



AFI ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Statement

Bribery involves offering, promising, giving, providing, accepting, or soliciting an advantage as an inducement for action, or to gain any commercial, contractual, regulatory, or personal benefit. It may be illegal and is certainly a breach of trust.

Our policy is to conduct all business in an honest and ethical manner. We adopt a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships, wherever we operate. We also strive to implement and enforce effective systems to prevent bribery and corruption.

We will uphold all laws relevant to combating bribery and corruption in every jurisdiction where we operate. Nonetheless, we remain bound by Malaysian law in relation to our conduct, both domestically and internationally.

Reporting Concerns, Including Whistleblowing

All employees and individuals associated with the Company are encouraged to report any concerns they may have regarding potential breaches of this policy, including incidents involving external agencies and third parties. This also includes any instances where you may be the target of an attempted bribe.

The Company is fully committed to providing a safe and confidential way to report any suspected wrongdoing, either through PeopleTray or to the designated Officer. The Company's Whistleblowing Policy, which is available, outlines the procedures to be followed in such cases. AFI also allows employees, and anyone contractually associated with the Company to raise concerns about malpractice within the organization.

Training & Declaration

The Company will provide training on this policy as part of the induction process for all new employees. In addition, employees will receive regular and relevant training or updates on how to comply with this policy and will be required to formally acknowledge their commitment to it.

The Company's anti-bribery and anti-corruption policy, along with its zero-tolerance stance, will be clearly communicated to all suppliers, contractors, business partners, and third parties at the outset of any business relationship. This will be reinforced as appropriate through the signed declaration in the AFI Integrity Pack.

Compliance and Audit

All employees and partners of AFI are required to read, understand, and comply with this policy. The prevention, detection, and reporting of bribery and other forms of corruption are



the responsibility of everyone working for, under the control of, or connected to AFI. You must avoid any activity that could lead to, or appear to suggest, a breach of this policy.

Employees must promptly notify or report to their manager if they believe or suspect that a breach of, or conflict with, this policy has occurred or may occur—whether through bribery or any other form of malpractice.

Any employee who breaches this policy will be subject to disciplinary action, which may include dismissal. We reserve the right to terminate our contractual relationship with any individual or party who breaches this policy. Additionally, a breach may result in significant fines or imprisonment for the individual or third party, and/or the termination of a contract with any third party involved.

The Board of the Company, or any committee or individual authorized by the Board for this purpose, shall determine the appropriate actions to be taken in response to violations of this policy, including the conduct of internal audits to ensure compliance.

Any individual who breaches this policy shall indemnify AFI against all claims, actions, damages, losses, liabilities, and costs—including reasonable legal fees—that may be incurred or suffered by AFI because of their non-compliance with this policy.

In the event of an employee's dismissal or the termination of a contractual relationship with any third party due to a breach of this policy, no further payments shall be made by the Company from the date of such dismissal or termination, except for any amounts that had already accrued up to that point.

Furthermore, if an employee wilfully ignores or turns a blind eye to evidence of bribery or corruption within their department or surroundings, they will be deemed complicit in the act. As such, the same disciplinary action will apply to them as if they had directly and intentionally participated in the misconduct.



John Mervyn Baxter
General Manager

16 December 2024