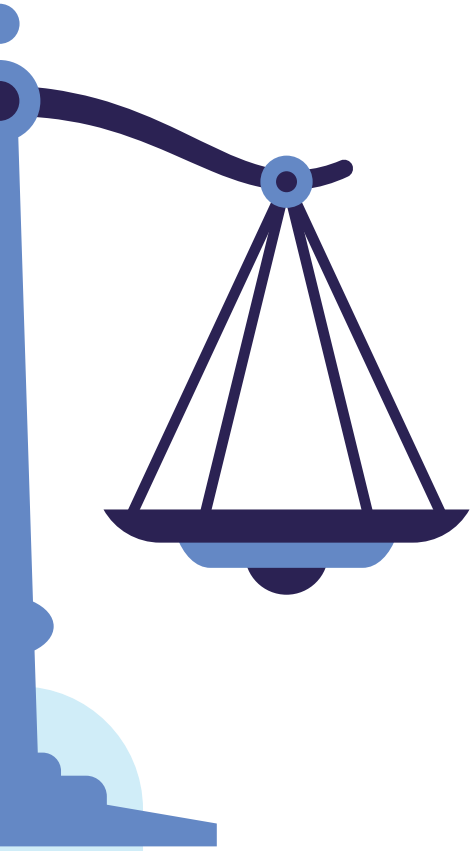
LETTER OF COMMITMENT FOR ANTI-BRIBERY COMPLIANCE LAWS

Alphamatic



I, authorised signatory of the below stated Vendor / Supplier / Business Partner, declare that I have read and understand the ALPHAMATIC Group Code of Conduct for Business Partners attached hereto as Appendix 1 and by signing the below, agree to all its terms and conditions being legally binding on the Vendor / Supplier / Business Partner. The Vendor / Supplier / Business Partner will fully comply with said Code of Conduct and ensure full compliance by its employees and agents and that there is no conflict of interest in this respect. The Vendor / Supplier / Business Partner shall not do, or omit to do, any act that will cause or lead ALPHAMATIC and/or its subsidiary companies, to be in breach of any part of the said Code of Conduct.

I, hereby solemnly and sincerely pledge the following throughout my service with **Alphamatic Group of Companies (ALPHAMATIC)**:

a) shall fully abide by the nation's law, rules, procedures and policies on corruption prevention and abuse of power;

b) shall abhor and reject all forms of corruption and abuse of power, and shall give my full cooperation to the Malaysian Anti-Corruption Commission in preventing corruption and abuse of power;

c) shall not indulge in any form corruption and abuse of power either directly or indirectly, with any party dealing with **Alphamatic Group of Companies (ALPHAMATIC)**;

d) shall ensure that my subordinates shall not indulge in any act of corruption and abuse of power in any dealings concerning **Alphamatic Group of Companies (ALPHAMATIC)**;

e) shall instantly report any form of corruption and abuse of power either involving me or my subordinates, to the Malaysian Anti-Corruption Commission.

If the Vendor / Supplier / Business Partner breaches its obligation under the said Code of Conduct, ALPHAMATIC may immediately terminate the contract with the Vendor / Supplier / Business Partner and the Vendor / Supplier / Business Partner shall be liable to indemnify ALPHAMATIC from and against any and all judgments, awards, disgorgements, losses, liabilities, penalties, damages (including loss of profit), costs, expenses, liens, claims, demands and causes of action of every kind, resulting from such breach and termination.

Signature :_____

Name of Vendor / Supplier / Business Partner :_____

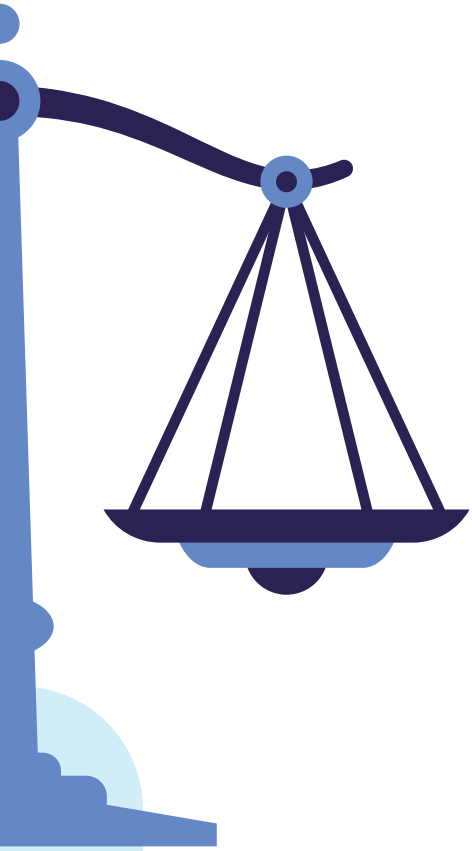
Registered address :_____

Name of authorised signatory :_____

Designation of authorised signatory :_____

Date :_____

ALPHAMATIC Group Code of Conduct for Business Partners



1. INTRODUCTION

In ALPHAMATIC, being a good corporate citizen has always been an integral part of the way we do business. We are committed to operate our business in ethical, legal and socially responsible manner.

We expect our suppliers, contractors, consultants, agents and other business partners ("Business Partners") to embrace the spirit of our commitment to integrity and high ethical standards as set out in the Code of Conduct for Business Partners ("Code"). All our Business Partners are to adhere to the Code when conducting business with ALPHAMATIC.

This Code sets the required standards for all our business dealings. Commitment to fully comply with this Code is a fundamental requirement to work for, or with ALPHAMATIC. Failure to comply with this Code or applicable laws and regulations, will be a sufficient cause for ALPHAMATIC to terminate any business relationship with a Business Partner.

ALPHAMATIC believes our sustainable business relationship is based on key principles of integrity, honesty, accountability and compliance with applicable laws and regulations.

2.PRINCIPLES OF THE CODE

The Principles of this Code support the core values and the Code of Conduct of ALPHAMATIC Group.

The Principles of ALPHAMATIC Code of Conduct for Our Business Partners:

a. Compliance with Laws

Business Partners must understand and comply with all laws, rules and regulations, i ncluding, but not limited to, laws related to anti-corruption, anti-competition, occupational health safety, privacy data protection, and any other laws whether or not described herein, which are applicable to their business wherever conducted throughout the world.

Business Partners shall comply with all applicable labour, employment, and human rights legislation including, but not limited to, minimum wages, minimum age for employment and maximum working hours.

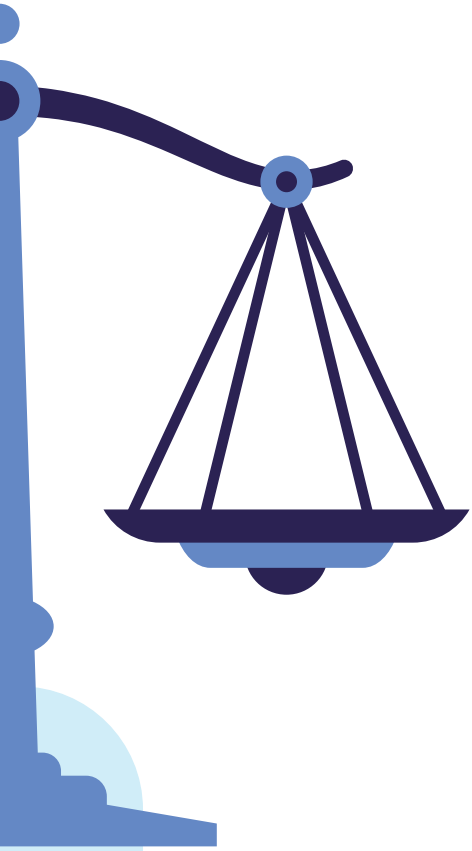
b. Act with Integrity

Business Partners must conduct all businesses with integrity, respect and trust.

Hence, Business Partners shall:

- Behave ethically and transparently in all business dealings
- Never offer, give, promise, request, accept, or authorise any bribe, gift, fee, reward, advantage, or anything of value directly or indirectly to ALPHAMATIC employees, government officials, private parties or entities to obtain a business advantage or to improperly influence any action or decision
- Never make facilitation payments, either directly or indirectly
- Ensure all subcontractors, referral parties, and affiliates used in connection with ALPHAMATIC business, adhere to these standards and have not engaged in, and shall not engage in, improper or illegal conduct

ALPHAMATIC Group Code of Conduct for Business Partners



- Maintain complete and accurate books and records relating to all ALPHAMATIC business, together with supporting documentation, in accordance with applicable accounting principles, laws, and regulations

- Act lawfully responsibly when using social media

c. Maintain Accountability

Business Partners shall maintain full accountability for services rendered or goods provided and honour their commitment on a timely basis and in accordance with their obligations under the specific agreements and undertakings with ALPHAMATIC.

d. Avoid Conflict of Interest

Business Partners with a real or potential conflict of interest shall disclose to ALPHAMATIC even if such knowledge arises after the appointment and to take action to proactively address the conflict as soon as it is known.

If in doubt, please highlight to ALPHAMATIC Risk & Compliance Officer.

e. Maintain Confidentiality

Business Partners shall respect ALPHAMATIC's intellectual property, trade secrets and other confidential, proprietary or sensitive information.

Business Partners may not use or disclose any such information to unauthorised party. Independent use of ALPHAMATIC's data is prohibited.

Business Partners shall comply with all applicable data privacy and data protection laws and implement policies and controls to ensure that the privacy rights of personal data are respected.

f. Maintain a healthy work culture

Business Partners and their employees shall not be involved in illegal use of drugs or alcohol in ALPHAMATIC premises.

Prohibited substances may not be brought, kept, consumed, sold, purchased or dealt with in any way on ALPHAMATIC premises.

Violent behaviour or harassment that includes unwelcome verbal, visual, psychological, physical or other adverse conduct of any kind that creates an intimidating, offensive or hostile work environment are unacceptable.

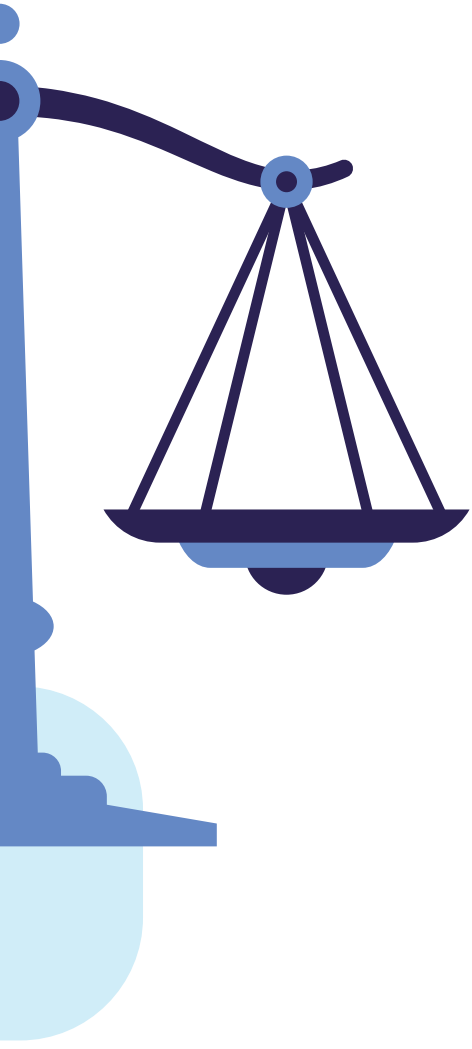
g. Prohibit any form of gift / business courtesy

Business Partners shall not offer any bribe, kickback, cash, bartering arrangement for goods/services or any other incentives to ALPHAMATIC employees and/or their families in order to obtain or maintain ALPHAMATIC's business.

Business Partners should report to ALPHAMATIC if any ALPHAMATIC employee or other business associate request for any such incentive or any form of gift or favour.

ALPHAMATIC practices "No Gift Policy" and we expect our Business Partners to observe the policy.

ALPHAMATIC Group Code of Conduct for Business Partners



h. Workplace Culture and Environment

At ALPHAMATIC, we are committed to maintaining a workplace that is not only productive but also safe, secure and conducive to the well-being of all employees. This commitment is fundamental to our values and essential for fostering a positive and respectful work environment.

Health and Safety: The health and safety of our employees are paramount. ALPHAMATIC implements rigorous safety protocols and procedures to prevent accidents and injuries.

Secure Facilities: We maintain secure facilities to protect our employees and company assets. This includes access controls, surveillance systems and emergency response plans that are regularly reviewed and updated to address potential security threats.

Discrimination and Harassment: ALPHAMATIC has zero tolerance for discrimination or harassment based on race, gender, age, religion, sexual orientation, disability or any other protected characteristic. Our policies clearly define unacceptable behaviours and provide a mechanism for reporting and addressing any incidents of discrimination or harassment.

3. COMPLIANCE WITH THE CODE

3.1. Business Partners should read and understand the Code and consult relevant ALPHAMATIC Risk Compliance Officer on any queries. Business Partners shall embed the standards outlined in the Code into their work with, or on behalf of ALPHAMATIC and are responsible to self-monitor their compliance to the Code.

3.2. Business Partners shall pro-actively extend the principles defined in the Code to its own suppliers and business partners.

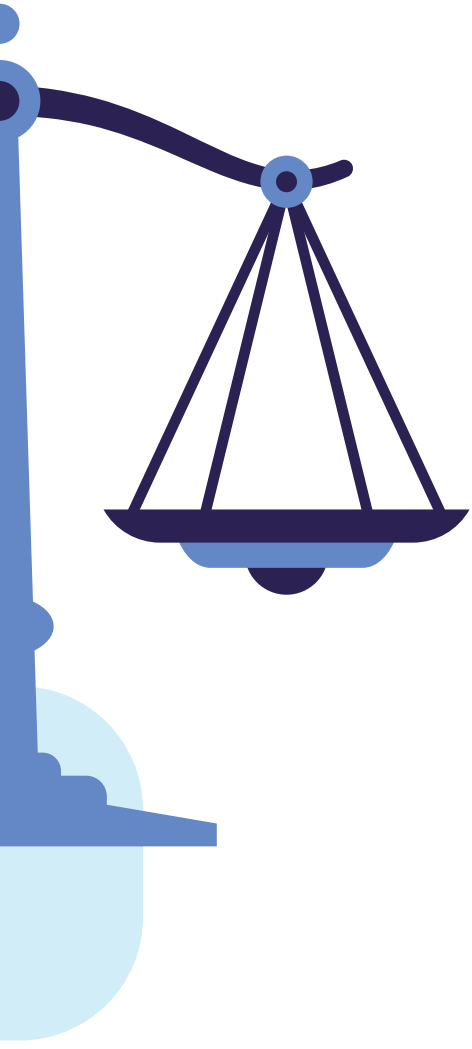
3.3. If and when any situation arises that caused a Business Partner to operate in violation of this Code, the Business Partner shall immediately inform their ALPHAMATIC key contact person or ALPHAMATIC Risk Compliance Officer.

3.4. Business Partners are expected to cooperate fully in any investigation and shall provide ALPHAMATIC with reasonable access to business records, documents, personnel and facilities related to matters involving ALPHAMATIC.

3.5. Business Partners that acts in contravention of this Code and/or other applicable laws and regulations shall risk termination of all existing and future ALPHAMATIC businesses.

3.6. ALPHAMATIC reserves the right, as a condition of doing business, to monitor compliance with the Code. The process of such monitoring may include an initial collection of Code related information by ALPHAMATIC, questionnaires, an on-site audit, or other means deemed appropriate.

ALPHAMATIC Group Code of Conduct for Business Partners



4. RAISING CONCERNS

4.1. Business Partners are obligated to report to ALPHAMATIC any conduct, including conduct of any ALPHAMATIC employees, that are believed – in good faith – to be an actual, apparent or potential violation of the Code or any ALPHAMATIC said policies or applicable laws and regulations.

4.2. If you have questions or concerns about compliance or ethics issues while working with ALPHAMATIC, or want to report potentially illegal or unethical activities, you may contact ALPHAMATIC confidentially in one of the following ways:

- Online reporting system through Secured Postbox; or
- Email to assb-account@alphamatic.com.my; or
- In writing or in-person to the Head of Compliance Office or Head of Human Capital Office; or
- In-writing to Chairman of ALPHAMATIC Board.

4.3. The identity of such Business Partner (“Concerned Business Partner”) and the details of the concerns raised will be treated as confidential. If the concerns raised need to be revealed, this will be first discussed with the Concerned Business Partner.

4.4. ALPHAMATIC will not tolerate any retribution or retaliation taken by any of its employees or Business Partners, against a Concerned Business Partner who has in good faith and with a reasonable basis, sought our advice or has reported questionable behaviour and/or possible violation of the Code.