ADVANCE INFORMATION MARKETING BERHAD

Registration No. 200401006266 (644769-D)
(Incorporated in Malaysia)

ANTI-CORRUPTION AND BRIBERY ("ACB") POLICY

I. OUR COMMITMENT

Advance Information Marketing Berhad do not tolerate any forms of corruption and bribery. On this note, the Board of Directors ("Board") and management are committed to act professionally and responsibly in ensuring all business dealings involving the Group are free from corruption.

II. PURPOSE OF THIS POLICY

The principal aims of the Board in defining this policy are to outline:

- The Board's and management's responsibilities in establishing anti-corruption measures and enforcing the provisions in this policy; and

- The guide to stakeholders in responding to sensitive corruption and bribery issues when dealing with the Group.

III. BOARD'S RESPONSIBILITIES

In order to address the corruption risks exposure of the Group, the Board shall:

a. Establish, maintain and periodically review the effectiveness and adequacy of its anti-corruption policy and measures vis-à-vis the current laws and regulation requirements on anti-corruption;

b. Oversee and assess the effectiveness of the anti-corruption compliance measures;

c. Ensure that the Group's ACB policy is appropriately communicated to all stakeholders and is accessible publicly;

d. Maintain a reliable whistleblowing channel, for stakeholders to raise concerns about actual or suspected corruption incidents;

e. Safeguard the identity of and protect the whistleblower from harassment and reprisal resulting from whistleblowing;

f. Periodically, review the Group corruption risk exposures or when there is change in law, circumstance of the business and the profile of the business associates; and

g. Ensure that all Board, management and staff members of the Group receive essential trainings on anti-corruption.

IV. MANAGEMENT'S RESPONSIBILITIES

Management is responsible to:

a. Implement the Group's ACB policy and measures as well as the financial and organisational structure and procedures to controls corruption risks;

b. Communicate the Group' policies and commitments on anti-corruption to both internal and external stakeholders via the corporate's website, emails, circular, briefing sessions;

c. Assess corruption risk before establishing any business dealings/ relationship with business partners, contractors, suppliers, customers, government authorities, agents and consultants; and

d. Manage and enhance the adequacy and effectiveness of the Group's systems in preventing corruption and bribery.

V. REFERRAL FEE

The Group prohibits referral fee payment to government bodies, officials and individuals representing any regulatory authorities. At the same time, none of the Directors, officers, management and employees or their immediate family members shall solicit or receive any referral fee from the Group's business associates on personal capacity.

Any referral payments for business and customers shall be approved by Group General Manager. However, referral payment shall not be above the market and industry practices and shall be documented in an agreement and reviewed by the Board.

VI. FACILITATION PAYMENT

The Group prohibits receipt and payment of facilitation fee, commission or benefits directly or indirectly from or to any person.

All Directors, management and employees of the Group should follow strict compliance and shall not breach any procedural requirements to expedite application and approval processes for business dealings and transactions.

VII. ENTERTAINMENT & HOSPITALITY

All entertainment and hospitality offered to business partners:

a. Shall not exceed the prescribed limit stated in the Group's approved Employee Handbook; or

b. Shall be approved in accordance with the procedures provided in the Employee Handbook when the amount of entertainment and hospitality offered is above the prescribed limit.

VIII. GIFT

Gift giving and receiving are allowed for value not more than RM1,000 (the "prescribed value") for official functions, events, celebrations or for presentation of corporate souvenirs bearing Company's logo of not more than the prescribed value.

Where gifts to be offered or received are above the prescribed value, Directors, employees, family members or agents working on behalf of the Group are obligated to obtain pre-approval from the Chief Executive Officer ("CEO") or Executive Director ("ED"). However, CEO and ED shall not approve gift to be offered and received by himself and shall seek approval from other Directors. If approval is not obtained, the gift must be returned with a note of explanation about the Group's Gift policy.

IX. SPONSORSHIP AND DONATION

Sponsoring events, functions and activities and making donation either in the form of monetary or equivalent, equipment, or other benefits to charity causes are part of the Group's Corporate Social Responsibility ("CSR").

Sponsorship and donation of and above RM10,000 should be approved by the Board.

Nonetheless, the Group will not request for sponsorship and donation nor sponsor or make donations to any political related parties or individuals officials from government offices, regulatory bodies, authorities.

X. WHISTLEBLOWING

All Directors, members of management and employees should adhere to and educate our business associates to adhere to this ACB policy. Staff members, employees and business associates who are aware of, or suspect a violation of this policy shall report the violations in accordance with the Group's reporting procedures in the Whistleblowing Policy.

This policy was reviewed and approved by the Board of Directors of the Company on 21 August 2026.