

SEM MATIC SDN BHD	Anti-Bribery and Anti-Corruption Policy Polisi Anti-Rasuah dan Anti-Korupsi		
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SEM MATIC Sdn Bhd – Anti-Bribery and Anti-Corruption Policy/ Dasar Antirasuah dan Anti Korupsi

SEM MATIC Sdn Bhd is committed to conducting business ethically, with integrity, and in full compliance with all applicable laws and regulations.

SEM MATIC Sdn Bhd komited untuk menjalankan perniagaan secara beretika, berintegriti, dan mematuhi sepenuhnya semua undang-undang dan peraturan yang terpakai.

We adopt a ZERO-TOLERANCE policy toward bribery, corruption, extortion, and embezzlement in any form—whether committed directly or through third parties.

Kami mengamalkan dasar TOLERANSI SIFAR terhadap rasuah, korupsi, peras ugut dan penyelewengan dalam apa jua bentuk—sama ada dilakukan secara langsung atau melalui pihak ketiga.

1. Purpose/Tujuan

The purpose of this policy is to:

Tujuan dasar ini adalah untuk:

- Ensure compliance with applicable anti-bribery and anti-corruption laws.
Memastikan pematuhan undang-undang anti-rasuah dan anti-rasuah yang terpakai.
- Provide clear guidance to employees, contractors, and business partners.
Memberi panduan yang jelas kepada pekerja, kontraktor dan rakan kongsi perniagaan.
- Safeguard the company's reputation and support ethical decision-making
Menjaga reputasi syarikat dan menyokong pembuatan keputusan yang beretika

2. Scope/ Skop

This policy applies to all employees, directors, contractors, consultants, and third-party representatives acting on behalf of SEM MATIC Sdn Bhd, regardless of location.

Dasar ini terpakai kepada semua pekerja, pengarah, kontraktor, perunding dan wakil pihak ketiga yang bertindak bagi pihak SEM MATIC Sdn Bhd , tanpa mengira lokasi.

All parties mentioned above are required to comply with this policy and actively promote a culture of ethical behavior.

Semua pihak yang dinyatakan di atas dikehendaki mematuhi dasar ini dan secara aktif mempromosikan budaya tingkah laku beretika.

3. Definitions/ Definisi

Bribery: Offering, promising, giving, receiving, or soliciting anything of value to influence the actions of an individual or organization improperly, including obtaining or retaining business or gaining other advantages.

Rasuah: Menawarkan, menjanjikan, memberi, menerima atau meminta apa-apa yang bernilai untuk mempengaruhi tindakan individu atau organisasi secara tidak wajar, termasuk mendapatkan atau mengekalkan perniagaan atau memperoleh kelebihan lain.

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Corruption: Dishonest or fraudulent conduct by those in power, typically involving bribery.

Korupsi: Kelakuan tidak jujur atau penipuan oleh mereka yang berkuasa, biasanya melibatkan rasuah.

A corrupt act is deemed to have occurred even if:

Perbuatan rasuah dianggap telah berlaku walaupun:

- A bribe does not succeed/ *Rasuah tidak berjaya.*
- A person authorizes or directs a bribe, even if no payment is ultimately made/ *Seseorang membenarkan atau mengarahkan rasuah, walaupun tiada pembayaran akhirnya dibuat.*

“Anything of value” includes, but is not limited to:

“Apa-apa sahaja yang bernilai” termasuk, tetapi tidak terhad kepada:

- Cash or cash equivalents (e.g., gift cards, vouchers), stock, or personal property.
Wang tunai atau setara tunai (cth, kad hadiah, baucar), stok atau harta peribadi.
- Gifts, meals, entertainment, and travel – these must be reasonable, appropriate to the occasion, and aligned with SEM MATIC’s Gift Policy.
Hadiah, makanan, hiburan dan perjalanan – ini mestilah munasabah, bersesuaian dengan majlis dan sejajar dengan Dasar Hadiah SEM MATIC
- Political contributions/ *Sumbangan politik*
- Charitable contributions – particularly if made at the request of a government official or private partner, as it may be seen as an indirect bribe.
Sumbangan amal – terutamanya jika dibuat atas permintaan pegawai kerajaan atau rakan kongsi swasta, kerana ia boleh dilihat sebagai rasuah tidak langsung.
- Job offers or internships, especially those extended to government officials or their relatives, must be reviewed by Anti-Corruption & Anti Bribery committee
Tawaran pekerjaan atau latihan amali, terutamanya yang diberikan kepada pegawai kerajaan atau saudara mereka, mesti disemak oleh jawatankuasa Pencegahan Rasuah & Anti Korupsi

4. Prohibited Conduct/ *Kelakuan Terlarang*

The following are strictly prohibited:

Perkara berikut adalah dilarang sama sekali:

- Offering or accepting bribes or kickbacks
Menawarkan atau menerima rasuah atau sogokan.
- Making facilitation payments to expedite or secure routine actions.
Membuat pembayaran pemudahan untuk mempercepatkan atau menjamin tindakan rutin.
- Providing gifts or hospitality to influence business decisions.
Menyediakan hadiah atau layanan untuk mempengaruhi keputusan perniagaan.
- Using third parties to engage in bribery or corruption.
Menggunakan pihak ketiga untuk terlibat dalam rasuah atau korupsi.

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5. Prevention Measures/ Langkah-langkah Pencegahan

SEM MATIC Sdn Bhd will take all reasonable steps to prevent bribery and corruption, including:
SEM MATIC Sdn Bhd akan mengambil semua langkah yang munasabah untuk mencegah rasuah dan rasuah, termasuk:

- Conducting due diligence on business partners to ensure compliance with anti-corruption practices.
Menjalankan usaha wajar terhadap rakan niaga untuk memastikan pematuhan terhadap amalan pencegahan rasuah.
- Providing mandatory training to management on risks, legal requirements, reporting procedures, and consequences of non-compliance.
Menyediakan latihan mandatori kepada pengurusan tentang risiko, keperluan undang-undang, prosedur pelaporan dan akibat ketidakpatuhan.
- Promoting employee awareness via posters, employee meetings, and digital communication.
Mempromosikan kesedaran pekerja melalui poster, mesyuarat pekerja dan komunikasi digital.
- Emphasize and assure that staff, workers, and suppliers have the right to refuse doing anything in non-conformance to the 'highest standard of integrity' policy and do not experience any retribution for such refusal.
Tegaskan dan pastikan kakitangan, pekerja dan pembekal mempunyai hak untuk menolak melakukan apa-apa yang tidak mematuhi dasar 'standard integriti tertinggi' dan tidak mengalami sebarang pembalasan atas keengganan tersebut.
- Implementing approval procedures for gifts, hospitality, and expenses.
Melaksanakan prosedur kelulusan untuk hadiah, hospitaliti dan perbelanjaan.
- No exemptions – All individuals are subject to disciplinary processes.
Tiada pengecualian – Semua individu tertakluk kepada proses tatatertib.
- Informing third parties (suppliers, consultants, contractors) of their obligation to comply with this Policy.
Memaklumkan pihak ketiga (pembekal, perunding, kontraktor) tentang kewajipan mereka untuk mematuhi Polisi ini.

Due diligence includes verifying the legitimacy of third parties, their qualifications, and alignment with SEM MATIC's standards.

Usaha wajar termasuk mengesahkan kesahihan pihak ketiga, kelayakan mereka dan penjajaran dengan piawaian SEM MATIC.

All suppliers and partners will receive a copy of the SEM MATIC Supplier Code of Conduct to affirm commitment to our legal, ethical, and reputational standards.

Semua pembekal dan rakan kongsi akan menerima salinan Tatakelakuan Pembekal SEM MATIC untuk mengesahkan komitmen terhadap piawaian undang-undang, etika dan reputasi kami.

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Written agreements with third parties must include:

Perjanjian bertulis dengan pihak ketiga mesti termasuk:

- Compliance with all relevant anti-corruption laws.
Pematuhan kepada semua undang-undang pencegahan rasuah yang berkaitan.
- A clause requiring third parties to respond to reasonable information requests.
Klausa yang memerlukan pihak ketiga untuk bertindak balas terhadap permintaan maklumat yang munasabah.
- Oversight responsibility lies with the Chief Financial Officer (CFO).
Tanggungjawab pengawasan terletak pada Ketua Pegawai Kewangan (CFO).

Violations of this Policy may result in disciplinary action or termination of contracts or engagements.

Pelanggaran Polisi ini boleh mengakibatkan tindakan tatatertib atau penamatan kontrak atau pertunangan.

Reports can be made anonymously via the official online & physical reporting system.

Laporan boleh dibuat tanpa nama melalui system pelaporan dalam talian & fizikal rasmi

The **Whistleblower Policy** protects those reporting in good faith, including consultants, agents, contractors, and employees.

Dasar Whistleblower Policy melindungi mereka yang melaporkan dengan suci hati, termasuk perunding, ejen, kontraktor dan pekerja.

6. Reporting and Whistleblower Protection/ Pelaporan dan Perlindungan Pemberi Maklumat

Employees and stakeholders are encouraged to report any suspicions or knowledge of bribery or corruption.

Kakitangan dan pihak berkepentingan digalakkan untuk melaporkan sebarang syak wasangka atau pengetahuan tentang rasuah atau rasuah.

If unsure whether something of value is acceptable, consult the Gift and Entertainment Policy, HR Manager, or your supervisor.

Jika tidak pasti sama ada sesuatu yang bernilai boleh diterima, rujuk Polisi Hadiah dan Hiburan, Pengurus Sumber Manusia atau penyelia anda.

Violations may be reported anonymously through:

Pelanggaran boleh dilaporkan tanpa nama melalui:

- The Ethics Hotline/ Talian Etika
- QR code reporting system/ Sistem pelaporan kod QR
- Anonymous drop box/ Kotak drop tanpa nama
- Direct communication with the CFO or HR Manager/ Komunikasi terus dengan CFO atau Pengurus HR

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All reports will be treated confidentially, and the privacy of the whistleblower will be respected.
Semua laporan akan dilayan secara sulit, dan privasi pemberi maklumat akan dihormati.

Retaliation is strictly prohibited and will lead to disciplinary action.
Tindakan balas adalah dilarang sama sekali dan akan membawa kepada tindakan tatatertib.

7. Consequences/ *Akibat*

All allegations of bribery or corruption will be investigated promptly and thoroughly, including those made anonymously.

Semua dakwaan rasuah atau rasuah akan disiasat dengan segera dan menyeluruh, termasuk yang dibuat tanpa nama.

Violations may result in:

Pelanggaran boleh mengakibatkan:

- Disciplinary action for employees/ *Tindakan tatatertib untuk pekerja.*
- Termination of third-party relationships/ *Penamatan hubungan pihak ketiga.*
- Legal action where applicable/ *Tindakan undang-undang jika berkenaan.*

8. Compliance and Monitoring/ *Pematuhan dan Pemantauan*

The RBA Management Representative is responsible for:

Wakil Pengurusan RBA bertanggungjawab untuk:

- Monitoring the policy's implementation/ *Memantau pelaksanaan dasar*
- Ensuring regular training, internal audits, and reporting/ *Memastikan latihan tetap, audit dalaman dan pelaporan*
- Supporting management reviews of compliance/ *Menyokong semakan pengurusan pemuatan.*

9. Reporting Channels & Anonymous Complaints/ *Melaporkan Saluran & Aduan Tanpa Nama*

You may report incidents of bribery or corruption through the following confidential channels:

Anda boleh melaporkan insiden rasuah atau rasuah melalui saluran sulit berikut:

- Email/ *E-mel*: whistleblower@semmatic.com.my
- Hotline/ *Talian Penting*: +6011-1558-0087
- In-person reporting to/ *Melapor kepada*:
 - **Chief Financial Officer (CFO)**
 - Email/ *E-mel*: jesper.leong@semmatic.com.my
 - Phone/ *Telefon*: +60 12-688 3466
 - **HR Asst Manager**
 - Email/ *E-mel*: kharthikaisu.raman@semmatic.com.my
 - Phone/ *Telefon*: +60 16-709 4998

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- Anonymous complaint drop box in Sem Matic's facility/ *Kotak aduan tanpa nama di kemudahan Sem Matic*
- QR code available at in Sem Matic's facility/ *Kod QR tersedia di kemudahan Sem Matic*
- Employee survey feedback/ *Maklum balas tinjauan pekerja*
- Superior / Hostel Management Staff/ *Kakitangan Pengurusan Atasan / Asrama*

Anonymous reports are welcomed and protected. All reports are documented, investigated fairly, and resolved confidentially. Retaliation against reporters is strictly prohibited.

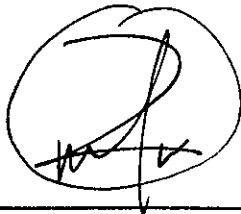
Laporan tanpa nama dialu-alukan dan dilindungi. Semua laporan didokumenkan, disiasat secara adil dan diselesaikan secara sulit. Tindakan balas terhadap wartawan adalah dilarang sama sekali.

10. Review and Amendments/ *Semakan dan Pindaan*

This Policy will be reviewed annually or as needed to reflect:

Dasar ini akan disemak setiap tahun atau mengikut keperluan untuk mencerminkan:

- Regulatory changes/ *Perubahan peraturan*
- Legal updates/ *Kemas kini undang-undang*
- Business process adjustments/ *Pelarasan proses perniagaan*



Sam Law
Chief Executive Officer
Date : 1 April 2025