

# Anti-Bribery & Corruption Policy



## **ANTI-BRIBERY & CORRUPTION POLICY**

**Process Owner: All Users**

**Intended Users: ABNT Group - All Users**

**Last Updated: 23 Sept 2024**

Anti-Bribery & Corruption Policy ABNT Global is a leading engineering, procurement, and construction (EPC) company specializing in water and energy solutions. Our projects, including Nano Water Treatment Plants powered by Solar PV and Battery Energy Storage Systems (BESS), are designed to provide sustainable infrastructure for communities in need. As we expand our operations, integrity and ethical business practices remain at the core of everything we do.

We are committed to conducting our business with honesty, transparency, and accountability. ABNT Global upholds a strict zero-tolerance policy towards bribery and corruption, ensuring compliance with the highest ethical standards across all operations. This Anti-Bribery & Corruption (ABC) Policy applies to all employees, partners, and third parties working with us, reinforcing our commitment to responsible and fair business conduct.

## Purpose

This policy aims to:

- Ensure all employees and partners understand our commitment to ethical practices.
- Prevent bribery and corruption in any form within our business dealings.
- Provide clear guidance on how to identify and report any incidents of bribery or corruption.

## Our Commitment

ABNT Global is committed to:

- Prohibiting bribery in all forms, including offering or receiving bribes.
- Ensuring that everyone involved with our company acts with integrity and follows the law.
- Complying with both local and international anti-bribery and corruption laws, including the **Malaysian Anti-Corruption Commission Act (MACC)**.

## Compliance with MACC

We strictly follow the **Malaysian Anti-Corruption Commission (MACC) Act**, which prevents corruption in both the public and private sectors. We expect all our employees, contractors, suppliers, and agents to comply with the MACC Act, ensuring we do not offer or accept bribes, kickbacks, or facilitation payments.

## What We Don't Tolerate

ABNT Global prohibits:

- **Bribery:** Offering or accepting bribes, gifts, or any other favors to influence business decisions.
- **Kickbacks:** Returning part of a payment to gain favor or avoid penalties.
- **Facilitation Payments:** Offering money to speed up actions that are part of the regular business process.
- **Political Donations:** Making donations to influence business decisions.
- **Fraud:** Engaging in dishonest practices that harm the company's reputation or business.

## Reporting Concerns

If you suspect any form of bribery or corruption, we encourage you to report it:

- **Whistleblowing Hotline:** Employees and third parties can report concerns confidentially.
- **Investigation:** We will investigate all reports and take appropriate action, including disciplinary measures if necessary.

## Training and Awareness

ABNT Global ensures that all employees, contractors, and business partners receive regular training on anti-bribery and corruption practices, so they understand their responsibilities and how to avoid unethical behavior.

## Consequences of Violating the Policy

Any violation of this policy may result in:

- **Disciplinary action** against employees, including termination.
- **Termination of contracts** with third parties found to be involved in bribery or corruption.
- **Legal action**, including penalties from the Malaysian Anti-Corruption Commission (MACC).

## Continuous Improvement

ABNT Global is committed to continuously reviewing and improving our policies to ensure we stay ahead of any potential bribery or corruption risks. We steadfast in its commitment to maintaining the highest ethical standards in all aspects of our business. By enforcing a strict zero-tolerance policy against bribery and corruption, we ensure that integrity, transparency, and accountability guide our operations and decision-making processes.