**ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

Bright-Win Technology (M) Sdn Bhd and Bright-Win Solution (M) Sdn Bhd (collectively referred to as “Bright-Win”) are committed to conducting business with integrity. This means avoiding and prohibiting all forms of bribery and corruption in daily operations and dealings with third parties. To this end, Bright-Win has formalised and implemented the following policies and procedures:

Bright-Win is committed to:

* A **ZERO TOLERANCE** approach to bribery and corruption.
* Compliance with all anti-bribery and anti-corruption laws currently in force.
* Adopting a **No-Gift Policy**, whereby all employees are prohibited from soliciting or accepting any gifts from third parties that may have a direct or indirect business relationship with Bright-Win.
* Prohibiting all employees from soliciting or accepting any form of corporate hospitality or entertainment that is excessive, inappropriate, illegal, or given in response to, in anticipation of, or intended to influence a favourable business decision—particularly from parties involved in a tender or competitive bidding process.
* Bright-Win does not engage in, or offer, any monetary or in-kind political contributions to political parties, party officials, or candidates for political office.
* Bright-Win prohibits the acceptance or solicitation of facilitation payments from any person for the benefit of its employees or any other individual, whether directly or indirectly, as such payments are considered a form of bribery and corruption.
* For the purposes of this policy, third parties dealing with Bright-Win include (but are not limited to) customers, contractors, vendors, suppliers, solicitors, agents, consultants, business partners, transporters, and all legitimate business entities—ranging from public listed companies to private limited companies, partnerships, and sole proprietorships. These third parties must accept and adhere to Bright-Win's Anti-Bribery and Anti-Corruption Policy in all dealings with the company.
* Any CSR, donation, or sponsorship activities must not be used as a means to circumvent, avoid, or evade legal or regulatory requirements. More importantly, such activities shall not be used to facilitate corruption, illegal conduct, or money laundering.
* Bright-Win shall review its Anti-Bribery and Anti-Corruption Policy every three (3) years or as deemed necessary by the Board of Directors or Management, or upon updates or changes to applicable regulations.

**FROM THE BOARD OF MANAGEMENT**