MEDIASMART RESOURCES SDN BHD

ANTI-BRIBERY AND CORRUPTION POLICY / POLISI ANTIRASUAH DAN ANTISOGOKAN

PEMBERITAHUAN PENTING / IMPORTANT NOTICE

Dokumen ini menetapkan Polisi Antirasuah dan Antisogokan (ABC Policy) rasmi bagi Mediasmart Resources Sdn Bhd. Pematuhan terhadap polisi ini adalah wajib bagi semua pengarah, pekerja, rakan perniagaan, dan pembekal.

This document outlines the official Anti-Bribery and Corruption Policy for Mediasmart Resources Sdn Bhd. Compliance is strictly mandatory for all directors, employees, business partners, and suppliers.

SECTION 1: ANTI-BRIBERY AND CORRUPTION POLICY (ENGLISH)

1.1 Policy Statement

Mediasmart Resources Sdn Bhd ("MSR" or "the Company") is fully committed to upholding the highest standards of integrity, transparency, and ethical conduct across all business operations. MSR enforces a strict zero-tolerance policy towards bribery, corruption, extortion, and unlawful gratification in any form. This policy aligns with the requirements of the Malaysian Anti-Corruption Commission (MACC) Act 2009 (including Section 17A Corporate Liability amendments) and applicable international standards.

1.2 Zero-Tolerance Principles & Key Rules

- **Strict Prohibition of Bribes & Kickbacks:** Directors, employees, and representatives shall not directly or indirectly offer, promise, give, solicit, or accept bribes, kickbacks, or facilitation payments to/from any public official, customer, vendor, or third party.
- **Strict 'No Gift' Policy:** MSR operates a strict 'No Gift' policy. Employees must not accept or offer personal gifts, lavish hospitality, or monetary tokens that could impair objective business judgment or create perceived conflicts of interest.
- **Immediate Rejection & Reporting:** Any solicitation, demand, or offer of an illegal payment or favor must be rejected immediately and formally documented and reported to MSR Management.
- **Protection of Corporate Standing:** All transactions, invoicing, and commercial arrangements must reflect true arms-length dealings and complete factual accuracy to protect MSR's reputation.

1.3 Governance, Applicability & Whistleblowing

- **Scope & Enforcement:** This policy applies to all MSR personnel (permanent, contract, and temporary), directors, contractors, consultants, and third parties acting for or on behalf of MSR.
- **Consequences of Non-Compliance:** Failure to comply constitutes severe misconduct, leading to internal disciplinary action up to summary dismissal, termination of business contracts, civil claims, and immediate referral to law enforcement agencies.
- **Whistleblowing Channel:** MSR guarantees protection and strict confidentiality for any individual reporting suspected bribery or corruption in good faith.

BAHAGIAN 2: POLISI ANTIRASUAH DAN ANTISOGOKAN (BAHASA MALAYSIA)

2.1 Pernyataan Polisi Syarikat

Mediasmart Resources Sdn Bhd ("MSR" atau "Syarikat") berikrar untuk mempertahankan tahap integriti, ketelusan, dan tingkah laku etika tertinggi dalam seluruh operasi perniagaan kami. MSR menguatkuasakan pendekatan toleransi sifar (zero-tolerance) yang tegas terhadap sebarang bentuk rasuah, sogokan, pemerasan, dan pemberian imbalan tidak sah. Polisi ini direka berasaskan peruntukan Seksyen 17A Akta Suruhanjaya Pencegahan Rasuah Malaysia (SPRM) 2009 (Pindaan 2018) serta garis panduan tatacara mencukupi (Adequate Procedures).

2.2 Prinsip Utama & Larangan Mutlak

- **Larangan Mutlak Rasuah & Sogokan:** Semua pengarah, warga kerja, dan wakil syarikat dilarang sama sekali menawar, menjanjikan, memberi, meminta, atau menerima rasuah, komisen penyelewengan (kickbacks), atau pembayaran fasilitasi secara langsung mahupun tidak langsung.
- **Polisi 'Tanpa Hadiah' (No Gift Policy):** MSR menguatkuasakan Polisi 'Tanpa Hadiah' yang ketat. Warga kerja dilarang menerima atau menawarkan hadiah peribadi, keraian melampau, atau cenderamata berharga yang boleh mempengaruhi pertimbangan perniagaan secara saksama.
- **Penolakan Serta-merta & Pelaporan:** Sebarang desakan, permintaan, atau tawaran rasuah hendaklah ditolak serta-merta dan dilaporkan dengan segera kepada pihak Pengurusan MSR.
- **Perlindungan Reputasi Syarikat:** Semua urus niaga, invois, dan perjanjian perniagaan hendaklah dilaksanakan secara telus, sah, dan jujur demi memelihara reputasi dan kelangsungan MSR.

2.3 Tadbir Urus, Skop Pemakaian & Saluran Pelaporan

- **Skop Pemakaian:** Polisi ini terpakai kepada seluruh warga kerja MSR (tetap, kontrak, sementara), ahli lembaga pengarah, pembekal, perunding, dan pihak ketiga yang bertindak bagi pihak Syarikat.
- **Implikasi Pelanggaran:** Sebarang pelanggaran polisi ini merupakan salah laku berat yang boleh mengakibatkan tindakan tatatertib sehingga penamatan perkhidmatan/kontrak, tuntutan sivil, serta tindakan undang-undang di bawah Akta SPRM 2009.
- **Talian Pelaporan Sulit (Whistleblowing):** MSR menjamin kerahsiaan penuh dan perlindungan daripada tindakan balas bagi mana-mana pihak yang membuat laporan berhubung syak wasangka rasuah secara jujur.

BAHAGIAN 3: PENGESAHAN & KELULUSAN PENGURUSAN / MANAGEMENT ENDORSEMENT

Polisi Antirasuah dan Antisogokan ini telah diluluskan dan diguna pakai secara rasmi oleh Lembaga Pengarah dan Pengurusan Mediasmart Resources Sdn Bhd.

This Anti-Bribery and Corruption Policy has been officially approved and adopted by the Board of Directors and Management of Mediasmart Resources Sdn Bhd.