

ABAC POLICY

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ABAC-01
3



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

DOC No: ABAC-01

Item	Prepared by	Reviewed by	Approved by	Date
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Title	Executive	Certified Integrity Officer	Chief Executive Officer	
Note: Approved by the Board of Directors via Board Meeting dated on 4 June 2025				

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1.0 PURPOSE

This Anti-Bribery and Anti-Corruption Policy (“ABAC Policy” or the “Policy”) shall serve as a foundation and reference to establish, implement, maintain, continually review and where necessary, improve Anti-Bribery and Anti-Corruption (“ABAC”) Programme under CTRM Holdings Sdn. Bhd. and its subsidiaries. This Policy being supported by the ABAC Programme, aims to assist CTRM Group in complying with applicable ABAC laws and regulations, as well as to assist in demonstrating the highest standards of ethical conduct, integrity, and accountability practices in CTRM Group businesses and operational activities.

2.0 SCOPE

The Policy shall be applicable to all CTRM’s Board of Directors (“Board”), Top Management, employees, and business associates engaged by CTRM Group or for any business-related activity or relationship, whether formally or informally.

3.0 ABBREVIATION / DEFINITION

3.1 Abbreviation

3.1.1	ABAC	Anti-Bribery and Anti-Corruption
3.1.2	Board	Board of Directors
3.1.3	CTRM Group	CTRM Holdings Sdn. Bhd. and its subsidiaries: 1. CTRM Aero Composites Sdn. Bhd. 2. CTRM TestLab Sdn. Bhd. 3. CTRM CE Sdn. Bhd.
3.1.4	CRA	Corruption Risk Assessment
3.1.5	HOC	Head of Company
3.1.6	IU	Integrity Unit
3.1.7	MACC	Malaysia Anti-Corruption Commission
3.1.8	RIC Dept.	Risk, Insurance, Incentive, Integrity, Compliance and Continuity Department

3.2 Definition

ABAC Programme	A structured framework of policies, procedures and practice implemented within an organization to prevent, detect and respond to bribery and corruption risks. It is typically designed to ensure compliance with applicable ABAC laws, regulations and ethical standards, as well as to promote a culture of integrity.
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Agent	Any person employed by or acting for another and includes an officer of a public body or an officer serving in or under any public body, a trustee, an administrator, or executor of the estate of a deceased person, a subcontractor, and any person employed by or acting for such trustee, administrator or executor, or subcontractor.
Board of Directors	Any person occupying the position of director of CTRM by whatever name called and includes a person in accordance with whose directions or instructions the majority of directors of CTRM are accustomed to act and an alternate or substitute director.
Bribery	Offering, promising, giving, accepting, or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting, in relation to the performance of that person's duties.
Business Associate	External party with whom CTRM has, or plans to establish, some form of business relationship. Business Associate includes, but not limited to clients, customers, outsourcing providers, contractors, vendors, consultants, suppliers, distributors, agents, and representatives.
Conflict of Interest	Situation where business, financial, family, political or personal interests could interfere with judgement of persons in carrying out their duties for CTRM.
Corporate Social Responsibility	A voluntary, self-regulated and ethics-driven action to ensure sustainability of the society and the environment.
Corruption	Act of giving or receiving of any gratification or reward in the form of cash or in-kind of high value for performing a task in relation to his/her job description.
Corruption Risk	Risk relating to the occurrence of corruption that may include, but not limited to the following: (a) Solicits or receives or agrees to receive any gratification; (b) Gives or promises or offers any gratification; (c) False claim (Intending to deceive); (d) Abuse of power (Using office or position for gratification); (e) Fail to report bribery and corruption transactions Collusion (Abetment or engagement in a criminal conspiracy to commit any offence under MACC Act, 2009 (Act 694)).
Corruption Risk Assessment	A diagnostic tool that seeks to identify weaknesses within a system, which may present opportunities for

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	corruption to occur. The aim of Corruption Risk Assessment is not to determine whether there is corruption or not in certain area or to detect corruptible people but more to identify potentials for corruption.
Donation	A contribution in cash or in-kind, directly or indirectly to a charitable organization or association without expecting any incentive, advantages or returns.
Employees	Employees of CTRM as well as contracted staff.
Enforcement Authority	Any government agency responsible for the enforcement of the laws i.e. MACC, Royal Malaysian Police and etc.
Entertainment	Form of activity that hospitable provision for the needs and wants of guests, such as hospitality (i.e. food, drink, etc), karaoke, show (including movie, music, sports, etc.) and other type of entertainments.
Facilitation Payment	Payment made to secure or expedite the performance by a person performing a routine or administrative duty or function. Offering, promising or requesting facilitation payment is just as prohibited as paying or receiving facilitation payments. Facilitation payment need not involve cash or other financial assets. It can be any sort of advantage with the intention to influence those involved in carrying out their duties.
Gift	Anything of value in cash or in-kind that is given to or received from a third party as a present and without expecting payment of fair value compensation from the recipient.
Governing Body	Group or body that has the ultimate responsibility and authority for CTRM's activities, governance and policies to which Top Management reports and by which Top Management is held accountable for the Board.

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Gratification	Gratification is defined as: a) money, donation, gift, loan, fee, reward, valuable security, property, or interest in property being property of any description whether movable or immovable, financial benefit or any other similar advantage; b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity; c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part; d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction, or percentage; e) any forbearance to demand any money or money's worth or valuable thing; f) any other service or favor of any description, including protection from any penalty or disability incurred or apprehended or form any action or proceedings of a disciplinary, civil, or criminal nature, whether or not already insinuated, and including the exercise or the forbearance from the exercise of any right or any official power of duty; g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).
Hospitality	Includes (but is not limited to) gifts, travel, accommodation, trips, services, entertainment, prizes from external competition or lotteries and any other gratuitous item, events, benefits or things of value received from or offered to any person in connection with CTRM's business.
Improper Conduct	Any conduct which if proved, constitutes a disciplinary offence or a criminal offence.
Letter of Support	A written document that provides a support and a level of assurance that an obligation will ultimately be met by a third party and relation to ABAC, the purpose is to request for special favor without following normal business processes.
Money Laundering	A process whereby criminals attempt to hide and disguise the true origin and ownership of the proceeds from their criminal activities thereby avoiding prosecution, conviction and confiscation of the criminal funds (as per the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act, 2001 (Act 613))
Political Contribution	Make or offer monetary or in-kind political parties, political party officials or candidates for political office.

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Sponsorship	A support financially or non-financially, extended to an individual, entity, organization or association to fund, care or sustain a project, activity individual or event with the primary purpose to promote CTRM's brand and build the Company's reputation in return.
Principal	Any employer, any beneficiary under a trust, any trust estate, any person beneficially interested in the estate of a deceased person, the estate of a deceased person, and, in the case of any person serving in or under a public body, the public body.
Third Party	Person or body that is independent of CTRM.
Top Management	The highest level of management team in an entity, led by the CEO and his direct reports.
Whistleblowing Channels	Any medium of communication that provides an additional avenue to report or disclose any attempted, suspected and actual bribery or corruption as well as any other improper conduct (e.g whistleblowing hotline, email, letter, mailbox, etc.). Any report or disclosure through whistleblowing channels will be dealt in confidential manners to protect the identity of the reporter and of others involved or reference in the report.

4.0 RESPONSIBILITIES

4.1 The Board is responsible to review and approve this ABAC Policy prior to issuance and implementation.

4.2 The Chief Executive Officer/ Head of Company / Head of RIC Dept. and/or Head of Integrity Unit is responsible to review and recommend this Policy prior to any approval by Board.

4.3 Governing Body

4.3.1 The Board and its equivalent body(s) shall demonstrate leadership and commitment to CTRM ABAC Policy and Programme by:

4.3.1.1.1 Approving the ABAC Policy and Programme to establish a clear direction and commitment to ABAC practices;

4.3.1.2 Ensuring that CTRM upholds the highest standards of ethics and integrity, complies fully with applicable laws, regulations, and ABAC requirements, and effectively mitigates key bribery and corruption risks;

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- 4.3.1.3 Aligning CTRM strategic planning and objectives with the ABAC Policy to ensure consistency and integration;
- 4.3.1.4 Allocating and assigning adequate and appropriate resources to support the effective operation of the ABAC Programme;
- 4.3.1.5 Exercising reasonable oversight of the Programme's implementation and assessing its effectiveness through Top Management;
- 4.3.1.6 Receiving and reviewing periodic updates on the content, performance, and operations of the ABAC Programme at planned intervals; and
- 4.3.1.7 Overseeing the execution and effectiveness of ABAC Programme activities by the Top Management.

4.4 Management Committee (Top Management)

- 4.4.1 Top Management shall demonstrate leadership and commitment to CTRM ABAC Policy and Programme by:
 - 4.4.1.1 Establishing, implementing, maintaining, and reviewing the ABAC Policy and Programme to effectively address the Company's bribery and corruption risks;
 - 4.4.1.2 Integrating ABAC Programme requirements into the Company's operational processes to ensure consistency and compliance;
 - 4.4.1.3 Allocating and deploying adequate resources to ensure the effective operation of the ABAC Programme;
 - 4.4.1.4 Designing the ABAC Programme to achieve its objectives and meet regulatory and organisational requirements;
 - 4.4.1.5 Communicating the ABAC Policy and Programme internally and externally to promote transparency and awareness;
 - 4.4.1.6 Emphasizing internally the importance of the ABAC Programme and adherence to its requirements;
 - 4.4.1.7 Promoting a culture of ethics, integrity, good governance, and anti-corruption across the Company;

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- 4.4.1.8 Encouraging the use of established DRB-HICOM Group's whistleblowing channels to report suspected or actual bribery, corruption, or improper conduct;
- 4.4.1.9 Ensuring no retaliation, discrimination, or disciplinary action against personnel who:
 - 5.4.1.9.1 Report violations or suspected violations in good faith; and
 - 5.4.1.9.2 Refuse to engage in bribery or corrupt practices, even at the risk of business loss (except where the individual was involved in the violation).
- 4.4.1.10 Directing and supporting personnel to contribute effectively to the ABAC Programme's success;
- 4.4.1.11 Supporting other management roles to demonstrate leadership in preventing and detecting bribery and corruption within their areas of responsibility;
- 4.4.1.12 Promoting continuous improvement of the ABAC Programme to address emerging risks and enhance its effectiveness; and
- 4.4.1.13 Providing regular reports to the Governing Body on:
 - 5.4.1.13.1 The content and operation of the ABAC Programme; and
 - 5.4.1.13.2 Allegations and investigations of serious or systemic bribery and corruption.

4.5 ABAC Working Committee

- 4.5.1 CTRM has established the Anti-Bribery and Anti-Corruption Working Committee with the objective of assisting the Top Management to facilitate the overall planning, implementation, maintenance, review, and improvement of ABAC Programme. This working committee is chaired by the Head of RIC and its members comprised of:
 - 4.5.1.1 Head of Human Capital & Administration;
 - 4.5.1.2 Head of Strategic Planning;
 - 4.5.1.3 Head of Finance;

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- 4.5.1.4 Head of Business Development;
- 4.5.1.5 Head of Supply Chain;
- 4.5.1.6 Head of Corporate Communication;
- 4.5.1.7 CTRM Aero Composites Sdn. Bhd.; and
- 4.5.1.8 CTRM TestLab Sdn. Bhd.

4.5.2 The Committee's main roles and responsibilities in relations to ABAC Programme are:

- 4.5.2.1 Review and endorse the ABAC Programme, which may include the policies, standard operating procedures, and work instructions prior to approval by the Board and/or Top Management and implementation;
- 4.5.2.2 Assist in planning, execution, and monitoring of the annual ABAC Programme;
- 4.5.2.3 Facilitate internal and external communication on ABAC-related information which may include the ABAC Policy, ABAC Programme and any other relevant information; and
- 4.5.2.4 Provide advice and recommendation on ABAC Programme to the Governing Body and Top Management.

4.6 Integrity Unit (IU)

4.6.1 Integrity Unit is the custodian of the ABAC Policy and shall take the appropriate and adequate control measures to ensure the implementation of the Policy and ABAC Programme throughout CTRM. Integrity Unit roles and responsibilities in relation to ABAC Programme are:

- 4.6.1.1 Integrity Strengthening:
 - 4.6.1.1.1 Plan, implement, and coordinate integrity strengthening Programme to enhance the practice of good values, ethical conduct, and integrity within the Company;

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4.6.1.1.2 Monitor, coordinate, and analyze the performance and reporting of the Programme;

4.6.1.1.3 Provide advice, guidance, and communication on the ABAC Programme and issues relating to integrity and ABAC; and

4.6.1.1.4 Provide adequate and appropriate integrity, governance, ABAC training, awareness, and communication Programme.

4.6.1.2 Governance

4.6.1.2.1 Coordinate the establishment, maintenance, review, and improvement of CTRM ABAC Programme which may include, but not limited to relevant Programme, policies, standard operating procedures, and work instructions; and

4.6.1.2.2 Reporting on the overall performance of ABAC Programme to the ABAC Committee and the Board at planned intervals.

4.7 Employees of CTRM

4.7.1 All employees of CTRM are responsible to adhere to the ABAC internal and external requirements, as stated in the ABAC Policy and all other related policies, standard operating procedures, and work instructions of the Company, including:

4.7.1.1.1 To read and understand the ABAC Policy and Code of Conduct of CTRM and subsequently to acknowledge having read and understood both documents;

4.7.1.1.2 To read, understand, and sign CTRM “Corruption Free Pledge”;

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- 4.7.1.1.3 To declare their assets, financial commitments, and business interests. This is inclusive of any new acquisition or disposal of assets, as well as changes to the business interest that may occur in between;
- 4.7.1.1.4 To attend periodic ABAC refresher training (either face-to-face or online training);
- 4.7.1.1.5 To attend ABAC onboarding/orientation training (for new employees); and
- 4.7.1.1.6 To attend and support all ABAC related training, awareness, and communication Programme organised by CTRM.

5.0 PROCEDURES

5.1 Anti-Bribery and Anti-Corruption (“ABAC”) Policy Statement

CTRM adopts a zero-tolerance approach to any form of bribery and corruption. CTRM is fully committed to upholding the highest standards of ethics, integrity, and accountability in all of CTRM businesses and operational activities by:

1. Prohibiting the Board of Directors, Top Management, employees, and business associates from being involved or engaged in any act of bribery and corruption;
2. Complying with all applicable anti-bribery and anti-corruption laws and regulations, which may include, but not limited to the Malaysian Anti-Corruption Commission Act, 2009 (Act 694) and amendments;
3. Establishing, implementing, maintaining, reviewing, and continuously improving ABAC Programme in CTRM;
4. Satisfying the requirements of the CTRM ABAC Programme that have been set;
5. Establishing and maintaining an independent ABAC compliance function in CTRM with the responsibility and authority to oversee the design and implementation of the CTRM ABAC Programme; and

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6. Encouraging any person to report in good faith or on the basis of a reasonable belief, any suspected, attempted, or actual bribery, corruption, and other improper conduct through the DRB-HICOM whistleblowing channels.

This Statement reflects our commitment to prevent, detect, and respond to any form of bribery and corruption while conducting businesses and operations. The Board of Directors, Top Management, employees, as well as business associates shall read, understand, and comply with the CTRM's ABAC Policy. Any breach or violation to this Policy shall be subjected to disciplinary and/or legal action.

5.2 Compliance Obligations

5.2.1 Malaysian Anti-Corruption Commission Act, 2009 (Act 694)

5.2.1.1 The MACC Act, 2009 (Act 694) is the main law in Malaysia for combating bribery and corruption. It aims to enhance provisions for preventing such misconduct. Key sections of the Act include:

Section 16	Offence of accepting gratification
Section 17	Offence of giving or accepting gratification by an agent
Section 18	Offence of intending to deceive the principal by an agent
Section 23	Offence of using office or position for gratification
Section 24	Penalty for offences under Sections 16, 17, 18 and 23
Section 25	Duty to report bribery transactions
Section 28	Attempts, preparations, abetments, and conspiracies are punishable
Section 17A	Offence by a commercial organization

5.2.1.2 These provisions collectively establish the framework for addressing bribery and corruption in Malaysia.

5.2.2 Guidelines on Adequate Procedures Pursuant to the Subsection [5] of Section 17A under the MACC Act, 2009 (Act 694)

5.2.2.1 Issued by the Prime Minister's Department on 10 December 2018, these guidelines provide a framework

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for commercial organisations to establish and maintain adequate procedures to prevent corruption and ensure compliance with Section 17A of the MACC Act, 2009 (Act 694). The Guidelines are structured around five (5) principles, Top-Level Commitment; Risk Assessment; Undertake Control Measures; Systematic Review, Monitoring, and Enforcement; and Training and Communication.

5.2.2.2 By adhering to these Guidelines, commercial organisations can establish robust anti-corruption frameworks that align with the requirements of Section 17A of the MACC Act, 2009 (Act 694), thereby minimizing the risk of corrupt practices and enhancing overall corporate integrity.

5.2.3 Under this Policy, the Board, Top Management, employees and business associates shall strictly observe and comply with the provisions set out in the above-mentioned requirements. Any breach or violations or non-compliance by any member of the Board, Top Management, employees, or business associates may result in actions being taken, which may include CTRM commencing legal actions.

5.3 Policy Implementation

5.3.1 Anti-Bribery and Anti-Corruption Programme

5.3.1.1 CTRM has established, implemented, and continually improved its ABAC Programme in accordance with Adequate Procedures requirements of MACC Act, 2009 (Act 694). The ABAC Programme is based on the T.R.U.S.T. Principles.

- a) **Top Level Commitment;**
 - b) **Risk Assessment;**
 - c) **Undertake Control Measures;**
 - d) **Systematic Review, Monitoring and Enforcement;**
- and

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e) Training and Communication.

5.3.1.2 All Board members, Top Management, employees, and business associates must comply with ABAC Programme requirements, with non-compliance resulting in disciplinary or legal actions. Business Associates and relevant third parties are expected to implement their own ABAC Programme or adequate controls to manage bribery and corruption risks, demonstrating a commitment in preventing improper conduct in their dealings with CTRM.

5.3.2 Management of Letter of Support, Facilitation Payments, Political Contribution, Money Laundering, and Other Similar Practices

5.3.2.1 CTRM shall implement policies and procedures that are designed to handle any bribery or corruption practices in relation to acceptance of letter of support, facilitation payments, political contribution, money laundering, and other similar corrupt practices.

5.3.2.2 Effective control measures shall be placed by the respective divisions/departments when dealing with letter of support, political contribution, and other similar transactions, due to high-risk of bribery and corruption incidents, including to obtain approval from the respective parties.

5.3.2.3 CTRM prohibits any business transaction linked to unethical practices, such as, facilitation payments, money laundering (as per the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act, 2001 (Act 613)) and other similar corrupt practices.

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5.3.3 Raising Concerns (Whistleblowing)

5.3.3.1.1 CTRM adopts the DRB-HICOM Group's Whistleblowing Policy to provide an additional avenue for reporting or disclosing any attempted, suspected, or actual bribery, corruption, or other improper conduct. Reports or disclosures will be handled confidentially to protect the identity of the whistleblower and others involved. Reports can be made through DRB-HICOM Group's whistleblowing channels.

5.3.3.1.2 CTRM is responsible to lodge report on any breach or violation to ABAC laws and regulations, involving any of its Board members, Top Management, employees, business associates, or third parties to the relevant enforcement authorities.

6.0 REFERENCES

This Policy shall be read together with the following guidelines:

- 6.1 Malaysian Anti-Corruption Commission Act, 2009 (Act 694) and amendments ("MACC Act, 2009" or "the Act").
- 6.2 Guidelines on Adequate Procedures Pursuant to the Subsection [5] of Section 17A under the MACC Act, 2009, issued by the Prime Minister's Department (10 December 2018).
- 6.3 ABAC-related policies, standard operating procedures, and work instructions.
- 6.4 All other relevant documented policies and procedures of CTRM.

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7.0 AMENDMENT RECORDS

Issue	Date	Description	Amendment by
3	1 Apr 2026	1. Revised policy format 2. Revised objective to align with DRB-HICOM 3. Revised Composites Technology Research Malaysia Sdn. Bhd. to CTRM Holdings Sdn. Bhd.	Wan Zamakhshari
2	4 Jun 2025	Revised as per latest template of ABAC Policy from DRB-HICOM, IGU.	Wan Zamakhshari
1	21 Aug 2024	First issued.	Wan Zamakhshari

8.0 APPENDIX

N/A