

ANTI-CORRUPTION COMPLIANCE POLICY

Asia Propel Sdn Bhd (AP) is committed to conducting business ethically and in full compliance with applicable anti-corruption laws. Bribery and all forms of corrupt practices are strictly prohibited. This policy applies to all employees, directors, officers, shareholders, agents, contractors and any third party acting on behalf of the Company.

1. PROHIBITED CONDUCT

- a) Offering or giving anything of value (e.g., money, gifts, travel, meals, entertainment, job offers) to influence decisions or gain improper advantage.
- b) Making payments directly or indirectly to Influential Outside Persons, including government officials, their family members or business associates.
- c) Facilitation or “grease” payments to expedite routine government actions are also banned.

2. GIFTS, ENTERTAINMENT & TRAVEL

- a) Allowed only if modest, customary, transparent and in compliance with applicable laws or policy.
- b) Cash or cash-equivalent gifts are prohibited.

3. USE OF THIRD PARTIES

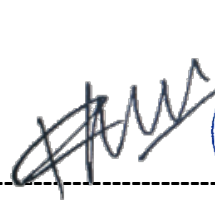
- a) Agents, consultants, JV partners or representatives must not be used to make improper payments.
- b) Written agreements and due diligence are mandatory before engagement.
- c) Payments must reflect fair market value and be properly recorded.

4. REPORTING & COMPLIANCE

- a) Suspected violations must be reported to the Legal or Compliance Department.
- b) Reports may be submitted anonymously via email: mailbox@asiapropel.com
- c) Retaliation against whistleblowers is strictly prohibited.

5. ENFORCEMENT

Violations may result in disciplinary action, including dismissal or termination of third-party contracts and legal prosecution where applicable.



MOHD FAUZI MUSTAFFA
(MANAGING DIRECTOR)

DATE : 19TH July, 2025