




ALAM MARITIM RESOURCES BERHAD
Group of Companies

**ANTI-BRIBERY & ANTI CORRUPTION (“ABAC”)
POLICY**

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	ALAM MARITIM GROUP OF COMPANIES ANTI-BRIBERY & ANTI-CORRUPTION ("ABAC") POLICY	Doc No	AMGC-AMS-POL-04
		Rev No	01
		Issue Date	3/3/2026
		Page	Page 1 of 18
		Uncontrolled when printed or copied	

COMMITMENT TOWARDS ANTI-BRIBERY & ANTI-CORRUPTION ("ABAC") POLICY

We, employee and Directors of ALAM Group of Companies ("ALAM"):

1. Are committed to uphold integrity values in practicing business ethics and to maintain good corporate governance among employees, Directors and with the relevant external parties at all time.
2. Acknowledge and shall adhere to the ABAC Policy and ALAM's related Manuals including the Employee Handbook;
3. Shall not compromise to any bribery and corruption practice to safeguard reputation of ALAM and its Stakeholders;
4. Shall prevent, report and mitigate risks against bribery and corruption according to the ABAC Policy and shall monitor fraud risks regularly and effectively;
5. Shall, upon act of bribery and corruption being reported, fully co-operate in any investigation thereto, to ensure a fair due diligent process is carried out;
6. Continuously promote to ALAM's employees, Directors and contractors on zero tolerance of bribery and corruption practices where training on fraud prevention, its management and effective mitigations shall be conducted among ALAM's employees and Directors.

Recommended by:	Reviewed by:	Endorsed by:
Fatimah Binti Mohamad Rosli Head, Internal Audit & Risk Management Department	Puan Nuraznita Binti Taip Executive Director	Datuk Hj. Azmi bin Ahmad Group MD/CEO

Note: The ABAC Policy is effective 24 June 2020 approved by the Board of Directors on the same date.



ALAM MARITIM GROUP OF COMPANIES

**ANTI-BRIBERY
& ANTI-CORRUPTION
("ABAC") POLICY**

Doc No AMGC-AMS-POL-04

Rev No 01

Issue Date 3/3/2026

Page Page 2 of 18

Uncontrolled when printed or copied

1. Background

- 1.1 Purpose
- 1.2 Policy Objective
- 1.3 Policy Scope

2. Governance and Professional Ethics Statement

- 2.1 Codes of Conduct & Discipline ("COCD")

3. Fraud Elements: Bribery and Corruptions

- 3.1 Understanding Fraud's Characteristic
 - 3.1.1 Opportunity
 - 3.1.2 Pressure
 - 3.1.3 Rationalization
- 3.2 Bribery and Corruptions' Scenarios in Business Activities

4. Roles and Responsibilities

- 4.1 Board of Directors
- 4.2 Board Audit Committee
- 4.3 Group Managing Director/ Chief Executive Officer ("GMD/ CEO")
- 4.4 Group Risk Management Working Committee ("GRMWC") and Board Risk Management Committee ("BRMC")
- 4.5 Human Resource & Administration Department
- 4.6 Internal Audit & Risk Management ("IARM")
- 4.7 Supply Chain Department
- 4.8 Legal Department
- 4.9 Staff or Employee

5. Bribery and Corruption Prevention

- 5.1 Bribery and Corruption Risk Assessment
- 5.2 Bribery and Corruption Prevention Control
 - 5.2.1 Affirmation Process (Declaration)
 - 5.2.2 Disclosure of Conflict of Interest
 - 5.2.3 Limits of Authority ("LOA")
 - 5.2.4 Bribery and Corruption Awareness and Training

6. Bribery and Corruption Detection

- 6.1 Bribery and Corruption Detection Procedures



ALAM MARITIM GROUP OF COMPANIES

**ANTI-BRIBERY
& ANTI-CORRUPTION
("ABAC") POLICY**

Doc No AMGC-AMS-POL-04

Rev No 01

Issue Date 3/3/2026

Page Page 3 of 18

Uncontrolled when printed or copied

7. Bribery and Corruption Reporting Process

8. Investigation Process

8.1 Reporting the Results

8.2 Corrective Actions

8.3 Recovery of the Proceeds of Fraudulent Activities

9. Sub Policies & Declarations

9.1 Whistle blowing Policy

9.2 No Gift Policy

9.3 Entertainment Policy

9.4 ABAC Policy Acknowledgement & Personal Integrity Pledge


10. ABAC Policy Custodian and Review

Appendix A - Roles and Responsibilities

Appendix B - ABAC Policy's Process Decision Matrix

**Appendix C - ABAC Policy's Acknowledgement & Personal Integrity Pledge
(for ALAM's Employee & Directors)**

Appendix D - Policy Acknowledgement & Integrity Pledge by ALAM's Contractors

	<p>ALAM MARITIM GROUP OF COMPANIES</p> <p>ANTI-BRIBERY & ANTI-CORRUPTION ("ABAC") POLICY</p>	Doc No	AMGC-AMS-POL-04
		Rev No	01
		Issue Date	3/3/2026
		Page	Page 4 of 18
		Uncontrolled when printed or copied	

1. Background

3.1 Purpose

This ABAC Policy outlines ALAM Maritim Group of Companies ("ALAM") commitment concerning anti-bribery and anti-corruption and provides guidelines for the implementation and enforcement of the Policy. The Board of Directors has the authority to approve this Anti-Bribery and Anti-Corruption ("ABAC") Policy and any future amendments to it.

3.2 Policy Objective

The Policy is designed to ensure the following:

- Protect ALAM's funds and other assets;
- Maintain the highest standard of ethics, professional conduct and fiduciary responsibility;
- Maintain the integrity of ALAM as a Public Interest Entity ("PIE");
- Secure all businesses of ALAM;
- Protect the reputation of ALAM and its employees at all times;
- Maintain the highest level of services to the community, and individuals;
- Communicate ALAM's commitment to best practice.

3.3 Policy Scope

- Bursa Malaysia has revised one of their listing requirements on Anti-Corruption in support of the National Anti-Corruption Plan 2019-2023 effective 1st June 2020, which encompasses all listed issuers to establish and implement policies and procedures to prevent corrupt practices. This is to become a measure and a defense against corporate liability for corruption under section 17A of the Malaysian Anti-Corruption Commission Act 2009. Hence, ALAM Group has initiated its Anti-Bribery and Anti-Corruption ("ABAC") Policy in respond to this requirement.
- The ABAC Policy is intended to apply to every employee of every ALAM group of companies. It is also intended to apply to every Director (Executive and non-Executive) for those companies, except as otherwise stated in this ABAC Policy. Joint-venture companies in which ALAM is a non-controlling co-venturer and associated companies are encouraged to adopt these or similar principles and standards.
- Bribery refers to the offering, giving, soliciting, or receiving of monetary or any item of value as a means of influencing the actions of an individual or party who has specific authorities. Whereas, corruption is a form of dishonesty or criminal offense undertaken by a person or organization entrusted with a position of authority, to acquire illicit benefit or abuse power for one's private gain.

	ALAM MARITIM GROUP OF COMPANIES	Doc No	AMGC-AMS-POL-04
	ANTI-BRIBERY & ANTI-CORRUPTION ("ABAC") POLICY	Rev No	01
		Issue Date	3/3/2026
		Page	Page 5 of 18
		Uncontrolled when printed or copied	

- The ABAC Policy is established to outline the requirement for the development of controls that will assist in the detection, prevention and response on bribery and corruption practices reported against ALAM's businesses. It is the intention to promote consistent organizational behavior by providing guidelines and assigning responsibility for the development of controls and conduct of investigations.
- The ABAC Policy is to be applied to any bribery and/ or corruption, as well as suspected bribery and/ or corruption, involving any member of the Board of Directors, the Chief Executive Officer, Management or employee and our Stakeholders (including our contractors, suppliers, clients, joint venture partners, consultants, vendors, agents, authorities and other relevant interested parties).
- Investigations on the Accused Employee/ Management/ Directors ("The Accused Person(s)") shall be conducted irrespective of the individuals' position or tenure within ALAM.
- Should there be any contradiction(s) between COCD matters in the Employee Handbook and the ABAC Policy, the latter shall take precedent. In addition, if a Law provision conflicts with this ABAC Policy, the Law shall take precedent.

2. Governance and Professional Ethics Statement

- ALAM is committed to promote honesty and opposition to Fraud, and does not permit bribery and corruption to be tolerated or perpetuated.
- ALAM is committed to the highest ethical and moral standards, openness, and accountability.
- All employees at all levels are expected to share in this commitment and to lead by example in ensuring adherence to all appropriate regulations, procedures, practices, and codes of conduct.
- The Board of Directors ("BOD") of ALAM expects individuals and organizations with whom it comes in contact, to act with honesty and no intent to commit bribery and corruption against it.

	ALAM MARITIM GROUP OF COMPANIES	Doc No	AMGC-AMS-POL-04
	ANTI-BRIBERY & ANTI-CORRUPTION ("ABAC") POLICY	Rev No	01
		Issue Date	3/3/2026
		Page	Page 6 of 18
		Uncontrolled when printed or copied	

2.2 Codes of Conduct & Discipline ("COCD")

The COCD in the ALAM's Employee Handbook and the ABAC Policy establish a clear guideline that define its culture and standards of ethical behaviour and reflects the BOD, the Group Managing Director/ Chief Executive Officer ("GMD/CEO"), Group Chief Operating Officer ("GCOO") and the Management Team (hereafter "Management") commitment to incorporate risks on bribery and corruptions into the Risk Management reporting during Group Risk Management Working Committee ("GRMWC") and Board Risk Management Committee ("BRMC").

All Employees and Relevant Stakeholders are required to adhere to the standards set out in the COCD.

3. Fraud Elements: Bribery and Corruptions


3.1 Understanding Fraud's Characteristics

The fraud triangle is a model commonly used to explain the motivation behind an individual's decision to commit fraud such as bribery and corruptions. The fraud triangle outlines three components that contribute to increasing the risk of fraud:



3.1.1. Opportunity

Opportunity refers to circumstances that allow fraud to occur. In the fraud triangle, it is the only component that a company exercises complete control over. For example, weak internal controls, lack of enforcement and inadequate accounting policies and procedures may provide an opportunity for the fraud practices.

	<p>ALAM MARITIM GROUP OF COMPANIES</p> <p>ANTI-BRIBERY & ANTI-CORRUPTION ("ABAC") POLICY</p>	Doc No	AMGC-AMS-POL-04
		Rev No	01
		Issue Date	3/3/2026
		Page	Page 7 of 18
		Uncontrolled when printed or copied	

3.1.2 Pressure

Pressure refers to an employee's mindset towards committing fraud. Examples of things that provide incentives for committing fraud include wanting to earn more money unlawfully, the need to pay personal expenses, to solve personal's financial difficulties, etc.


3.1.3 Rationalization

Rationalization refers to an individual's justification for committing fraud. Examples of common rationalizations that fraud committers may say "*Many people have done it for many years already*", "*There is no other solution*" etc.

3.2 Bribery and Corruptions' Scenarios in Business Activities

Following are the scenarios that organizations or employee may commits fraud e.g. bribery and corruptions, but not limited to:

- Corporate gifts, hospitality and entertainment with clients, suppliers, public officials, authorities, etc.
- Requests for donations, political contributions and sponsorships
- Conflict of interest issues or insider trading,
- Protection of confidential company information,
- Whistleblower issues,
- Breach of authority limits,
- Payment practices of agents, contractors and suppliers,
- Misappropriation i.e. illegal use of the Company's funds or assets for personal or other unauthorized purpose;
- Making false disclosures or misleading information
- Activities prohibited under The Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 ("AMLA").

	ALAM MARITIM GROUP OF COMPANIES	Doc No	AMGC-AMS-POL-04
	ANTI-BRIBERY & ANTI-CORRUPTION ("ABAC") POLICY	Rev No	01
		Issue Date	3/3/2026
		Page	Page 8 of 18
		Uncontrolled when printed or copied	

4. Roles of Responsibilities

The roles and responsibilities in implementing ABAC Policy encompassed all levels, but not limited to:

- 4.1 Board of Directors
- 4.2 Board Audit Committee
- 4.3 Group Managing Director/ Chief Executive Officer
- 4.4 Group Risk Management Working Committee ("GRMWC") and Board Risk Management Committee ("BRMC")
- 4.5 Human Resource & Administration Department ("HRAD")
- 4.6 Internal Audit & Risk Management ("IARM")
- 4.7 Supply Chain Department
- 4.8 Legal Department
- 4.9 Staff or Employee

The details of roles and responsibilities of the above are set out in the **Appendix A: Role and Responsibilities**.

Further, their respective authority is summarized in **Appendix B: ABAC Policy's Process Decision Matrix**.

5. Bribery and Corruption Prevention

Management must adopt a preventative approach for identifying, analysing and managing the risk of bribery and corruption that could prevent ALAM from achieving its business objectives or strategies.


8.1 Bribery and Corruption Risk Assessment

A bribery and corruption's risk identifications and assessment shall be incorporated in the regular Risk Assessment process throughout ALAM Group of companies' business activities, involve appropriate personnel, consider relevant bribery and corruption schemes and scenarios, and map those bribery and corruption schemes and scenarios to mitigating controls.

8.2 Bribery and Corruption Prevention Control

5.2.1 Affirmation Process (Declaration)

All ALAM employees, Management & Directors shall acknowledge that they have read, understood, and complied with the ABAC Policy. This shall be submitted electronically or via manual signature. Disciplinary action will apply for refusal to sign-off and apply such action consistently and kept by HRAD (See **Appendix C**).

	ALAM MARITIM GROUP OF COMPANIES	Doc No	AMGC-AMS-POL-04
	ANTI-BRIBERY & ANTI-CORRUPTION ("ABAC") POLICY	Rev No	01
		Issue Date	3/3/2026
		Page	Page 9 of 18
		Uncontrolled when printed or copied	

5.2.2 Disclosure of Conflict of Interest

All ALAM employees and its Stakeholders must disclose potential or actual conflicts of interest if they are responsible for covering out any procedure or taking a decision or express an opinion. The management has to be informed through the employee immediate superior or the Chairman of the Board of Directors if the employee is a member of the Board.

This should be documented according to the requirement of the Codes of Conduct & Discipline ("COCD"). Any constraints placed on the situation must be monitored.

5.2.3 Limits of Authority ("LOA")

All employees are required to follow LOA levels that has been established across ALAM to serve as an entity-level control. Individuals working within a specific function must be assigned to his/ her authorized system access as a process-level control.


5.2.4 Bribery and Corruption Awareness and Training

HRAD shall plan for training or seminars to employees, Management and Board of Directors on anti-fraud management to improve the understanding and awareness.

6. Bribery and Corruption Detection

6.1 Bribery and Corruption Detection Procedures

- i. Effective automated systems must be used to identify potential red flags within their financial transactions. Data analysis, continuous auditing techniques, and other technology tools effectively to detect bribery and corruption activity shall be used;
- ii. Continuous auditing will be conducted with the use of data analytics on a continuous or real-time basis, thereby allowing management or auditing to identify and report fraudulent activity effectively. The employees shall ensure the greatest possible transparency of transactions to have a good initial line of defense against fraud. These systematic approaches that assist in detection and prevention involve both internal and external processes;
- iii. A reporting mechanism will be put in place that provides for anonymity (unless the employee reporting the bribery and corruption case expressed his/her desire to disclose his/her name) to any individual who willingly comes forward to report suspicious acts of bribery and corruption and encourage such reporting. ALAM preserves the confidentiality of the whistleblower during the investigation process and provides assurance to the employees that they will not be retaliated against for reporting suspicious acts of wrongdoing including wrongdoings by their superiors.

	ALAM MARITIM GROUP OF COMPANIES	Doc No	AMGC-AMS-POL-04
	ANTI-BRIBERY & ANTI-CORRUPTION ("ABAC") POLICY	Rev No	01
		Issue Date	3/3/2026
		Page	Page 10 of 18
		Uncontrolled when printed or copied	

7. Bribery and Corruption Reporting Process

- i. Each employee shall inform his/her direct superior or higher management of any suspected bribery and corruption activities that comes to their attention. If the instance is related to the employee direct superior or any senior employee of ALAM, the employee may report the case to the HRAD, Group Managing Director/ Chief Executive Officer (GMD/ CEO) or Chairman of the Board if it involves the Director(s). Any incident report can be sent to Head, HRAD, GMD/ CEO or Chairman of the Board to:
 - The recipient's e-mail address in ALAM, or
 - Any mean of electronic reporting platform e.g. via ALAM's portal that can be developed, which is reasonably secured and confidential.
- ii. The immediate superior or the higher management shall inform the HRAD and Legal Department about the case when it comes to their attention to take the necessary action and decide on the required Internal Audit procedures, conducting investigations or informing the concerned supervisory and law enforcement bodies to take the necessary action.
- iii. Any alleged or suspected improper conduct must be disclosed using the procedures provided for in the ALAM Whistleblowing Policy included in the ALAM's Employee Handbook.

8. Investigation Process

The investigation process should include the following procedure:

- i. All investigation of the bribery and corruption cases related to Accused Person(s) will be conducted internally with the resources within employee of ALAM. The Investigation Panel may use the Domestic Inquiry ("DI") Procedure within HRAD Manual to conduct a fair investigation and interview process.
- ii. Upon any incident reported to HRAD, each case will be categorized and decided under the authority of:
 - a. ALAM Disciplinary Board ("ADB") : where the Accused Person(s) involving ALAM employee only (Non-Executive and Executive up to Manager level)
or
 - b. Board of Directors (BOD) Panel : where the Accused Person(s) involving Management (Senior Manager & above) or any ALAM Directors.

	<p style="text-align: center;">ALAM MARITIM GROUP OF COMPANIES</p> <p style="text-align: center;">ANTI-BRIBERY & ANTI-CORRUPTION ("ABAC") POLICY</p>	Doc No	AMGC-AMS-POL-04
		Rev No	01
		Issue Date	3/3/2026
		Page	Page 11 of 18
		Uncontrolled when printed or copied	

- iii. In both ADB and BOD Panel, the composition of the Investigation Team is as follow:
 - a. Head of Investigation Team.
 - b. Minimum 2 (two) Members from various departments in ALAM.

- iv. HRAD shall recommend the incumbent of the Investigation Team, which is to be approved either by the Chairman of ADB or BOD Panel, whichever category applicable, depending on the Accused Person(s). For example, whenever an Executive is the Accused Person, the ADB shall approve the Investigation Team's list. However, whenever a Senior Manager is the Accused Person, BOD Panel should approve the Investigation Team's list. (Remark: whenever the Accused Persons involve both various levels, e.g. Executive and Senior Manager, the higher authority i.e. BOD Panel shall approve the Investigation Team).


- v. The Investigation Team members must be independent and non-associated with the lodged incident. Upon appointment, they shall hear the statement of the complainant or inform and gather evidence within stipulated time frame.

- vi. The ALAM Disciplinary Board ("ADB") (who authorizes to decide incident report involving ALAM employees up to Manager level) shall comprise a minimum of:
 - a. Chairman (any Director who is not associated with the reported incident);
 - b. Minimum 2 (two) Member, from any Director or Senior Management (General Manager equivalent and above (who is not associated with the reported incident)

Whereas

The Board of Directors ("BOD") Panel (who authorizes to decide incident report involving Senior Manager and above and ALAM's Directors) shall comprise a minimum of:

- a. Chairman (Board's Chairman or any ALAM's Independent Non-Executive Director who is not associated with the reported incident)
- b. Minimum 2 Board Members

	ALAM MARITIM GROUP OF COMPANIES ANTI-BRIBERY & ANTI-CORRUPTION ("ABAC") POLICY	Doc No	AMGC-AMS-POL-04
		Rev No	01
		Issue Date	3/3/2026
		Page	Page 12 of 18
		Uncontrolled when printed or copied	

The above structure can be summarized as follow:


- a) Incident Category under ALAM Disciplinary Board (ADB)'s decision: ALAM employee up to Manager level:

Incident Category	Limits of Authority (LOA)	Investigation Team	ADB Panel (appointed by BOD)
ALAM employee up to Manager level	ALAM Disciplinary Board (ADB)	Composition: i. Head of Investigation Panel & ii. Minimum 2 (two) Members from various department Recommended by: HRAD Approved by: Chairman of ADB (GMD/CEO or ALAM's Director who is not associated with the reported incident);	A minimum of: i. Chairman (GMD/CEO or any ALAM's Director who is not associated with the reported incident); & ii. Assisted by minimum 2 (two) Member, from any Director or Senior Management (General Manager equivalent and above (who is not associated with the reported incident)

- b) Incident Category under BOD Panel : where the Accused Person(s) involving Management (Senior Manager & above) or any ALAM Directors.

Incident Category	Limits of Authority (LOA)	Investigation Team	BOD Panel (appointed by the Board)
Senior Manager of ALAM and above or any ALAM'S Directors	BOD Panel	Composition: i. Head of Investigation Team & ii. Minimum 2 (two) Members from various department Recommended by: HRAD Approved by: Chairman of BOD Panel (Board's Chairman or any ALAM's Director who is not associated with the reported incident)	A minimum of: i. Chairman (Board's Chairman or any ALAM's Independent Non-Executive Director who is not associated with the reported incident) & ii. Assisted by minimum of 2 Board Members

Remark: Whenever the Accused Persons involve two or more individuals from various level within ALAM, for example two Accused Persons i.e. an Executive and a Senior Manager, thus both appointment of the Investigation Team shall be approved by the higher authority i.e. BOD Panel. Thus, the Investigation Team shall later report both Accused Persons' case to the BOD Panel for deliberation and decision.

	ALAM MARITIM GROUP OF COMPANIES	Doc No	AMGC-AMS-POL-04
	ANTI-BRIBERY & ANTI-CORRUPTION ("ABAC") POLICY	Rev No	01
		Issue Date	3/3/2026
		Page	Page 13 of 18
		Uncontrolled when printed or copied	

- vii. The investigation process must ensure key elements as follow:
- a. *Confidentiality* - Information gathered must be kept confidential and distribution limited to those who have a legitimate need to know. This is important to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect ALAM from potential civil liability;
 - b. *Legal Involvement* - Legal Department must be involved early in the process or, in some cases, in leading the investigation, will help safeguard work product and attorney-client communications;
 - c. *Securing evidence*: Evidence must be protected so that it is not destroyed and so that it is admissible in legal proceedings;
 - d. *Objectivity*: the investigation team must be independent and non-associated from the issues and individuals under investigation to conduct an objective assessment;
 - e. *Goals*: the investigation must not affect the running of ALAM's business;
 - f. *Notification*: notifying the concerned parties, law enforcement, and regulators with the outcome of the investigations;

8.1 Reporting the Results

The investigation team shall report its findings to the ADB or BOD Panel, whichever applicable:

- a. Should the incident category be under the ADB's LOA, recommendation from the Investigation Team will be escalated to the ADB during hearing for decision. The decision will be then shared to BOD for information within a reasonable time line.
- b. Should the incident category be under the BOD Panel's LOA, recommendation from Investigation Team will be escalated to the BOD Panel during hearing and decision.

Remark: The Accused Person(s) or individual who is associated in the incident reported is refrained from:

- a. being a member in the Investigation Team and
- b. hearing the case and make decision in the ADB or in the BOD Panel.

Remark: The Accused Person(s) has the right to appeal; however, it is subject to ADB or BOD Panel (whichever case category is applicable) for approval.

8.2 Corrective Actions

Upon decision by the ADB or BOD Panel, follow up actions must be determined. HRAD will take lead in implementing the decision.

	<p>ALAM MARITIM GROUP OF COMPANIES</p> <p>ANTI-BRIBERY & ANTI-CORRUPTION ("ABAC") POLICY</p>	Doc No	AMGC-AMS-POL-04
		Rev No	01
		Issue Date	3/3/2026
		Page	Page 14 of 18
		Uncontrolled when printed or copied	

8.3 Recovery of the Proceeds of Fraudulent Conduct

All reasonable steps (including the institution of criminal or civil proceedings) shall be taken to recover property of ALAM that has been misappropriated or otherwise been obtained as a result (either directly or indirectly) of bribery and corruption.

9. Sub Policies & Declarations

The ABAC Policy shall be read together with the following sub policies:

9.1 Whistle blowing Policy

- a. ALAM encourages openness and transparency in its commitment to the highest standard of integrity and accountability.
- b. If anyone makes an incident report or disclosure about any actual or perceived bribery or corruption in good faith, belief, without malicious intent, that a breach or violation as aforesaid may have occurred or may about to occur, the whistle blower will be accorded protection of confidentiality, to the extent reasonably practicable.

9.2 No Gift Policy

- a. ALAM adopts a "No Gift" Policy whereby, subject only to certain narrow exceptions, ALAM employees and directors (executive and non-executive), family members or agents acting for or on behalf of ALAM employees, directors or their family members are prohibited from, directly or indirectly, receiving or providing gifts.
- b. ALAM requires employees and directors to abide by this policy to avoid conflict of interest or the appearance of conflict of interest for either party in on-going or potential business dealings between ALAM and external parties as a gift can be seen as a bribe that may tarnish ALAM reputation or be in violation of anti-bribery and corruption laws.
- c. As set out in the ALAM's Codes of Conduct & Discipline ("COCD") in the ALAM's Employee Handbook, a conflict of interest arises in a situation in which an individual is in a position to take advantage of his or her role in ALAM for his or her personal benefit, including the benefit of his or her family/household and friends. This would undermine the duties of good faith, fidelity, diligence and integrity as expected by ALAM from its employees and directors in the performance of their duties and obligations.



ALAM MARITIM GROUP OF COMPANIES

**ANTI-BRIBERY
& ANTI-CORRUPTION
("ABAC") POLICY**

Doc No AMGC-AMS-POL-04


Rev No 01

Issue Date 3/3/2026

Page Page 15 of 18

Uncontrolled when printed or copied

- d. It is the responsibility of ALAM employees to inform external parties involved in any business dealings with ALAM that the Company practices a "No Gift Policy" and to request the external party's understanding for and adherence with this policy.
- e. In no circumstances may an employee, director or his/her family/household members accept gifts in any form.
- f. ALAM is very much aware that the exchange of gifts can be a very delicate matter where, in certain cultures or situations, gift giving is a central part of business etiquette. Despite acknowledging ALAM's "No Gift Policy", some external parties may still insist in providing gifts to ALAM employees, directors and/or their family members in certain situations which do not fall within the general exceptions.
- g. In these limited circumstances, employees are expected to immediately record the gift in the Gift Register maintained by HRAD for submission to GMD/ CEO who will then decide whether to approve the acceptance of the gift or require it to be returned. Directors should inform the Company Secretary, as soon as reasonably practicable, to seek his/her advice when faced with a similar situation.
- h. Even if it may appear disrespectful to refuse a gift from an external party, nevertheless, if there is a conflict of interest situation (e.g. bidding is in progress and the company that gave the gift is one of the bidders) then clearly the Head of Department cannot approve the acceptance of said gift (in the case of directors, the Company Secretary would advise the same). In this situation, the gift must be politely returned with a note of explanation about the Company's "No Gift" policy.
- i. In the event the Head of Department approves the acceptance of the gift, he/she must also determine the treatment of the gift whether to:
- Donate the gift to charity; or
 - Hold it for departmental display; or
 - Share with other employees in the department; or
 - Permit it to be retained by the employee
- j. Generally, employees are not allowed to provide gifts to third parties with the exception of the GMD/ CEO, Executive Directors and any other officers identified in the gift and entertainment policy of the respective jurisdictions.


	ALAM MARITIM GROUP OF COMPANIES	Doc No	AMGC-AMS-POL-04
	ANTI-BRIBERY & ANTI-CORRUPTION ("ABAC") POLICY	Rev No	01
		Issue Date	3/3/2026
		Page	Page 16 of 18
		Uncontrolled when printed or copied	

k. Although generally ALAM practices a "No Gift" Policy, there are certain exceptions to the general rule whereby the receiving and provision of gifts are permitted in the following situations:-

- a) Exchange of gifts at the company-to-company level (e.g. gifts exchanged between companies as part of an official company visit/courtesy call and thereafter said gift is treated as company property);
- b) Gifts from company to external institutions or individuals in relation to the company's official functions, events and celebrations (e.g. commemorative gifts or door gifts offered to all guests attending the event);
- c) Gifts from ALAM to employees and directors and/or their family members in relation to an internal or externally recognized Company function, event and celebration (e.g. in recognition of an employee's/director's service to the Company);
- d) Token gifts of nominal value normally bearing the ALAM or company's logo or (e.g. t-shirts, pens, diaries, calendars and other small promotional items) that are given out equally to members of the public, delegates, customers, partners and key stakeholders attending events such as conferences, exhibitions, training, trade shows etc. and deemed as part of the company's brand building or promotional activities; and
- e) Gifts to external parties who have no business dealings with ALAM e.g. monetary gifts or gifts in-kind to charitable organizations.

l. Even in the above exceptional circumstances, employees and Directors are expected to exercise proper judgment in handling gift activities and behave in a manner consistent with the general principles set out in the COCD as per below:

- a) Conscientiously maintain the highest degree of integrity,
- b) Always exercise proper care and judgment,
- c) Avoid conflicts of interest,
- d) Refrain from taking advantage of his or her position or exercising his or her authority to further his or her own personal interest at the expense of ALAM, and
- e) Comply with applicable laws, regulations and ALAM policies and procedures

	ALAM MARITIM GROUP OF COMPANIES	Doc No	AMGC-AMS-POL-04
	ANTI-BRIBERY & ANTI-CORRUPTION ("ABAC") POLICY	Rev No	01
		Issue Date	3/3/2026
		Page	Page 17 of 18
		Uncontrolled when printed or copied	

9.3 Entertainment Policy

- a. ALAM recognizes that providing modest entertainment is a legitimate way of building business relationships and as such a common practice within the business environment to foster good business relationship with external clients. As such, eligible employees are allowed to entertain external clients through a reasonable act of hospitality as part of business networking as well as a measure of goodwill towards the recipients.
- b. In some countries, the act of hospitality through entertainment is a central part of business etiquette. However, this may not necessarily be the case in every country or in all circumstances as it may create a negative perception if observed or known by others despite selfless motives behind the entertainment provided.
- c. Employees and Directors should always bear in mind that this is an area where perception is often regarded as more important than facts and therefore you should always exercise proper care and judgment when providing or accepting entertainment to/ from third parties especially when it involves public officials, clients and suppliers to ensure compliance with local anti-bribery and corruption laws.
- d. Employees and Directors are strictly prohibited from providing or offering to provide entertainment with a view to improperly cause undue influence on any party in exchange for some future benefit or result. Any acts of this nature, whether provided directly or indirectly through an intermediary, may be construed as an act of bribery and contrary to the general values and principles of the COCD.
- e. ALAM recognizes that the occasional acceptance of a reasonable and modest level of entertainment provided by third parties in the normal course of business is a legitimate way to network and build good business relationships.
- f. However, it is important for employees and Directors to exercise proper care and judgment before accepting entertainment offered or provided by a third party. This is not only to safeguard the Company's reputation, but also to protect employees and Directors from allegations of impropriety or undue influence.
- g. All employee is required to comply with the policies and procedures of the COCD in the ALAM's Employee Handbook and the ABAC Policy in relation to receiving entertainment from third parties.

	ALAM MARITIM GROUP OF COMPANIES	Doc No	AMGC-AMS-POL-04
	ANTI-BRIBERY & ANTI-CORRUPTION ("ABAC") POLICY	Rev No	01
		Issue Date	3/3/2026
		Page	Page 18 of 18
		Uncontrolled when printed or copied	

9.4 ABAC Policy Acknowledgement & Personal Integrity Pledge

- a. HRAD shall seek all Employee, Heads of Department ("Management") and all Directors to sign off the *ABAC Policy Acknowledgement & Personal Integrity Pledge*. The sign off renewal is required should the document is revised.
See **Appendix C**.
- b. ALAM's Commitment Towards Anti-Bribery and Anti-Corruption Practices
 - a) HRAD shall send statement of *ALAM's Commitment Towards Anti-Bribery and Anti-Corruption Practices* to all active Contractors. Upon acknowledgement of receipt, the forms must be kept by HRAD accordingly.
See **Appendix D**.
 - b) These forms and the acknowledgment can be done and kept electronically for better monitoring.
 - c) The statement in both Appendices as well as ABAC Policy is to be uploaded in the Company's website by the Company Secretary.

10. ABAC Policy Custodian and Review

- a. The custodian of the ABAC Policy is Human Resource & Administration Department ("HRAD").
- b. Any clarification required with regard to the ABAC Policy, please consult:
 - a) Head, Internal Audit & Risk Management ("IARM")
 - b) Head, Human Resource & Administration ("HRAD")
 - c) Legal Department.
- c. Further enhancement of the ABAC Policy shall be recommended by Head of IARM Department, reviewed by Head of HRAD, and endorsed by the GMD/CEO for onward approval by the BOD.

	ALAM MARITIM GROUP OF COMPANIES	APPENDIX C	
	ANTI-BRIBERY & ANTI-CORRUPTION ("ABAC") POLICY	Rev No	01
		Issue Date	3/3/2026
		Uncontrolled when printed or copied	

ABAC POLICY ACKNOWLEDGEMENT & PERSONAL INTEGRITY PLEDGE

.....
Name of the Employee:


Employee No.: _____
 Division/Department: _____
 Job Title/Position: _____ Job Grade _____
 Date of joining: _____

I hereby confirm that I have read, acknowledge and will comply with the content of the ALAM’s Anti-Bribery and Anti-Corruption (“ABAC”) Policy and sincerely pledge that I:

1. Am committed to uphold integrity values in practicing business ethics and to maintain good corporate governance among employees, Directors and with the relevant external parties at all time.
2. Acknowledge and shall adhere to the ABAC Policy and ALAM’s related Manuals including the Employee Handbook;
3. Shall not compromise to any bribery and corruption practice to safeguard reputation of ALAM and its Stakeholders;
4. Shall prevent, report and mitigate risks against bribery and corruption according to the ABAC Policy and shall monitor fraud risks regularly and effectively;
5. Shall, upon act of bribery and corruption being reported, fully co-operate in any investigation thereto, to ensure a fair due diligent process is carried out;
6. Continuously promote to ALAM’s employees, Directors and contractors on zero tolerance of bribery and corruption practices where training on fraud prevention, its management and effective mitigations shall be conducted among ALAM’s employees and Directors.

Signed by	Date
<Employee name>	

(the content of this form can be uploaded in an electronic form and to be acknowledged by each employee)

	ALAM MARITIM GROUP OF COMPANIES	APPENDIX D	
	ANTI-BRIBERY & ANTI-CORRUPTION ("ABAC") POLICY	Rev No	01
		Issue Date	3/3/2026
		Uncontrolled when printed or copied	

ABAC POLICY ACKNOWLEDGEMENT & INTEGRITY PLEDGE BY ALAM’S CONTRACTORS

We hereby read and acknowledge the Anti-Bribery & Anti-Corruption (“ABAC”) Policy of ALAM Group of companies and pledge that we:

1. Are committed to uphold integrity values in practicing business ethics and to maintain good corporate governance among employees, Directors and with the relevant external parties at all time.
2. Acknowledge and shall adhere to the ABAC Policy and ALAM’s related Manuals including the Employee Handbook;
3. Shall not compromise to any bribery and corruption practice to safeguard reputation of ALAM and its Stakeholders;
4. Shall prevent, report and mitigate risks against bribery and corruption according to the ABAC Policy and shall monitor fraud risks regularly and effectively;
5. Shall, upon act of bribery and corruption being reported, fully co-operate in any investigation thereto, to ensure a fair due diligent process is carried out;
6. Continuously promote to ALAM’s employees, Directors and contractors on zero tolerance of bribery and corruption practices where training on fraud prevention, its management and effective mitigations shall be conducted among ALAM’s employees and Directors.

For and on behalf of

Received by (ALAM’s representative)

Company

.....
Name:
Position:
Date:

.....
Name:
Position:
Date: