

ANTI-BRIBERY AND CORRUPTION NOTICE

1. Introduction

Bluesify Solutions Sdn. Bhd. (**'Bluesify'**) is committed to conducting business dealings with integrity. This means avoiding practices of bribery and corruption in all forms of Bluesify's daily operations. Bluesify has adopted a zero-tolerance approach against all forms of bribery and corruption and takes a strong stance against such acts. Compliance with this Anti-Bribery and Corruption Notice (the **'Notice'**) is mandatory and will be monitored with a principle-based approach.

This Notice shall be read together with the Anti-Bribery and Corruption Policy (the **'Policy'**), which provides comprehensive details on Bluesify's commitment to combating bribery and corruption. This Notice serves as a summarized version of the Policy, highlighting key points for ease of reference. In the event of any discrepancy or need for further guidance, the provisions of the Policy shall prevail.

2. Objective

This Notice is intended to:

- 2.1. set out the obligations of Bluesify and all parties working for/with/on behalf of Bluesify in observing and upholding our anti-bribery and corruption commitment which is an integral part of our business ethics and Bluesify's respective Code of Conduct;
- 2.2. set out guidance to all parties in detecting potential bribery and corruption activities and to curb bribery and corruption practices;
- 2.3. to ensure all Bluesify's directors and employees discharge their duties in an ethical, responsible, transparent and efficient manner and free from corruption; and
- 2.4. to promote better corporate governance, culture and ethical behaviour amongst Bluesify's directors and employees.

3. Background

This Notice is issued pursuant to sub-section (5) of section 17A of the Malaysian Anti-Corruption Act 2009 (Act 694) (**"MACC Act 2009"**), as stated in the Malaysian Anti-Corruption Commission (Amendment) Act 2018 (**"Amendment Act 2018"**). The provision of section 17A Amendment Act 2018 establishes the principle of a criminal liability (corporate liability) for the corrupt practices of its directors, employees and/ or any person(s) associated with the organisation in cases where such corrupt practices are carried out for the organisation's benefit or advantage.

The nature of Bluesify's business requires its directors and employees to engage in business with a wide range of parties/stakeholders, inclusive of internal and external parties. Bluesify's directors and employees shall uphold a high level of personal and professional values in all business interactions and decisions. This Notice establishes the boundaries on interactions with all parties.

4. Application

This Notice is intended to apply to:

4.1. Bluesify’s directors and employees; and

4.2. Bluesify’s Business Associates (anyone whom Bluesify has or intends to have business relationship or in any way associated with Bluesify including but not limited to vendors, suppliers, contractors, sub-contractors, agents, and customers).

5. Anti-Bribery and Corruption Notice

Zero-tolerance	Bluesify upholds a zero-tolerance approach, therefore, all forms of bribery and corruption is prohibited. In addition to bribery, Bluesify directors and employees must not participate in any corrupt activity, such as extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.
Forms of Bribery and Corruption	Bribery and corruption may take in the form of exchange of money, goods, services, property, privilege, employment position or preferential treatment. Bluesify directors and employees shall not therefore, whether directly or indirectly, offer, give, receive or solicit any item of value, in the attempt to illicitly influence the decisions or actions of a person in a position of trust within an organization, either for the intended benefit of Bluesify or the persons involved in the transaction.
Integrity First	Bluesify recognises the value of integrity in its directors and employees. Bluesify’s recruitment, training, performance evaluation, remuneration, recognition and promotion for all employees, shall be designed to recognise integrity. No Employee will suffer demotion, penalty or other adverse consequences for refusing to pay or receive bribes or other illicit behaviour, even if such refusal may result in Bluesify losing business or experiencing a delay in business operations.
Merit-Based	Bluesify awards contracts, if any, and employment purely based on merits. Support letters in all forms shall not be recognised as part of the business decision making process.
Compliance to Laws and Regulations	All Bluesify directors and employees are responsible in ensuring that they always comply with all laws and regulations, in particular, to the MACC Act 2009. No excuses or exceptions will be acceptable for non-compliance of any domiciled laws and regulations where Bluesify conducts its businesses.
Applicability	This Notice applies equally to its business dealings with commercial (private sector) and government (public sector) entities, and includes interactions with their directors, personnel, employees, agents and other appointed representatives. Even the possible appearance of bribery or corruption is to be avoided.

6. Violation of this Notice

6.1. Any violation of this Notice by Bluesify’s directors or employees will attract serious repercussions and disciplinary action after due inquiry.

6.2. Bluesify directors or employees who are found to have assisted or facilitated the violation of this Notice, whether actively or by way of negligence or omission, will also be deemed to have violated the ABC Notice and committed a misconduct.

6.3. Bluesify reserves the right to take actions against its directors or employees who violate this Notice, which includes the following actions:

- (a) dismissal;
- (b) legal action;
- (c) Bluesify filing a police report; and/or
- (d) Bluesify filing a report to MACC.

7. Reporting of Notice Violations

7.1 Suitable reporting channels are established and maintained for receiving information regarding violations of this notice, and other matters of integrity, provided in good faith by Bluesify's Employees and/or Business Associates.

7.2 Employees and/or Business Associates who, in the course of their activities relating to their employment at Bluesify, encounter actual or suspected violations of this notice are required to report their concerns using the reporting channels as provided in the official Bluesify website.

8. Record Keeping

8.1 Bluesify must keep all financial records and have appropriate internal controls in place which will evidence, substantiate and justify that business reason for making payments to, and receiving payments from third parties.

8.2 All documents, accounts and records relating to dealings with third parties, such as customers, suppliers and business contracts, should be prepared and maintained with strict accuracy and completeness. No accounts should be kept "off-book" to facilitate or conceal improper payments.

9. Directors' and Employees' Declaration

9.1. Bluesify's directors and employees (existing/new recruits) shall undergo training and complete assessment on this Notice and the Policy. It is mandatory for all of the Company Directors and Employees to periodically declare strict compliance of this Notice and the Policy in the course of their employment/service.

9.2. All directors and employees shall declare in writing that they have read, understood and will abide by this Notice and any applicable laws and regulations specifically in relation to anti-bribery and corruption. A copy of this declaration shall be documented and retained in the records of the Company.

10. Monitoring and Compliance

10.1 Where there is any uncertainty for any practices which relate to this Notice, Employees must seek the advice of their immediate supervisor. Where there is still uncertainty, they should direct their concerns to the Legal and Governance Department or the board of directors of Bluesify.

10.2 Bluesify is cognizant of the importance to combat bribery and corruption and is resolute to continually enhance and review this Notice at least once every three years or when required by the law to ensure it continues to remain relevant, appropriate and effective.