

Anti-Bribery & Anti-Corruption Policy

The Board of Directors (“BOD”) and Management of Seni Jaya Corporation Berhad (“Seni Jaya” or “the Company”) strives to uphold its commitment to prohibit bribery and corruption in the business conduct within the Company.

In line with good corporate governance practices, the BOD of Seni Jaya encourage its employees, directors and associates to commit to the highest possible standards of ethical, moral, and legal conduct. Consistent with this commitment, the policy aims to support good management practices and sound corporate governance practices within the Company.

This policy aims to provide a structured guideline for its employees, directors and associates (“associated person”) to elaborate upon those principles, providing guidance to employees concerning how to deal with improper solicitation, bribery and other corrupt activities and issues that may arise in the course of business. It is also intended to apply to every director (executive and non-executive) except as otherwise stated in this Policy Statement.

This Policy Statement are not intended to provide definitive answers to all questions regarding bribery and corruption. Rather, the Policy Statement are intended to provide employees with a basic introduction to how the BOD combats bribery and corruption in furtherance of the Company’s commitment to lawful and ethical behavior at all times.

For the purpose of this policy, the wrongful activities or wrongdoings refers to any potential violations or concerns relating to any laws, rules, regulations, acts, ethics, integrity and business conduct, including any violations or concerns relating to malpractice, illegal, immoral, embezzlement and fraudulent activities which will affect the business and image of Seni Jaya.

The BOD of Seni Jaya has a stewardship responsibility to communicate the requirements of this policy and to guide the organisation in dealing with concerns arising from wrongful activities or wrongdoings.

The Policy of the BOD is:

1. To ensure Top-Level Commitment

Establish, maintain, and periodically review an anti-corruption compliance programme which includes clear policies and objectives that adequately address corruption risks. Encourage the use of any **reporting whistleblowing channel** in relation to any suspected and/or real corruption incidents or inadequacies in the anti- corruption compliance programme

2. To ensure Risk Assessments are carried out

Corruption risk assessment is done **on an annual basis**, with intermittent assessments conducted when necessary covering the following:

- a. Opportunities for corruption and fraud activities resulting from weaknesses in the organisation’s governance framework and internal systems/procedures;
- b. Financial transactions that may disguise corrupt payments;
- c. Business activities in countries or sectors that pose a higher corruption risk;
- d. Non-compliance of external parties acting on behalf of the organisation regarding legal and regulatory requirements related to anti-corruption; and

3. To undertake control measures

Put in place the appropriate controls and contingency measures in order to mitigate corruption risk within the Company, including establishing appropriate reporting channel and key considerations or criteria for conducting due diligence on any relevant parties or personnel (such as Board members, employees, agents, vendors, contractors, suppliers, consultants and senior public officials) prior to entering into any formalised relationships.

4. To ensure systematic review, monitoring & enforcement

Plan, establish, implement and maintain a monitoring programme, which covers the scope, frequency, and methods for review; Identify the competent person(s) and/or establish a compliance function to perform an internal audit, in relation to the organisation's anti-corruption measures; Conduct continual evaluations and improvements on the organisation's policies and procedures in relation to corruption; and conduct disciplinary proceedings against personnel found to be in violation of relevant Seni Jaya's internal policies.

5. To ensure adequate training, awareness & communication

The Company's Anti-Bribery and Anti-Corruption Policy Statement should be made publicly available and should also be appropriately communicated to all personnel and business associates.



Dato' Sri Anne Teo
Chairman of the Audit Committee/Board Audit Committee
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