

# **SYNERGIC HALLMARK SDN. BHD.**

**(Co. No. 514374-U)**

No.4 & 6, Jalan Makmur 2, Taman Perindustrian Cemerlang,  
81800 Ulu Tiram, Johor.

## **ANTI BRIBERY AND ANTI CORRUPTION POLICY**

### **1. Purpose**

Synergic Hallmark Sdn. Bhd. is committed to conducting business with integrity and in full compliance with all applicable anti-bribery and corruption laws in Malaysia, including the Malaysian Anti-Corruption Commission Act 2009 (MACC Act). This policy outlines our zero-tolerance approach to bribery and corruption in all forms.

### **2. Scope**

This policy applies to all employees (full-time, part-time, contract), directors, and any third party acting on behalf of Synergic Hallmark including agents, suppliers, contractors, consultants, and joint venture partners.

### **3. Policy Statement**

- Bribery and corruption in any form are strictly prohibited.
- Synergic Hallmark has a zero-tolerance approach to any acts of bribery or corruption.
- No employee or associated person shall offer, give, solicit, or receive bribes or improper payments in any form, whether directly or indirectly.

### **4. Responsibilities**

#### **Managing Director**

- a. Provide commitment and oversight for the ABAC programme within the Group
- b. Approve the a Approve the anti-bribery and corruption Policy
- c. Ensure adequate resources are allocated for implementation
- d. Oversee investigations involving senior management
- e. Implement and enforce the ABAC programme across all departments
- f. Ensure compliance with applicable anti-corruption laws and internal policies
- g. Conduct regular risk assessments and ensure controls are in place
- h. Report ABAC matters to the Board periodically

#### **Operation Manager**

- a. Develop, review, and update the ABAC policy and related procedures.
- b. Conduct training and awareness programmes for employees and stakeholders.
- c. Monitor compliance and perform internal audits on ABAC controls.
- d. Investigate any reported or suspected breaches of the ABAC programme.
- e. Maintain records of all compliance activities and findings.

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### **Head of Department**

- a. Ensure staff under their supervision comply with ABAC policies.
- b. Report any suspicious activities to the Compliance Officer.
- c. Support investigations and corrective actions when breaches occur.

### **Employee**

- a. Understand and comply with the ABAC policy and procedures.
- b. Report any suspected bribery or corruption without fear of retaliation.
- c. Participate in training and awareness activities

## **5. Gifts, Entertainment & Hospitality**

- **Improper Influence:** Employees are prohibited from offering or accepting gifts, entertainment or hospitality that could influence or appear to influence a business decision.
- **Gifts from Synergic to employees and/or their family members in connection with officially recognised internal or external company functions, events, or celebrations** are permitted.
- **Token Gifts:** Token gifts of nominal value (e.g. corporate souvenirs or promotional items) may be accepted with prior approval from management, provided they do not create a conflict of interest.
- **Travel Expenses:** Acceptable of travel or accommodation paid by third parties is only permitted when:
  - It is directly related to legitimate business activities (e.g., site visits, conferences)
  - It has prior written approval from Top Management
  - It complies with the company's anti-bribery and conflict of interest policies

All gifts, entertainment, hospitality and travel offer must be transparently recorded and are subject to internal review.

## **6. Donations and Sponsorships**

- All charitable donations and sponsorships must be complied with the following:
  - Ensure it are allowed by applicable laws.
  - Obtain all necessary internal and external authorisations.
  - Should be directed to well-established entities with a sufficient organisational structure to ensure the proper management of the funds.
  - Be accurately stated in the company's accounting books and records.
  - Such contributions must not be used as a cover for bribery or any other unethical practice.
- All donations and sponsorships require prior approval from the Managing Director. Requests must be supported by an official letter from the external party and documented with a valid proof of receipt.

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### **7. Facilitation Payments**

- **Strict Prohibition:** Synergic strictly prohibits facilitation payments under all normal business circumstances as it. These are typically unofficial, small payments made to secure or expedite routine government actions, such as processing permits, visas, or customs clearances.
- **Zero Tolerance:** Employees must not offer, promise, or make facilitation payments - either directly or indirectly - on behalf of the company, regardless of local customs or expectations. This includes payments through third parties or agents acting on behalf of the company.
- **Exception – Threat to Personal Safety:** The only exception permitted is in situations where a facilitation payment is made solely to protect the personal safety, health, or liberty of an employee or any individual associated with the company. For example, if a payment is demanded under duress or threat of violence during international travel or field operations, and refusal could result in harm, such a payment may be justified.
- **Reporting Requirement:** Any facilitation payment made under these exceptional circumstances must be reported immediately to senior management or the Compliance Officer. A written incident report should be submitted as soon as it is safe and practical to do so, outlining the nature of the threat, the amount paid, the recipient, and the surrounding circumstances.
- **Training and Awareness:** Employees operating in regions where facilitation payments are known to occur will receive specific training to recognize, avoid, and appropriately respond to such demands, including escalation protocols.

### **8. Political Contributions**

To maintain political neutrality and avoid any appearance of undue influence:

- **Prohibition:**
  - Synergic Hallmark does not make political contributions (whether in cash or in kind) to political parties, candidates or political campaigns.
  - Employees, directors and third parties acting on behalf of Synergic Hallmark must not use company funds or resources to make any political donations or contributions, whether directly or indirectly.
- **Personal Capacity:** Employees are free to participate in political activities in their personal capacity, they must do so outside of working hours, at their own expense, and without using the company's name, resources or influence.
- **Transparency and Engagement:** Any lobbying, engagement with government officials, or public policy advocacy must be done transparently, lawfully and with prior written approval from Top Management.

This ensures that the company remains politically neutral and avoids any actual or perceived attempts to gain improper advantage through political influence.

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**9. Due Diligence and Third Parties**

- Due diligence must be carried out on all third parties providing services or acting on behalf of Synergic Hallmark. The purpose is to assess the risk of bribery and corruption and to support decisions on whether to proceed or decline before entering any contract or business deal.
- Due diligence procedures to be applied on the key stakeholders as supplier or agents, customers and specific categories of shortlisted candidate(s) in certain positions

**10. Reporting of Concerns**

- Employees and stakeholder are encouraged to report any suspicion or knowledge of bribery or corruption via:
  - Company website at [www.synergichallmark.com](http://www.synergichallmark.com)
  - mailing to [whistleblowersynergic@gmail.com](mailto:whistleblowersynergic@gmail.com)
- Reports may be submitted anonymously and will be treated with strictly confidentiality.

**11. Training and Communication**

- All employees will receive regular anti-bribery and corruption training.
- This policy will be accessible to all employees and stakeholders and subjected to periodic review and update.

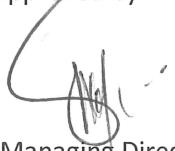
**12. Consequences of Non-Compliance**

- Any employee found in violation of this policy may be subject to disciplinary action, up to and including termination of employment.
- Legal action may also be taken where necessary.

**13. Policy Review**

This policy will be reviewed regularly to ensure it remains effective and aligned with current laws, regulations, and business practices. Any updates or amendments must be submitted for approval by the Managing Director, and all changes will be recorded for version control.

Approved by:



[Managing Director]

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