



Anti-Bribery & Anti-Corruption Policy

Version 1.3



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Document Change History

Version	Date	Description
1.0	11/05/2020	New document created
1.1	02/07/2020	Document further reviewed and updated
1.2	23/08/2021	Document reviewed and approved by Board of Directors
1.2.1	30/09/2022	Document reviewed and approved by Board of Directors
1.2.2	22/08/2023	Document reviewed and approved by Board of Directors
1.3	27/08/2024	Document reviewed and approved by Board of Directors



Anti-Bribery & Anti-Corruption Policy

Overview

Rexit Berhad and its subsidiaries (“the Group”) takes a very serious stand against any incident that is seen or deemed to be an act of bribery or corruption for the Organisation has zero tolerances towards such conducts.

This policy applies to all members of the Board of Directors (executive and non-executive) and staff of Rexit Berhad and its subsidiaries who are required to strictly abide by the provisions of this policy.

The Group is committed to fully comply with policies and procedures on anti-corruption that are, at a minimum, guided by the Guidelines on Adequate Procedures issued pursuant to section 17A(5) of the Malaysian Anti-Corruption Commission Act 2009.

Bribery is defined as an act of offering someone money, something valuable or favour given in order to influence the judgement or conduct of a person in a position of trust to do something that provides an unfair advantage for you; and

Corruption is defined as a dishonest or fraudulent conduct by those in power or with authority entrusted to them in the Organisation to solicit for favours, money or something valuable for personal gain.

Scope

This document:

- Affirms Rexit’s strict stand against bribery or corruption as defined.
- Imparting companywide awareness against bribery or corruption and the consequences for any violation.
- Legal provisions and guidelines on adequate procedures.
- How to respond when encountering hospitality practices.
- Responsibility of staff to report suspected cases of bribery or corruption to the management or board.
- The policy shall be reviewed, including amendments or changes, as and when necessary, at minimum once every 3 years.

Glossary

Rexit – Rexit Berhad and all its subsidiaries.

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Audiences of Document

The intended audience of this document are as follows:

Audience	Application of the Document
Board of Directors	The Board of Directors are responsible in approving this policy and delegates the responsibility of overseeing the implementation and reviewing of this policy to Senior Management.
Rexit's Staff and Senior Management	Rexit's staff will need to understand and comply with the Anti-Bribery & Anti-Corruption Policy in place in the company. Senior Management of Rexit will oversee the implementation, review and use of this document as a basis for all staff to be guided and follow strictly so as to conform to the requirements of this anti-bribery & anti-corruption policy.
Internal Audit Department	The Internal Audit Department will use this document as a guide to check that the policy is being conformed to and there are no breaches to this policy.
Training Department	To provide training from time to time to all staff to ensure they are well aware of what the anti-bribery & anti-corruption constitutes.

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Policy Awareness	<p>All new employees should be made aware of the importance of the Anti-Bribery & Anti-Corruption Policy. Every employee of the company should have access to a copy of this Policy which will be included in the existing communication mechanisms for policy dissemination (Intranet).</p> <p>Clients, Suppliers or Third Party with mutual business interest with Rexit Berhad should also be made aware of the importance of Rexit's Anti- Bribery & Anti-Corruption Policy through communicating the policy to them where needed</p>
Risk Assessment	<p>Risk assessment will be conducted on a quarterly basis. It will help the Group to identify the most critical areas that will be exposed. The assessment will be undertaken by Chairman of Risk Management Steering Committee and members from the respective departments within the Group in accordance with the assessment methodology designed by the Group. The risk assessment is designed to identify the areas exposed to bribery and corruption risk, analyse the severity of the risk and determine the appropriate action plan to address the risk.</p>
Review and Monitoring	<p>The policies and procedures that are established and implemented should be monitored and reviewed constantly. Internal Audit shall validate the adequacy and effectiveness of the established policies, procedures and internal controls and provide independent assurance to the Board and Senior Management on the conformance to anti-bribery and corruption programs through its regular review.</p>
Training	<p>Training is to be provided to new staff upon their joining the Group during the Induction Training and to all staff from time to time to reinforce their awareness on the requirements, strict adherence in conforming to it and the consequences for any violation.</p>
Violations	<p>Violations of this Policy by staff will incur disciplinary measures that may lead to termination of their service. The matter may also be further escalated to the appropriate authorities for criminal actions to be taken against the erring person.</p> <p>Violation of this Policy by the Supplier will result in their appointment being terminated and possible criminal actions taken against the erring party.</p>

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Anti-Bribery & Anti-Corruption Policy

Application

In observing and conforming to requirements to ensure strict adherence so as not to violate any law or guidelines, the following are to be observed and to be adhered to strictly.

When dealing with our Clients, Suppliers or any Third Party who has mutual business interest with Rexit:

- i) *The Parties undertake that neither the Party nor any party acting on the Party's behalf, has offered, promised, given, authorised, requested or accepted any undue financial or other advantage of any kind or in any way connected with any purpose nor has either Party made any improper payments to or received from any person, including officials in the public or private sector, customers, suppliers and/or any other person related to or affiliated with the other Party, with the intention of influencing any act or decision where either Party is involved in or securing any improper business advantage for either Party.*
- ii) *The Parties shall throughout the course of the business relationship, comply with and take reasonable measures to ensure that any other parties acting on the Party's behalf complies with all applicable laws, statutes and regulations relating to anti-bribery and anti-corruption.*
- iii) *The Parties shall maintain in place throughout the course of the business relations, the Party's own policies and procedures to ensure compliance with anti-bribery and anti-corruption laws, statutes and regulations including the maintaining of detailed and accurate accounting records of transactions.*
- iv) *The Parties immediately report to the other Party in the event any offer, request or demand for any undue financial or other advantage of any kind is made by or received from any party acting on the Party's behalf and/or from any officials in the public or private sector, customers, suppliers and/or any other person related to or affiliated with either Party*

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Legal Provisions

The requirement in this policy are specified pursuant to Section 17A of the Malaysia Anti-Corruption Commission Act 2009 (Amendment 2008) and Guidelines on Adequate Procedures 2018.

Section 17A

- i) *The provision of section 17A under the MACC Act establishes the principle of criminal liability (corporate liability) of a Corporation for the corrupt practices of its associated person (i.e., the director, partner or employee of the Group or the person performing services for or on behalf of the group) where such corrupt practices are performed for the purpose of the group; The group may be liable whether or not its top level management and/or representatives had actual knowledge of the corrupt acts of its employees.*
- ii) *In the event that the Group is found liable under section 17A of the MACC act, the provision provides that the Group having adequate procedures can raise it as a degree against corporate liability. In this regard, the Group should prove the necessary procedures were in place to prevent its employees and/or associate persons from undertaking corrupt practices in relation to business activities.*

Adequate Procedures

- i) *The above guidelines were issued pursuant to subsection (5) of Section 17A of Malaysian Anti-Corruption Commission (Amendment) Act 2018. The objective of these guidelines is to assist commercial organisations in understanding the adequate procedures that should be implemented to prevent occurrence of corrupt practices in relation to their business activities.*
- ii) *These guidelines have been formed on the basis of five principles (Top Level Commitment; Risk Assessment; Undertake Control Measures; Review, Monitoring and Enforcement; and Training and Communication) which are to be used as reference points for the commercial organisations to implement towards the goal of having adequate procedures.*

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Accepting Invitations or Gifts

Notwithstanding the guide mentioned in item (i), (ii), (iii) and (iv) in the preceding section on Application, we are mindful of the hospitality practices where there is a need to meet up with clients or suppliers occasionally with the aim of establishing and strengthening relations in furtherance of the Group's product and services and that there are times and occasions when we may be offered gifts and or invitations to meals or events which we find difficult to turn down so as not to disappoint our clients, suppliers or business partners.

To ensure that such gifts, invitations or entertainments are accepted appropriately, the following guidelines are to be followed:

Accepting invitation to Meals and/or Social Events

- the acceptance must be made in good faith to improve the image of the Group and to improve the cordial relationship with the party concerned;
- the acceptance must be proportionate to the occasion and it must not be felt that the giver is trying to gain an unfair advantage on the Group;
- it does not give an appearance that it is being given as a bribe, payoff or to secure an unfair advantage from the Group.

Accepting Gifts

- The value of the gift is reasonable, proportionate and made in good faith and within the jurisdiction of the law to improve the cordial relations between the Group and the giver;
- The gift accepted should not be in cash and does not give the appearance of been given as a bribe, payoff or been given to obtain an unfair advantage from the Group;
- The gifts are given openly and transparently and it would not embarrass the Group if the Giver were to disclose the gift publicly.

Donations and Sponsorship

Donations and Sponsorship

- The donations or sponsorship given must not be used as a trickery to conceal bribery. Ensure donations to charities or beneficiaries given are not disguised as illegal payments to public officials or conduit to fund illegal activities. All donations and sponsorship must adhere to the following:
 - Ensure such contributions are allowed by applicable laws; and
 - Be accurately reflected in the company's accounting books and records.

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Employee's Responsibility

Each employee is responsible to ensure that he/she adheres strictly to the policy and guidelines as stated herein in this document.

Each employee is also responsible and is free to speak out against any suspected cases of bribery or corruption committed by staff of the Group to their superiors or directly to the CEO, COO, CFO or the Chairman of the Audit & Risk Management Committee (ARMC) without fear of their identity being exposed or fear of any retaliation.

All Employee are to exercise good judgement and always be seen to act appropriately in the interest of the Organisation.

Reporting Channel

Any real and/or suspected cases of bribery or corruption may be reported to our confidential reporting channel at the following email address:

1. anti.briberycorruption@rexit.com

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