



ISEC SDN. BHD. AND SUBSIDIARIES' ANTI-BRIBERY AND CORRUPTION COMMITMENT

ISEC Sdn. Bhd. and subsidiaries (hereinafter "the Group") has established an Anti-Bribery and Corruption Policy ("the Policy"). The policy has been designed to align with the requirements set out in Prime Minister Department's Guidelines on Adequate Procedures.

The Group is committed in conducting business dealings with integrity, transparency and accountability. The Group zero-tolerance against all forms of bribery and corruption.

The policy is applicable to all the Group's personnel, its controlled organizations, business associates acting on the Group's behalf, and all business associate's personnel.

Non controlled joint-venture companies or co-venture and associated companies are encouraged to adopt these or similar principles that has reasonable and proportionate anti-bribery and corruption controls. External providers conducting work with or on behalf of the Group are expected to comply the same.

"Personnel" means directors and all individuals directly contracted to the Group on an employment basis, including permanent and temporary employees.

"Business Associate" means an external party with whom the Group has, or plans to establish, some form of business relationship. This may include clients, joint venture partners, consortium partners, pharmaceutical suppliers, medical device vendors, contractors, consultants, suppliers, advisers, agents, distributors, representatives, intermediaries and investors.

ANTI-BRIBERY AND CORRUPTION POLICY

- The Group prohibits bribery and corruption in all its forms.
- Bribery and corruption take all form of value, including money, goods, services, property, privilege, employment position or preferential treatment. The Group's personnel and its business associates
- The anti-bribery and corruption statement applies equally to business dealings with commercial ('private sector') and Government ('public sector') entities, and includes their directors, personnel, agents and other appointed representatives. Even the possible appearance of bribery or corruption shall be avoided, in particular when dealing with Government officials.



- No employee or external party will suffer demotion, penalty or other adverse consequences in retaliation for refusing to pay, receive bribes or participate in other illicit behavior.
- The Group is also committed to conducting due diligence checks on prospective personnel, particularly as it relates to appointments to positions where a more than low bribery or corruption risk has been identified.
- All the Group's personnel and business associates:
 - (a) shall not 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, for the intended benefit of the Group or the persons involved in the transaction.
 - (b) are prohibited from giving or receiving of charitable donations and CSR to influence someone to act improperly or as a reward for having acted improperly.
 - (c) shall decline to make the payment and report to their superior immediately when they encounter any requests for a facilitation payment.
 - (d) should avoid situations in which personal interest could conflict with their professional obligations or duties. Conflicts of interest arise in situations where there is personal interest that could be considered to have potential interference with objectivity in performing duties or exercising judgment on behalf of the Company. Personnel must not use their position, official working hours, Company's resources and assets, or information available to them for personal gain or to the Company's disadvantage.

WHISTLEBLOWING OF POLICY VIOLATIONS

- Group's personnel and/or external parties who, in the course of their activities for the Group, encounter actual or suspected violations of this policy are required to report their concerns through email: whistleblower@isec.sg.
- All information and identity of whistleblower will be kept confidential.



- Reports made in good faith, either anonymously or otherwise, shall be addressed in a timely manner and without fear of reprisal regardless of the outcome of any investigation.
- Retaliation in any form against Group's personnel where the person has, in good faith, reported a violation or possible violation of this policy is strictly prohibited. However, the Group does not condone frivolous, mischievous or malicious allegations. Personnel or external party making such allegations will face disciplinary action, as appropriate.