



FLOWCO (MALAYSIA) SDN BHD strives to carry out its business activities ethically with honesty and transparency and without using corrupt practices to gain an unfair business advantage. Flowco Malaysia's policy is to comply with the laws, rules and regulations governing anti-bribery, corruption and anti-money laundering law.

The Directors of the Company have a zero-tolerance approach to bribery, corruption and money laundering. Any breach of this policy will be regarded as a serious matter which may result in disciplinary action.

This policy applies to all individuals working at all levels (whether permanent, fixed term or temporary), including contractors or any other person acting on our behalf.

There are many definitions of bribery and corruption for this policy:

- Bribery is an inducement/reward offered, promised, provided, or received to gain contractual, commercial, regulatory, or personal advantage.
- Corruption is the misuse of position, power, or authority for private gain.
- Money laundering is the introduction of money, property, or other assets derived from illegal activities into legitimate financial and business systems to give them a lawful appearance. It disguises the criminal origin of these assets. Under the Anti-Money Laundering, Anti-Terrorism Financing, and Proceeds of Unlawful Activities Act 2001 (AMLATFA), money laundering is a punishable offense.

GIVING/RECEIVING OF GIFTS

Giving/receiving gifts is acceptable if they are of an appropriate type and value and presented in proper circumstances (I.e., Chinese New Year hampers).

No gifts should be given to third parties without the express permission of the Director. Any gifts should always be given shared, not secretly, in the name of Flowco Malaysia and not an individual.

The offer of or receipt of all gifts should be notified to the Corporate Governance.

OMAR MOHAMED SAID
MANAGING DIRECTOR
01 SEPTEMBER 2024

ANTI-BRIBERY, CORRUPTION & ANTI-MONEY LAUNDERING ACT



ANTI-MONEY LAUNDERING

Engaging in activities that facilitate money laundering or the funding of terrorist or criminal activities. All individuals should be attentive to potential money laundering red flags, such as:

- Payment made by a third party with no verified association or no legitimate relationship with the counterparty
- The provision of false information or documentation by the counterparty
- A request to make payments in cash (in contexts where cash payments are not typically expected or practicable)
- Frequent changes in payment-related information (e.g., banks; bank accounts);
- Awareness that the counterparty has a history of money laundering; and – any other indications a financial transaction may be concealing terrorist, criminal, or other illegal conduct.

INDIVIDUAL RESPONSIBILITY

It is the responsibility of all individuals to whom this policy applies:

- Read, understand and comply with it at all times
- Avoid any activity that might lead to or suggest a breach of this policy
- To seek guidance from the Corporate Governance if you are unsure whether a particular act constitutes bribery or corruption
- To report immediately to the Corporate Governance:
 - If you are offered a bribe by a third party or are asked to make one.
 - if you become aware of any activity or conduct that has occurred or may occur in the future that you suspect is an action of bribery or corruption.
 - If you aware of any potential money laundering red flags or non-compliance with AML laws in any way related to Flowco Malaysia Sdn Bhd.

RECORD KEEPING

The Company will maintain accurate books, records and financial reporting for all areas of its business.

Individuals must complete expense forms relating to gifts or expenses incurred by third parties and submit them in line with the Flowco Malaysia expenses procedure.

OMAR MOHAMED SAID
MANAGING DIRECTOR
01 SEPTEMBER 2024