



ANTI-BRIBERY AND ANTI-CORRUPTION

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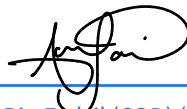
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DEFINITION OF TERMS

For the purpose of this document and unless the context obviously indicates another meaning, the following words and expressions shall have the following meaning:

Term	Definition
Board of Directors	Refers to MDEC's Board of Directors.
Board Committees	Refers to the board committees established by the Board of Directors to support governance and oversight, namely; a) Board Tender Committee (" BTC "), which oversees procurement matters in line with the DAL; b) Board Remuneration & Nomination Committee (" BRNC "), which handles nomination and remuneration for the Board of Directors and management; c) Board Audit & Risk Committee (" BARC "), which monitors audit functions, internal controls, risk management and compliance; and d) Board Integrity & Governance Committee (" BIGC "), which oversees governance and integrity-related matters.
Business Associate	Pursuant to Malaysian Standard of Anti-Bribery Management System (" ABMS ") ISO 37001:2016, Business Associate refers to external parties with whom MDEC has, or plans to establish, some form of business relationship, includes but not limited to clients, customers, participants, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, sub-contractors, suppliers, vendors, advisors, agents, distributors, representatives, intermediaries and investors.

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Term	Definition
Employee	Means an employee of MDEC, who is designated as permanent, probationary, temporary or fixed term contract (“ FTC ”), and includes apprentice (if any).
Entity	Refers to individuals(s), firm(s), partnership(s), corporation(s) or authority body(ies).
Gratification	According to Malaysian Anti-Corruption Commission Act (“ MACC ”) 2009 [Act 694], Gratification refers to: <ul style="list-style-type: none">a. money, donation, 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; andg. any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).
Individual Consultant	Means an individual (who is not an Employee) engaged by MDEC as independent consultant or contractor to perform specified services for MDEC.

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Term	Definition
Intern/Trainee	Means an individual engaged by MDEC as an intern or trainee but does not fall under the definition of apprentice under the Employment Act 1955.
Policy	Refers to this ABAC Policy.

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REVIEW OF THIS DOCUMENT

This document will be reviewed every three (3) years or when deemed necessary.

CONFLICTS BETWEEN DOCUMENTS

In the event of any conflict or inconsistency between this document and any other document, the document in the higher level of document hierarchy shall prevail.

COMPLIANCE

- a. All Heads of Division and Heads of Department are responsible to ensure that this Policy is operationalized within their respective divisions and departments.
- b. Non-compliance of this Policy by an Employee may result in appropriate disciplinary action being taken against such Employee.
- c. Board of Directors, Individual Consultant, Business Associate and Intern/Trainee shall also comply with this Policy, failing which appropriate action may be taken against such Board of Directors, Individual Consultant, Business Associate or Intern/Trainee.
- d. Employee shall observe, conform and/or comply with the provisions as stated in the MDEC Code of Conduct for Employees and Vendors including to perform any duties under this Policy without compromising the integrity and governance related aspects and/or shall not perform any act that may be perceived as an act of interference in decision-making process.

ASSOCIATED DOCUMENTS

This document should be read together with the following associated documents:

Title	Document ID
Board Policy Manual	MDEC/BPM/V4/2021
Code of Conduct for Employees	N/A
Code of Conduct for Vendors	N/A

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Title	Document ID
Complaint Management	MDEC/IGD/S/001
Connected and Interested Party Transaction Policy	MDEC-POL-IGD-004
Discretionary Authorisation Limit	MDEC/IGD/DAL/001
Declaration of Assets Policy	MDEC/IGD/P/001
Fit and Proper Policy	MDEC-POL-IGD-001
Gift, Hospitality and Entertainment Policy	MDEC-POL-IGD-003
HR Policy	MDEC/HRA/P/002
Integrity and Governance Department Charter	N/A
Integrity Pact	MDEC/IGD/Integrity Pact V02/2024
Whistleblowing Policy	MDEC-POL-IGD-002

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1.0 INTRODUCTION

- 1.1 This Anti-Bribery and Anti-Corruption Policy (“**Policy**”) outlines the commitment of MDEC in upholding the highest standards of integrity, business ethics, and accountability in all aspects of its monetary and non-monetary business dealings and operations. This Policy reflects MDEC’s zero-tolerance stance against bribery, corruption, malpractices and abuse of power which serves as a key measure to maintain transparency and accountability, building trust with stakeholders across the digital economy sector.
- 1.2 This Policy sets out the principles, responsibilities, and practices that must be adhered to by all Board of Directors, employees, individual consultants, interns/trainees, business associates, stakeholders, and relevant third parties (hereinafter referred to as “**Applicable Parties**”). This Policy as well as all policies and/or SOP stated in the paragraphs hereinbelow shall also be applicable to all subsidiaries of MDEC until such time that the said subsidiary develops, adopts, and implements its own Anti-Bribery and Anti-Corruption Policy or other similar policy that is consistent with the principles and standards set out herein. This Policy is aligned with applicable laws, including the MACC Act 2009 and the Guidelines on Adequate Procedures (“**GAP**”) issued by the Prime Minister’s Department, Government of Malaysia pursuant to Section 17A of the MACC Act 2009.

2.0 OBJECTIVE

- 2.1. To support MDEC’s compliance with Section 17A of the MACC Act 2009 by demonstrating adequate procedures in preventing bribery, corruption, malpractices and abuse of power as well as to serve as a defence against corporate liability exposures under the MACC Act 2009.

- 2.2. To reinforce MDEC's core stance on zero tolerance of any forms of bribery, corruption, malpractices and abuse of power as its commitment to comply with all applicable anti-bribery and anti-corruption laws.
- 2.3. To establish clear responsibilities and expected conduct in relation to anti-bribery and anti-corruption at all levels of MDEC.
- 2.4. To provide guidance to the Applicable Parties on circumstances that can be or may be perceived to be improper, unethical, or related to bribery, corruption, malpractices and abuse of power.
- 2.5. To provide confidential channel(s) to all the Applicable Parties to raise concerns regarding bribery, corruption, malpractices and abuse of power without fear of reprisal.

3.0 SCOPE

This Policy as well as all policies and/or SOP stated in the paragraphs hereinbelow applies to all Applicable Parties, including MDEC's subsidiaries, and covers all monetary and non-monetary business dealings or transactions. It ensures that anti-bribery and anti-corruption measures are consistently implemented across MDEC and its subsidiaries until such time that the said subsidiary develops, adopts, and implements its own Anti-Bribery and Anti-Corruption Policy or other similar policy that is consistent with the principles and standards set out herein.

4.0 POLICY STATEMENTS

- 4.1. In driving the digital economy through catalytic high-impact initiatives, strategic and sustainable business opportunities based upon a solid foundation of integrity, transparency and good governance, MDEC is committed to adopt a zero-tolerance stance against any forms of bribery, corruption, malpractices and abuse of power by the Applicable Parties. MDEC strives to demonstrate well the importance of integrity and business

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ethical values in support of this commitment through MDEC's culture, deliverables, actions, and behaviours. Please refer to the MDEC ABAC Policy Statement in **Appendix 1** of MDEC's commitment on anti-bribery and anti-corruption.

- 4.2. MDEC is committed to continuously improve MDEC's anti-bribery and anti-corruption related policies and controls described in the ABAC Policy Statement to represent MDEC's commitment towards establishing, implementing and maintaining a robust anti-bribery and anti-corruption management system in accordance with the international standard ISO 37001:2016 (including any of its revision).

5.0 POLICY MANDATE

- 5.1. This Policy is deduced from the GAP issued by the Prime Minister's Department, Government of Malaysia in 2018 (in accordance with Subsection 17A (5) of the MACC Act 2009). There are five (5) core guiding principles under the GAP which are as follows:

- 5.1.1. **Top level commitment:** to provide assurance to the Applicable Parties that MDEC is operating in compliance with its policies and any applicable regulatory requirements;
- 5.1.2. **Risk assessment:** to establish appropriate processes, systems and controls to mitigate the bribery risks;
- 5.1.3. **Undertake control measures:** to put in place appropriate control/contingency measures such as due diligence exercises and appropriate reporting channel(s);
- 5.1.4. **Systematic review, monitoring and enforcement:** to conduct periodic monitoring and reporting; and

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- 5.1.5. **Training and communication:** to develop and disseminate relevant awareness on anti-bribery and anti-corruption to the Applicable Parties.

6.0 ROLES AND RESPONSIBILITIES

6.1. Board of Directors shall:

- 6.1.1. fully comply with this Policy and all applicable anti-bribery and anti-corruption laws and guidelines and bear full and final accountability for the oversight of this Policy. The Board of Directors/Board Committees shall exercise discretion and reasonable oversight with respect to the adequacy, communication, effectiveness and implementation of this Policy including:
- a. approving MDEC's anti-bribery and anti-corruption policy;
 - b. ensuring that the MDEC's strategy and anti-bribery and anti-corruption policy are aligned;
 - c. at planned intervals, receiving and reviewing information about the content and operation of the MDEC's anti-bribery and anti-corruption related policies;
 - d. ensuring adequate and appropriate resources needed for effective operation of the anti-bribery and anti-corruption related programmes/initiatives are allocated and assigned; and
 - e. exercising reasonable oversight over the implementation and effectiveness of the ABMS.

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6.2. Executive Committee (“EXCO”)

6.2.1. EXCO which comprises of senior management of MDEC, is collectively and individually responsible for the implementation and operational enforcement of this Policy. EXCO shall demonstrate leadership and commitment with respect to the anti-bribery and anti-corruption including but not limited to:

- a. fully comply with this Policy, internal governing controls, and all applicable anti-bribery and anti-corruption laws and guidelines;
- b. ensuring that this Policy and its objectives, is established, implemented, maintained and reviewed to adequately address the organization’s bribery and corruption risks;
- c. ensuring full integration of anti-bribery and anti-corruption controls into MDEC’s operations, processes, and decision-making at all levels;
- d. lead by example in demonstrating MDEC’s zero-tolerance stance against bribery, corruption, malpractices and abuse of power and act decisively on any act of breach (internal rules and regulations or prevailing laws), omissions, or suspected misconduct;
- e. allocate sufficient resources, support to and ensure independency of the integrity and governance function for effective execution and monitoring of this Policy;
- f. communicating internally and externally regarding this Policy;

- g. communicating internally the importance of effective anti-bribery and anti-corruption management and of conforming to the applicable requirements;
- h. directing and supporting personnel to contribute to the effective implementation of this Policy;
- i. promoting an appropriate anti-bribery culture within MDEC;
- j. promoting continual improvement of anti-bribery and anti-corruption management;
- k. supporting other relevant management roles to demonstrate their leadership in preventing and detecting bribery, corruption, malpractices and abuse of power as it applies to their areas of responsibility;
- l. encouraging the use of reporting procedures for suspected or actual bribery, corruption, malpractices and abuse of power;
- m. ensuring that no personnel will suffer retaliation, discrimination or disciplinary action for reports made in good faith, or on the basis of a reasonable belief of violation or suspected violation of the Policy, or for refusing to engage in bribery, corruption, malpractices and abuse of power even if such refusal can result in the MDEC losing business (except where the individual participated in the violation); and
- n. to ensure that all monetary and non-monetary business dealings or transactions and any external engagements are subject to appropriate due diligence and risk assessment.

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6.3. Integrity and Governance Department (“IGD”)

- 6.3.1. IGD is an anti-bribery and anti-corruption compliance function established within MDEC, which reports directly to the Board of Directors, to implement anti-bribery and anti-corruption programs or related policies including the anti-bribery management system.
- 6.3.2. IGD implements four (4) core functions as per the Directive of the Prime Minister No.1 of 2018 Series 1, i.e. integrity strengthening, governance, complaint management and detection and verification.
- 6.3.3. IGD is responsible for conducting internal investigations relating to integrity matters, including suspected or reported cases of bribery, corruption, malpractice and abuse of power. This encompasses conducting preliminary assessments, collecting relevant evidence or information and coordinating with relevant departments and/or authorities, where appropriate, to ensure that follow-up actions are taken in accordance with internal procedures, this Policy and other applicable policies and regulations.
- 6.3.4. These functions shall be read in tandem with IGD Charter, Complaint Management SOP and/or any other relevant policies and/or SOP including its revisions and/or related replacement.

6.4. Employee/Individual Consultant/Intern/Trainee

- 6.4.1. Every Employee/ Individual Consultant/ Intern/ Trainee, irrespective of grade, role, or location at MDEC, is bound by this Policy and shall:

- a. fully comply with this Policy, internal governing controls, and all applicable anti-bribery and anti-corruption laws and guidelines;
- b. abstain from offering, soliciting, giving, or receiving any Gratification that may be construed as an act of bribery or could be perceived as an act of bribery or corrupt practice;
- c. promptly report any suspicion, attempt, or actual incident of bribery, corruption, malpractices and abuse of power through the designated whistleblowing channel(s);
- d. complete all required, trainings, in anti-bribery and anti-corruption related matters;
- e. complete all required declarations and disclosures in anti-bribery and anti-corruption related matters by providing true, accurate and complete declaration and/or statement within the stipulated timeline; and
- f. fully cooperate in any investigation(s) conducted by IGD and/or authority and to provide all access within the required timeline for the requested information, documents, and resources essential to the investigation(s) process.

6.5. Business Associate/Entity

- 6.5.1. Business Associate or any Entity representing, acting or performing services for and/or on behalf of Business Associate in any monetary and non-monetary business dealings or transactions with MDEC are required, without exception, to:

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- a. fully comply with this Policy, relevant anti-bribery and anti-corruption laws, as well as executed contractual obligations;
- b. refrain from engaging in any act or omission that could expose MDEC to corporate liability under Section 17A of the MACC Act 2009;
- c. complete relevant due diligence prior to engagement and renew relevant declarations or comply with any other requirements as directed by MDEC;
- d. be subjected to due diligence to be conducted by MDEC (if any). The extent of the due diligence shall be made on risk-based assessment including bribery risk assessment. Due diligence may include but not limited to search through relevant databases, blacklist/alert list, self-declaration, and/or documenting the justification for choosing one Business Associate over another. The results of the due diligence process shall be documented accordingly;
- e. ensure that all personnels, servants or employees under their control and/or any Entity that are being engaged by the said Business Associate for the performance of monetary and non-monetary business dealings or transactions with MDEC, are aware of and adhere to MDEC's anti-bribery and anti-corruption requirements;
- f. fully cooperate with MDEC in any audit(s), inquiry(ies), or investigation(s) related to potential violations of bribery, corruption, malpractices and abuse of power; and

- g. this Policy shall be read in tandem with MDEC Integrity Pact and/or any other relevant policies and/or SOP including its revisions and/or related replacement.

7.0 GIFTS, HOSPITALITY AND ENTERTAINMENTS

- 7.1. Employee shall not directly or indirectly give, agree to give, promise or offer to any person, or accept, agree or promise to accept from any person, any gifts, hospitality, entertainment, or gratification, whether for the benefits of that person or another person with the intent to obtain or retain business for MDEC or to obtain or retain an advantage in the conduct of business for MDEC.
- 7.2. MDEC adopts a strict policy on preventing the offering, giving and receiving of gifts, hospitality, and entertainment in respect of any monetary and non-monetary business dealings or transactions with MDEC regardless of the value at any time, on or off the work premises. However, MDEC recognises the occasional acceptance or offer of the gifts, hospitality and entertainment as acceptable subject to the provisions set out in the MDEC Gifts, Hospitality and Entertainment Policy, including the requirements to make declaration.
- 7.3. This Policy shall be read in tandem with the MDEC Gifts, Hospitality and Entertainment Policy and/or any other relevant policies and/or SOP including its revisions and/or related replacement.

8.0 FACILITATION

- 8.1. MDEC adopts a strict stance of disallowing the offer, giving and/or receiving of facilitation in its monetary and non-monetary business dealings or transactions. Facilitation may be in the form of an unofficial monetary payment or other form of goods or services made to MDEC or other Entity in control of or has authority over a process or decision making. The facilitation is given to secure, waive or expedite the performance of a

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process, operational, administrative duty or function to which the receiver or offeror/giver of the facilitation has certain authority, control or influence over the said process or decision making.

- 8.2. The Applicable Parties shall decline and shall notify MDEC through designated whistleblowing channel(s) upon encountering any requests for a facilitation payment or offer.
- 8.3. In the event the Applicable Parties have been directly or indirectly offered and/or accepted the facilitation (in which the Applicable Parties are not aware of the prohibition of facilitation at the time of the acceptance or offering), the said Applicable Parties shall immediately notify MDEC through MDEC's designated whistleblowing channel(s) upon realisation/knowledge of the same.

9.0 CONFLICT OF INTEREST

- 9.1. Generally, a conflict of interest may arise in a situation where an individual or any of the Applicable Parties is in a position to take advantage of his or her role for personal and/or business benefits, including the benefits of family members, friends, or affiliated companies. This would undermine the duties of good faith, fidelity, diligence, and integrity as expected by MDEC from the Applicable Parties in the performance of their duties and obligations.
- 9.2. Generally, personal and/or business benefits refer to any advantage, gain or value, whether monetary or non-monetary, obtained directly or indirectly for oneself or for any other person or Entity. This includes benefits given to family members or any third party with whom the individual has a personal or professional connection, in line with the definition of "**Gratification**" under Section 3 of the MACC Act 2009. For avoidance of doubt, family members mean spouse, parent, grandparent, great-grandparent child, including adopted child and stepchild, grandchild, great-grandchild,

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brother, sister, son-in-law, daughter-in-law, brother-in-law, sister-in-law, uncle, aunt, cousin, niece, grandniece, great-grandniece, nephew, grandnephew and great-grandnephew.

- 9.3. The Applicable Parties shall ensure that there is no conflict of interest or any potential conflict of interest in any of MDEC's monetary and non-monetary business dealings or transactions. In the event there is any conflict of interest or potential conflict of interest, the Applicable Parties shall declare the interest to MDEC and abstain or withdraw themselves from participating in the deliberation, approval or voting process (if any) relating to the said MDEC's monetary and non-monetary business dealings or transactions. Any deliberation, approval or voting process shall be conducted at arm's length principle.
- 9.4. The Applicable Parties shall not use their position, company resources and assets, or information made available to them for personal and/or business gain or to the detriment of MDEC.
- 9.5. This Policy shall be read in tandem with the MDEC Code of Conduct (applicable for Employees and Vendors), Connected or Interested Party Transactions Policy (applicable for Board of Directors) and/or any other relevant policies including its revisions and/or related replacement.

10.0 REPORTING OF POLICY VIOLATIONS

- 10.1. The Applicable Parties who encounter, suspect, have reasonable belief or become aware of any actual or potential violations of this Policy, including facilitation (as set out in paragraph 8 above), acts of bribery, corruption, malpractices and abuse of power or other misconduct, are required to immediately report their concerns to MDEC through designated whistleblowing channel(s). The duty to report is mandatory and applies regardless of the individual's role, seniority, or involvement in the said matter.

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- 10.2. In the event the Applicable Parties are not aware of the wrongdoing at the time of the act/omission, the said Applicable Parties shall immediately notify MDEC through MDEC designated whistleblowing channel(s) upon realisation/knowledge of the same.
- 10.3. Failure to report shall constitute breach of this Policy and is subject to appropriate action being taken against the relevant Applicable Parties. Failure to report on bribery shall constitute an offence under Section 25 of the MACC Act 2009.
- 10.4. Pursuant to Section 50 of MACC Act 2009, where in any proceedings against any person for offences as stipulated under the said section, it is proved any gratification has been received or agreed to be received, accepted or agreed to be accepted, obtained or attempted to be obtained, solicited, given or agreed to be given, promised, or offered, by or to the accused, the gratification shall be presumed to have been corruptly received or agreed to be received, accepted or agreed to be accepted, obtained or attempted to be obtained, solicited, given or agreed to be given, promised, or offered as an inducement or a reward for or on account of the matters set out in the particulars of the offence, unless the contrary is proved.
- 10.5. MDEC provides a secure and confidential whistleblowing channel(s) as a formal avenue for the Applicable Parties to make genuine disclosures in good faith and based on reasonable belief. In the event the disclosure or report is later found to be not genuine or not made in good faith or reasonable belief, a strict action shall be taken in accordance with MDEC's approved policies and/or standard operating procedures.
- 10.6. This Policy shall be read in tandem with MDEC Whistleblowing Policy, HR Policy and/or any other relevant policies and/or SOP including its revisions and/or related replacement.

11.0 DECLARATION OF ASSET

- 11.1. In line with MDEC's commitment to the highest standards of integrity, transparency, and accountability, all Board of Directors and senior management are required to declare their assets to MDEC. This declaration process is essential to mitigate any potential conflicts of interest or situations that may compromise the integrity of MDEC's businesses and operations. The declaration ensures that any personal financial interests or assets that could potentially influence professional decisions are properly identified, addressed in a timely manner and made in the best interest of MDEC.
- 11.2. This Policy shall be read in tandem with MDEC Declaration of Assets Policy, Board Policy Manual and/or any other relevant policies and/or SOP including its revisions and/or related replacement.

12.0 FIT AND PROPER ASSESSMENT

- 12.1. MDEC is dedicated to ensuring that all Employee and Board of Directors appointed within the organization are individuals who meet the expected standards of professionalism, integrity, and competency. MDEC Fit and Proper Policy establishes clear criteria for evaluating the suitability of individuals appointed for MDEC.
- 12.2. This evaluation process is to assess an individual appointed by MDEC based on the following criteria:
- 12.2.1. Probity, personal integrity, and reputation – individual shall have the qualities of honesty, integrity, diligence, independence of mind and fairness;
 - 12.2.2. Competence and capability - individual shall have the necessary skill, experience, ability, and commitment to carry out the role; and

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- 12.2.3. Financial integrity – individual shall be able to manage his/her financial affairs, primarily his/her debts, prudently.
- 12.3. MDEC shall ensure that all individuals appointed as MDEC Employee or Board of Directors, are fit and proper, to manage risk to MDEC's business or financial standing.
- 12.4. This Policy shall be read in tandem with MDEC Fit, Proper Policy and/or any other relevant policies and/or SOP including its revisions and/or related replacement.

13.0 CODE OF CONDUCTS

- 13.1. MDEC Code of Conducts strictly prohibits bribery, corruption, malpractices, abuse of power, conflict of interest, misuse of information, and any unethical or unlawful practices in any of MDEC's monetary or non-monetary business dealings or transactions. The Applicable Parties shall not engage in actions that may be perceived as compromising MDEC's integrity, governance, values or operations. Any unethical behaviour, whether in the form of direct or indirect involvement or indirect facilitation, will not be tolerated and may result in disciplinary action, termination of contract, or reporting to the relevant authorities, depending on the severity of the breach.
- 13.2. This Policy shall be read in tandem with MDEC's Code of Conduct for Employees and Vendors, and/or any other relevant policies including its revisions and/or replacement.

14.0 TERMINATION

MDEC shall include standard clauses in all contracts with the Applicable Parties enabling MDEC to terminate the contract in the event that any of the Applicable Parties and/or its personnels, servants or employees is/are convicted by a court of law for bribery, corruption, unlawful or illegal activities in relation to any

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monetary and non-monetary business dealings or transactions entered with MDEC.

15.0 TRAINING AND COMMUNICATION

- 15.1. MDEC is committed to ensuring that all the Applicable Parties are informed about the provisions of this Policy. Awareness and understanding of anti-bribery and anti-corruption standards are integral to maintaining a high level of integrity across all functions within MDEC.
- 15.2. MDEC will conduct regular training and/or awareness sessions tailored to different levels of the Applicable Parties focusing on clarifying key principles of this Policy and/or other applicable policies as well as providing practical guidance on recognizing and managing potential corruption and bribery associated risks.
- 15.3. Updates or changes of this Policy will be communicated effectively to all Applicable Parties to ensure ongoing alignment with good governance practices and compliance with relevant anti-bribery and anti-corruption laws.

16.0 CONTINUOUS MONITORING AND IMPROVEMENT

- 16.1. MDEC shall conduct validation exercises to ensure compliance with this Policy. These exercises may be carried out independently by the relevant departments in MDEC or in collaboration between the relevant internal departments and/or other external independent parties where necessary. The objective is to proactively detect gaps, assess the effectiveness of controls, and ensure continuous alignment with applicable anti-bribery and anti-corruption requirements.

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16.2. MDEC will continuously monitor the effectiveness of this Policy and its implementation across all levels of MDEC. Any improvements identified will be integrated into this Policy to ensure it remains effective and relevant to emerging risks.

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17.0 APPENDIX**17.1. APPENDIX 1: MDEC ABAC Policy Statement**

In driving the digital economy through catalytic high-impact initiatives, strategic and sustainable business opportunities based upon a solid foundation of integrity, transparency and good governance, MDEC is committed to adopt a zero-tolerance stance against any forms of bribery, corruption, malpractices and abuse of power by its Board of Directors, Employee, Individual Consultant, Intern/Trainee, Business Associate, stakeholders and the relevant third parties (hereinafter referred to as “**the Applicable Parties**”). MDEC strive to demonstrate well the importance of integrity and business ethical values in support of this commitment through its culture, deliverables, actions, and behaviours.

In recognition of this commitment, MDEC has implemented and enforced comprehensive anti-bribery and anti-corruption programs or related policies to prevent and deter risks of bribery and corruption in MDEC’s businesses and operation to ensure:

- i. MDEC is in compliance with the laws under Malaysian Anti-Corruption Commission (“**MACC**”) Act 2009 particularly corporate liability provision, Section 17A of the MACC Act;
- ii. MDEC’s anti-bribery and anti-corruption programs or related policies provide guidance to the Applicable Parties concerning how to deal with bribery, corruption, malpractices, abuse of power as well as any issues that may arise in the course of its businesses and operations;
- iii. the Business Associate and any Entity performing work or services for or on behalf of MDEC comply with the relevant provisions of MDEC’s anti-bribery and anti-corruption programs or related policies when performing such work or services;
- iv. the Applicable Parties are strictly prohibited from directly or indirectly soliciting, accepting or offering bribes in relation to all of MDEC’s monetary and non-monetary business dealings or transactions;
- v. failure to comply with MDEC’s anti-bribery and anti-corruption related policies will result in the necessary action being taken by MDEC against the defaulting party in accordance with MDEC’s related policies and procedures including reporting to the enforcement body under the MACC Act 2009;
- vi. an anti-bribery and anti-corruption compliance function is established within MDEC, which reports directly to the Board of Directors, to implement anti-bribery and anti-corruption

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programs or related policies including the anti-bribery management system; and

- vii. MDEC provides avenues for the Applicable Parties to lodge report(s) on any misconduct within MDEC, in accordance with MDEC Whistleblowing Policy.

MDEC is committed to continuously improve MDEC's anti-bribery and anti-corruption related policies and controls described in this statement to represent its commitment towards establishing, implementing and maintaining a robust anti-bribery and anti-corruption management system in accordance with the international standard ISO 37001:2016 (including any of its revision).

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