

**MALAYSIAN GENOMICS RESOURCE CENTRE BERHAD  
ANTI-BRIBERY AND CORRUPTION POLICY (“ABC POLICY”)**

**1. Introduction**

Malaysian Genomics Resource Centre Berhad and its subsidiaries (“the Group”) has established an ABC Policy which sets out a firm ‘tone from the top’ against all corrupt practices. It includes the framework for implementation, and the responsibilities of the Associated Person in regard to observing and upholding the Group’s zero-tolerance position on corruption and bribery.

The ABC Policy makes references to the Company’s Code of Conduct and Ethics, and they are summarised as below.

**2. Scope**

The ABC Policy applies to all directors, staff (whether temporary, fixed-term, or permanent), trainees, seconded staff, casual workers, agency staff, volunteers, interns, and agents of the Group.

The Group also expects its partners, contractors, sub-contractors, consultants, representatives and others performing work or services for or on behalf of the Group, or any other person associated with the Group to comply with the ABC Policy when performing such work or services.

**3. Definitions**

“**Associated Person**” means all directors, staff (whether temporary, fixed-term, or permanent), trainees, seconded staff, casual workers, agency staff, volunteers, interns and agents of the Group, and partners, contractors, sub-contractors, vendors, suppliers, service providers, consultants, representatives and all other performing work or services for and/or on behalf of the Group.

“**Bribery**” refers to the act of corruptly authorising, giving, agreeing to give, promising, offering, soliciting, receiving, or agreeing to receive any gratification.

“**Company**” means each company in the Group.

“**Corruption**” means an act of giving or receiving of any gratification or rewarding the form of cash or in kind of high value for performing task in relation to his/her job description.

“**Gratification**” means:

- a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
- b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;

- c) any payment, release, discharge or liquidation of any loan, obligation, or other liability, whether in whole or in part;
- d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- e) any forbearance to demand any money or money's worth or valuable thing;
- f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and
- g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f);

**“Group”** means MGRC and all its subsidiary companies.

#### **4. Policy Statement**

The Group has a zero-tolerance position for bribery and corrupt activities.

The Group 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.

In particular, the Board of Directors and Senior Management of the Group do not condone or consent to any Associated Person:

- (a) Soliciting, receiving, or agreeing to receive any gratification whether for him/herself or for any other person; or
- (b) Giving, agreeing to give, promising or offering to any person any gratification whether for the benefit of him/herself or of another person, including with intent to obtain or retain business or any advantage in the conduct of business for the Company.

The Group will uphold all laws and regulatory requirements in all the jurisdictions in which it operates, including those relating to anti-bribery and corruption.

The Group treats any violation of the ABC Policy seriously and will undertake necessary actions including but not limited to, review of employment or appointment, disciplinary actions, dismissal, and reporting to authorities, consistent with the relevant laws and regulations.

#### **5. Gifts and Entertainment**

The Group adopts a “No Gift Policy”, whereby employees are generally prohibited from soliciting, accepting or offering gifts, cash, cash equivalents, vouchers, or personal benefits in connection with their duties.

Notwithstanding the above, acceptance of gifts or entertainment may be permitted on an exceptional and infrequent basis, provided that:

- (a) The gift or entertainment is of reasonable value, customary in nature and does not influence, or appear to influence, business decisions; and
- (b) The value does not exceed RM500 per occasion, whether provided as a gift, entertainment, or a combination of both arising from the same occasion; and

- (c) The total value of gifts and/or entertainment received from the same source does not exceed RM1,000 in aggregate within a calendar year, regardless of the number of occasions.

For the purpose of this Policy, “same source” refers to the same individual, company, or its representatives or related parties.

Any gifts or entertainment received in breach of the above requirements must be:

- (a) Declined or returned to the giver within five (5) working days; or  
(b) Where return is impracticable, surrendered to the Company for appropriate handling (e.g. donation).

All gifts and entertainment received, regardless of value, must be declared and recorded in a register or record maintained by the Company within seven (7) days.

Employees are strictly prohibited from accepting any gifts or entertainment from parties involved in ongoing or potential procurement, tender or negotiation processes, regardless of value.

#### 6. **Donation and Sponsorship**

All donations and sponsorships undertaken by the Company which are charitable in nature (“Donations”) shall adhere to conditions below:

- (a) No political Donations are permitted.  
(b) Due diligence on donation recipients must include at a minimum:
- Verification of legal registration (e.g., ROS registration);
  - Screening against MACC’s corrupt practices database (where available);
  - Confirmation that no Company employee, director, or their close family member has a personal interest in the recipient organisation.
  - **No political donations** are permitted, whether direct or indirect.

All Donation requests must be reviewed by the Company’s Finance Department.

#### 7. **Facilitation Payments**

Facilitation payments are prohibited regardless of amount. These are unofficial payments made to secure or expedite a routine government action (e.g., processing a permit, visa, or license). Even if customary in certain countries, such payments are illegal under Malaysian law. No employee may authorise, make, or conceal a facilitation payment, including through a third party.

#### 8. **Responsibilities and Commitments**

##### (a) **Company’s Board of Directors and its respective committees**

- Provide oversight for maintaining the highest level of corporate integrity and ethics, compliance with applicable laws and regulatory requirements on anti-corruption;
- Provide oversight for maintaining the highest level of corporate integrity and ethics, compliance with applicable laws and regulatory requirements on anti-corruption.

**(b) Company's Senior Management**

- Ensure a high level of integrity and ethics and full compliance with all applicable laws and regulatory requirements on anti-corruption;
- Effectively manage corruption risks of the Company;
- Ensure adequate and clear policies, procedures and control systems are in place to minimise and mitigate opportunities for corrupt practices in the Company and to respond to suspected or confirmed corruption incidences in the Company;
- Encourage use of whistleblowing and other appropriate channels in relation to any suspected or real corruption incidences;
- Develop a communication plan and training program based on the Company's policies and commitments towards anti-corruption for relevant internal and external parties;

**(c) Associated Person**

- Observe and uphold the Group's zero-tolerance position on corruption and bribery;
- Observe the ABC Policy;
- Raise concerns about improper conduct or wrongful act at the earliest opportunity through various communication channels including as set out in the Company's Whistleblowing Policy.

**9. Risk Assessment**

A corruption risk assessment shall be conducted periodically and whenever necessary, including in response to changes in law or business circumstances, to identify, analyse, and assess internal and external corruption risks. Senior Management shall review the risk assessment findings and consider relevant improvements to policies and procedures to address corruption risks. The risk assessment report should be presented to the Board for review.

**10. Conflict of Interest**

The Group seeks to ensure that a conflict of interest does not adversely affect the interest of the Group, its shareholders, clients and other stakeholders through identification, prevention, and management of the conflict of interest. All Associated Persons shall submit a written declaration of any personal interest they or persons connected to them may have in any Company decision or matter they are involved in.

**11. Reporting Channel and Whistleblowing Policy**

Internal and external parties are encouraged to raise concerns in relation to real or suspected corruption incidents or inadequacies of the anti-corruption program at the earliest opportunity.

Please refer to the MGRC's Whistleblowing Policy published at [www.mgrc.com.my](http://www.mgrc.com.my) for details on how such concerns may be raised.

The Company's Whistleblowing Policy protects the identity of the whistleblower, while also protecting the whistleblower from retaliation and adverse employment action, provided the disclosure was made in good faith and to the extent permitted by law.

Where relevant, the Company shall report details of incidents of corruption to the Malaysian Anti-Corruption Commission ("MACC") or other law enforcement agencies and authorities.

## **12. Other Control Measures**

### **(a) Financial Controls**

All expenses and claims shall be governed by the Group's payment approval authority limit and/or expenditure approval request policy and procedures.

### **(b) Procurement**

All procurement activities shall be governed by the Group's procurement/tender policy and procedures; and

### **(c) Record Keeping**

All records related to gifts, entertainment, donations, sponsorships, and third-party payments must be maintained for a minimum of seven (7) years. No 'off-book' accounts or unrecorded funds are permitted.

## **13. Review, Monitoring and Enforcement**

### **(a) Review**

Internal audit shall review the Group's anti-corruption program and measures to assess its compliance, performance, efficiency, and effectiveness. The audit report shall be presented by internal audit to the Group's Board for review.

### **(b) Monitor**

All Heads of Departments shall monitor the performance of their personnel in relation to this Policy and report any non-compliance. The non-compliance report shall be presented to the Board for review.

### **(c) Enforcement**

The Group may take such disciplinary action as appropriate against personnel found to be non-compliant with the ABC Policy.

When a weakness or gap is detected during a breach, a process review exercise, or where there is a new development in the industry, laws, or regulations, improvements on the Group's policies and procedures shall be considered.

## **14. Training and Communication**

The Group shall develop and implement a training program and a communication plan on its policies and commitments on anti-corruption for relevant parties.

The Policy is approved by the Board on 27 April 2026.