



## SMANDCO GROUP SDN BHD : ANTI-BRIBERY AND CORRUPTION POLICY

**Our Mission:** To uphold integrity, transparency, and accountability by prohibiting all forms of corruption and bribery

**Our Commitment:**

- **Zero Tolerance:** SMANDCO Group strictly prohibits bribery, corruption, facilitation payments, kickbacks, or any unethical practices in all business dealings.
- **Compliance with Laws:** We comply with the Malaysian Anti-Corruption Commission Act 2009 (MACC Act) and all other relevant international anti-bribery standards.
- **Transparency:** All financial transactions, procurement processes, and business dealings must be documented accurately and honestly.
- **Third-Party Integrity:** Vendors, contractors, and partners are expected to adhere to this policy.

**Reporting Process:**

- **Immediate Reporting:** Employees must report any suspected or actual incidents of bribery or corruption to their supervisor, HR, or via the confidential reporting channel (whistleblowing line/email).
- **Confidentiality & Protection:** All reports will be treated confidentially. Whistleblowers are protected from retaliation.
- **Investigation:** A formal investigation will be conducted promptly, with findings documented and corrective actions taken.

**Responsibilities:**

- **Employees:** Avoid and refuse any act of bribery, gifts, or undue influence. Report suspicions immediately.
- **Management:** Lead by example, ensure awareness training, and enforce strict disciplinary action for violations.
- **Company:** Regularly review, audit, and strengthen anti-bribery controls.

**Commitment to Excellence:**

We are dedicated to conducting business with integrity and honesty. Any violation of this policy will result in disciplinary action, including termination and possible legal consequences.

Managing Director

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Name: S.M HAFIZAN BIN SK. AHMAD

Date: 04/01/2021



## SMANDCO GROUP SDN BHD : HUMAN RIGHTS POLICY

**Our Mission:** To respect, protect, and promote human rights for all employees, stakeholders, and communities in line with the Universal Declaration of Human Rights and Malaysian law.

### **Our Commitment:**

- **Dignity & Respect:** Every individual will be treated fairly, with dignity and respect, regardless of race, gender, religion, age, or background.
- **Safe & Healthy Workplace:** We are committed to a workplace free from harassment, discrimination, forced labor, and child labor.
- **Fair Employment:** Recruitment, promotion, and employment practices are based on merit, equal opportunity, and non-discrimination.
- **Freedom of Association:** Employees have the right to join or not join lawful associations or unions without fear of retaliation.
- **Working Hours & Wages:** Employees will receive fair wages and working hours in compliance with applicable laws and industry standards.
- **Community & Environment:** We respect the rights of local communities and aim to operate in a socially responsible and environmentally sustainable manner.

### **Implementation:**

- **Awareness & Training:** All employees will be informed and trained on human rights principles.
- **Grievance Mechanism:** Employees may raise concerns through HR or confidential reporting channels. Complaints will be addressed promptly and fairly.
- **Continuous Monitoring:** Regular audits and reviews will ensure compliance with human rights obligations.

### **Commitment to Excellence:**

SMANDCO Group Sdn Bhd is committed to building a culture of respect and equality, ensuring that human rights are safeguarded in all aspects of our operations.

Managing Director

A handwritten signature in black ink, appearing to read 'S.M. Haeizan Bin Sk. Ahmad', written over a dotted line.

Name: S.M HAEIZAN BIN SK. AHMAD

Date: 04/01/2021