



**SUCCESS TRANSFORMER
CORPORATION BERHAD**
(200301034518) (636939-W)

ANTI - BRIBERY & CORRUPTION POLICY

EFFECTIVE DATE	:	28/11/2023
VERSION	:	2

CONTENT

Ref	Content	Page
i.	Document Revision Date	1
1.0	Introduction	3
2.0	Objective	3
3.0	Scope	3
4.0	Anti-Bribery and Corruption Practice	4
5.0	Gifts and Entertainment	4
6.0	Facilitation Payments	5
7.0	Donations and Sponsorships	6
8.0	Conflicts of interest	6
9.0	Awareness	7
10.0	Monitoring and Assessment	7
11.0	Reporting of Policy Violations	7
12.0	Staff Declaration	9
13.0	Enforcement for Non-Compliance	9
14.0	Record Keeping	9
15.0	Validity and Review of the Policy	10

Document Revision Date

Version	Date
1	31/5/2020

SUCCESS TRANSFORMER CORPORATION BERHAD

ANTI-BRIBERY AND CORRUPTION POLICY

1.0 INTRODUCTION

The Anti-Bribery and Corruption Policy ("the Policy") of Success Transformer Corporation Berhad ("STC" and/or "the Company") is prepared with reference of the Guidelines on Adequate Procedures pursuant to Subsection (5) of Section 17A under the Malaysia Anti-Corruption Commission Act, 2009.

2.0 OBJECTIVE

The main objective of the policy is to ensure that the Company established the necessary safeguards which should prevent any conduct of bribery or corruption from happening.

The Policy is developed to:

- Set out the responsibilities of STC, and of those working for STC, in observing and upholding the Company's position against corruption and bribery; and
- Provide information and guidance to those working for STC on how to recognise and deal with corruption and bribery issues.

3.0 SCOPE

This Policy is applicable to STC and its subsidiary companies ("the Group"). This includes all individual working at all levels and ranks, including company directors, managing director, chief operation officer, general managers, managers, and employees (whether full-time, part-time, or contract) of the Company.

The Policy is also extended to any individual or organisation ("Third Party") our Group meets and works with. It may refer to actual and potential customers, suppliers, distributors, agents, dealers, advisors, consultants, government and public bodies servants.

4.0 ANTI-BRIBERY AND CORRRPTION PRACTICE

Bribery and Corruption in all its forms as it relates to STC’s activities is prohibited.

Bribery and Corruption may take the form of anything of value, such as money, goods, donations, loan, fee, reward, valuable security, services, property, privilege, employment position or preferential treatment.

STC personnel shall not therefore, whether directly or indirectly, offer, give, receive or solicit any item of value, in the attempt to illicitly influence the decisions or actions of a person in a position of trust within an organisation, either for the intended benefit of STC or the persons involved in the transaction.

The anti-bribery and corruption statement apply equally to its business dealings with commercial ('private sector') and Government ('public sector') entities, and includes their directors, personnel, agents and other appointed representatives. Even the possible appearance of bribery or corruption is to be avoided, in particular when dealing with Government officials.

No employee will suffer demotion, penalty or other adverse consequences in retaliation for refusing to pay or receive bribes or participate in other illicit behaviour.

5.0 GIFTS AND ENTERTAINMENT

GIFTS

- 5.1 The Company adopted a No-Gift Policy where the policy prohibits employees to receive gifts or asking for (soliciting) gifts from external parties including customers, business partners, suppliers, regulators, and government officers.
- 5.2 Gifts may be in the form of cash or cash equivalent, including gift certificates, loans, commissions, discounts services, advantage or any other benefit, which is not extended to all employees of STC.
- 5.3 However, corporate gift and souvenirs which are given out of hospitality are exempted if the following criteria are met:
 - The items are attached with company logo.
 - The items are given at the following types of event:
 - i. Open to public (e.g. job fair, trade events, conference, etc); or
 - ii. By invitation where the invitation is not exclusive to one organisation or person and participation is transparent (e.g. industry meeting, event, Annual General Meeting, etc.)
 - The items are not concealed.

- The items are given equally to all participants attending the event without discrimination.
 - The items are of appropriate type and value, and given at an appropriate time, whilst taking into account the reason for the gift.
- 5.4 All gift received must be declared and forward to STC’s Managing Director within five (5) working days of receipt.

ENTERTAINMENT

- 5.5 It is a common practice within the business environment to provide or accept entertainment to foster business relationship. STC recognises the need to provide reasonable and proportionate entertainment under appropriate circumstances. Our Personnel may offer appropriate and proportionate entertainment that is legal and reasonable within the scope of their work as part of business networking as well as measure of goodwill towards the recipients. Our Personnel must not directly or indirectly provide or offer to provide entertainment with a view to cause undue influence the outcome of business decision.
- 5.6 Our Personnel must at all times conduct themselves with integrity in relation to accepting entertainment from any party. Our Personnel or any of their family members must not accept entertainment in exchange for an exercise or non-exercise of their job function or activity.

6.0 FACILITATION PAYMENTS

- 6.1 STC adopts a strict policy of disallowing the use of facilitation payments in its business. Facilitation payment is a payment or other provision made personally to an individual in control of a process or decision. It is given to secure or expedite the performance of a routine or administrative duty or function.
- 6.2 Personnel shall decline to make the payment and report to the Company immediately when they encounter any requests for a facilitation payment. In addition, if a payment has been made and personnel are unsure of the nature, the Company must be notified immediately, and the payment recorded accordingly.
- 6.3 Only in the event that an employee’s security is at stake is permitted to make the payment. The employee must immediately report the incident to their Head of Department to record the details and keep a record of what was spent.

7.0 DONATIONS AND SPONSORSHIPS

Donations and sponsorships are permitted however, the Company prohibits the giving and receiving of donations and sponsorships to influence business decisions and it is not made with the suggestion that a return favour is expected.

POLITICAL CONTRIBUTIONS

7.1 STC will not make donations, whether in cash, kind or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

CHARITABLE CONTRIBUTIONS

7.2 STC accepts and encourages the act of donating to charities as part of its corporate social responsibility initiatives, whether through services, knowledge, time or direct financial contributions (cash or otherwise).

7.3 Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

7.4 We shall ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are offered or made in accordance with the Group's approval mandate.

8.0 CONFLICTS OF INTEREST

8.1 Conflicts of interest arise where there is personal interest that can be considered to have potential interference with objectivity in performing duties or exercising judgement for or on behalf of STC. Our Personnel must avoid situations in which their personal interest would conflict with their duties and responsibilities. Our Personnel must not use their position, official working hours, company's resources and assets, or information available to them for personal gain or to the company's disadvantage.

8.2 In situations where conflict of interest arises, our Personnel are required to immediately declare the matter to their immediate supervisor in writing.

9.0 AWARENESS

- 9.1 STC shall conduct an awareness programme for all its personnel on the Company's position regarding anti-bribery and corruption, integrity and ethics.
- 9.2 Our zero-tolerance approach to bribery and corruption must be communicated to both internal and external relevant parties, as appropriate thereafter.
- 9.3 A copy of this policy shall be enclosed with appointment letter and notify new staff a copy of this policy is published at STC's webpage. An acknowledgment of this policy by staff shall be documented and retained by Human Resource Department for the duration of employment.

10.0 MONITORING AND ASSESSMENT

- 10.1 Workers are responsible for the success of this Policy and should ensure they use it to disclose any suspected danger or wrongdoing.
- 10.2 Internal control systems and procedures will be subject to audits to provide assurance that they are effective in countering bribery and corruption.

11.0 REPORTING OF POLICY VIOLATIONS

- 11.1 Suitable reporting channels shall be established and maintained for receiving information regarding violations of this policy, and other matters of integrity provided in good faith by STC personnel.
- 11.2 Personnel who, in the course of their activities relating to their employment at STC, encounter actual or suspected violations of this policy are required to report their concerns using the reporting channels stated in Whistleblowing Policy as stated in our company website (<https://www.stcgroup.com.my/investor-relations/#policy-procedure>).
- 11.3 Reports made in good faith shall be addressed in a timely manner and without incurring fear of reprisal regardless of the outcome of any investigation.
- 11.4 Retaliation in any form against STC personnel where the person has, in good faith, reported a violation or possible violation of this policy is strictly prohibited. Any STC personnel found to have deliberately acted against the interests of a person who has in good faith reported a violation or possible violation of this policy shall be subjected to disciplinary proceedings including demotion, suspension, dismissal or other actions (including legal action) which STC may pursue.

- 11.5 Report can be made anonymously via Whistleblowing Channel.
- 11.6 Any concern by the Directors, Management and/or all employees of the STC Group should be raised with immediate superior. If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to Managing Director (“MD”). Channel of reporting to MD are:

Name	: Tan Ah Bah @ Tan Ah Ping
Telephone	: 03- 61565151
Mail	: Success Transformer Corporation Berhad No.3, 5 & 7 Jalan TSB 8, Taman Industri Sungai Buloh, 47000 Sungai Buloh, Selangor Darul Ehsan. [Mark Strictly Confidential]
Attention	: Managing Director
Email	: stc.corporate@success.com

In the case where reporting to Management and/or MD is a concern, then the report should be made to the Chairman of Audit Committee. Channel of reporting to the Chairman of Audit Committee are:

Name	: Chan Foong Ping
Mail	: Success Transformer Corporation Berhad No.3, 5 & 7 Jalan TSB 8, Taman Industri Sungai Buloh, 47000 Sungai Buloh, Selangor Darul Ehsan. [Mark Strictly Confidential]
Attention	: Chairman – Audit Committee
Email	: cfp@success.com.my

12.0 STAFF DECLARATION

- 12.1 STC personnel shall certify 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 Human Resources Department for the duration of the personnel's employment.
- 12.2 The Company reserves the right to request information regarding an employee's assets in the event that the person is implicated in any bribery and corruption-related accusation or incident.

13.0 ENFORCEMENT FOR NON-COMPLIANCE

- 13.1 STC regard acts of bribery and corruption seriously and will take appropriate actions in the event of non-compliance of this Policy. For our Personnel, non-compliance of this Policy may lead to disciplinary action and termination of employment.
- 13.2 For Business Partners, non-compliance of this Policy may lead to termination of contract and claim for damages.

14.0 RECORD KEEPING

- 14.1 Must keep financial records and have appropriate internal controls in place which will evidence that business reason for making payment to third parties.
- 14.2 Ensure all expenses claims relating to hospitality, gifts or entertainment incurred to third parties are submitted in accordance with STC reimbursement practice.
- 14.3 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as customers, supplies and business contracts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept off-book to facilitate or conceal improper payment.

15.0 VALIDITY AND REVIEW OF THE POLICY

- 15.1 Any changes to the Policy shall be approved by the Board of Director (BOD).
- 15.2 RMC shall review the recommendation for changes before submitting to BOD for approval.
- 15.3 The effective date of the Policy shall be immediately upon approval by the BOD.
- 15.4 This Policy shall be updated, amended or reviewed from time to time to ensure its adequacy in implementation and enforcement.