



SWIFT GROUP OF COMPANIES ANTI-BRIBERY & ANTI-CORRUPTION POLICY (“ANTI-BRIBERY POLICY”)

Name of policy: Swift Group of Companies Anti-Bribery & Anti-Corruption Policy
("Anti-Bribery Policy")

Version: 1

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1. INTRODUCTION

Swift Haulage Berhad, its subsidiaries and associated companies (“the Swift Group of Companies”) is committed to take reasonable and appropriate steps to ensure that its businesses do not participate in corrupt activities for its advantage and/or benefit. This Anti-Bribery Policy sets out the parameters to prevent the occurrence of Bribery and Corrupt practices in relation to the businesses of the Swift Group of Companies.

2. APPLICABILITY

- 21 The Anti-Bribery Policy is applicable to Shareholders, Directors, Employees, Business Partners and Vendors (collectively referred to as “Members”)
- 22 All Members have a duty to read and understand the Anti-Bribery Policy. Violation of any of the Anti-Bribery Policy’s provisions can result in disciplinary action, including termination of employment or appointment respectively.

3. BRIBERY AND CORRUPTION PROCEDURE

- 31 The Swift Group of Companies operates a zero tolerance towards Bribery and Corruption. Even the appearance of a conduct prohibited by this Anti-Bribery Policy which is unethical or which will tarnish the Swift Group of Companies’ reputation for honesty and integrity shall be avoided.
- 32 The Swift Group of Companies supports the aims of Malaysian Anti-Corruption Commission Act 2009 (“MACC 2009”) to combat Bribery and Corruption. The Swift Group of Companies will comply with the current and prevailing rules, regulations and laws regarding Bribery and Corruption.
- 33 Business Partners

The Swift Group of Companies will only work with business partners and potential vendors that meet its standards and commitment to preventing

Bribery and Corruption by certifying the business partners and potential vendors commitment through a **Tenderer/ Vendor's Declaration** as attached at **Appendix A** of this Anti-Bribery Policy.

34 Employees

3.4.1 No Employees or Directors, their agents, representatives, joint ventures partners or other third parties employed and/or engaged by the Swift Group of Companies will:

- i. offer, promise, give, accept, condone, approve or knowingly benefit from an improper business gratuity, a briber, 'kickback' or other improper advantage, benefit or reward, or otherwise apply inappropriate influence; or
- ii. make Facilitation Payments.

3.4.2 The Swift Group of Companies shall take adequate measures to ensure that each Employee understands this Anti-Bribery Policy. In doing so, the Swift Group of Companies shall circulate an **Employee's Declaration** form as attached at **Appendix B** of this Anti-Bribery Policy.

3.4.3 The Swift Group of Companies' terms and conditions of employment and all contracts will clearly state that the giving or acceptance of bribes to any third party in exchange for a business courtesy is unacceptable.

35 Contract Compliance Undertaking

3.5.1 The Swift Group of Companies shall ensure that all contracts and legal documents entered into with the Business Partners shall include a Corporate Compliance Clause that covers anti-bribery, corruption and/or money laundering acts and/or data protection and/or anti-competition acts and/or anti-soliciting acts and/or any other clauses that the Swift Group Legal, Corporate Service & Strategic Communications Department ("GLCSC") may find fit and reasonable.

4. **REPORTING OF VIOLATIONS OF THE ANTI-BRIBERY POLICY**

Any Members who knows of, or suspects, a violation of the Anti-Bribery Policy, is encouraged to report the concerns to the Swift Group of Companies Human Resource & Admin. Report may be made via email to compliance@swiftlogistics.com.my. No individual will be discriminated

against or suffer any act of retaliation for reporting in good faith on violations or suspected violations of this Anti-Bribery Policy.

5. INVESTIGATIONS

The Swift Group of Companies' Human Resource & Admin shall investigate reported concerns promptly and confidentially with the highest level of professionalism and transparency.

6. REVIEW OF THE ANTI-BRIBERY POLICY

Upon the recommendation of GLCSSC, this Anti-Bribery Policy may be reviewed by the Board and, as and when the need arises, and the changes shall be communicated to all Members, through announcement/s made in the Swift Group of Companies' official website.

APPENDIX A
LAMPIRAN A
TENDERER/VENDOR'S DECLARATION
DEKLARASI PETENDER/VENDOR
("Declaration")
("Deklarasi")

Our company, _____ **(Company Name) bearing**
Syarikat kami, _____ *(Nama Syarikat) yang mempunyai*

Registration Number _____, **hereinafter shall be**
Nombor Pendaftaran _____, *selepas ini akan disebut*

referred to as the "Vendor" which includes its Directors, Officers and Employees
sebagai "Vendor" yang merangkumi Pengarah, Pegawai dan Pekerja

who intend to conduct any business transaction with Swift Haulage Berhad,
yang berhasrat untuk melakukan sebarang transaksi perniagaan dengan Swift Haulage Berhad,

its subsidiaries and associated companies ("the Swift Group of Companies") for
respective transaction ("Business Transaction")) hereby:

subsidiari dan/atau syarikat bersekutu ("Kumpulan Syarikat Swift") untuk transaksi yang berkenaan ("Transaksi Perniagaan ") dengan ini:

1. PLEDGES AND UNDERTAKES THAT:

1. BERIKRAR & BERAKUJANJI BAHAWA

a. We have read and understood, and will comply with:

a. Kami telah membaca dan memahami, dan akan mematuhi:

- (i) the Swift Group of Companies's policies ("Policies"); The Policies outline the standards of**
- (i) Polisi-polisi Kumpulan Syarikat Swift ("Polisi"); Polisi yang menggariskan standard*

behaviour required from the Vendor relating to but not limited to the following:

yang diperlukan daripada Vendor yang berkaitan tetapi tidak terhad kepada yang berikut:

- (a) Health, Safety, Environment Policy;**
- (a) Polisi Kesihatan, Keselamatan & Alam Sekitar;*
- (b) Quality Policy;**
- (b) Polisi Kualiti;*
- (c) Drug, Alcohol & Smoking Policy;**
- (c) Polisi Dadah, Alkohol & Merokok;*
- (d) Land Transport Policy;**
- (d) Polisi Pengangkutan Darat;*

- (e) **Behaviour Based Safety Policy;**
(e) *Polisi Keselamatan Berasaskan Tingkah Laku;*
- (f) **Security Policy; and**
(f) *Polisi Sekuriti; dan*
- (g) **Anti-Bribery Policy.**
(h) *Polisi Anti-Rasuah*

- (ii) **all applicable laws and regulations relating to anti-bribery, fraud,**
(ii) *semua undang-undang dan peraturan yang berkaitan dengan aktiviti anti-rasuah, penipuan*

corruption and anti-money laundering activities; and
anti-penyelewengan dan anti pengubahan wang haram; dan

- (iii) **the following anti-corruption principles:**
(iii) *prinsip-prinsip anti-rasuah berikut:*

- (a) **committing to promote values of integrity, transparency, accountability and good corporate governance;**
(a) *komited untuk mempromosikan nilai-nilai integriti, ketelusan, kebertanggungjawaban dan tadbir urus korporat yang baik;*
- (b) **strengthening internal systems that support corruption prevention;**
(b) *memperkuahkan sistem dalaman yang menyokong pencegahan rasuah;*
- (c) **fighting any form of corrupt practice; and**
(c) *memerangi segala bentuk amalan rasuah; dan*
- (d) **supporting corruption prevention initiatives by the Government and the local authorities;**
(d) *menyokong inisiatif pencegahan rasuah oleh Kerajaan dan pihak berkuasa tempatan.*

to the best of our knowledge (collectively, the “Requirements”).
sepanjang pengetahuan kami (secara kolektifnya, "Syarat-syarat").

- b. **We will ensure our subsidiaries, associated companies and all other parties that we appoint to**
- b. *Kami akan memastikan subsidiari syarikat, syarikat bersekutu dan semua pihak lain yang kami lantik*

conduct work for the Swift Group of Companies also comply with the Requirements.
untuk menjalankan kerja untuk Kumpulan Syarikat Swift juga mematuhi Syarat-syarat.

- c. **We have not been convicted nor are we the subject of any investigation, inquiry or**
- c. *Kami tidak pernah disabitkan kesalahan dan juga tidak menjadi subjek sesuatu penyiasatan, siasatan atau*

enforcement proceedings by the relevant authorities of any actual or suspected
prosiding penguatkuasaan oleh pihak berkuasa yang berkenaan dengan pelanggaran
sebenar atau yang disyaki

breach to the Requirements and will report any actual or suspected breach to the
melanggar Syarat-syarat dan akan melaporkan apa-apa pelanggaran sebenar atau yang
disyaki melanggar

Requirements as soon as reasonably practicable and to the extent permitted by
Syarat-syarat secepat mungkin dan setakat yang dibenarkan oleh

law, to the The Swift Group of Companies.
undang-undang, kepada Kumpulan Syarikat Swift.

2. AGREES THAT:
2. BERSETUJU BAHAWA

a. In the event that we are in breach of any of the above sections, the Swift Group of Companies may

a. Sekiranya kami melanggar mana-mana bahagian sepertimana tersebut di atas, Kumpulan Syarikat Swift boleh

immediately revoke the contract award, or terminate the contract for all
dengan serta merta membatalkan pemberian kontrak, atau menamatkan kontrak bagi
kesemua

Business Transaction with the Vendor without any liability whatsoever on the
Transaksi Perniagaan dengan Vendor tanpa sebarang tanggungjawab daripada

part of the Swift Group of Companies to the Vendor. This is without prejudice to any other rights or
pihak Kumpulan Syarikat Swift kepada Vendor. Ini tanpa menjejaskan hak

remedies that the Swift Group of Companies may have or any other appropriate action which the
atau remedi lain yang mungkin diambil oleh Kumpulan Syarikat Swift atau tindakan lain yang sewajarnya

Swift Group of Companies may seek under the terms of the applicable tender/contract or applicable laws and regulations.
yang mungkin diambil oleh Kumpulan Syarikat Swift di bawah syarat tender/kontrak atau undang-undang dan peraturan yang terpakai.

a. Should any person attempt to solicit any bribe or advantage (whether financial or

b. Sekiranya ada percubaan bagi mendapatkan rasuah/sogokan/keuntungan (sama ada dalam bentuk kewangan atau

otherwise) from the Vendor or any other person connected to the Vendor either
atau sebaliknya) daripada Vendor atau orang lain yang berkaitan dengan Vendor sama ada

as an inducement or incentive to be selected or as a reward, gift or bonus for being

sebagai dorongan atau insentif untuk dipilih atau sebagai ganjaran, hadiah atau bonus kerana

selected in the Business Transaction(s), or where the Vendor has reasonable
dipilih dalam Transaksi Perniagaan, atau Vendor mempunyai alasan

grounds to suspect any breach of the obligations in this Declaration, the Vendor
yang munasabah untuk mengesyaki pelanggaran Deklarasi ini, Vendor

will report such act to the Swift Group of Companies as soon as reasonably practicable.

akan melaporkan berkenaan hal tersebut kepada Kumpulan Syarikat Swift secepat mungkin.

Signed for and on behalf of, :
Company's Signature
Bagi Pihak Syarikat

Name (Authorised Representative) :
Nama (Wakil yang diberi Kuasa)

Designation :
Jawatan

Company Name :
Nama Syarikat

Date :
Tarikh

**APPENDIX B
LAMPIRAN B****DECLARATION OF UNDERSTANDING OF
ANTI-BRIBERY & ANTI-CORRUPTION POLICY
DEKLARASI PEMAHAMAN KEPADA POLISI ANTI-
RASUAH & ANTI-PENYELEWENGAN**

- 1. I/We confirm that I/we have read the Swift Group of Companies's Anti-Bribery & Anti-Corruption Policy.**

Saya / Kami mengesahkan bahawa saya/kami telah membaca Polisi Anti-Rasuah & Anti-Penyelewengan Kumpulan Syarikat Swift.

I/We also confirm that I/we have understood the Requirements of this Policy and
Saya/kami juga mengesahkan bahawa saya / kami telah memahami Syarat-syarat Polisi ini dan

my responsibilities in relation to this document.
tanggungjawab saya/kami berkaitan dengan dokumen ini.

- 2. I/We understand that if I am/we are a party to any breach of this Policy then it**
Saya/Kami memahami bahawa sekiranya saya/kami adalah pihak yang melanggar Polisi ini, maka ia

should be regarded as gross misconduct and this may result in disciplinary *akan dianggap sebagai suatu salah laku yang besar dan ini boleh mengakibatkan tindakan tata tertib*

up to and including dismissal, in accordance with the Swift Group of Companies's disciplinary procedures.
serta termasuk pemecatan, berpandukan kepada prosedur tatatertib Kumpulan Syarikat Swift.

- 3. If any individual(s) attempts to solicit any bribe from me/us and/or by any**
Sekiranya ada individu yang cuba mendapatkan rasuah/sogokan daripada saya/kami dan/atau oleh mana-mana

individual(s) as an inducement for any purpose whatsoever, I/we undertake to
individu sebagai dorongan untuk tujuan apa jua pun, saya/kami berakujanji untuk

promptly report the said action(s) to the Swift Group of Companies Human Resource & Administration Department, or
segera melaporkan tindakan tersebut kepada Bahagian Sumber Manusia & Pentadbiran Syarikat Kumpulan Swift, atau

the Malaysian Anti-Corruption Commission's office or the nearest police station.
pejabat Suruhanjaya Pencegahan Rasuah Malaysia atau kepada balai polis terdekat.

I/We understand that failure to do so is an offence under the Malaysian
Saya/Kami sedia memahami bahawa kegagalan untuk melaporkan kejadian ini adalah suatu kesalahan di bawah

Anti-Corruption Commission Act 2009 (Act 694) and/or any other relevant law.
Akta Suruhanjaya Pencegahan Rasuah Malaysia 2009 (Akta 694) dan/atau undang-undang lain yang berkaitan.

.....

Name :
Nama

Designation :
Jawatan

Employee No.:
No Pekerja