

Ocean Fresh Berhad

(Registration No. 202301019041 (1512963-A))

1. Introduction

- 1.1 Ocean Fresh Berhad and its group of companies (“Group”) observes and upholds a zero-tolerance position on bribery and corruption and is committed to implement guidelines and enforcing systems to ensure that corruption and bribery are prevented and avoided at all levels of the Group’s daily operations. This position is to reflect our core values of integrity and ethics where we practise transparency and governance in our business dealings and relationships with third parties and acting with professionalism and sound business management.
- 1.2 This Anti-Bribery and Anti-Corruption Policy of the Group (“the Policy”) exists to set out the responsibilities of the Group and those who have business dealings/relationships with the Group in observing and upholding our zero-tolerance policy on corruption and bribery.
- 1.3 It acts as a source of information and guidance for all third parties and is intended to help them to recognize and deal with bribery and corruption issues as well as understand their responsibilities in this context.

2. Scope

The Policy is applicable at all times to all Third Parties as defined in item C in Clause 3 (Definitions) for any business-related activity, whether formally and informally.

3. Definitions

- A. “**Bribery**” means bribe or corruption that occurs when one person gives, offers, pays, seeks or accepts a payment, gift, favour or a financial or other advantage from another to influence a business outcome improperly, to induce or reward improper conduct or to gain any commercial, contractual, regulatory or personal advantage. It can be direct or indirect form of bribery through Third Parties.
- B. “**Donation**” means a voluntary contribution in the form of monetary or non-monetary gifts to a fund or cause for which no return service or payment is expected or made. Contributions to industry associations or fees for memberships in organisations that serve business interests are not necessarily considered Donations.
- C. “**Third Parties**” means and includes any individual or organisation performing work or services for or on behalf of the Group, who (including but is not limited to) our suppliers, consultants, vendors, service providers, contractors, sub-contractors, real estate agents, external lawyers/solicitors, trainees, seconded staff from external parties, interns, agents, sponsors, business partners or any other person associated with us as well as Public Officials.
- D. “**Sponsorship**” means partnering with external organisations to deliver mutual benefits through an exchange of monies, products, services, content or other intellectual property.
- E. “**Facilitation Payments**” means a form of Bribery in which payments of “anything of value” are made with the purpose of expediting or facilitating the performance by a Public Official or a person with a certifying function of a routine governmental action to obtain or retain business

or any other undue advantage. Facilitation payments are typically demanded by low level and low-income Public Officials in exchange for providing services to which one is legally entitled without such payments.

- F. **“Gifts, Invitations & Hospitality”** means invitations that are given or received in relation to social functions, sporting events, meals and entertainment, gifts or customary tokens of appreciation.
- G. **“Kickback”** means a bribe to obtain an undue advantage, where a portion of the undue advantage is 'kicked backed' to the person who gave, or is supposed to give, the undue advantage.
- H. **“Public Officials”** means officials or employees of any government or other public body, agency or legal entity, at any level, including officers or employees of state-owned enterprises and officers or employees of enterprises which are mandated by a public body or a state-owned enterprise to administrate public functions.

4. Responsibilities

- 4.1 All business associates and third parties doing business with the Group are required to adhere to this Policy.
- 4.2 The following levels in the Group are designated and expected to ensure that the Policy is implemented and carried out across the organisation:
 - (i) Human Resource Department: Policy Owner
 - (ii) Risk Management: Monitors the activities of all employees in terms of policy compliance.

5. Policy

- 5.1 Due diligence in order to ensure the Group is undertaking business with third parties that share the same standard of integrity and ethical business practice as the Group, we would need to perform the following but not limited to:
 - (i) Perform due diligence and assess the prospective third parties' reputation and qualifications with the focus on its integrity prior to entering into a business dealing with the said Third Party.
 - (ii) Due diligence may be conducted in numerous ways, including but not limited to:
 - (a) Document verification
 - (b) Background check
 - (c) Online / Web search
 - (d) Interview
 - (e) Questionnaire
 - (f) Screening tools such as CCRIS and CTOS
 - (g) Government and/or Judicial database
 - (iii) Item ii (a) to (g) – Due diligence to be performed by respective department person in-charge that deal with Third Party.
- 5.2 All Third Parties must be made aware of and agree to comply with the Anti-Corruption laws and the Policy. They shall sign the Integrity Declaration Form to confirm their acceptance and agreement to the Policy.

5.3 Frequency of conducting due-diligence may occur in the following events:- (i) Prior to first time engagement and/or project commencement and/or employment (ii) Renewal of contracts (iii) Performance evaluation (iv) Incidents of misconduct and (v) Changes in circumstances.

5.4 Prior to appointment by the Group, Third Parties must filli up the Group’s Integrity Declaration Form

6. Facilitation Payment and Kickbacks

6.1 The Group prohibits the giving of Facilitation Payments. We do not make and will not accept Facilitation Payments or Kickbacks of any kind anywhere in the world.

6.2 Where the Facilitation Payment is being extorted or the Third Party is being coerced to pay it, it must be reported to the Group as soon as possible.

6.3 Any Third Party with any suspicion, concern or query regarding a Facilitation Payment made on the Group’s behalf or involve improper business practices, shall immediately report the matter to the Group using the channel prescribed in Clause 7 below.

7. Reporting on Concern or Whistleblowing

7.1 Any party who encounters actual or suspected violation of this Policy is required to report their concerns using the channel below:

Email Hotline:	armcchairman@oceanfresh.com.my
Hotline:	09-534 3888 (from Monday to Friday, excluding public holidays)

7.2 The Group has in place a whistleblowing policy which encourages employees to report any violation of this Policy, concerns of malpractice and/or criminal offence (including bribery and corruption related activities) through independent and neutral channels without fear of recrimination. The identity of the employee and the content of such report will be held in confidence. Employees may opt to make such reports anonymously in accordance with the procedures of the Group’s Whistleblowing Procedures

8. Protection

Third Parties who refuse to take part in bribery, or report in good faith under this Policy their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future will be protected from detrimental treatment (Detrimental treatment includes cancellation of the contract awarded by the Group) and retaliation.

Approved and adopted by the Board of Directors on 27 October 2023.