

ANTI-BRIBERY AND CORRUPTION POLICY

1.0 Policy statement

HSB Reclaimed Rubber Sdn. Bhd. conduct its business in a legal and ethical manner. This policy requires to all employees (including full time, probationary, contract, part-time, temporary staff or interns) and any other persons who providing services to HSB Reclaimed Rubber Sdn. Bhd. (including external agencies or any third party with a business relationship with the Company). HSB Reclaimed Rubber Sdn. Bhd. will take reasonable and appropriate measures to ensure that its businesses do not participate in corrupt activities for its advantage or benefits. This policy set out the company's responsibilities, and the responsibilities of those working for or with the Company in observing and upholding the Company's position, on bribery and corruption. The Employees and Directors are collectively referred to as "Persons" or "Officers" throughout this Policy.

2.0 Responsibilities

All Persons / Officers in the company must have the responsibility to comply with this Policy. We take a zero-tolerance approach to bribery and corruption. Any violation of this policy will be regarded as serious matter and will result in disciplinary action, including dismissal and termination in accordance with the appropriate laws.

2.1 Management

- To approve relevant anti-bribery and corruption training on compliance and awareness for employees.
- To communicate the Policy to all employees and agents of HSB Reclaimed Rubber Sdn. Bhd.
- To recognize the types of gratification, bribery and corruption that may occur within the business of HSB Reclaimed Rubber Sdn. Bhd.
- To ensure an adequate system of the internal control exists and operates effectively to minimize the opportunity for the employees to receive or give or offer any form of gratification, a bribery inducement in the conduct of business for the personal benefit or for the benefit of the company.
- To ensure new employees and agents are given approached briefing on this Policy.

2.2 Employees

- To act ethically and with integrity at all times.
- To report any incidence of gratification, bribery or corruption to the person specified.
- To not give, agree to give, promise or offer to or accept from any person / party, any form of gratification or bribery either voluntarily or when ask to do so in the conduct of Company business for personal benefits or for the benefit of HSB Reclaimed Rubber Sdn. Bhd.

3.5 Record Keeping

It is important that all the records and books must accurately and properly reflect the nature and purpose of any payments made or received, and the nature of any transactions entered into. HSB Reclaimed Rubber Sdn. Bhd. should keep the records and have appropriate internal controls in place which will evidence the business reason for any payments made to third parties. HSB Reclaimed Rubber Sdn. Bhd. should be prepared and maintained with strict accuracy and completeness for all accounts, invoices and other similar documents and records related to dealings with third parties.

4.0 Training and Awareness

Training on awareness of this Policy shall be provide for all Persons / Officers. They shall receive relevant training on how to implement and adhere to this Policy.

5.0 Reporting

Any Persons / Officer who knows of, or suspects, a violation of the Policy, is encourage to whistle blow or report the concerns via the channel outlined in the Whistle-Blowing Policy. No individual will be discriminated against or suffer any sort or manner of retaliation for raising genuine concerns or reporting in good faith on violations or suspected violations of the Policy. All reports will be treated confidentially.

6.0 Monitoring and Review

The board will monitor the effectiveness and reviews the implementation of this Policy at appropriate intervals, considering its suitability, adequacy and effectiveness. Any improvement identified is made as soon as possible. Internal control systems and procedures are also subject to regular reviews to provide assurance that they are effective in countering any risks of corruption.