

## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY STATEMENT

**Synergy Tours Sdn. Bhd. Company No. 199001002752 (194318-M) (hereinafter referred to as “ST”)**, recognizes the importance of establishing and upholding good corporate governance and is committed to conducting its business in accordance with the highest ethical standards in full compliance with all applicable laws, regulations and standards in all locations and jurisdictions in which ST operates. This reputation had been created by our organizational values and the values of our employees, therefore, having a collective commitment to promote ethics and integrity. As part of our commitment to ethical business practices, ST shall not participate or condone any acts or forms of bribery or corruption.

In line with this commitment, ST adopts a “zero-tolerance approach” towards any form of bribery and corruption in conducting its business. This principle is that any form of bribery and/or corruption as an inducement or a pecuniary reward that has been offered, promised and provided in order to gain any commercial, contractual, regulatory or personal advantage is not acceptable.

The ST’s Anti-Bribery and Anti-Corruption Policy (“ABAC Policy”) applies to all ST officers and directors of ST, employees (whether permanent or temporary basis), contractors, its subsidiaries and joint venture companies under ST’s control. Third parties acting on behalf of or in the name of ST, including agents, representatives and other intermediaries, are required to act consistently with ST’s Anti-Bribery Policy. Joint venture companies not under ST’s control, and our joint venture partners, are encouraged to adopt a similar policy and procedures to prevent bribery. All employees and personnel are to refrain from offering or receiving any gifts, entertainment, hospitality and non-business travel to/from external party in the course of their duties as it may put them in an obligated or compromised position which could affect business judgement.

Any non-compliance with ST's ABAC Policy requirements by the personnel, employees, or agents will be treated as grounds for disciplinary action, dismissal or termination. ST reserves its right to report such matters to the relevant enforcement authorities for their further action.

Any personnel, employee or external party, with a business relationship with ST, who suspects that a form of bribery or corruption has occurred or that there has been a breach of the ABAC Policy, can report such suspected incidents via ST’s whistleblowing channel. All information will be treated with strict confidentiality.

### **ST’s Whistleblowing Channel**

ST has put in place the Whistleblowing Policy and Procedures to provide an avenue which serves as a confidential platform for all personnel, employees, agents and/or third parties to disclose any acts of bribery and/or corruption in a confidential manner that protects the whistleblower from any risk of reprisals.

Our whistleblowing form can be downloaded [here](#).

The Whistleblowing form can be submitted via email at [compliance@synergy-tours.com](mailto:compliance@synergy-tours.com) or to the Whistleblowing Committee via post.