



**DE ECO SR HYGIENE SDN BHD** (202001042946 (1399267-U))  
Science & Engineering Research Centre (SERC), Engineering Campus, Universiti Sains Malaysia,  
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## **DE ECO SR HYGIENE SDN. BHD. ANTI-BRIBERY & ANTI-CORRUPTION POLICY**

### **1. Purpose**

De Eco SR Hygiene Sdn. Bhd. (“the Company”) is committed to conducting business with integrity, fairness, and transparency. This Anti-Bribery and Anti-Corruption Policy establishes clear standards to prevent bribery, corruption, and unethical conduct in all business dealings and ensures compliance with applicable laws and governance principles.

### **2. Policy Statement**

The Company adopts a **zero-tolerance approach** toward all forms of bribery and corruption. No employee, director, or representative may directly or indirectly offer, promise, give, request, or accept any bribe, kickback, improper payment, or undue advantage in connection with Company activities.

Compliance with this Policy is mandatory and applies to all individuals acting on behalf of the Company.

### **3. Scope**

This Policy applies to:

- Directors and management
- All employees (permanent, temporary, contract)
- Consultants, agents, intermediaries, and contractors
- Suppliers, vendors, and business partners acting for or on behalf of the Company

### **4. Definitions**

**Bribery** – Offering, giving, receiving, or soliciting anything of value to influence a decision improperly.

**Corruption** – Abuse of entrusted power for personal or business gain.

**Facilitation Payment** – Small unofficial payments made to secure routine actions (strictly prohibited).

**Kickback** – A payment or reward made in return for a business favour or advantage.

### **5. Prohibited Conduct**

The following actions are strictly prohibited:

- Offering or accepting bribes or improper benefits



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- Providing gifts, hospitality, or entertainment intended to influence decisions
- Making facilitation payments
- Engaging third parties to perform corrupt acts on the Company's behalf
- Concealing or falsifying financial or business records
- Any conduct that creates a conflict of interest or undermines fair business practices

Reasonable and bona fide hospitality or promotional expenses may be permitted only when lawful, modest, transparent, and properly documented.

## **6. Responsibilities**

### **Management**

- Implement and enforce this Policy.
- Conduct periodic risk assessments for corruption risks.
- Ensure adequate internal controls and monitoring systems.

### **Human Resources / Compliance Function**

- Communicate and maintain awareness of this Policy.
- Provide guidance on ethical conduct and compliance matters.
- Maintain records of employee acknowledgements and training.

### **Employees and Representatives**

- Read, understand, and comply with this Policy.
- Avoid situations that may lead to bribery or conflicts of interest.
- Report suspected violations promptly.

All personnel may be required to sign a declaration confirming understanding and compliance with this Policy.

## **7. Training and Awareness**

The Company will conduct periodic training and awareness programmes to ensure employees understand anti-corruption obligations, ethical standards, and reporting procedures. Training records will be maintained as part of governance and compliance documentation.



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## **8. Reporting Violations**

Any actual or suspected breach of this Policy must be reported immediately through the Company's official reporting channels or via the Whistleblowing Policy mechanism. Reports will be handled confidentially and investigated fairly and promptly.

Failure to report known violations may itself constitute a breach of Company policy.

## **9. Non-Retaliation**

The Company strictly prohibits retaliation against anyone who reports concerns in good faith. Individuals who raise concerns honestly will be protected from dismissal, discrimination, or any form of adverse treatment.

## **10. Consequences of Non-Compliance**

Violations of this Policy may result in disciplinary action, including termination of employment or contract, recovery of losses, and referral to regulatory or law-enforcement authorities where required.

## **11. Policy Review**

This Policy will be reviewed periodically to ensure its effectiveness, relevance, and alignment with applicable laws, regulatory requirements, and ESG governance standards.