



ASM AUTOMATION GROUP BERHAD  
[Registration No. 202401033717 (1579565-M)]

## ANTI-BRIBERY AND CORRUPTION POLICY

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## 1. INTRODUCTION

This Anti-Bribery and Corruption Policy (“ABC Policy” and/or “Policy”) sets out ASM Automation Group Berhad’s (“ASM”) principles in dealing with improper solicitation, bribery and other corrupt activities and related issues that may arise in ASM’s course of business. This policy applies throughout ASM and its group of companies (“Group”). This Policy should be read in conjunction with ASM’s various policies & guidelines. This Policy is not intended to provide definitive answers to all issues related to bribery and corruption. If multiple documents speak on the same subject, then the more stringent provision always applies.

## 2. ANTI-BRIBERY AND CORRUPTION COMMITMENT

ASM is committed to conducting business dealings with integrity, honesty and respect. This means avoiding practices of bribery and corruption of all forms in ASM’s daily operations.

ASM has adopted a zero-tolerance approach against all forms of bribery and corruption. Employees who refuse to pay bribes or participate in acts of corruption will not be penalised even if such refusal may result in losing business.

The Policy reflects ASM’s dedication to maintaining the highest level of integrity and ethics within the Group. Full compliance to both the spirit and the letter of this Policy is mandatory and should be maintained using a principle-based approach.

## 3. OBJECTIVE

This Policy sets out ASM’s overall position on bribery and corruption in all its forms. The Policy is not intended to be exhaustive as there may be additional obligations that the Employee is expected to adhere to or comply when performing their duties. For all intents and purposes, the Employee shall always observe and ensure compliance with this Policy and all applicable laws, rules and regulations in the performance of their duties.

## 4. SCOPE

This Policy is applicable to ASM, its Controlled Organisations, Business Associates acting on ASM’s behalf, the Board of Directors and all Employee of ASM and the Group, and shall be amended from time to time in line with laws and regulatory requirements. All reviews and changes therein must be approved by the Board of Directors before coming into effect.

Joint-venture companies or associate companies dealing with ASM are encouraged to adopt these or similar principles and standards. External Providers are also expected to comply with this Policy in relation to all work conducted with ASM, or on behalf of ASM.

ASM expects that contractors, sub-contractors, consultants, agents, representatives and others performing work or services for or on behalf of ASM will comply with this Policy in relevant part when performing such work or services.

## 5. REFERENCES

- Employees Manual Handbook
- Whistleblowing Policy
- Code of Conduct and Ethics
- Conflict of Interest

## 6. DEFINITIONS

**“Audit and Risk Management Committee”** means the Audit and Risk Management Committee of ASM.

**“ASM”** or **“Company”** means ASM Automation Group Berhad.

**“bribery”** means any action which would be considered as an offence of giving or receiving ‘gratification’ under the Malaysian Anti-Corruption Commission Act (“MACCA”) 2009. In practice, this means offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person who is in a position of trust within an organisation.

Bribery may be ‘outbound’, where someone acting on behalf of ASM attempts to influence the actions of someone external, such as a government official or client decision-maker. It may also be ‘inbound’, where an external party is attempting to influence someone within ASM such as a senior decision-maker or someone with access to confidential information.

**“Business Associates”** means an external party with whom ASM has, or plans to establish, some form of business relationship. This may include clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors.

**“Conflict of Interest”** means when a person’s own interests either influence, have the potential to influence, or are perceived to influence their decision making at ASM.

**“Controlled Organisation”** means an entity where ASM has the decision-making power over the entity such that it has the right to appoint and remove the management. This would normally be where ASM has the controlling interest (>50% of the voting share ownership), but it could be where there is an agreement in place that ASM has the right to appoint the management, for example a joint venture where ASM has the largest (but still <50%) allocation of the voting shares.

**“Corporate Gift”** means something given from one organisation to another organisation or individuals, with the appointed representatives giving and accepting the gift. Corporate Gifts may also be promotional items given out equally to the general public at events, functions, trade shows and exhibitions as a part of building the company’s brand and include gifts from the company to its Employee in relation to an internally or externally recognised company’s events, functions or celebrations. The gifts are given transparently and openly, with the implicit or explicit approval of all parties involved. Corporate Gifts normally bear the company’s name and logo. Examples of Corporate Gifts include items such as diaries, table calendars, pens, notepads and plaques.

**“corruption”** means dishonesty or illegal behaviour by individuals or organisations entrusted with positions of authority, aimed at obtaining illicit benefits or abusing power for personal gain and benefit.

**“Donation & Sponsorship”** means charitable contributions and sponsorship payments made to support the community. Examples include sponsorship of educational events, supporting NGOs, and other social causes.

**“Employee”** means all individuals working at all levels and grades, whether permanent, fixed-term or temporary, including directors, senior managers, officers, executives, staff, consultants, trainees, casual workers and agency staff, volunteers, interns, appointed agents & representatives, or any other person associated with ASM, or any of our subsidiaries or their employees, wherever located.

**“Exposed Position”** means a staff position identified as vulnerable to bribery through a risk assessment. Such positions may include any role involving: procurement or contract management; financial approvals; human resource; relations with government officials or government departments; sales; positions where negotiation with an external party is required; or other positions which ASM has identified as vulnerable to bribery.

**“gifts” or “present”** means any form of monetary and/or non-monetary rewards such as goods, services, cash or cash equivalents, fees, rewards, facilities, benefits, voucher, gift cards, hampers and festive gifts.

**“Gratification”** is defined in the MACCA to include the following:

- (a) money, Donation & Sponsorship, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
- (b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- (c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- (d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- (e) any forbearance to demand any money or money’s worth or valuable thing;
- (f) any other service or favour of any description including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and
- (g) any offer, undertaking or promise, whether conditional or unconditional, of any Gratification within the meaning of any of the preceding paragraphs (a) to (f).

**“Group”** means ASM and its group of companies.

**“hospitality”** means the considerate care of guests, which may include refreshments, accommodation and entertainment at a restaurant, hotel, club, resort, convention, concert, sporting event or other venue such as ASM’s offices, with or without the personal presence of the host. Provision of travel may

also be included, as may other services such as provision of guides, attendants and escorts; use of facilities such as a spa, golf course or ski resort with equipment included.

## 7. CORRUPTION RISK ASSESSMENT

A corruption risk assessment forms the basis of ASM's anti-corruption efforts. As such, the Company shall conduct internal and/or external corruption risk assessments annually and when there is a change in law or circumstance of the business. The processes of risk evaluation are as follows:

- Assessment of existing risk by updating its rating of probability and impact;
- Identify of new risk, if any, and rating of its probability and impact;
- Assessment / update of control and management action plan relating to each risk; and
- Elimination of risk that is no longer relevant.

This risk assessment should be used to establish appropriate processes, and controls approved by the top-level management to mitigate the specific corruption risks the business is exposed to.

The risk assessment may include the following:

- a) opportunities for corruption and fraud activities resulting from weaknesses in the Group's governance framework and internal systems/ procedures;
- b) financial transactions that may disguise corrupt payments;
- c) business activities in countries or sectors that pose a higher corruption risk;
- d) non-compliance of external parties acting on behalf of the Group regarding legal and regulatory requirements related to anti-corruption. Note that, given the wide definition of an associated person, a commercial organization can be liable for the acts of such third parties; and
- e) relationships with third parties in its supply chain (e.g. agents, vendors and suppliers) which are likely to expose the commercial organization to corruption.

## 8. BRIBERY AND CORRUPTION

**8.1** Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal, unethical or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage and can take the form of gifts, loans, fees, rewards or other advantages.

Corruption is the abuse of entrusted power for private gain. Bribery and Corruption which may take the form of anything of value, such as money, goods, services, property, privilege, employment position or preferential treatment, and are in all forms prohibited.

### **8.2** Statement

The Group's Employee and its Business Associates shall not therefore, whether directly or indirectly, offer, give, receive or solicit any item of value constituting bribe, kickback, personal

favour etc, 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 ASM or the persons involved in the transaction.

- 8.3 The above anti-bribery and corruption statement applies in all countries worldwide and to ASM's business dealings with commercial (private sector) and government (public sector) entities, includes all ASM's Employee.
- 8.4 No Employee or external party will suffer demotion, penalty or other adverse consequences in retaliation for refusing to pay or receive bribes or participate in other illicit behaviour.
- 8.5 ASM is also committed to conducting due diligence checks on prospective Employee, particularly for appointments to positions where bribery or corruption risk has been identified.

## 9. RECOGNITION OF LOCAL AND INTERNATIONAL LEGISLATION

- 9.1 ASM is committed to conducting its business ethically and in compliance with all applicable laws and regulations in the countries where it does business.
- 9.2 These laws include but are not limited to the Malaysian Penal Code (revised 1977) (and its amendments), the Malaysian Anti-Corruption Commission Act 2009 and its amendments, the Companies Act 2016, the US Foreign Corrupt Practices Act 1977 (amended 1998), and the UK Bribery Act 2010. These laws prohibit bribery and acts of corruption, and mandate that companies establish and maintain accurate books and records and sufficient internal controls.
- 9.3 In cases where there is a conflict between mandatory laws and the principles contained herein and other relevant policies, the law shall prevail.

## 10. GIFTS, DONATIONS AND SPONSORSHIPS

- 10.1 Gifts and hospitality given and received as a reward, inducement or encouragement for any other advantage or inappropriate or dishonest conduct are strictly prohibited. If giving or receiving gifts or hospitality is intended to influence normal decision making, the giver retains special advantage, this constitutes corruption.

Employee must not directly or indirectly solicit or accept gifts and hospitality in any forms that is excessive, inappropriate, illegal or given in response to, in anticipation of, or to influence a business decision.

Employee must exercise proper care and good judgement when providing or accepting gifts and hospitality to or from external parties. If Employee is unsure of how to consider the intention behind any gifts and hospitality, they must always disclose and consult their immediate superiors to obtain advice and approval before proceeding.

- 10.2 The gifts and hospitality may be given to third party or received from third party are not prohibited but restricted to maximum of RM500 and under limited circumstances as follow:

- a) Made for the right reason - it should be clearly given as an act of appreciation or common courtesy associated with festive seasons or other ceremonial occasions like Corporate Gift;
- b) Legal - Customary and lawful under the circumstances. No corrupt / criminal intent involved;
- c) No obligation - Do not have or are perceived to have (by either the giver or the receiver), any effect on actions or decisions. No expectation of any specific favour or improper advantages from the intended recipients; and
- d) Documented - Gifts and hospitality to be done in an open and transparent manner and be recorded and disclosed properly.

**10.3** Donations and Sponsorships are permitted but ASM prohibits the giving and receiving of Donations and Sponsorships that intends to influence business decisions. When in doubt, Employee is to consult the Compliance Officer.

**10.4** Employee is to report any gifts of whatever value (whether offered or accepted) to the Head of Department. Approval from the Managing Director (“MD”)/Chief Executive Officer (“CEO”) of the Company shall be required if the Employee is about to offer a gift to a government official.

**10.5** If approval is obtained to provide a gift, entertainment or Hospitality to public officials, Employee must ensure that the gift, entertainment or Hospitality is not excessive and lavish, and must commensurate with the official designation of the public official and not his personal capacity.

## **11. FACILITATION PAYMENTS**

**11.1** ASM adopts a strict policy of disallowing the use of facilitation payments in its business. Facilitation payment is an unofficial 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.

**11.2** Employee shall decline to make the payment and report to MD/CEO of the Company immediately when they encounter any requests for a facilitation payment. In addition, if a payment has been made and Employee are unsure of the nature, the MD/CEO of the Company must be notified immediately, and the payment shall be recorded accordingly. Employee must not promise, or offer, or agree to give or offer facilitation payments to any other party.

**11.3** Facilitation payments are only permitted in situations where the Employee’s life, limb or liberty is at risk. In such cases, the Employee must immediately report the incident to their Head of Department and/or MD/CEO of the Company to record the details and amount spent.

## **12. ENTERTAINMENT**

Employees and Directors are strictly prohibited from providing or offering to provide entertainment with the intention of improperly cause undue influence on any party in exchange for some future benefit or



result. Any such acts, whether carried out directly or indirectly through an intermediary, may be construed as an act of bribery.

The Group recognises that the occasional acceptance of a reasonable and modest entertainment provided by third parties in the normal course of business is a legitimate way to networking and building good business relationships. The Company thus set entertainment limits applicable to all levels of Employee and will not reimburse for any entertainment bills that exceed the prescribed limit as per the Human Resources Department's policy.

However, it is important for Employee and Directors to exercise proper care and judgment before accepting or offering any form of entertainment. This is not only to safeguard ASM's reputation but also to protect Employee and Directors from allegations of impropriety or undue influence.

However, under no circumstances may you or any of your family/household members accept entertainment in exchange for exercising or refraining from exercising your authority or otherwise that may be detrimental to ASM.

### **13. RECRUITMENT, PROMOTION AND SUPPORT OF EMPLOYEE**

**13.1** ASM recognises the value of integrity in its Employee and Business Associates. ASM's recruitment, training, performance evaluation, remuneration, recognition and promotion for all Employee, including the management level, shall be designed and regularly updated to recognize integrity.

**13.2** The recruitment of Employee should be based on approved selection criteria to ensure that only the most qualified and suitable individuals are employed. This is crucial to ensure that no element of corruption is involved in the hiring of Employee.

In line with this, proper background checks should be conducted in order to ensure that the potential Employee has not been convicted in any bribery or corruption cases nationally or internationally. More detailed background checks should be taken when hiring Employee that would be responsible in management positions, as they would be tasked with decision making obligations.

**13.3** ASM does not offer employment to any prospective Employee as a reward for having improperly favoured ASM in a previous role.

### **14. BUSINESS ASSOCIATES**

**14.1** All Business Associates (including external providers such as consultants, advisors, and agents) acting on behalf of ASM are required to comply with this Policy and all other policies as it relates to them.

**14.2** In circumstances where ASM retains controlling interest, such as in certain joint venture agreements, Business Associates are required to adhere to this Policy. Where ASM does not have controlling interest, Business Associates are encouraged to comply the same.

- 14.3** Due diligence should also be carried out with regards to any Business Associates intending to act on ASM's behalf as an agent or in other representative roles, to ensure that the entity is not likely to commit an act of bribery or corruption in the course of its work with ASM.
- 14.4** The extent of the due diligence should be based on a Bribery and Corruption risk assessment. Due diligence may include a search through relevant databases, checking for relationships with public officials, self-declaration, and documenting the reasons for choosing one particular Business Associate over another. The results of the due diligence process must be documented, retained for at least seven years and produced on request by the custodian of the process.
- 14.5** ASM shall include standard clauses in all contracts with Business Associates enabling ASM to terminate the contract in the event that bribery or an act of corruption has been proved to occur. Additional clauses may also be included for Business Associates acting on ASM's behalf where bribery risk has been identified.

## **15. RESPONSIBILITIES OF EMPLOYEE**

- 15.1** All Employee are required to carry out those responsibilities and obligations relating to the Company's anti-bribery and corruption stance, alongside those already in existence, which includes the following:
- a) Be familiar with applicable requirements and directives of the policy and communicate to subordinates;
  - b) Promptly record all transactions and payments in the Company's books and records accurately and with reasonable detail;
  - c) Ask the MD/CEO if any questions about this Policy arise or if there is a lack of clarity about the required action in a particular situation;
  - d) Always raise suspicious transactions and other "red flags" (indicators of bribery or corruption) to immediate superiors for guidance on the next course of action;
  - e) Be alert to indications or evidence of possible violations of this Policy;
  - f) Promptly report violations or suspected violations through appropriate channels;
  - g) Attend required anti-bribery and corruption training as required according to position; and
  - h) Not misuse their position or the Company's name for personal advantage.
- 15.2** When dealing with Business Associates, all Employee shall not:
- a) express unexplained or unjustifiable preference for certain parties;
  - b) make any attempt at dishonestly influencing their decisions by offering, promising or conferring advantage;
  - c) exert improper influence to obtain benefits from them; and
  - d) directly or indirectly offer or make promise or corrupt payments, in cash or in kind for a specific favour or improper advantage from them.
- 15.3** During an active or anticipated procurement or tender exercise, Employee participating in the exercise in any way whatsoever, shall not:

- a) receive gifts or Hospitality or any kind from any external party participating, planning to participate, or expected to participate, in the procurement or tender exercise;
- b) provide anything other than a Corporate Gift and Hospitality to any external/third party related to the exercise;
- c) be involved in any discussions regarding business or employment opportunities, for personal benefit or for the benefit of a Business Associate;
- d) abuse the decision-making and other delegated powers given by the top management; and
- e) bypass normal procurement or tender process and procedure.

**15.4** When dealing with external parties in a position to make a decision to the Company's benefit (such as a government official or client), Employee shall not:

- a) offer, promise or make any attempt at dishonestly influencing the person's decision by directly or indirectly offer or make promise of corrupt payments, in cash or in kind;
- b) be involved in any discussions regarding business or employment opportunities, for their own personal benefit or for the benefit of the external party;
- c) otherwise abuse the decision-making and other delegated powers given by the top management, in order to illicitly secure an outcome which would be to the commercial advantage to themselves and/or the Company; and
- d) exert improper influence to obtain personal benefits from them.

**15.5** The Group's managers have a particular responsibility to ensure that this Policy is applied and complied with within their department or function and to monitor compliance of the same. They also must ensure that subordinates in 'Exposed Positions' attend relevant training.

## 16. CONFLICTS OF INTEREST

**16.1** A Conflict of Interest may arise in a situation where an individual is in a position to take advantage of his/her role in the Group for his/ her personal benefit, including the benefit of his/her family and/or friends and/or company. This would undermine the duties of good faith, fidelity, diligence and integrity as expected by the Group from its Employee in the performance of the Employee's duties and obligations.

**16.2** All Employee should avoid situations in which personal interest could conflict with their professional obligations or duties. Employee 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.

**16.3** In situations where a conflict does occur, Employee are required to immediately declare the matter.

**16.4** Conflict of Interest may arise directly or indirectly through an intermediary, such as third party,

friends or family. As such, the Group encourage all Employee to report any actual or potential Conflict of Interest such as family relation, financial relation or other connection directly or indirectly related to their line of work when necessary.

## 17. PROHIBITION OF POLITICAL CONTRIBUTION & DEALING WITH PUBLIC OFFICIALS

- 17.1 Directors and Employee strictly prohibit to provide any form of political donation or support to political parties, individual politicians or towards political campaigns or initiatives for or on behalf of the Group particularly where it is to obtain any business or advantage.

Employee may participate in political activities in their personal capacity with their own money and time. However, their political views and actions are personal and not reflective or representative of ASM.

- 17.2 No improper payment or gifts, business hospitality and facilitation payments are to be made or offered to a government official or person associated with government officials. Besides, the advantage to government and public official is strictly prohibited even if

- a) the benefits not to the party who granted the advantage but for another party. For example, offer benefits such as gifts, travel expenses and scholarship to a family member of a government officer to influence a decision;
- b) the benefits transfer through intermediaries or a third party with the knowledge that all or part of the payment will contribute directly or indirectly as an improper, secret or facilitation payment to a government officer;
- c) the advantage granted does not result in the expected award of business or service;

Employee must comply with all applicable laws, conduct themselves with integrity and apply the highest ethical standards whenever they deal or otherwise engage with government, government agencies, regulatory bodies, statutory bodies (whether local or foreign) and any of its officials.

## 18. MONITORING AND ENFORCEMENT

- 18.1 Compliance officer of ASM shall implement this anti-bribery and corruption compliance function and the MD/CEO/Executive Director of the Company to oversee the design, implementation and management of this Policy.
- 18.2 All Employee 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 Employee's employment. A sample declaration can be found in the **Appendix** of this Policy.
- 18.2 The top-level management shall ensure that annual reviews are conducted to assess the performance, efficiency and effectiveness of the anti-corruption programme, and ensure the programme is enforced. Such reviews may take the form of an internal audit, or an audit carried

out by an external party. Review report should be presented to the Audit and Risk Management Committee member(s) at least once a year.

## 19. TRAINING AND AWARENESS

- 19.1** ASM shall conduct an awareness programme for all its Employee regarding anti-bribery and corruption, integrity and ethics.
- 19.2** The Group should disseminate internal and external training and communications relevant to its anti-corruption management procedure, in proportion to its operation, covering the following areas:
- a) Policy and procedures;
  - b) Training;
  - c) Reporting channel; and
  - d) Consequences of non-compliance.
- 19.3** This Policy shall be made available to public and will be appropriately communicated to all Employees and Business Associates. The communication of this Policy may be conducted in a variety of formats and mediums, includes messages on the Group's intranet or website, emails and employee's handbooks.
- 19.4** ASM shall provide its Employees with adequate training to ensure their thorough understanding of the Company's anti-corruption position, especially in relation to their role within or outside the Group.

The training may be conducted in a variety of formats, including induction programs featuring anti-corruption elements and corporate training programs, seminars, and in-house courses.

## 20. REPORTING OF POLICY VIOLATIONS

- 20.1** 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 Employee and/or external parties.
- 20.2** Employee who, in the course of their activities relating to their employment, encounter actual or suspected violations of this Policy are required to report their concerns using the reporting channels stated in the ASM's Whistleblowing Policy.
- 20.3** Reports made in good faith, either anonymously or otherwise, shall be addressed in a timely manner and without incurring fear of reprisal regardless of the outcome of any investigation.
- 20.4** Retaliation in any form against Employee where the person has, in good faith, reported a violation or possible violation of this Policy is strictly prohibited. Any Employee 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 the Company may pursue.

## 21. SANCTIONS FOR NON-COMPLIANCE

- 21.1 Non-compliance as identified by the audit and any risk areas identified through this and other means should be reported to the top management and Audit and Risk Management Committee in a timely manner in accordance with the level of risk identified.
- 21.2 ASM regards bribery and acts of corruption as serious matters and will apply penalties in the event of non-compliance with this Policy. For Employee, non-compliance may lead to disciplinary action, up to and including termination of employment.
- 21.3 For external parties, non-compliance may lead to penalties including termination of contract. Further legal action may also be taken in the event that the Group's interests have been harmed by the results on non-compliance by individuals and/or organisations.

## 22. CONTINUOUS IMPROVEMENT

- 22.1 In maintaining this Policy, ASM is committed to satisfying the requirements set out in this Policy. Any concerns to improve this Policy can be channelled to MD/CEO.
- 22.2 ASM shall monitor the legal and regulatory regimes where it operates and any changes to business environment and risks and identify opportunities for the improvement of this Policy. A report should be submitted to the top management and Audit and Risk Management Committee on a regular basis for the appropriate action to be taken.
- 22.3 The Company shall assess this Policy in timely basis to ensure its scope, policies, procedures and controls match the Bribery and Corruption related risks faced by the Group.
- 22.4 ASM endeavours to impact the business environment where it operates. This includes extending its integrity programme to non-controlled Business Associates such as suppliers and contractors, seeking to work with companies who have a similar commitment and supporting initiatives in the private and public sectors which are likely to improve the integrity of its operating environment.

## APPENDIX I

### Sample of Staff Declaration Form

I, \_\_\_\_\_, hereby declare that I have read and understood the Anti-Bribery and Corruption Policy (“POLICY”) of ASM Automation Group Berhad. I will abide by the requirements and provisions set out in the Policy, as required by my employment contract.

.....

Name:

Designation:

Date: