directors and it must be done in a transparent manner for social and moral responsibility.

G. Prohibition of Political Contribution and/or Donation

Employees are strictly prohibit to provide any form of political donation or support to political parties, individual politicians or towards political campaigns or initiatives for or on behalf of SSF particularly where it is to obtain any business or advantage. Any political contribution should be brought to the attention of the Directors immediately and requires prior approval from Directors. Any payment must be properly recorded and accounted with supporting documents.

Employees may participate independently in political activities in their personal capacity with their own money and time. However, their political views and actions are personal and not reflective or representative of SSF. All Employees shall not directly or indirectly use such participation, alliances or relations in political activities as means to obtain or provide any business and/or business advantages for or on behalf of SSF. SSF will not reimburse any personal political contributions.

H. Facilitation Payments

SSF prohibits the use of Facilitation Payments in its business dealings. Employees must never directly or indirectly pay, offer, solicit or receive bribes of any forms including facilitation payments whether inside or outside of Malaysia. Facilitation payment is an unofficial payment or other provision made personally to an individual intended to secure or expedite the performance of a routine or administrative duty or function. Although Facilitation Payment may be allowed in other jurisdictions, Facilitation Payment is illegal in Malaysia and is considered as an act of corruption.

It is usually small bribe payments (usually paid to low-level officials) made directly or indirectly to secure or speed up performance of a routine or to avoid bureaucratic delays and red tapes that may slow down certain business dealings. These payments are

intended to influence the timing of public officials' action such as speed up the clearing goods through customs, processing visas and scheduling inspections.

I. Dealing with Governments and Public Officials

Any improper or secret payments or transfer of Gratification (including gifts, entertainment, corporate hospitality and facilitation payments), whether directly or indirectly, to a Public Official or person associated with Public Officials to persuade that official or person to help the company to obtain undue or illegal benefits is strictly prohibited.

Besides, the advantage to government and public official is strictly prohibited even if:-

(a) the benefits not to the party who granted the advantage but for another party. For example, offer benefits such as gifts, travel expenses and scholarship to a family member of a government officer to influence a decision;

(b) the benefits transfer through intermediaries or a third party with the knowledge that all or part of the payment will contribute directly or indirectly as an improper, secret or facilitation payment to a government officer;

(c) the business is not with the government and public official;

(d) the advantage granted does not result in the expected award of business or service;

(e) the government or public officials initially suggested or solicited the advantage.

Employees must comply with all applicable laws, conduct themselves with integrity and apply the highest ethical standards whenever they deal or otherwise engage with government, government agencies, regulatory bodies, statutory bodies (whether local or foreign) and any of its officials.

J. Due Diligence Performed on Business Associates and Other External Parties

The Company is committed to uphold the highest standard of ethics and integrity in all aspects of its procurement and sales activities. The Company should avoid dealing with any Business Associates known or reasonably suspected of corrupt practices or known or reasonably suspected to pay bribes.

The Company must ensure that all procurement activities are in line with the procurement and sales policies and procedures that are applicable in your jurisdiction, which include:

- Due diligence of Business Associates are undertaken before any formalization of relationship with the Company.

- Business Associates has the knowledge and understanding on the Company's Policy and code of conduct and that they will comply accordingly.

- All commercial contracts and invitations to bid incorporate the provisions relating to business conduct, conflict of interest and fighting corruption and unethical practices.

- All commercial contracts with Business Associates to incorporate a provision where the Company retains the right to audit third party compliance with this Company's Policy and code of conduct's provisions.

The Company must conduct due diligence on prospective Business Associates to confirm whether or not the Business Associates have in place anti-bribery programmes and that they will not engage in any improper practices. The scope and extent of the due diligence required will vary depending upon the circumstances of each proposed transaction.

Screening should be conducted on the Company, its directors and top management and this can be done through the due diligence process and procedures.

The Company should also monitor significant Business Associates as part of their regular review of the performance of the third parties. The Company has the right to terminate their services in the event that these third parties pay bribes or act in a manner which is inconsistent with this Policy and code of conduct.

If any red-flags are raised, these issues must be resolved. If it is not possible then the Company must be barred from being on the list of registered Business Associates and/or disqualified from participating in any the Company's business dealings.

<u>Due Diligence</u>

The Company in particular, the procurement function must follow the following procedures when dealing with Business Associates or external parties, and any donations or contributions made to charitable organisations and educational organisations:

- Perform a risk assessment using a risk-based approach
- Undertake due diligence on the third party depending on the level established by the risk analysis
- Preparing and maintaining appropriate written documentation of the due diligence and risk assessment performed

K. Recruitment of Employees

The Company provides equal opportunity for any qualified and competent individual to be employed by the company from various multicultural and multiracial background.

The recruitment of employees should be based on approved selection criteria to ensure that only the most qualified and suitable individuals are employed. This is crucial to ensure that no element of corruption is involved in the hiring of employees.

In line with this, background checks should be conducted in order to ensure that the potential employee has not been convicted in any bribery or corruption cases nationally or internationally. More detailed background checks should be taken when hiring employees that would be responsible in management positions, as they would be tasked with decision-making obligations.

If you find or suspect that another person subject to this policy has violated or about to violate this policy or applicable law, whether deliberately or inadvertently, you must forthwith report the same, in writing, to your head of department or compliance officer.

L. Red Flag of Bribery

During transaction or business arrangement, you are expected to ask question and look out for corruption and bribery "red flags". If you are unsure of the next course of action, you should consult the compliance officer and should not ignore the red flags. Transaction may not proceed if there are "red flags" yet to be resolved.

Examples of "red flags" include but not limited to the followings:

(a) The other party has a reputation or history of bribery;
(b) Excessive reliance on third-party agents or "middleman";
(c) Unusual payment terms, such as large upfront payment or via agents;
(d) Large amount of cash payment;
(e) Payments to private account or offshore bank account;
(f) Large charity contribution or sponsorship;
(g) Gifts – lavishness, secrecy, inaccurate records;
(h) Request for invoice with amount differ from the payment;
(i) The other party refuses to disclose its owners, partners or principals;
(j) Objection to anti-bribery representations and warranties in commercial agreements or negative response when told of such requirements;
(k) The transaction involves a country known for a high incidence of corrupt payments; and
(l) Family, business or other "special" ties with government or public officials.

M. Business Partners and their Conduct

All Employees must carry out proper due diligence process as required under Section J of this Policy and comply with all applicable SSF's standard operating procedures before on-boarding any Business Associates. This includes informing the Business Associates on this Policy and all other applicable policies and procedures of the Company. All Business Associates shall return a duly completed and signed Anti-Corruption Compliance Certification in the form prescribed by SSF or confirmation in similar terms prior to on-boarding as SSF's Business Associates. The Anti-Corruption Compliance Certification can be found in **Appendix A** of this Policy.

Our Employees shall monitor our Business Associates' performance and conduct from time to time to be in compliance with this Policy and other policies and procedures enforced by the Company. Whenever there is a breach or suspected breach arises, immediate action shall be taken. Any failure to comply with this Policy and other policies and procedures enforced by the Company by the Business Associates may lead to the immediate termination of any contractual relationship and claim for damages.

All Business Associates are expected to comply with (a) all applicable anti-bribery and anti-corruption laws it is subjected to; and (b) this Policy and other policies and procedures enforced by the Company, for all dealings by them for, on behalf of or involving SSF. Our Business Associates shall also refrain and procure its affiliates to refrain from conducting any acts which would result in a violation of any applicable anti-bribery and anti-corruption laws as well as this Policy and any policies and procedures set by SSF.

Unless evidence suggests otherwise, all our Business Associates are deemed to be an independent contractors. They are not, in any kind or whatsoever an agent of or representative of SSF and they are not entitled or must not hold themselves out to have the authority to bind SSF for any purposes.

N. Whistleblowing Policy

The Company encourages openness and transparency in its commitment to the highest standard of integrity and accountability.

If you make a report or disclosure about any actual or perceived bribery or corruption, breach or violation of this Policy in good faith, belief and without malicious intent, you will be accorded protection of confidentiality, to the extent reasonably practicable, notwithstanding that, after investigation, it is shown that you were mistaken. In addition, all reports will be protected against detrimental action and retaliation for having made the disclosure in good faith, belief and without malicious intent.

Any alleged or suspected improper conduct must be disclosed using the procedures provided for in the SSF's Whistleblowing Policy as adopted for your jurisdiction, a copy of which is available at http://www.ssf.com.my/.

O. Systematic, Review Monitoring and Enforcement

SSF has the commitment in ensuring that its anti-bribery and anti-corruption efforts are reviewed, monitored and enforced continuously to preserve the reputation and standards of SSF.

Regular audits shall be conducted to monitor, review, improve, assess performance, efficiency and effectiveness as well as mitigate any inadequacies of the anti-bribery and anti-corruption efforts by the Company. Such audits may be conducted internally by SSF or by an external party. The results of any audit, risk assessment, review of control measures and performance shall be reported to the CEO and the Board and acted upon accordingly.

All Employees and Business Associates are welcomed to raise any concerns or inadequacies in the anti-bribery and anti-corruption compliance programme to the A*nti-Corruption Committee*.

P. Enforcement for Non-Compliance

SSF considers the acts of bribery and corruption seriously and will take appropriate actions in the event of non-compliance of this Policy. For Employees, non-compliance of this Policy may lead to disciplinary action and termination of employment.

For Business Associates, non-compliance of this Policy may lead to termination of contract and claim for damages.

Q. Training and Communication

The commercial organisation should develop and disseminate trainings and communications relevant to its anti-corruption management system to Employees and Business Associates, covering the following areas:

(a) Policy and procedures;
(b) Reporting channel; and
(c) Consequences of non-compliance.

<u>Communication of Policies</u>

SSF's Anti-Corruption Policy and Guidelines is made available to public and will be appropriately communicated to all Employees and Business Associates.

The communication of the Company's policy may be conducted in a variety of formats and mediums. These may include, but are not limited to:

(a) messages on the Company's intranet or website;
(b) emails, newsletters, posters; and
(c) code of business conduct and employee's handbooks.

Training

The Company provide its Employees and Business Associates with adequate training to ensure their thorough understanding of SSF's stance in anti-corruption, especially in relation to their role within or outside the Company.

The Company will similarly familiarise all employees with its Whistleblowing Policy and procedures so that the employees can vocalise their concerns swiftly and confidentially.

The training may be conducted in a variety of formats, including but not limited to:

(a) induction programs featuring anti-corruption elements;
(b) role-specific training, which is tailored to corruption risks the position is exposed to;
(c) corporate training programs, seminars, and in-house courses; and
(d) Non-physical trainings such as online courses and/or tests.

R. Record Keeping

SSF shall maintain and keep all records properly with accuracy and completeness for all payments made to third parties in the ordinary course of business which is prove as evidence that those payments not related to corrupt and unethical manner. All expenses claim from Employees incurred to third parties should be approved by the Directors and specifically recorded the reason for such expenses.

S. Directors, Employees and Associated Persons Responsibilities

Directors, employees and associated persons of the Company are required to read, understand, and comply with the information contained within this Policy and any other anti-bribery and corruption briefing or information that may be provided by the Company.

Directors, employees and associated persons shares the responsibility for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this Policy.

If any directors, employees or associated persons breaches this Policy, they may face disciplinary actions which may include dismissal for gross misconduct. The Company has the right to sanction or terminate a contractual relationship with any involved persons if they breach this Policy.

T. General Enquiries

In the event of any queries in relation to this Policy or on the Company's anti-bribery and anti-corruption efforts, you may contact –

Name : Anti-Corruption Committee
E-mail Address : abccomm@ssf.com.my

U. Compliance Certifications

Effective from the date of this Policy, all Employees shall confirm in writing that they have read, understood and will abide by this Policy. A copy of this declaration shall be documented and retained by the Company's Human Resources Department for the duration of employment. A form of declaration can be found in **Appendix B** of this Policy.

V. Validity, Amendments and Revision

This Policy shall take effect immediately upon the approval by the Board of Directors of the Company. It shall be immediately disseminated to Employees, Directors and Business Associates. This applies to future and subsequent Employees, Directors and Business Associates who must be immediately notified of this Policy upon appointment, engagement or establishment of the interests or relationships. Steps should be taken to secure their acceptance and agreement to the Policy. All changes to the Policy shall be disseminated and notified in the same way.

For any recommendation of amendments or changes to be made to this Policy, please forward your recommendations to the head of internal audit or the designated compliance officer. The head of internal audit or the designated compliance officer shall review the recommendations before submitting to the Board of Directors of the Company for consideration, if and to the extent considered appropriate.

This policy will be updated, amended or revised from time to time to ensure its adequacy in implementation and enforcements. SSF reserves the right to all amendments, deletions or argument any terms and conditions or any part of this policy when necessary. Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

Document ID	Version	Approval
Anti-Bribery And Corruption	V1	03 October 2022
Anti-Bribery And Corruption	V2	1 October 2025

APPENDIX A
BUSINESS ASSOCIATE'S LETTER OF DECLARATION

Our company, _____ *(Company Name)* bearing the company registration number of _____, (hereinafter referred to as the "**Business Associate**" which includes its Directors, officers and employees with the intention to carry on any commercial transactions with SSF Home Group Berhad.) hereby:

1. PLEDGES, COMMIT AND UNDERTAKES THAT:

A. We have read and understood, and will comply with:

(i) the **Code of Business Conduct and Ethics ("COBCE")** which is available at http://www.ssf.com.my/. The COBCE outlines the standards of behavior and business ethics required from the Business Associate relating to, but not limited to:-

(a) policies and procedures implemented within SSF Home Group Berhad. ("**SSF**");
(b) non-disclosure of confidential, proprietary and sensitive information;
(c) business dealings with SSF;
(d) conflicts of interests;
(e) obligations under securities laws; and
(f) dealings with Business Associates

(ii) **Anti-Bribery and Anti-Corruption Policy ("ABAC Policy")** that referring to http://www.ssf.com.my/. The ABAC Policy outlines SSF's zero-tolerance stance against corruption and we shall always fully adhere to the ABAC Policy during the performance of our duties for or on behalf of SSF.

(iii) **all applicable laws and regulations relating to anti-bribery, fraud and corruption;** and

(iv) the following **anti-corruption principles** promoted by the Malaysian Anti-Corruption Commission ("**MACC**")**:**
(a) committing to promoting values of integrity, transparency and good governance;
(b) strengthening internal systems that support corruption prevention;

(c) comply with rules and regulations relating to fighting corruption;
(d) fighting any form of corrupt practice; and *
(e) supporting corruption prevention initiatives by the Malaysian Government, MACC and other authorities within the country jurisdiction we operate.

to the best of our knowledge (collectively referred to as the "**Provisions**").

B. We shall not, through any of our employees, representatives, agents or any persons associated to us or SSF, commit any corruption offence or breach any of the Provisions. Our business practices and activities shall not encourage any corruption elements within its operations and transactions.

C. We have not been convicted nor are we the subject to any investigation, inquiry or enforcement proceedings by the relevant authorities of any actual or suspected breach to the Provisions and will report any actual or suspected breach to the Provisions as soon as reasonably practicable and to the extent permitted by law, to SSF.

2. AGREES THAT:

a. In the event that we are in breach of any of the above sections or the Provisions, SSF may immediately revoke the contract award or terminate the contract for the business transactions without any liability whatsoever on the part of SSF to the Business Associates. This is without prejudice to any other rights or remedies that SSF may have or any other appropriate action which SSF may seek under the terms of the applicable tender or contract or applicable laws and regulations.

b. In the event that we are in breach of any of the above sections or the Provisions, we may seek to indemnify SSF of any form of damages and/or liabilities, whether criminal or civil, if any legal action was brought against SSF in relation to the breach.

c. Should any person attempt to solicit any bribe or advantage (whether financial or otherwise) from the Business Associates or any other person connected to the Business Associates either as an inducement or incentive to be selected or as a reward, gift, or bonus for being selected in the business transactions with SSF or where the Business Associates has reasonable grounds to suspect any breach of the obligations in this Business Associate Letter of Declaration, the COCBE, the ABAC Policy or any applicable laws, the Business Associate will report such act to SSF as soon as reasonably practicable.

d. The COCBE and ABAC Policy may be updated, amended or revised from time to time to ensure its adequacy in implementation and enforcements and we, upon receiving the updated, amended or revised COCBE and ABAC Policy, shall fully adhere to all terms thereto.

e. We were fully informed on the Whistleblowing Policy and Channel which are available to us as an avenue to report any misconducts or incidents in relation to the commercial transaction(s) between SSF and us. The Whistleblowing Channel is available on the following:

E-mail Address : arc@ssf.com.my
Postal Address : No. 6, Jalan Jurutera U1/23, Hicom Glenmarie Industrial Park, 40150 Shah Alam, Selangor, Malaysia

For and on behalf of the Business Associate,

Yours sincerely

_____

Name of Company Director :
IC / Passport No. :
Position/Designation :
Company Stamp :

Received and acknowledged by:

_____

Name and IC/Passport No. :
Position :
Company Stamp :

APPENDIX B
COMPLIANCE CERTIFICATION BY EMPLOYEE

I hereby confirm that I have read, understood and will abide by this Policy as required in my employment contract.

Name	**:**	
Role / Designation	**:**	
Signature	**:**	
Date	**:**	