



LAC MED BERHAD

Registration No. 202401049485 (1595329-H)

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

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1. Purpose

- 1.1 This Policy sets out LAC Med Berhad and its group of subsidiary companies ("LAC Group" or "the Group") anti-bribery compliance framework, management systems and standards, such that the Group conducts its business and operations ethically and in full alignment with its commitment to a zero-tolerance approach towards bribery.
- 1.2 LAC Group shall always conduct the business with integrity, in an ethical and proper manner, and be in strict compliance with all applicable national and international laws, including all anti-bribery laws. The Group strives to continually improve its anti-bribery management systems, towards achieving LAC Group's vision and mission, while satisfying all requirements.
- 1.3 All stakeholders, including but not limited to employees and business associates, are encouraged to report violations of this Policy in good faith in accordance with the procedure set out in the Group's **Whistle-Blowing Policy**. No employee shall suffer retaliation, discrimination, reprisal, or disciplinary action for making such report in good faith or for refusing to participate in any activity where there is real risk of bribery.
- 1.4 Violation of this Policy and the rules of conduct constitutes misconduct and may result in disciplinary action or termination.

2. Scope

This Policy encapsulates the LAC Group Enhanced Code of Conduct ("**Code of Conduct**") and the anti-bribery provisions therein. The **Code of Conduct** provides guidance on rules of personal and business conduct and on policy and measures on anti-bribery.

3. Policy

- 3.1 LAC Group's Anti-Bribery Policy ("the Policy") extends to and covers a comprehensive framework of policies, systems and processes.
- 3.2 The anti-bribery policies, rules of conduct and measures set out below are necessary to protect the business, resources and reputation of the LAC Group.

4. Government Officials and Other Persons

- 4.1 LAC Group is particularly mindful and exercise care when dealing with government officials. The Policy is that under no circumstances should we offer, promise, give or authorize the giving, directly, indirectly or through third parties, of any bribe, kickback, illicit payment, benefit in kind or any other advantage to a Government Official or Government Entity (as defined in the Code of Conduct), private sector customer, supplier, contractor, or any other person or entity, as an inducement or reward for an improper performance or non-performance of a function or activity. This includes facilitation payments and the Policy prohibits the making of any facilitation payments.

- 4.2 Similarly, the Policy states that we must not under any circumstances solicit or accept, directly or indirectly, any bribe, kickback, illicit payment, benefit in kind or any other advantage from any customer, supplier, contractor, or any other person or entity that is intended to induce or reward an improper performance or non-performance of a function or activity.
- 4.3 Our **Solicitations and Extortions Policy** sets out the Group's position and gives further detailed guidance in respect of solicitations and extortions for bribes or improper payments.

5. Gifts and Hospitality

- 5.1 As provided for and further detailed in the **Gifts and Hospitality Policy**, while it is recognized that the giving or receiving of gifts and hospitality may help in the building of business relationships, good judgement must be exercised at all times. The offer and receipt of gifts or hospitality must be avoided whenever they could affect or be perceived to affect the outcome of business transactions or dealings or are not reasonable and bona fide. Employees should avoid giving or receiving gifts or hospitality (including entertainment, meals, business travel, tickets to social, entertainment or sports events etc.) which is excessive in value, given too often, or leaves the employee or (as the case may be) the other person in a position of obligation or perceived obligation. Gifts or hospitality in the form of cash or cash equivalent are prohibited and must be avoided.

6. Donations and Contributions

- 6.1 Donations, sponsorships and contributions made on behalf of LAC Group must adhere to an underlying principle to avoid any risk of actual or perceived bribery and be made only for bona fide purposes.
- 6.2 When making any donation or contribution, the following must be adhered to:
- donations and contributions must always take place in a transparent manner and be documented;
 - documentation must include recipient identity, purpose, reasons for donation / contribution;
 - donations / contributions must comply with the laws of the country in which the donation is to be made;
 - donations / contributions should be made to an organization, instead of any particular person;
 - anonymous donations are prohibited;
 - payments into private or personal bank accounts are prohibited; and
 - requisite approval must be obtained in accordance with **LAC Group approval processes and authorized levels of approval.**
- 6.3 No donations or sponsorships may be made to any political party or politicians for any campaign and/or related purposes.

7. Dealing with Third Party Associates

- 7.1 We have prescribed processes when dealing with Third Party Associates, which are individuals or entities (not owned or controlled by the Group) that provide services, or engage in business activities, on behalf of a group company. Such persons or entities include without limitation joint venture partners, members of a consortium, commercial agents, sales representatives, distributors, consultants, advisors, suppliers of services, contractors or sub- contractors, and any other service providers who act on behalf of a group company in any way in connection with its business.
- 7.2 The local knowledge of Third-Party Associates is essential. However, to minimize the risk of bribery on their part, Third Party Associates should be made aware of and, adhere to LAC Group's rules of business conduct. All and any payment to agents must be comparable to industry/market rates, commercially reasonable and commensurate with the services they provide. Payment must be properly approved in accordance with prescribed authority levels, made in the country where services are provided or where the agent has its primary place of business and made to the bank account in the name of the agent who is on the agency agreement.
- 7.3 Each Third-Party Associate should be carefully selected and evaluated based on merit and clear rationale for engagement, before being retained by the Group company. It is the responsibility of each employee to know the Third-Party Associates with whom the employee transacts business for or on behalf of a group company, and to understand the services each Third Party Associate performs for the Group company and the manner in which the Third-Party Associate performs them.

8. Accounting and Record Keeping

- 8.1 To comply with anti-bribery laws and policies, all transactions must be properly authorized and recorded. For purposes of financial audits and to prevent improper payments being made, it is important that the books and records of each subsidiary company contain full and accurate information about all transactions and expenditures incurred by the subsidiary company.
- 8.2 The information documented should be such that it is possible to see exactly what was paid, to whom, the reason why it was paid, where it was paid (for example, from or to which accounts) and when. Attempts to create false or misleading records constitutes misconduct and may result in disciplinary action or termination.
- 8.3 Requests for approval for a payment must include adequate supporting documentation in order for the payment to be authorized.

9. Reporting

- 9.1 Except to the extent prohibited by applicable law, all stakeholders are encouraged to report violations of this Policy and related policies or applicable laws (including the U.S. FCPA, U.K. Bribery Act 2010, Singapore Prevention of Corruption Act, the Malaysian Anti- Corruption Commission Act 2009, Whistleblower Protection Act 2010 and other applicable anti-bribery laws) in accordance with the procedures set out in the Group Whistle-Blowing Policy.

10. TRAINING AND QUERIES

Compliance training for employees will be periodically provided to enhance understanding and reinforce the importance of complying with this Policy and corresponding policies covered under this document. The Head of Human Resources Department can be contacted at any time should there be any query about any of the rules of conduct or any other matter relating to this Policy.

11. REVIEW

This Policy will be reviewed regularly to ensure it remains updated, relevant and in line with best practice.

The Anti-Bribery and Anti-Corruption Policy has been approved by the Board on 26 May 2025.