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ANTI-BRIBERY & CORRUPTION POLICY

One Gasmaster are fully committed to conducting its business with highest integrity, Code of Conduct & Business Ethics to ensure that employees understand their responsibilities in compliance with One Gasmaster Group’s zero tolerance for bribery and corruption in particular the Malaysian Anti-Corruption Commission Act 2009 (“the MACC Act 2009”), and all guidelines issued by relevant authorities pertaining to the same (collectively “ABC Laws”).

1. SCOPE

The scope of this Policy and Procedure applies to every One Gasmaster (“OGM” or “Company”) and its subsidiaries (“the Group”) and employees, including members of our Board of Directors, and reflects the standard to which its business associates, partners, agents, contractors, and consultants to adhere when acting on the Company’s behalf.

2. OBJECTIVE

This Anti-Bribery & Corruption Policy (“ABC”) sets out the responsibilities of One Gasmaster. (“OGM” or “Company”) and its subsidiaries (“the Group”) and those who work for the Group on the requirement to observe and uphold the Group’s zero-tolerance position on “Bribery and Corruption” (collectively known as “corrupt gratification”).

The Policy is supplemental to, and shall be read in conjunction with the Code of Ethics and Conduct of the Group as annexed herewith, Whistle Blowing Policy, the Malaysian Anti-Corruption Commission Act 2009 (“MACC Act 2009”) and the Malaysian Anti-Corruption Commission (Amendment) Act 2018.

3. POLICY STATEMENT

OGM adopts a zero-tolerance position for bribery and corrupt activities.

OGM is committed to acting professionally, fairly and with integrity in all its business dealings and relationships, and is committed to implementing and enforcing systems that ensure corruption and bribery is prevented.

The Policy prohibits all forms of bribery and corrupt practices, and makes no distinction. OGM recognizes that acts of corrupt gratification are punishable by way of pecuniary finds and/or jail sentences, as the case may be, upon conviction.

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4. DEFINITION OF BRIBERY AND CORRUPTION

“Bribery” is any offering, promising, giving, requesting, transferring, agreeing to receive, and accepting a gratification or other advance for oneself or another with the intention of inducing or rewarding someone to perform their job function or activity improperly. A bribe for the purposes of this ABC Policy may be any financial, inflated commissions, gifts or other improper advantage given directly or through an intermediary.

“Corruption” refers to the misuse of entrusted power for personal gain or enrichment, or the misuse of one’s position to assist others in improperly or unlawfully enriching or empowering themselves.

“Gratification” includes but is not limited to anything of monetary, donation, gift, loan, fee, reward, valuable security, property or interest in property, employment, appointment, release, forbearance, undertaking, promise, rebate, discount, services employment or contract of employment or services and agreement to give employment or render services in any capacity.

“Gifts” can be in the form of goods or services, including anything that can be of value to the person receiving it.

“Hospitality” includes providing travel, transportation, lodging, as well as entertainment in the context of conventional, cultural and sporting events.

“Whistle blower” is an insider of an organization who reports improper conduct that has occurred within that same organization.

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5. GIFT, BENEFITS, ENTERTAINMENT, HOSPITALITY & TRAVEL

OGM accepts normal and appropriate gestures of hospitality and goodwill (whether given or received from third parties) so long as the giving or receiving of gifts, entertainment, hospitality and travel meets the following requirements:

- a) It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours, positions or benefits;
- b) It is not made with the suggestion that a return favour is expected;
- c) It is in compliance with local laws;
- d) It is given in the name of the organization, not in an individual's name;
- e) It does not include cash or a cash equivalent (e.g. a voucher or gift certificate);
- f) It is appropriate for the circumstances (e.g. giving small gifts around festive seasons or as a small thank you to an organization for helping with a large project upon completion);
- g) It is of an appropriate type and value, and given at an appropriate time, taking into account the reason for the gift, entertainment, hospitality and travel;
- h) It is given or received openly, not secretly;
- i) It is not selectively given to a key or influential person, clearly with the intention of directly influencing them;
- j) It accords with the limits of threshold, frequency and approval mandate as predetermined by the Group; and
- k) It is not offered to, or accepted from, a government official or representative, politician or political party, without the prior sanction based on the Group's approval mandate.

Where it is inappropriate to decline the offer of a gift, entertainment, hospitality or travel (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift, entertainment, hospitality or travel may be accepted as long as it is declared to the Compliance Officer, who shall assess the circumstances, including whether it accords with the Group's predetermined thresholds and frequency.

OGM recognizes that the practice of giving and receiving business gifts varies amongst countries, regions, cultures and religions. As such, definitions of what is acceptable and not acceptable will inevitably differ for each.

As good practice, gifts, entertainment, hospitality and travel given and received should always be disclosed to the Compliance Officer including those received from suppliers.

The intention behind a gift, entertainment, hospitality or travel being given or received should always be considered. If there is any uncertainty, the advice of the Compliance Officer should be sought.

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6. SPONSORSHIP AND DONATION

All Sponsorships, charitable donations and corporate social responsibilities activities are subject to Management’s approval and shall be made for genuine and verifiable causes. Bribes or facilitation payments shall not be disguised as sponsorships or donations as a means to improperly influence business decisions or conduit to fund illegal activities.

7. FACILITATION PAYMENT AND KICKBACKS

OGM strictly prohibits accepting or giving, whether directly or indirectly, any Facilitation payment or Extortion payments or Kickbacks.

OGM recognizes that despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment of kickback may put their or their family’s personal security at risk. Under these circumstances, the following steps must be taken:

- a. Keep any amount to the minimum;
- b. Ask for a receipt, detailing the amount and reason for the payment;
- c. Create a record concerning the payment; and
- d. Report this incident to your manager.

8. POLITICAL CONTRIBUTIONS

OGM does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office.

9. CONFLICTS OF INTEREST

OGM upholds the highest standards of business practice and corporate integrity. We are committed to ensuring that any ethical, legal, financial or other conflicts of interest are avoided and if they do arise, they do not conflict with the obligations to OGM.

Conflict of interest occurs when an individual or organization is involved in multiple interests, one of which could possibly corrupt, or be perceived to corrupt, the motivation for an act in another. A conflict of interest may be actual, potential or perceived and may be financial or non-financial.

Associated Persons must not use their positions, official working hours, the Firm’s resources and assets, or any information available to them for personal gain.

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10. EMPLOYEE RESPONSIBILITIES

As an employee of OGM, you must ensure that you read, understand and comply with the information contained within this Policy, and with any training or other anti-bribery and corruption information you are given from time to time.

All employees and those under our control are equally responsible for the prevention, detection and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this Policy.

If any employee breaches this Policy, the employee will face disciplinary action and could face dismissal for gross misconduct. The Group has the right to terminate a contractual relationship with an employee if the employee breaches this Policy.

11. REPORTING OF POLICY VIOLATIONS

Employees who encounter actual or suspected violations of this Policy are required to report their concerns. Each Employee has a responsibility to ensure that suspected bribery and corruption incidents are reported promptly. OGM practices an open door policy and encourages all Employees to share concerns and suggestions with Supervisors who are able to address them in an appropriate manner.

Email Reporting:

Managing Director (ivantan@onegasmaster.com)

General Manager (cat@onegasmaster.com)

12. TRAINING AND COMMUNICATION

Human Resources must ensure that employees will be provided with this Policy and related training to educate on this Policy as part of the induction process for all new employees. For declarations obtained from employees, a copy of the said documentation shall be retained by the Human Resource throughout the employee's employment tenure. Employee will be asked formally accept in writing that they will comply with this Policy.

The Anti-Bribery and Corruption Policy and zero-tolerance stance shall be clearly communicated to all suppliers, contractors, business partners and any third parties at the outset of business relations, and as appropriate thereafter.

This Policy is published on the Company's HRM System.

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13. COMPLIANCE AND REVIEW OF THE POLICY

OGM will be monitoring compliance with the ABC Policy. There is no tolerance or excuse for non-compliance with the ABC Policy.

Employees must always seek the advice of their Supervisor or Head of Department. Where there is still uncertainty, they should direct their concerns to MD or GM.

The Management reserves the right to amend, modify, suspend or terminate this policy at any time, with or without notice.

The ABC Policy will review from time-to-time to ensure that it continues to remain relevant, appropriate and effective in the enforcement of the principles herein and to ensure continued compliance with the prevailing law.

14. RECORD KEEPING

OGM shall keep detailed and accurate financial and other records, and shall have appropriate internal controls in place to act as evidence for all payments made.

We shall declare and keep a written record of the amount and reason for gifts, entertainment, hospitality and travel accepted and given including donations, sponsorships and expenses of similar nature by whatever name called, and understand that such expenses are subject to managerial review.

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Appendix (1)

CODE OF ETHICS AND CONDUCT

Every directors and employees of the Group in exercising and/or discharging his/ her powers or duties shall comply with all applicable laws, rules and regulations including the constitutions of the Company. The core areas of conduct include the following:-

- i. Compliance at all times with the Code of Ethics and Conduct.
- ii. Not misuse information gained in the course of duties for personal gain or for political purposes.
- iii. Uphold accountability and act in good faith and in the best interests of the Group corporate opportunities, assets and confidential information.
- iv. Observe high standards of corporate governance at all times.
- v. Observe high standards of business, professional and ethical conduct, and to refrain themselves from offering, giving or receiving any gifts and any other form of benefits (in kind, cash, advantages and/or favour and etc) from persons or entities who deal with the Company where the gift would reasonably be expected to influence the performance of their duties in any aspect.
- vi. Adhere to the principles of selflessness, integrity, objectivity, accountability, openness, honesty and leadership, including fair dealing and the ethical handling of conflicts of interest.
- vii. Ensure the protection of the Group's legitimate business interests, including corporate opportunities, assets and confidential information.
- viii. Ensure full, fair, accurate, timely and understandable disclosure.
- ix. Declaration of any personal, professional or business interests that may conflict with responsibilities.

In the event of any violation of this Code of Ethics and Conduct by any Director or employee of the Group, the Board of Directors of the Company shall determine appropriate actions to be taken after considering all relevant information and circumstances.

The Board of Directors of the Company will review this Code of Ethics and Conduct from time to time to ensure that it continues to remain relevant and appropriate.