

Company Registration No.: 201101014489 (Malaysia)

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TRIDES SDN BHD — Anti-Bribery and Corruption (ABC) Policy

1. Introduction

TRIDES Sdn Bhd ("TRIDES") is committed to conducting its business with the highest standards of integrity, transparency, and accountability. This Anti-Bribery and Corruption (ABC) Policy establishes our commitment to comply with the Malaysian Anti-Corruption Commission (MACC) Act 2009 (including Section 17A) and all relevant anti-bribery and corruption laws applicable to our operations.

This policy supports our ethical business culture and complements our Environmental, Social, and Governance (ESG) principles.

2. Policy Statement

TRIDES adopts a zero-tolerance approach to bribery and corruption. We will not, directly or indirectly, offer, promise, give, request, or accept any form of bribe, facilitation payment, or improper advantage to obtain or retain business, or to influence a business decision.

We are committed to:

- Acting honestly and ethically in all business dealings.
- Preventing bribery and corruption in any form.
- Implementing internal controls and training to detect and prevent bribery.
- Upholding all applicable Malaysian and international anti-corruption laws.

3. Scope

This policy applies to:

 All directors, officers, employees (permanent, contract, or temporary), trainees, and interns of TRIDES. • All business associates including consultants, contractors, resellers, agents, vendors, and third-party representatives acting on behalf of TRIDES.

The policy covers the following:

- Bribes and kickbacks
- Gifts and hospitality
- Facilitation payments
- Political contributions
- Charitable donations and sponsorships

4. Bribes and Improper Payments

Employees and business partners must not:

- Offer, give, or receive any bribe or improper payment, directly or indirectly.
- Solicit, request, or accept any benefit intended to influence a business decision.
- Engage intermediaries or agents to make illegal or unethical payments.

All business transactions must be documented accurately and transparently.

5. Gifts, Hospitality, and Entertainment

TRIDES recognizes that modest gifts or hospitality may be part of business culture. However:

- All gifts or hospitality must be reasonable, transparent, and not intended to influence any business decision.
- The following thresholds apply unless otherwise approved by a Director:
- - Gifts not exceeding RM100 per instance, or RM1,000 per financial year.
- - Hospitality or entertainment not exceeding RM500 per event.
- Cash or cash-equivalent gifts are strictly prohibited.
- Any offer exceeding these limits must be declared to management and recorded in the Gift & Hospitality Register.

6. Facilitation Payments and Kickbacks

TRIDES prohibits any facilitation payments unofficial payments made to secure or expedite routine actions. If unavoidable due to personal safety concerns:

- 1) Keep the payment amount to a minimum.
- 2) Record and report the payment immediately to your Line Manager or Company Secretary.

7. Political Contributions

TRIDES does not make political donations, in cash or kind, to political parties, candidates, or related entities. Employees are free to participate in political activities in their personal capacity, provided such participation does not represent the company or create conflicts of interest.

8. Charitable Contributions

TRIDES supports charitable causes and community programs, provided they are legal, transparent, and not used to conceal bribery. All charitable donations must be:

- Reviewed and approved by Management.
- Properly documented and, where applicable, publicly disclosed.

9. Responsibilities

Every TRIDES employee and business partner must:

- Read, understand, and comply with this policy.
- Report any suspected bribery, corruption, or unethical behavior.
- Avoid any activity that could breach this policy.

Management is responsible for communicating and enforcing this policy, and the Company Secretary oversees monitoring, training, and compliance reporting.

10. Reporting and Whistleblowing

All employees are encouraged to raise concerns or suspicions of bribery in good faith. Reports can be made confidentially to:

- Immediate Supervisor or Line Manager
- Company Secretary (Compliance Office)
- Confidential Whistleblowing Channel (if applicable)

TRIDES will protect any employee who reports concerns in good faith from retaliation or disciplinary action.

11. Record Keeping

- All financial records and supporting documents must accurately reflect transactions.
- Gifts, hospitality, or expenses must be recorded in the relevant register.

• No "off-book" accounts or unrecorded transactions are permitted.

12. Training and Awareness

- All new employees will receive ABC awareness training as part of their induction.
- Annual refresher training will be provided to ensure ongoing understanding and compliance.
- Business associates will be informed of TRIDES's zero-tolerance approach to bribery and corruption.

13. Monitoring and Review

The Company Secretary will periodically review this policy to ensure its effectiveness and compliance with the MACC Act and best practices. TRIDES is committed to continual improvement in maintaining a culture of integrity and accountability.

14. Endorsement

This policy has been approved by the Board of Directors of TRIDES Sdn Bhd and is effective from January 2025.