

VISDYNAMICS HOLDINGS BERHAD
(Company No. 200501000050 (677095-M))
ANTI BRIBERY AND CORRUPTION POLICY

1.0 INTRODUCTION

The Company recognizes the importance of establishing and upholding good corporate governance and is committed to conducting its business in accordance with the highest ethical standards in full compliance with all applicable laws, regulations and standards in all locations and jurisdictions in which the Company operates.

2.0 OBJECTIVE

The objective of this policy is to:

- 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, in order to ensure that the Company comply with applicable laws, regulations and policies and procedures;
- Ensure that the Company has adequate procedures in place to prevent and detect bribery and corruption;
- Provide information and guidance to those working for or with the Company on how to recognize and deal with potential bribery and corruption issues;
- Protect the Company against the possible penalties and repercussions resulting from acts of bribery and corruption or being associated with such behavior.

3.0 SCOPE

This policy applies to any form of corruption or bribery.

CORRUPTION

- The abuse of entrusted power for private gain.

BRIBERY

- The offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal, unethical or a breach of trust.
- An inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.
- Can take the form of gifts, loans, fees, rewards or other advantages.

4.0 ANTI-BRIBERY AND CORRUPTION COMMITMENT

- The Company is committed to conducting business dealings with integrity. This means avoiding practices of bribery and corruption of all forms in the Company's daily operations.
- We want to compete and win over customers by virtue of the quality of our products and value of our services – not through unfair means.
- Anybody associated with the Company (employees, agents, suppliers, vendors, actual and potential customers, advisors, partners, representatives etc.) who refuse to pay/ receive bribes or participate in acts of corruption will not be penalized even if such refusal may result in losing business.
- We reject bribery and corruption, in whatever form.

5.0 GIFTS, ENTERTAINMENT & HOSPITALITY

- The Company's practice encourages the use of reasonable, good judgement, discretion and moderation when giving or accepting gifts or entertainment in business settings.
- Any gifts or entertainment or invitations given or received must be in compliance with law and be consistent with local custom and practice.
- Gifts or entertainment or invitations to events or privileges of any kind, may be made or accepted only if decisions are not and may not be perceived as being influenced by them.
- The intention behind the gifts, entertainment or hospitality should always be considered.
- Accepting private benefits from third parties (such as money, services or discounts) is prohibited because they may impede objective business decisions.
- Value Threshold of giving or accepting: RM200/USD50 and above to be declared and approval obtained from Head Of Departments/ Management.

6.0 EMPLOYMENT OF BOARD MEMBERS/ EMPLOYEES

- The recruitment process of Board Members and employees should not be influenced by the exchange of improper favors. The Company carries out due diligence assessment on the candidates before recruitment and all new joiners will be given the Anti-Bribery and Anti-Corruption training upon joining. On a yearly basis, the Board Members/ employee will need to make and attestation to re-affirm their understanding, compliance and commitment on the anti-bribery programme.

7.0 FACILITATION PAYMENTS

- Facilitation payments are inducements or incentives given to secure or expedite a routine function that an individual is ordinarily obliged to perform. They are usually small unofficial payments paid to speed up routine administrative processes such as licenses, permits, or visas.
- The Company do not make, and will not accept, facilitation payments of any kind.

8.0 CHARITABLE CONTRIBUTIONS, DONATIONS AND SPONSORSHIPS

- Any charitable contributions or sponsorships made on behalf of the Company must not be related to, dependent on, or made in order to win, or influence, a business deal or decision. The contributions or donations need to be made in good faith and in compliance with the Company's Code of Conducts and all relevant policies and procedures.

9.0 RECORD KEEPING

- Documentations such as accounts, invoices, and records relating to dealings with third parties will be properly maintained with strict accuracy and completeness. 'Off-the-books' accounts and falsifying in the Company's books and records are strictly prohibited.

10.0 TRAINING

- Anti-Bribery training will be provided to all employees in the Company and proper records of trainings are maintained by the Admin Department.

11.0 POLITICAL DONATIONS AND CONTRIBUTION

- The Company will not make any contribution to any government officers or political parties. In the event that any of the employees or the associated third parties undertake such unauthorized activity, he or she will be deemed to be acting in their personal capacity and not on behalf of the Company.

12.0 PROTECTION & RESPONSIBILITIES

- All representatives are encouraged to raise concerns about any issues or suspicion of malpractice at the earliest stage.

- The Company has put in place the Whistle-blowing Policy to provide an avenue which serves as a confidential platform for all Employees and Associated Third Parties to disclose any acts of corruption and/ or bribery in a confidential manner that protects the whistleblower from any risk or reprisals. The Company encourage openness and will support anyone who raises genuine concerns in good faith even if they turn out to be mistaken.
- Our zero-tolerance approach to bribery and corruption must be communicated to anybody associated with the Company (employees, agents, suppliers, vendors, actual and potential customers, advisors, partners, representatives etc).
- The Company takes corruption and bribery very seriously. For employees, non-compliance may lead to disciplinary action, up to and including termination of employment. For external parties, non-compliance may lead to termination of contract.
- Bribery and corruption are criminal offense. Punishment may include imprisonment, probation, mandated community service and significant fines which will not be paid by the Company.