



**SPRITZER BHD**  
**Registration No. 199301010611 (265348-V)**  
**(Incorporated in Malaysia)**

**ANTI-CORRUPTION AND BRIBERY POLICY**

**Laws:** We will comply with all laws on anti-corruption and anti-bribery in all jurisdictions in which we operate.

**Corruption and Bribery activities:** We prohibit all forms of corruption and bribery activities:

- We will not give or receive bribes or improper advantages, either directly or through any third party.
- We will not defraud or deceive anyone or act dishonestly.
- We will not give or receive facilitation payments.
- We will not give or receive any gift, hospitality, donation or benefit that may improperly influence a decision or impair independence or judgement.
- We will not participate in any other criminal activity, such as extortion, collusion, breach of trust, abuse of power, embezzlement, trading in influence or money laundering.

**Conflicts of interest:** We will avoid or deal appropriately with situations in which our own interests could conflict with our obligations or duties.

**Personnel and controlled organisations:** We will ensure that our personnel and organisations which we control comply with this policy.

**Business associates:** We work only with organisations and people that conform to standards consistent with our own.

**Procedures:** We will implement appropriate management procedures to help prevent any breach of this policy, and to detect, report and deal with any breach which may occur.

This policy has been adopted by Spritzer Bhd via a board resolution on 27<sup>th</sup> November 2019.