

TAYOPACK Inspired By Zealous
**ANTI BRIBERY &
CORRUPTION
POLICY**



Effective Date: August 2025
Latest Amendment: March 2026

TAYOPACK SDN BHD

ANTI BRIBERY & CORRUPTION POLICY

1. Introduction

Tayopack Sdn Bhd (“Tayopack” or “the Company”) is committed to conducting all business activities with the highest standards of integrity, transparency, accountability, and ethical conduct.

The Company adopts a **zero-tolerance approach** towards all forms of bribery and corruption in any form, whether direct or indirect, in all its operations, transactions, and business relationships.

This policy is established to prevent, detect, and respond to bribery and corruption risks and to ensure compliance with all applicable laws, regulations, and best practices, including the **Malaysian Anti-Corruption Commission Act 2009 (MACC Act 2009)**.

2. Scope

This policy applies to all persons acting for or on behalf of Tayopack, including but not limited to:

- I. Board of Directors
- II. Management
- III. Permanent, temporary, and contract employees
- IV. Interns and trainees
- V. Vendors, contractors, suppliers, and consultants
- VI. Agents, representatives, and intermediaries
- VII. Business partners and third parties

This policy applies across all business operations, departments, and locations.

3. Definition

For the purpose of this policy:

Bribery

Bribery refers to the offering, promising, giving, receiving, soliciting, or accepting of any gratification, reward, benefit, gift, payment, commission, favour, or advantage with the intention of improperly influencing a decision or obtaining an unfair business or personal benefit.

Corruption

Corruption refers to the abuse of entrusted power, position, or authority for personal gain, company benefit, or any improper advantage.

Gratification

Includes money, gifts, entertainment, hospitality, commissions, discounts, services, employment opportunities, sponsorships, or any item of value.

4. Policy Statement

Tayopack strictly prohibits all forms of bribery and corruption.

No employee, management representative, or third party acting on behalf of the Company shall directly or indirectly:

- I. Offer
- II. Give
- III. Request
- IV. Solicit
- V. Receive
- VI. Accept

any form of bribe or corrupt payment.

This includes dealings with customers, suppliers, contractors, government agencies, and any external stakeholders.

Any breach of this policy shall be treated as serious misconduct and may result in disciplinary action, termination of employment or contract, and legal proceedings.

5. Principles

5.1 Top Level Commitment

The Board of Directors and Senior Management are fully committed to promoting an anti-bribery culture and ensuring ethical business conduct throughout the organization.

Management shall lead by example by demonstrating integrity, accountability, and compliance in all decision-making and business dealings.

5.2 Risk Assessment

Tayopack shall regularly identify, assess, and evaluate bribery and corruption risks that may arise from its operations, transactions, departments, and third-party engagements.

Risk assessments shall include areas such as:

- procurement and purchasing
 - vendor selection
 - contract awards
 - payments and commissions
 - dealings with government agencies
 - gifts and hospitality
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5.3 Undertake Control Measures

The Company shall establish and implement appropriate internal controls and procedures to prevent bribery and corruption.

These measures may include:

- segregation of duties
 - approval hierarchy and authorization limits
 - vendor due diligence
 - conflict of interest declaration
 - gift and hospitality controls
 - documentation and record keeping
 - whistleblowing and reporting channels
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5.4 Systematic Review, Monitoring & Enforcement

Tayopack shall conduct periodic reviews and monitoring of this policy and related controls to ensure effectiveness and compliance.

Any suspected or confirmed violation shall be investigated promptly and fairly.

Appropriate disciplinary actions and corrective measures shall be enforced where necessary.

5.5 Training & Communication

The Company shall ensure that all employees and relevant stakeholders are made aware of this policy through regular communication and training programs.

Training shall include:

- anti-bribery awareness
- reporting obligations
- conflict of interest
- ethical decision making
- compliance requirements

This policy shall be communicated through:

- employee handbook
- onboarding sessions
- internal notice boards
- company website
- periodic compliance briefings