SUPERCOMNET TECHNOLOGIES BERHAD [199001005958 (197527-H)]
LOT 172, JALAN PKNK 3/8, KAWASAN PERUSAHAAN SUNGAI PETANI,
08000 SUNGAI PETANI, KEDAH DARUL AMAN, MALAYSIA.
TEL: (60-4) 371-9808 (HUNTING LINE) FAX: (60-4) 441-1755

POLICY AND PROCEDURE ON ANTI-BRIBERY AND ANTI-CORRUPTION

1. Introduction

The Company refuses any acts of bribery or corruption that may occur in businesses and transactions in any business units and related companies whether local or overseas. Thus, it has determined to have a policy and procedures on anti-bribery and anti-corruption for compliance. A regular review of the policy and procedure will be made to ensure the policy and procedure are up to date with current changing laws and regulation pertaining to anti-bribery and anti-corruption. All directors and employees of the Supercomnet Technologies Berhad ("STB") and its subsidiaries shall comply with this policy and procedures.

2. Objective

This policy aims for all directors and employees of the Supercomnet Technologies Berhad and its subsidiaries to comply with Anti-Bribery and Anti-Corruption procedures when performing their duties.

3. Scope

3.1 This policy is applicable to the Board of Directors, staff, workers, agent, customers, suppliers, business associates of Supercomnet Technologies Berhad and its subsidiaries and shall be amended from time to time in line with laws and regulatory requirements. All reviews and changes therein must be approved by the Board of Directors before coming into effect.

3.2 Compliance with this policy is regarded as one of the employment conditions for all employees.

4. Definition

4.1 "Bribery & Corruption" means any action which would be considered as an offence of giving or receiving 'gratification' under the Malaysian Anti-Corruption Commission Act (MACCA) 2009.

4.2 "Gratification" is defined in the MACCA to mean the following:

(a) Money, donation & sponsorship, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;

4. Definition (Continued…)

(b) Any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;

(c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;

(d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;

(e) any forbearance to demand any money or money's worth or valuable thing;

(f) any other service or favor of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and

(g) any offer, undertaking or promise, whether conditional or unconditional, of any Gratification within the meaning of any of the preceding paragraphs (a) to (f).

5. Bribery And Corruption

5.1 Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal, unethical or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage and can take the form of gifts, loans, fees rewards or other advantages.

5.2 Corruption is the abuse of entrusted power for private/ personal gain. Bribery and Corruption which may take the form of anything of value, such as money, goods, services, property, privilege, employment position or preferential treatment, and are in all forms prohibited.

6. Gifts and Hospitality

6.1 STB Group does not solicit gifts, hospitality and favours of any value from any person, nor does the Group act in a manner that would place any person in a position where he may feel obligated to make a gift or provide hospitality or a favour to the Group and/or any associated person in order to do business or continue to do business with the Group.

6.2 Employees are generally prohibited from accepting or offering gifts to any third party. Employees may only accept or offer gifts to any third party in the limited exceptions where there is no conflict of interest in accepting or offering the following:

(a) Corporate gifts not exceeding RM200, where the gift is offered for departmental or company-wide, rather than for personal benefit of any individual; or

(b) Perishable items such as food, fruits, festive cookies or other customary festive delicacies offered during festive seasons or official occasions

Any gifts received or offering beyond the above thresholds or categories shall be promptly declared and reported to the respective Head of Department, and escalated to the CEO or Group Managing Director for review and appropriate action. Justification and approval decision to accept or offer gift beyond the allowable threshold should be documented in the Gift Register.

6.3 STB Group adopts a strict "No Cash Gift" policy. Employees and associated persons strictly prohibits the giving or receiving of cash or cash equivalents, including but not limited to cash, bank transfers, vouchers, gift cards, coupons, or any other form readily convertible into cash.

6.4 STB Group advocates the use of good judgement when giving or receiving gifts and hospitality in the course of the Group's business activities, provided it is in compliance with the law and must satisfy all of the following principles:

(a) Right purpose and intention;
(b) Reasonable in value;
(c) Infrequent in nature;
(d) Transparent and documented in the Gift Register;
(e) Must not have the ability to influence or gain improper advantages.

7. Roles, Duties and Responsibilities

7.1 The Board of Directors has a duty and responsibility to formulate a policy and oversee to ensure the Supercomnet Technologies Berhad and its subsidiaries has in place a system to support anti-bribery and anti-corruption.

7.2 The Managing /Executive Directors have a duty and responsibility to ensure the STB Group has in place a system to promote and support an anti-bribery and anti-corruption policy, which shall be communicated to all employees and all relevant parties for compliance as well as to review existing system and procedures to align with the changing business natures, regulation and law requirements.

7.3 All employees must sign on the acknowledgment and compliance form (as attached), which shall be submitted to Human Resources Management Department to assure that every staff member acknowledged, understand and will put the policy into practice.

7.4 The standard operating procedure for the creating, maintaining, reviewing, and employee training on the proper use of the Gift Register shall be overseen by the Human Resources Department and implemented in line with the Policy.

8. Whistle-Blowing on Fraud or Complaints

The Board of Directors has put in place channels to receive report on suspicious fraud incidents or behaviors and encouraged the employees to report such conduct as soon as possible. When the employees and stakeholders believe or suspect that such conduct may violate the Policy or there may be fraud in the future, they can report via the following channels:

Group Managing Director
Name : Hsueh, Chih-Yu
Email : kevin@supercomal.com.my
Telephone : 04-3719808
Fax : 04-4411755
Address : Lot 172,Jalan PKNK 3/8,
Kawasan Perusahaan Sungai Petani,
08000 Sungai Petani, Kedah

Chairman of Audit and Risk Management Committee
Name : Ang Hwui Tee
Email : anghwuitee@gmail.com
Address : Lot 172,Jalan PKNK 3/8,
Kawasan Perusahaan Sungai Petani,
08000 Sungai Petani, Kedah

The whistle-blower shall provide real name and surname, address and phone number or e-mail address as the name of persons or the incident in question to show that the whistle-blowing is made with sincerity, without intention to defame or cause damage to the Group of Supercomnet.

9. Awareness and Communication

9.1 This Policy is a public document and shall be communicated to all directors, employees of the Group, as well as relevant third parties dealing with STB Group.

9.2 All employees of STB Group, regardless of position, shall be made aware of this Policy and are required at all times to understand, comply with, and adhere to the relevant laws, regulations, and requirements set out herein.

9.3 Refresher awareness shall be conducted on a rotational basis to ensure continuous awareness and compliance.

10. Monitoring And Examination

10.1 It is the duty and responsibility of all directors and employees to acknowledge, understand and strictly comply with the Policy. In case of any violation against the Policy , the Company shall proceed with appropriate measures.

10.2 Executives of all levels shall monitor and be responsible to ensure that their subordinates strictly comply with the policy.

10.3 The policy shall be reviewed periodically to update and align to the current legislation and regulation.

Review and updated by the Board on November 20, 2026.

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ANTI-BRIBERY AND ANTI-CORRUPTION POLICY AND PROCEDURE

Acknowledgement and Compliance Form

I acknowledge, understand and strictly comply with the Policy and Procedures on Anti-Bribery and Anti-Corruption.

Signature:

Name:

Position:

Date: