



ANTI-BRIBERY AND CORRUPTION POLICY

Policy Statement

RWNA Engineering Sdn. Bhd is committed to maintaining high ethical standards and preventing bribery in all its forms. This Anti-Bribery and Corruption Policy is established to ensure compliance with all applicable laws and regulations, including the Malaysian Anti-Corruption Commission Act 2009 (MACC Act 2009) and its amendments. The organization prohibits all forms of bribery, whether direct or indirect, and fosters a culture of integrity, transparency, and accountability. This aligns with Section 17A of the MACC Act on corporate liability for corruption offences.

Applicability of the Policy

This policy applies to all employees, officers, directors, contractors, consultants, suppliers, vendors, agents, and any third parties acting on behalf of RWNA Engineering Sdn. Bhd, irrespective of their location or jurisdiction.

Definition

Bribery refers to the offering, promising, giving, accepting, or soliciting of anything of value to influence or reward someone in order to gain an unfair business advantage. Corruption is the abuse of entrusted power for private gain. Under Malaysian law, this includes:

- Gratification (money, donations, gifts, loans, rewards, or any other benefit).
- Abuse of position for personal or corporate gain.
- Failure to prevent bribery, as per Section 17A of the MACC Act 2009, which holds organizations liable for corruption committed by associated persons.

Due Diligence and Third Parties

The company will conduct due diligence on third parties to ensure they comply with this Policy. Contracts must include anti-bribery and corruption clauses.

Dr. Mohd Razif Abd Razak
Managing Director
RWNA Engineering Sdn. Bhd.

Reporting and Whistleblowing

Employees and stakeholders are encouraged to report any suspicion of bribery or corruption via:

- Confidential whistleblower channel: www.rwna.com.my
- No retaliation policy applies to genuine whistleblowers

Employees and associated parties must not:

- Offer, promise, or give bribes to influence a business decision, obtain a contract, or gain a competitive advantage.
- Accept or solicit bribes in any form.
- Engage in facilitation payments or small unofficial payments to expedite routine services or processes.
- Provide gifts, hospitality, or entertainment that are disproportionate or excessive and may be seen as an attempt to influence a business decision.
- Engage with a third party, such as a consultant or agent, without conducting proper due diligence to ensure they are not engaged in bribery or other corrupt business practices.
- Accept any form of benefits in exchange for a business advantage or to act improperly.

Gifts, Hospitality, and Donations

- Gifts and hospitality must be reasonable, transparent, and not intended to influence business decisions.
- Any gifts, entertainment, or hospitality must be disclosed and approved by management.
- Charitable donations and sponsorships must be lawful, ethical, and not used to secure business advantages.
- Political contributions are strictly prohibited unless explicitly approved by senior management and in full compliance with Malaysian law.

Training and Awareness

- Regular anti-bribery and corruption training will be provided to employees and relevant third parties to ensure awareness and compliance.

Consequences of Non-Compliance

- Violation of this policy may result in disciplinary action up to and including employment dismissal.

14th April 2025