

INNOVEAM SDN BHD

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	ANTI-BRIBERY AND ANTI-CORRUPTION (ABAC) POLICY	Issue Date	2026-07-17
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Policy

ANTI-BRIBERY AND ANTI-CORRUPTION (ABAC) POLICY

Document Level 1

Approved By	Date
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Reviewed By	Date
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REVISION HISTORY

NO	SECTION	REVISION PARTICULAR	ISSUE	REV	AUTHOR	EFF. DATE
1	ALL	Template updated	1	A	Amir Hidayat Hamzah	17-07-2026

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ANTI-BRIBERY AND ANTI-CORRUPTION (ABAC) POLICY

Innoveam Sdn. Bhd. is committed to conducting its business with integrity, transparency, accountability, and the highest standards of ethical business conduct. We adopt a zero-tolerance approach towards bribery and corruption in all forms and are committed to complying with the Malaysian Anti-Corruption Commission Act 2009 (MACC Act 2009), all applicable legal and regulatory requirements, and any other obligations subscribed to by the Company.

Innoveam recognises that an effective Anti-Bribery and Anti-Corruption (ABAC) framework protects our employees, clients, business partners, and the Company's reputation. We are committed to establishing, implementing, maintaining, and continually improving appropriate anti-bribery controls throughout our business operations.

1. Zero Tolerance

Innoveam maintains zero tolerance towards bribery and corruption.

The Company prohibits any employee, director, representative, contractor, consultant, or any person acting on behalf of Innoveam from directly or indirectly offering, promising, giving, requesting, soliciting, or accepting any form of bribery, facilitation payment, kickback, or other improper advantage.

All business decisions shall be conducted fairly, objectively, transparently, and free from improper influence.

2. Business Conduct Commitments

Innoveam is committed to:

- a) Conducting all business dealings honestly, ethically, and professionally.
- b) Preventing bribery and corruption throughout its business activities and relationships.
- c) Managing conflicts of interest in an open and transparent manner.
- d) Ensuring gifts, hospitality, sponsorships, donations, and business courtesies are appropriate, lawful, reasonable, transparent, and do not improperly influence business decisions.
- e) Encouraging business partners and third parties acting on behalf of the Company to uphold ethical business practices consistent with this policy.
- f) Promoting a culture of integrity, transparency, accountability and ethical decision-making throughout the Company.

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3. Compliance And Continual Improvement

Innoveam is committed to:

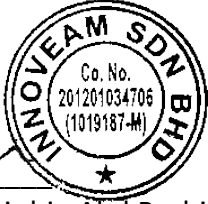
- Complying with all applicable anti-bribery legislation, regulatory requirements, and contractual obligations.
- Maintaining documented legal compliance obligations and conducting bribery risk assessments that are reviewed periodically and whenever significant business changes occur.
- Encouraging employees and relevant interested parties to report suspected bribery, corruption, unethical conduct, or conflicts of interest without fear of retaliation.
- Investigating reported concerns appropriately while maintaining confidentiality where practicable.
- Providing periodic awareness and communication programmes to promote ethical business conduct.
- Continually improving the effectiveness of the Company's Anti-Bribery and Anti-Corruption framework through management review, legal compliance monitoring, risk assessments, employee awareness, and corrective actions where appropriate.
- Taking appropriate disciplinary action for any violation of this policy in accordance with the Company's disciplinary procedures and referring matters to the relevant enforcement authorities where required by law.

4. Leadership Commitment

The Managing Director, Management Team, Department Heads, and every employee share the responsibility of supporting this policy and promoting an ethical culture throughout the Company.

Innoveam expects every employee and person acting on behalf of the Company to comply with this policy and contribute towards maintaining a workplace that is free from bribery and corruption.

This policy forms part of Innoveam's Integrated Management System (IMS) and shall be communicated to all employees and made available to relevant interested parties, where appropriate. The policy shall be reviewed periodically to ensure its continuing suitability, adequacy, and effectiveness.



Muhammad Zamir bin Abd Rashid
Managing Director
Innoveam Sdn Bhd