



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

Wah Kong Corporation Group (“WKC”) is committed to Section 17A MACC Act, to conduct its business in an ethical and upstanding manner. WKC and their employees are required to observe and adhere strictly to the following Anti-Bribery & Anti-Corruption Policy: -

General Policy: -

1. WKC are committed to observing the Section 17A MACC Act laws and regulations which govern the countries in which the Group operates.
2. The **new Section 17A Malaysian Anti-Corruption Commission (Amendment) Act 2018**, that is introduced into the Malaysian Anti-Corruption Commission Act 2009 effective 1 June 2020.

Under this section, a **commercial organization** is liable *when a ‘person associated with the commercial organization’*: corruptly gives, agrees to give, promises or offers to any person any gratification whether for the benefit of that person or another person with intent to obtain or retain business for the commercial organization; or to obtain or retain an advantage in the conduct of business for the commercial organization.

3. WKC practices “**ZERO-TOLERANCE**” to acts of bribery and corruption, either directly or indirectly, by persons associated with the Group; including: -
 - 3.1 WKC’s employees (the “Employees”); and
 - 3.2 Agents, consultants, representatives, distributors, contractors, suppliers, joint venture partners and any other person(s) associated with WKC (collectively “Business Associates”).

Action by Group

1. To put in place suitable and appropriate channels of communications to ensure that:-
 - 1.1 Employees and Business Associates are given access to report any suspicions acts or incidents of bribery and/or corruption that they may be aware of without fear;
 - 1.2 Sensitive information pertaining to incidents and acts of bribery and corruption is handled properly and appropriately.

Action by Employees

All Employees shall:

1. Carry out the Group’s business dealings and transactions fairly, professionally, ethically, honestly and with integrity.
2. Report any suspicious, acts or incidents of bribery and/or corruption that they may be aware of.
3. Not at any time or in any manner, make bribes in order to retain, secure or obtain any commercial, contractual, personal or business advantage.
4. Not at any time or in any manner, accept bribes or unofficial payments.
5. Not permit any third party to accept bribes or unofficial payments on his behalf.