

## ANTI BRIBERY AND ANTI CORRUPTION POLICY

### **Policy Statement**

NIOSH Certification ("NIOSHCert") has adopted a zero-tolerance policy for breaches of national regulatory obligations and laws and is against all forms of bribery and corruption. NIOSHCert firmly supports the national anti-bribery and anti-corruption effort by establishing and upholding good corporate governance while continuously conducting its business in its day-to-day operations honestly, ethically, and professionally. All related parties involved with the company's business must uphold the highest standard of integrity and accountability to ensure this policy's full compliance with the following commitments, including areas covered under this policy.

### **To express and in line with this commitment:**

1. NIOSHCert is committed to complying with all applicable laws relating to anti-bribery and anti-corruption in the countries where it does business. It applies equally this policy to its business dealings with commercial/industry (private sector) and government agency entities that operate nationally and internationally.
2. NIOSHCert shall exercise due care and due diligence when dealing with third parties/ business associates and ensure their affairs do not involve corrupt practices, perceived or actual.
3. NIOSHCert is committed to monitoring compliance and conducting due diligence in the event of bribery and corruption risk present.
4. NIOSHCert encourages employees and related parties to report genuine concerns about a breach of a legal obligation (including negligence, criminal activity related to bribery and corruption, and breach of contract and laws).
5. NIOSHCert is committed to regularly conducting training and communicating this policy to all relevant interested parties.
6. NIOSHCert reflects its core value in contributing to the progress and achievement of the related Sustainable Development Goals.

### **A. No Gifts, Entertainment & Hospitality**

NIOSHCert prohibits the offering, soliciting, or receiving any gifts, entertainment, and hospitality in any form, to or from current or potential clients, vendors, agents, associates, collaboration and business partners, government officials, and its associates either directly or indirectly, which may influence the employee judgment in a decision-making process or put the employee in a position of conflict.

### **B. Facilitation Payments**

NIOSHCert prohibits any forms of facilitation payments in any form of offering, giving, or accepting of improper payments act as bribes or kickbacks in exchange for business favors, including action to expedite or in its business. All employees and related interested parties will communicate and adhere to this policy.

### **C. Donations and sponsorships**

NIOSHCert prohibits the giving and receiving donations and sponsorships to influence business decisions in its business and political affairs, used as a channel for money laundering and unethical criminal activities.

### **D. Recruitment and promotion of employees or external associates/personnel**

NIOSHCert recognizes the value of integrity in recruiting or promoting employees or external associates/personnel involved in its business. NIOSHCert prohibits any form of employment/engagement opportunities, whether permanent or contract basis, used as an inducement to obtain or retain an advantage in the industry.

#### **E. Reporting of Policy Violations**

NIOHCert prohibits retaliation against employees or personnel where the person has good faith and integrity in reporting a policy violation. NIOHCert shall adhere to its whistleblowing policy and processes to ensure that individuals can confidentially report concerns while being protected from reprisals or victimization for whistleblowing in good faith.

#### **F. Compliance Monitoring**

NIOHCert shall establish an independent unit to oversight the implementation of compliance towards this policy. The team has the right to conduct due diligence, checking against potential bribery and corruption risks and effectively conducting investigations as deemed necessary based on the reasonable cause of suspicion. NIOHCert shall develop mechanisms and processes considered appropriately related to the reporting to address bribery and corruption risks with the committee. This is to ensure cases of misconduct or non-compliance against this policy and its related legislation are detected and confirmed, to be dealt with objectively with internal procedure for disciplinary action if related to the business. NIOHCert shall notify the relevant authority if any identified bribery and corruption cases prove with reasonable doubt for further legal action.

NIOHCert shall develop its anti-bribery and corruption-related procedures to ensure compliance with the established policy. NIOHCert has committed to continually improving its policy and enhancing the systems to maintain the highest standard of integrity in its business. All employees and related interested parties will communicate and adhere to this policy.



**(SYAMSUL ZHRIN ZAINUDIN)**

Chief Executive Officer

Date: 10 February 2023