

REDPLANET[®]

REDPLANET BERHAD
REGISTRATION NO.: 201901014292 (1323620-A)

**ANTI-BRIBERY AND CORRUPTION
POLICY**

1. INTRODUCTION

RedPlanet Berhad and its subsidiaries ("RedPlanet Group" or the "Group") have adopted this Anti-Bribery and Corruption Policy ("Policy") to uphold a zero-tolerance stance against bribery and corruption.

This Policy complies with Section 17A of the Malaysian Anti-Corruption Commission (MACC) Act 2009, which holds a commercial organization liable if a person associated with it offers, agrees to offer, or promises any form of gratification to gain or retain business or an advantage. The provision also acknowledges the implementation of adequate procedures as a defence.

"Commercial organization" refers to any company incorporated or doing business in Malaysia. A "person associated" refers to directors, partners, employees, or anyone acting on behalf of the organization, including third parties.

2. POLICY STATEMENT

The Group maintains a zero-tolerance approach towards all forms of bribery and corruption, whether direct or indirect, within the organization and among its Business Associates and third parties. All business dealings must be conducted with the highest standards of integrity, transparency, and full compliance with applicable laws and regulations.

Senior Management and the Board of Directors are committed to leading by example and fostering a culture of ethics and accountability at all levels of the organization. The Group will implement and regularly review preventive measures to ensure their effectiveness.

3. OBJECTIVES

This Policy aims to:

- i) Define the anti-bribery and anti-corruption responsibilities for all employees and Business Associates.
- ii) Provide clear guidance for identifying, managing, and reporting bribery and corruption risks.
- iii) Implement effective controls and preventive measures across Group operations.

4. SCOPE

This Policy applies to all employees of the RedPlanet Group. The Group also expects its Business Associates and any parties performing work or services on its behalf to comply with this Policy during their engagement, regardless of their geographical location.

5. DEFINITIONS

- **Audit and Risk Management Committee** is a committee established by the Board of Directors of RedPlanet Berhad, composed of non-executive directors. It is responsible for overseeing financial reporting, internal controls, compliance, and reviewing whistleblowing matters, especially those involving senior personnel or serious financial misconduct.

- **Bribery** is a form of corruption where a person offers, gives, solicits, or receives any benefits (in the form of gifts, entertainment or corporate hospitality) with the intention or knowledge that the benefit will induce someone to perform a dishonest act related to their role or function.
- **Business Associate** refers to any entity that has a business relationship with the Group, including but not limited to clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, sub-contractors, suppliers, vendors, advisors, agents, distributors, representatives, intermediaries, and investors.
- **Conflict of Interest** arises when an individual's personal interests either influence, have the potential to influence, or are perceived to influence the objectivity of their duties or functions that may affect the Group.
- **Corruption** generally refers to soliciting, receiving, offering or giving any gratification to improperly influence a business decision or to secure a specific advantage in a transaction.
- **Donation** refers to cash, goods or services given as a gift for charity, humanitarian aid, or to benefit a cause.
- **Employee** means individuals directly contracted to the Group, including permanent, temporary employees, senior management and directors.
- **Entertainment / Corporate Hospitality** refers to events or activities for employees, clients, or stakeholders, including meals, drinks, lodging, travel or other expenses incurred to maintain or build a legitimate business relationship.
- **Exposed Position** refers to roles or functions within the Group that are considered high risk for bribery or corruption, due to their responsibilities or authority.
- **Facilitation Payment** refers to payments made to secure or expedite the performance of a routine or administrative duty or function. These may include cash or other financial assets intended to influence someone in their duties.
- **Gifts** refer to something given from one individual to another with the intention to create or enhance a personal relationship, including cash, cash equivalents, discount, commissions, or other valuable items.
- **Gratification**, as defined in the MACC Act 2009, refers to the following:
 - i) Money, donations, gifts, loans, fees, rewards, valuable securities, property or interest in property (whether movable or immovable), financial benefits, or any other similar advantage.
 - ii) Any office, dignity, employment, contract of employment or services, or agreement to provide employment or render services in any capacity.
 - iii) Any payment, release, discharge or liquidation of any loan, obligation or other liability (whether in whole or in part).
 - iv) Any valuable consideration of any kind, including any discount, commission, rebate, bonus, deduction or percentage.
 - v) Any forbearance to demand money or any other valuable asset or thing.
 - vi) Any other service or favour of any kind, including protection from any penalty or disability incurred or anticipated, or from any action or proceedings of a disciplinary, civil or criminal nature (whether or not already instituted). This includes the exercise or forbearance from the exercise of any right or any official power or duty.

vii) Any offer, undertaking or promise, (whether conditional or unconditional) of any gratification as described in the preceding paragraphs (i) to (vi).

- **Policy** refers to this Anti-Bribery and Corruption Policy.
- **Public Official** refers to government, government agency, regulatory body, statutory body, or any of its officials, either local or foreign.

6. POLICIES AND PROCEDURES

PART 1: GIFTS, ENTERTAINMENT AND CORPORATE HOSPITALITY

Receiving Gifts

- i) The Group adopts a “No Gift” Policy with strictly limited exceptions to uphold the highest standards of integrity and to avoid actual, potential, or perceived conflicts of interest. Employees are generally prohibited from accepting gifts from Business Associates or other external parties. However, exceptions may be considered under the following circumstances:
- The gift is of nominal value (not exceeding RM500) and does not give rise to a conflict of interest; or
 - The gift is customary in nature or presented for ceremonial purposes.
- ii) Gifts exceeding RM500 must be declared using the Declaration Form for Gifts, Entertainment and Corporate Hospitality (Appendix C) and submitted to the Managing Director (MD) or Chief Executive Officer (CEO) or Group Chief Financial Officer (GCFO) for assessment.
- iii) Any gift that is deemed inappropriate or that may give rise to an actual or perceived conflict of interest must be politely declined or returned, accompanied by an explanation of the Group’s “No Gift” Policy.

Providing Gifts

- i) The Group permits the giving of corporate gifts (e.g., branded merchandise like diaries, pens, calendars, plaques) to external parties when:
- The gift is a gesture of goodwill or appreciation, not intended to influence business decisions.
 - Each item or transaction does not exceed RM500 in value.
 - Gifts are given transparently, aligned with local customs and legal standards, and intended to support professional relationships.
 - There is no expectation of reciprocation or undue advantage.
 - Gifts are not given during sensitive business stages (e.g., tendering or contract negotiations).

Receiving Entertainment and Corporate Hospitality

- i) Employees may accept modest entertainment or hospitality valued at RM500 or below per person per event, provided it:
- is not intended to influence business decisions;
 - complies with applicable laws and this Policy;
 - excludes illicit activities such as gambling or sexual entertainment.

- ii) In such permitted cases, prior approval is not required but employees should exercise sound judgment.
- iii) If the value exceeds RM500, or if there is any uncertainty or risk of perceived impropriety, employees must:
 - obtain verbal approval from their Head of Department or Senior Management;
 - submit a declaration form for review by the MD/CEO/GCFO.

Providing Entertainment and Corporate Hospitality

- i) The Group permits the provision of reasonable entertainment or hospitality to external parties to foster legitimate business relationships, subject to the following principles:
 - The cost is reasonable and proportionate to the nature of the business relationship and the context of the event;
 - The expense is transparent, properly documented, and reported through the company's expense claim process;
 - It is not intended to influence business decisions improperly or create a conflict of interest;
 - It does not include family members, unrelated individuals, or involve inappropriate venues or activities.
- ii) Eligible employees may claim related expenses with approval from their Head of Department, who must assess whether the entertainment is necessary, reasonable, and in the company's best interest.

PART 2: CHARITABLE DONATIONS AND CORPORATE SOCIAL RESPONSIBILITIES ("CSR")

- i) All charitable donations must comply with this Policy, the Code of Conduct & Ethics, and relevant internal procedures.
- ii) Charitable donations must be pre-approved by the MD/CEO/GCFO and made directly to recognized organizations and disclosed publicly where appropriate.

PART 3: FACILITATION PAYMENTS

- i) The Group strictly prohibits facilitation payments, which are often seen as a form of bribery.
- ii) Any offering, requesting, or accepting of facilitation payments is not tolerated and must be immediately reported to the MD/CEO/GCFO.
- iii) In exceptional cases where an employee's life or safety is at risk, a facilitation payment may be permitted only if:
 - It is the sole option to protect the employee's life or safety;
 - Prior approval is obtained from the MD/CEO;
 - The payment is for personal protection, not for business gain.

Such cases may be considered a valid defense if conditions are met.

PART 4: POLITICAL CONTRIBUTIONS

- i) The Group maintains political neutrality and does not make political donations or offer favors to political parties or politicians.
- ii) Employees may make political contributions in their personal capacity but must ensure no connection to the Group.
- iii) The Group will not provide any resources, funds, or services for political purposes.

PART 5: DEALING WITH PUBLIC OFFICIALS

- i) The Group upholds strict ethical standards when engaging with public officials and ensures compliance with all laws and regulations.
- ii) The offering, soliciting, or accepting of bribes, kickbacks, or facilitation payments from public officials is strictly prohibited and will result in immediate disciplinary action, including termination of employment and legal consequences.

PART 6: DEALING WITH BUSINESS ASSOCIATES

- i) All Business Associates must comply with the Group's Anti-Bribery and Corruption Policy.
- ii) Due diligence will be conducted before establishing business relationships to ensure ethical practices and compliance with anti-bribery laws.
- iii) The Group will periodically review its relationships with Business Associates to ensure continued compliance with this Policy and any applicable laws, regulations, or standards.
- iv) If at any point during the business relationship, a Business Associate is found to be involved in bribery, corruption, or unethical practices, the Group will terminate the relationship immediately and take any necessary legal action.

PART 7: EQUAL EMPLOYMENT OPPORTUNITY

- i) The Group is committed to providing equal employment opportunities for all qualified individuals, regardless of their background.
- ii) Recruitment decisions will be based on approved selection criteria, ensuring the most suitable candidates are employed and minimizing bribery and corruption risks during the hiring process.
- iii) Due diligence and background checks will be conducted as necessary to verify that prospective employees have no history of offenses, including bribery or corruption.
- iv) For management roles with decision-making authority, comprehensive background checks, including independent verification through credible agencies, will be conducted to ensure the integrity of hires.

PART 8: RECORD KEEPING AND ACCOUNTABILITY

- i) The Group must maintain accurate financial records to ensure transparency in all transactions, payments, gifts, and hospitality.

- ii) Off-book accounts to conceal or facilitate improper payments are strictly prohibited. All dealings must be open and transparent, in compliance with legal and regulatory requirements.
- iii) All gifts, entertainment, corporate hospitality, or other benefits exceeding RM500 must be declared in writing using the Declaration Form for Gifts, Entertainment and Corporate Hospitality (Appendix C), submitted to the MD/CEO/GCFO for review and retained by the Human Resources Department.

PART 9: DECLARATION AND COMPLIANCE

- i) Employees and Business Associates shall certify in writing that they have read, understood, and agreed to comply with this Policy. A copy of the declaration will be retained by the Human Resources Department.
- ii) In the event of reasonable suspicion of bribery or corruption, the Group reserves the right to request relevant information from employees or Business Associates, subject to applicable laws and contractual terms, to support internal investigations.

PART 10: TRAINING AND COMMUNICATION

- i) The Group shall conduct awareness programs for all employees on anti-bribery, anti-corruption, integrity and ethical conduct.
- ii) Training shall be provided based on the level of bribery and corruption risk associated with the role and is mandatory for new employees and employees appointed to or holding Exposed Positions.
- iii) All training materials, communications and attendance records will be maintained by the Human Resources Department.

PART 11: WHISTLEBLOWING CHANNEL

- i) The Group is committed to upholding the highest standards of transparency, integrity, and accountability in all business dealings. All reports of actual or suspected bribery or corruption will be taken seriously, particularly those made in good faith. Any potential breaches will be promptly reviewed and addressed.
- ii) To support this commitment, the Group provides confidential channels for employees and external stakeholders such as suppliers, customers, shareholders and the public to report concerns about misconduct, bribery, or corruption. Reports can be made via email to whistleblowing@redplanet.com.my or by post to:

<p>RedPlanet Berhad Chairman of the Audit and Risk Management Committee No. 1-8, Level 8, The Boulevard, Mid Valley City, Lingkaran Syed Putra, 59200 Kuala Lumpur, Malaysia.</p>

All reports will be handled in accordance with the Whistleblowing Policy. Whistleblowers who report in good faith will be protected from retaliation.

PART 12: SANCTIONS FOR NON-COMPLIANCE

- i) Non-compliance with this Policy will result in disciplinary action, up to and including termination of employment. Legal action may also be taken if the Group's interests are harmed due to non-compliance.
- ii) The Group will notify relevant regulatory authorities if bribery or corruption incidents are proven beyond a reasonable doubt and will fully cooperate with any investigations or legal proceedings.
- iii) Non-compliance by Business Associates may result in blacklisting and termination of the business relationship, in addition to legal action if the breach negatively impacts the Group.

7. MONITORING AND REVIEW

- i) All employees are responsible for the success of this Policy and should report any suspected wrongdoing or risks.
- ii) The Group will review this Policy periodically and make revisions as necessary to ensure its effectiveness and alignment with legal requirements.
- iii) This Policy was adopted by the Board on 28 January 2026 and is made available on the Company's website at <https://redplanetgrp.com/>.

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APPENDIX A

DECLARATION BY STAFF THAT THEY HAVE READ, UNDERSTOOD AND SHALL ABIDE AND COMPLY WITH THE INFORMATION, GUIDELINES AND REQUIREMENTS OF THE ANTI-BRIBERY AND CORRUPTION POLICY.

I, the undersigned, hereby certify and declare that I have read and understood the Anti-Bribery and Corruption Policy of **RedPlanet Berhad**.

I understand the importance of complying with RedPlanet Group's commitment to preventing bribery, corruption, and unethical practices in all business dealings. I will conduct myself with integrity and in accordance with the standards outlined in the policy.

I also acknowledge and understand that any failure by me to comply with the Anti-Bribery and Corruption Policy may result in Disciplinary Actions taken against me, including but not limited to withholding of bonuses, increments and merits awards, denial of promotion and termination of my employment or dismissal for gross misconduct, or termination of contractual agreement.

Signature : _____
Name : _____
NRIC/Passport No. : _____
Name of Company : _____
Designation : _____

APPENDIX B

DECLARATION BY BUSINESS ASSOCIATES THAT THEY HAVE READ, UNDERSTOOD AND SHALL ABIDE AND COMPLY WITH THE INFORMATION, GUIDELINES AND REQUIREMENTS OF THE ANTI-BRIBERY AND CORRUPTION POLICY.

I, the undersigned, hereby certify and declare that I have read and understood the Anti-Bribery and Corruption Policy of **RedPlanet Berhad**.

I recognize that this policy apply to me as a business associate of RedPlanet Group and agree to comply with them, including any future amendments as communicated by the Group.

I understand RedPlanet Group's commitment to ethical business practices and the prevention of bribery and corruption. Accordingly, I declare that:

- I will not offer, give, solicit, or accept any form of bribery in the course of our engagement with RedPlanet Group;
- I will not participate in any activity that breaches the Malaysian Anti-Corruption Commission Act 2009 or any applicable anti-bribery laws, regulations, or internal policies ("MACC Laws");
- I will report any suspected violations of the MACC Laws by RedPlanet personnel through the Group's designated whistleblowing channel;
- If I breach any applicable anti-bribery laws or policies, I acknowledge that RedPlanet Group may take necessary action and I agree to indemnify the Company against any resulting claims, fines, losses, or damages.

Signature : _____
Representative Name : _____
NRIC/Passport No. : _____
Designation : _____
Company Name : _____
Company Registration No. : _____
Company Stamp
(if applicable) : _____

SECTION B: APPROVAL REVIEW AND DECISION

(To be completed by Managing Director / Chief Executive Officer / Group Chief Financial Officer)

Name of Approver:	
Designation:	
Review Date:	
Decision on Handling: <i>(select one or more)</i>	<input type="checkbox"/> Return to sender <input type="checkbox"/> Donate to charity <input type="checkbox"/> Display in department <input type="checkbox"/> Share among employees <input type="checkbox"/> Allow employee to retain <input type="checkbox"/> Accept as part of approved entertainment/hospitality <input type="checkbox"/> Other (please specify): _____
Comments / Justification (if any):	
Signature of Approver:	
Date:	

SECTION C: HUMAN RESOURCES DEPARTMENT ACKNOWLEDGEMENT

Received by (Name):	
Signature:	
Date Received:	