



ANTI-BRIBERY & CORRUPTION POLICY

IN THE CONTENT HEREOF WITHOUT OBLIGATION OF FATHOPES ENERGY TO NOTIFY ANY PERSON OF SUCH REVISION OR CHANGES.

1. POLICY STATEMENT

1.1 We do not condone any form of bribery and corruption. Our policy is to conduct all our business activities in an honest, transparent and ethical manner, wherever we do business.

1.2 We will uphold all laws and regulations including anti-bribery and corruption laws, in all the jurisdictions we operate.

2. SCOPE

2.1 This policy applies to the Company, all Employees and relevant Third Parties of the Company, wherever the Company operates and includes activities in the public and private sector

2.2 If the laws and regulations in the countries we operate are stricter than what had been stated in this policy, the stricter laws and regulation must be followed.

2.3 This policy should be read in conjunction with the Company's Code of Business Conduct. If you have any questions or need clarifications, consult a Head of Department, a Board of Directors or a member of the COBC Committee.

3. DEFINITIONS

Agent: A non-employee who is a business partner or an intermediary, who acts for the Company by performing services on behalf of the Company including but not limited to negotiating with Third Parties, obtaining customs clearance or facilitating new market entry.

Bribery/Corruption: Bribery/Corruption is the receiving or offering of undue reward or anything of value to secure an advantage to which the Company or Employee is not entitled. It does not matter if it is done directly or through a third party. Anything of value can include gifts, hospitality or favors such as an employment offer for a relative of the person being bribed.

Company: FatHopes Energy Sdn Bhd, all subsidiaries and affiliated companies.



Charitable Contribution: A charitable contribution is a voluntary contribution to a non-profit organization to support a cause to benefit the public. The voluntary contribution can be in the form of monetary or non-monetary gifts or services. Membership fees to professional associations or sponsorships of events that serve business interests are not necessarily considered charitable contribution.

Employee: For the purposes of this policy, employee refers to all level and category of employees (permanent, temporary, contract) including the directors. It does not matter where the employee is located.

Facilitation Payments: Facilitation payments are small bribes to public officials with a view of speeding up routine governmental transactions to which the pay or is already entitled.

Gifts & Entertainment: Gifts, meals, entertainment, travel including invites to social functions and sporting events.

Kickback: A Kickback arises when suppliers, service providers or other third parties the Company does business with, pay part of their fees to the individuals who gives them the contract or some other business advantage.

Public Official: Includes all level of government employees or officials, employees of state-owned enterprises including enterprises which are authorized by a public body or a state-owned enterprise to provide public functions.

Sponsorship: Sponsorship is a type of advertising where the Company partners with external organizations to be associated with a specific event, research, training or other community events for mutual benefits through an exchange of monetary or non-monetary means.

Third Party: Any individual or organization that the Company or the employees interact with while carrying out their business activities. This can include current and potential customers, suppliers, business contacts, competitors, intermediaries (distributors, consultants, sales representatives, implementation partners, sales partners), government and public agencies, including their advisors and representatives, politicians and political parties.



4. POLICY

4.1 Bribes and Kickbacks

The Company will not engage in any acts of bribery and corruption, directly or indirectly. The Company prohibits its employees from paying to or receiving bribes and/or kickbacks from any third parties the Company does business with.

The following are a few examples which could be construed as bribes if given or received with the intention to induce or reward the recipient for improper performance:

- Cash, gift, loan, fee, reward, commission, property, sponsorship
- Any contract or employment opportunity
- Any payment, waiver of payment, liquidation of any loan/obligation/liability
- Any other services, favors (including sexual favors)

4.2 Facilitation Payments

The Company will not make any facilitation payments even if it is a local custom to make such payments. The Company understands that not paying facilitation payments could delay its business activities.

Details of any request and/or demands for facilitation payments must be reported by employees to their managers as soon as possible.

4.3 Gifts & Entertainment

In general, the Company prohibits gifting and entertainment (giving and receiving) to or from Third Parties.

The Company understands that at times it may be customary to give or disrespectful to decline and if in such a situation, employees may only give or receive gifts and entertainment which are nominal in value and the occasions should not be frequent. Examples of gifts and entertainment of nominal value include pens, calendars, mugs, hats (with company's corporate logo), fruits and cookies etc, which are not expensive or lavish. Importantly, gifts given or received should not be cash or cash equivalent (such as gifts certificates, vouchers, or gift cards).

However, if it involves public officials, it poses higher risks. Employees should take extra care by clarifying with the agency or government office that their rules allow them to receive the gifts and/or entertainment and get written approval from a Board of Directors.



If an employee receives an expensive gift, such as a fruit/food hamper, or an expensive box of chocolates or any other expensive gifts, these have to be handed over to one of the Board of Directors, who will decide on the next course of action. If the employee had received an expensive entertainment, for example, a lavish dinner, which the employee was not in a position to decline, the employee has to disclose it to one of the Board of Directors as soon as possible (not later than 7 working days).

4.4 Charitable Contributions and Sponsorship

The Company, being a good corporate citizen, may provide charitable contributions to legitimate charities or sponsor sports or cultural events. Prior to committing to such charitable contributions and sponsorships, the Company will conduct proper due diligence on the recipients to verify legitimacy. In addition, all arrangements between the Company and the parties need to be transparent and documented.

4.5 Political Contributions

The Company may participate in lawful political activities and contribute to political parties in accordance with limits set by government legislations. However, the Company prohibits financial support to individual politicians which may be perceived as a bribe to gain an improper business advantage.

Employees may participate in lawful political activities of their choice and contribute to political parties on a personal basis but must not represent the Company or give the impression that they are acting on behalf of the Company, without the written approval of the CEO or another Board of Directors.

4.6 Third Parties

The Company expects its Agents and Third Parties to follow the principles of this policy.

Due diligence needs to be conducted on the Agents and Third Parties prior to them providing services. Fees and commissions agreed need to be commensurate with the legitimate services the Agents and Third Parties are expected to provide. In addition, the selection and engagement process of Agents and Third Parties must be transparent with proper approval process and fully documented.

It will be the responsibility of the employee engaging the Agent or Third Party to share the relevant sections of this policy, brief them on the Company's Anti-Bribery & Corruption standards and get the Agents and Third Parties to give in writing their commitment to abide by the policy.



4.7 Keeping Proper Books & Records

The Company and employees should record all financial transactions according to the Company's financial and internal control policies and procedures.

Payments and other compensation such as commissions, service or consulting fees, expenditures for gifts, hospitality and other promotional activities to third parties must be accurately recorded providing details in the Company's accounts.

False, misleading, incomplete, inaccurate or artificial entries in accounts of the Company are prohibited.

Employees are not to use their personal funds to accomplish what is prohibited by this Policy.

4.8 Procedure for Reporting Concerns

It is all employees' responsibility to prevent, detect and report any form of bribery and corruption involving the Company. You must notify your manager, a Head of Department, a Board of Director or report to the Code of Business Conduct (COBC) Helpline via phone +6012 783 2732 or email (speakup@fathopesenergy.com) as soon as possible if you are offered a bribe, are asked to make a bribery payment or expected to make a payment in the future.

If employees ignore any bribery and corruption activities which come to their attention, under certain circumstance, the Company and the Employee involved could be fined and even imprisoned under anti-bribery and corruption laws.

All reports received of suspicious conduct will be treated in confidence. The Company prohibits any retribution or retaliation against any employee who in good faith reports any violation of this policy.

4.9 Monitoring

The Company will establish a system through reviews and audits to monitor that all employees comply with this policy together with the Code of Business Conduct.

5. NO EXCEPTIONS

Failure to comply with this policy or the Code of Business Conduct can have serious consequences such as disciplinary action leading to termination of employment and legal actions.

