



SWIFT GROUP

ANTI-BRIBERY

&

ANTI-CORRUPTION POLICY

FOR CUSTOMERS & SUPPLIERS OF SWIFT GROUP

A handwritten signature in black ink, appearing to read "TAN BIN CHEE".

**TAN BIN CHEE
CHIEF EXECUTIVE OFFICER
1ST JANUARY 2024**

Anti-Corruption, Gifts and Entertainment Guidelines

(For Customers & Suppliers)

Swift Group is committed to conduct its business with integrity.

In line with that commitment, Swift Group (“the Company”) has developed its Anti-Corruption, Gifts and Entertainment Guidelines (“Guidelines”). As a service provider or customer of the Company, you must comply with the terms of this document for your activities involving the Company.

1. The Company condemns any form of bribery or corruption. Customers and service providers shall take all measures to prevent corrupt practices in its dealings with the Company.

2. In addition, customers and suppliers shall not-
 - (a) offer or provide, directly or through any intermediaries, any bribe, gift, reward, consideration, favour or any other advantage, whether material or immaterial to any representative of the Company for the purpose of-
 - (i) influencing them to act contrary to the Company’s interest; or
 - (ii) obtaining or rewarding favourable treatment by the Company with respect to the terms, conditions, price or performance of a contract;

 - (b) offer or provide gratification which might be considered as a bribe under international legislation, to a government official, either in Malaysia or any other country;

 - (c) collude with other parties to preclude or compromise dealings with the Company. The customers and suppliers also undertake to report to , through its official reporting channels stipulated below, any such attempts made by others to involve the customers and suppliers in acts of collusion against the Company; or

 - (d) instigate third parties to perform actions pertaining to the above.

3. Customers and suppliers will ensure that all their employees, sub-contractors or agents are aware of and comply with the provisions in this document.
4. Customers and suppliers shall ensure that they adhere to the following-

Gifts

- (a) Any gift must be unsolicited and not affect, or be perceived as affecting, business judgment. Gifts should only be offered to and received in connection with a customary business or cultural occasion. Cash, loans, kickbacks or the equivalent advantages are absolutely prohibited.
- (b) Gifts **must not exceed MYR300 / SGD100 / THB2500 / CNY500** and in any event, must **not occur more than 3 times a year** with the same person.
- (c) No gift must be given to government officials or any companies that will benefit from the gift on behalf of the Company.

Hospitality (meals and entertainment)

- (a) Hospitality must be unsolicited and not affect, or be perceived as affecting, business judgment. Meals and entertainment should only be offered to and received from the Company representative dealing with the customer or service provider in their role in the Company is for purposes supported by the Company and may only be offered in conjunction with legitimate business meetings, conferences or events hosted, supported or sponsored by the Company. They may never be provided on a stand-alone basis.
- (b) Hospitality must be in a reasonable amount. Spouses or other guests of the invitee must not be included.

Any individual with any suspicions, concerns or queries regarding a payment made on our behalf or improper business practices, he or she should raise these by write in email to sawyong@senergy.com.my or bctan@senergy.com.my.

Letter of Commitment for Anti-Bribery, Anti-Corruption

I hereby declare that I understand the stated Policy and all its terms and conditions. I will ensure full compliance that I and/or any other personnel representing my company shall not give or offer bribe to any individual in Swift Group, to obtain individual or business purpose advantage.

If I or any personnel representing my company is found guilty of offering or giving bribes to any individual in Swift Group, then I as the representative of my company hereby consent and agree to the following actions to be taken against the company:

1. Termination of contract/agreement and any other business relations

2. Disciplinary action in accordance with Malaysian Anti-Corruption Act 2009

Yours Sincerely,

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Authorised Signatory

Name :

NRIC :

Designation:

Company's Name:

Company Registration Number:

Date: