

ECONPILE HOLDINGS BERHAD (1017164-M)

ANTI-BRIBERY AND CORRUPTION POLICY STATEMENT

Econpile Holdings Berhad ("the Company") and its subsidiaries (collectively known as "the Group"), adopts zero tolerance approach towards all forms of bribery and corruption. The Group promotes the value of good governance and integrity in carrying out its business activities.

The Group is committed to:

- Establish, maintain, and periodically review Anti-Bribery and Corruption ("ABAC") framework which includes clear policies and objectives that adequately address corruption risks;
- Promote the values of integrity and good corporate governance in all business dealings. All employees are expected to comply with all applicable laws and regulations including our internal policies pertaining to ABAC;
- Create and maintain a trusted and confidential whistleblowing channel in relation to the reporting of suspected and/or real corruption incidents or inadequacies in the anticorruption compliance programme;
- Provide adequate training, awareness and communication to ensure employees comprehend the requirements, benefits, and their role and responsibilities for ABAC framework implementation and monitoring as well as corruption risk management; and,
- Conduct continual review and improvements on the Group's policies and procedures in relation to ABAC.

Employees who engage in any corrupt practices shall be subjected to disciplinary action from written warning up to termination of employment by the Group and possible legal action.

Specifically, the Group has put in place a ABAC Policy & Guidelines and requires the adherence of the following key stakeholders to the rules therein:

- Directors of the Company, both executive and non-executive;
- All employees within the Group; and,
- Suppliers and subcontractors, customers, business partners, professional service providers and others who performing work or services for or on behalf of the Group.

Separately, the Group has also adopted a clear Whistleblowing Policy & Guidelines, accessible at www.econpile.com, so that any suspected bribery and corruption activities can be reported through a trusted and confidential whistleblowing channel without fear of retaliation.

Effective Date: 28 May 2020