SENDORA
Design For Life

SENDORA GROUP SDN. BHD.
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ANTI-BRIBERY AND CORRUPTION POLICY

CORPORATE POLICY

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Policy owner	*Managing Director*
Approved by	*Wong Wei Xiang (Managing Director)*
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1.0 PURPOSE

This Policy sets out Sendora Group Sdn. Bhd.'s commitment to conduct business honestly, transparently and without bribery or corruption. It supports compliance with the Malaysian Anti-Corruption Commission Act 2009 (Act 694), including Section 17A, as amended, and all other applicable anti-bribery and anti-corruption laws.

The Company will maintain reasonable and proportionate measures to prevent bribery by its personnel and by persons performing services for or on behalf of the Company.

2.0 SCOPE

This Policy applies to:

- all directors, officers, managers and employees, including temporary, probationary, part-time and contract personnel;
- interns, secondees and any person working under the Company's direction or control; and
- business associates performing services for or on behalf of the Company, including agents, consultants, dealers, distributors, installers, contractors, subcontractors and other representatives, where relevant to the relationship.

Suppliers, customers and other business partners that do not act for or on behalf of the Company are nevertheless expected to conduct their dealings with the Company ethically and in accordance with applicable law.

3.0 DEFINITIONS

Bribery: offering, promising, giving, requesting, agreeing to receive or accepting any gratification as an inducement or reward for improper conduct or an improper business advantage.

Corruption: the misuse of entrusted power, position or authority for private or business gain, including bribery, kickbacks, secret commissions and abuse of position.

Gratification: money or anything of value or benefit, whether financial or non-financial, including gifts, hospitality, entertainment, travel, discounts, employment opportunities, commissions, services, favours, donations and sponsorships.

Business Associate: any external party performing services for or on behalf of the Company or otherwise connected with the Company's business, depending on the circumstances.

Public Official: any officer, employee, representative or person acting for a government, ministry, department, agency, local authority, statutory body, government-owned or controlled entity, political party or public international organisation.

4.0 ZERO-TOLERANCE PRINCIPLE

CORE RULE: No person covered by this Policy may offer, give, promise, request, receive or authorise a bribe, directly or indirectly, in connection with the Company's business.

- Bribery is prohibited regardless of value, local custom or whether the intended business result is ultimately achieved.
- No person may use an agent, dealer, consultant, family member, contractor or other intermediary to do something that the Company or its personnel are prohibited from doing directly.
- No person may conceal, misdescribe, approve or ignore a transaction that they know or reasonably suspect is connected with bribery or corruption.
- Retaliation against anyone who raises a genuine concern or assists an investigation in good faith is prohibited.

5.0 RESPONSIBILITIES

Board and top management: approve this Policy, demonstrate visible commitment, provide appropriate resources and oversee bribery and corruption risks.

Designated Directors: receive reports, approve or reject gifts and hospitality, oversee proportionate reviews and escalate serious matters to the Board or relevant authorities where necessary.

Managers and department heads: communicate this Policy, identify risks in their operations, maintain proper approvals and records, and promptly escalate concerns.

All personnel: read and follow this Policy, attend required briefings, maintain accurate records, declare relevant interests and report suspected breaches promptly.

6.0 PROHIBITED CONDUCT

Examples of prohibited conduct include, but are not limited to:

- cash payments, kickbacks, secret commissions, rebates or benefits intended to influence a business decision;
- payments or benefits intended to secure a tender, project award, sales order, approval, inspection outcome, permit, licence or other improper advantage;
- facilitation payments or unofficial payments intended to speed up a routine action;
- lavish, frequent, concealed or inappropriate gifts, entertainment, travel or hospitality;
- offering employment, internships, discounts, free products, personal favours or other advantages to influence a decision;
- making false claims, invoices, descriptions, expense records or accounting entries; and
- threatening, disadvantaging or retaliating against a person who refuses to participate in bribery or reports a concern.

A payment made because of an immediate and credible threat to a person's health or safety is not treated as an authorised business payment. The person must keep the amount to the minimum necessary, report it to a Designated Director as soon as safely possible and ensure it is recorded accurately.

7.0 GIFTS, HOSPITALITY AND ENTERTAINMENT

Gifts and hospitality may create the appearance of improper influence even when no bribe is intended. The following controls therefore apply to all gifts, meals, entertainment, travel, accommodation and similar benefits connected with Company business:

- Cash and cash equivalents, including personal transfers, vouchers, loans or gift cards, must never be offered or accepted.
- All planned giving or acceptance of gifts, hospitality or entertainment requires prior written approval from a Designated Director. Approval must be retained in an email, approved form or other retrievable written record.
- If an unexpected gift is received and immediate refusal or return is impractical, it must be declared to a Designated Director within two working days and must not be used, consumed or retained until a decision is given.
- Gifts or hospitality involving a party engaged in an active tender, quotation evaluation, contract negotiation, dispute or approval process must not be offered or accepted.

- Any approved gift or hospitality must be lawful, reasonable, infrequent, transparent, for a legitimate business purpose and not capable of influencing or appearing to influence a decision.
- Extra care is required for any interaction involving a Public Official. No gift or hospitality may be offered to a Public Official without specific prior written approval from a Designated Director and confirmation that it is lawful.
- The Company shall maintain a Gift and Hospitality Register recording requests, approvals, refusals, receipts, returns and the final treatment of unexpected gifts.

8.0 DONATIONS, SPONSORSHIPS AND POLITICAL ACTIVITIES

Charitable donations and sponsorships must be genuine, transparent and supported by appropriate checks. They must never be used to disguise a payment, reward a decision-maker or obtain an improper business advantage. Prior written approval from a Designated Director is required, and complete supporting records must be retained.

Personnel may participate in lawful political activities in their personal capacity and at their own expense, but must not represent that they speak for the Company. Company funds, products, facilities or resources must not be used for political contributions unless expressly approved by the Board and confirmed to be lawful.

9.0 CONFLICTS OF INTEREST

Personnel must promptly disclose any actual, potential or perceived conflict between their personal interests and the Company's interests. This includes personal, family or financial relationships with customers, suppliers, contractors, candidates, competitors, consultants or decision-makers involved in Company business.

A person with a relevant conflict must not participate in the related evaluation, approval or decision unless management has reviewed the conflict and documented appropriate safeguards.

10.0 BUSINESS ASSOCIATES AND DUE DILIGENCE

The Company will apply proportionate anti-bribery checks to Business Associates based on the nature and risk of the relationship. Higher-risk relationships may include agents, commission-based representatives, dealers, consultants, installers, contractors, intermediaries and parties interacting with government bodies on the Company's behalf.

Depending on risk, controls may include:

- verifying identity, ownership, qualifications, reputation and relevant experience;
- understanding the services, fees, commissions, payment method and business rationale;
- checking for conflicts, unusual relationships, adverse information or other warning signs;
- using written contracts with appropriate anti-bribery, record-keeping, audit, suspension and termination provisions;
- requiring acknowledgement of this Policy or equivalent standards; and
- monitoring performance, invoices, expenses and payments throughout the relationship.

No person may appoint, pay or continue using a Business Associate where material bribery concerns remain unresolved. Concerns must be escalated to a Designated Director before proceeding.

11.0 SALES, PROCUREMENT, TENDERS AND COMMISSIONS

- Sales, procurement and tender decisions must be based on legitimate commercial criteria and supported by appropriate documentation and approval.

- No employee may manipulate specifications, quotations, evaluation records or approval processes to favour a party for personal benefit or in exchange for anything of value.
- Commissions and referral fees must be reasonable, supported by a written agreement, linked to legitimate services, properly approved and paid through traceable banking channels to the contracted party.
- Unusual payment requests, including payments to unrelated parties, personal accounts, offshore accounts without a clear rationale, cash payments or split invoices, must be stopped and escalated for review.

12.0 ACCURATE BOOKS, RECORDS AND INTERNAL CONTROLS

All transactions, expenses, gifts, hospitality, commissions, discounts, donations and sponsorships must be recorded completely and accurately. No off-book account, secret fund, false invoice, misleading description or undocumented payment is permitted.

Personnel must follow the Company's approval limits, segregation of duties and payment controls. Records must be retained in accordance with legal and Company requirements and made available for authorised review.

13.0 REPORTING CONCERNS

Anyone who knows of or reasonably suspects bribery, corruption, retaliation or a breach of this Policy should report the concern promptly. A report may be made to either of the following Designated Directors:

Reporting contact	Director 1	Director 2
Name and title	*Wong Wei Nian (William)*	*Wong Wei Xiang (Lance)*
Email	*sendora.williamwong@gmail.com*	*sendora.lance@gmail.com*

Concerns may also be reported confidentially through the Company’s dedicated Integrity Reporting Channel at:

integrity.sendora@gmail.com

If a concern involves one Designated Director, it should be reported to the other Designated Director or directly to another uninvolved Board member. Reports should include available facts and supporting documents, but the reporter should not investigate the matter personally or confront the persons involved.

Reports will be handled as confidentially as reasonably possible. The Company prohibits retaliation against anyone who reports a concern honestly and in good faith, even if the concern is not ultimately substantiated. Knowingly making a false or malicious allegation may result in disciplinary action.

14.0 INVESTIGATION AND COOPERATION

The Company may review or investigate any suspected breach and may appoint appropriate internal or external persons to assist. All personnel and relevant Business Associates must cooperate, preserve relevant information and maintain confidentiality. The Company may report suspected criminal conduct to the Malaysian Anti-Corruption Commission, police or other competent authorities where appropriate.

15.0 BREACHES AND CONSEQUENCES

A breach of this Policy is a serious matter. Depending on the circumstances and applicable law, consequences may include disciplinary action, dismissal, recovery of losses, suspension or termination of a business relationship, civil action and referral to law-enforcement or regulatory authorities.

No person will be penalised for refusing to pay or accept a bribe, even if that refusal results in the loss of business, delay or additional cost to the Company.

16.0 TRAINING, COMMUNICATION AND ACKNOWLEDGEMENT

The Company will communicate this Policy to personnel at induction and periodically thereafter, with additional guidance for roles exposed to higher bribery risks. Personnel may be required to confirm that they have read, understood and will comply with this Policy.

Relevant Business Associates may be provided with this Policy or an external policy statement and may be required to sign an acknowledgement or include equivalent anti-bribery obligations in their contracts.

17.0 RISK ASSESSMENT, MONITORING AND REVIEW

The Company will periodically assess bribery and corruption risks having regard to its business activities, locations, sales channels, tender exposure, government interactions, commission arrangements and use of third parties.

Compliance with this Policy and related controls may be monitored through document reviews, transaction checks, declarations, internal reviews or other proportionate measures. This Policy will be reviewed at least every two years, and earlier where there is a material legal, business or risk change, a significant incident or a control weakness.

18.0 QUESTIONS AND INTERPRETATION

Anyone uncertain about whether a proposed action is permitted must seek guidance from a manager or Designated Director before acting. Where this Policy imposes a higher standard than local custom or ordinary business practice, this Policy must be followed unless doing so would conflict with applicable law.

APPROVAL RECORD

19.0 APPROVAL AND EFFECTIVE DATE

This Policy was approved by the authorised management of Sendora Group Sdn. Bhd. and takes effect on the date stated below. It remains in force until replaced or withdrawn in writing.

Approved by	*Wong Wei Xiang (Lance)*
Job title	*Managing Director*
Signature	***Signed original retained by the Company***
Approval date	*08 January 2026*
Effective date	*08 January 2026*