

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

### **1.0 INTRODUCTION**

1.1 Integrity stands as the foundational value and guiding principle governing all decisions and actions within the workplace of Dynamic Navigation Sdn Bhd ("Dynamic"). The Company adheres to elevated ethical standards and maintains a zero-tolerance stance against all manifestations of bribery and corruption.

1.2 Bribery and corruption, as antithetical to business ethics, pose a significant threat to an organization's reputation. Consequently, the Company opposes any practices that disrupt proper business conduct, whether through improper or illegal means.

1.3 This document, the Anti-Bribery and Corruption Policy, serves as a definitive statement delineating the expected conduct of the Company's personnel. This policy extends to encompass third parties engaged in rendering services on behalf of the Company.

### **2.0 OBJECTIVE**

2.1 Dynamic commits unequivocally to compliance with anti-bribery and corruption laws not only within Malaysia but also across all jurisdictions where the Company conducts its operations. This policy uniformly applies to interactions with both commercial ("private sector") and government ("public sector") entities, including their directors, employees, agents, and representatives at all hierarchical levels.

2.2 The objective of this Policy is to provide comprehensive guidance for the Company's personnel and business associates. Its purpose is to enable them to proficiently identify and address issues related to bribery and corruption while fostering awareness of their respective roles and responsibilities.

### **3.0 ACCEPTANCE OF GIFTS, ENTERTAINMENT AND HOSPITALITY**

3.1 Directors and employees, alongside their family members, are mandated to refrain from accepting opulent gifts of significant value in their personal capacity from external entities with whom they share a business relationship or seek to cultivate one.

3.2 Permissible acceptance of gifts on behalf of the Company is subject to stringent conditions, particularly in situations where refusal may give rise to serious offense and jeopardize the existing business relationship. Employees are duty-bound to expeditiously report such instances to their immediate superior or the Chief Executive Officer.

3.3 The occasional acceptance of reasonable and modest entertainment, provided by external entities in the ordinary course of business, is sanctioned as a legitimate means of networking and relationship-building. Directors and employees are enjoined to exercise judicious discretion before acceding to entertainment offered by external parties.

#### 4.0 GIVING OF GIFTS, ENTERTAINMENT AND HOSPITALITY

4.1 Directors and employees must steadfastly refrain from offering extravagant gifts of substantial value to external entities engaged in or potentially pursuing business dealings with Dynamic. Exceptions to this restriction are explicitly outlined in the policy.

4.2 Directors and eligible employees may engage in the entertainment of external parties as a part of business networking, contingent upon compliance with internal limits on entertainment specified within their respective terms of service.

#### 5.0 FACILITATION PAYMENTS

5.1 All Directors, Employees, and Business Associates are categorically prohibited from either giving or receiving facilitation payments, whether directly or through a third party. Facilitation payments encompass unofficial and improper payments or benefits, including those in the form of gifts or entertainment, provided to secure or expedite a routine or necessary action to which the Company is legally entitled.

#### 6.0 DONATIONS AND SPONSORSHIPS

6.1 Charitable contributions or donations made by Dynamic are inherently philanthropic in nature and must never be undertaken with the intent to influence business decisions. Sponsorships, though customary for promoting business reputation and brand, must be executed judiciously to avoid conflicts of interest or implications of bribery. Dynamic maintains a strict stance of non-affiliation with political entities and refrains from making political contributions or sponsoring political events.

## 7.0 COMPLIANCE AND SUPPORT

7.1 Compliance with this Policy is obligatory for all Directors, Employees, and Business Associates. Violations will be addressed strictly by the Company, potentially resulting in disciplinary measures, dismissal, cessation of business relationships, and/or reporting to the appropriate authorities, in alignment with pertinent laws and regulations. This policy is readily accessible via the Company's official website for the perusal of all Directors, Employees, and Business Associates of the Company.