



## **Anti-Bribery & Corruption Policy**

Effective Date: January 5th, 2026

Last Reviewed: January 5th, 2026

Next Review Date: January 5th, 2027

### **1. Purpose**

Legacy Energies Inc. is committed to conducting business in compliance with all applicable anti-bribery and corruption laws, including the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and other relevant international regulations. We adopt a zero-tolerance approach towards bribery and corruption in any form.

### **2. Scope**

This policy applies to all employees, directors, officers, contractors, consultants, and third-party representatives acting on behalf of Legacy Energies Inc., including subsidiaries, joint ventures, and any entities under our operational control.

### **3. Policy Statement**

Legacy Energies Inc. strictly prohibits the offering, giving, receiving, or soliciting of bribes or anything of value intended to influence a business decision or to secure an improper advantage. Our stance covers all interactions with public officials, customers, suppliers, and business partners.

### **4. Definitions**

- **Bribery:** Offering, giving, receiving, or soliciting anything of value to improperly influence an individual's actions or decision-making.
- **Corruption:** The abuse of entrusted power for private gain.
- **Facilitation Payments:** Small, unofficial payments made to expedite routine government actions. These are strictly prohibited under this policy.

### **5. Responsibilities**

Employees and Contractors:

All personnel must comply with this policy and are expected to:

- Refuse any form of bribery or corrupt activity.
- Report any suspicious activity or violations to the Compliance Department.
- Complete required training on anti-bribery compliance.

#### Management:

Senior management is responsible for implementing, enforcing, and periodically reviewing this policy. This includes:

- Conducting risk assessments on operations, partners, and transactions.
- Overseeing investigations of potential violations and ensuring corrective actions.

#### 6. Compliance with Laws

We comply with all applicable anti-corruption laws, including the FCPA, UK Bribery Act, and Malaysian Anti-Corruption Commission Act (MACCA). If conflicting regulations apply, the most stringent will prevail.

#### 7. Prohibited Practices

##### - Bribery & Facilitation Payments:

Employees must never engage in bribery, either directly or indirectly. This includes offering or accepting facilitation payments, even if customary in the local context.

##### - Gifts & Hospitality:

Modest gifts and hospitality may be offered or received only if they are:

- Reasonable and in line with industry standards.
- Not intended to influence decisions.
- Reported and recorded in the Gifts & Hospitality Register if valued above [Insert Amount].
- In compliance with local laws and this policy.

##### - Political Contributions:

No political donations may be made by or on behalf of Legacy Energies Inc. without prior approval from the Board of Directors. Personal political donations by employees must not involve company funds or resources.

##### - Third-Party Intermediaries:

All third parties (e.g., agents, suppliers) must undergo due diligence to ensure they comply with this policy. Contractual agreements must include anti-bribery clauses, and audits will be conducted periodically to ensure compliance.

## 8. Risk Management & Due Diligence

Risk Assessments:

Legacy will regularly assess bribery risks based on:

- Country of operation.
- Industry sector.
- Use of intermediaries.

Third-Party Due Diligence:

Before engaging any third party, thorough due diligence will be conducted, including:

- Review of financial records.
- Examination of the third party's compliance with anti-bribery laws.
- Verification of reputation and business practices.

## 9. Reporting & Investigations

Reporting Mechanism:

Employees and third parties are required to report any known or suspected bribery or corruption violations through our Whistleblowing Mechanism. Reports may be made anonymously, and retaliation against whistleblowers is strictly prohibited.

Investigations:

All reports will be thoroughly investigated by the Compliance Department. Employees found to be involved in bribery or corruption will face disciplinary actions, including termination, and may be subject to criminal prosecution.

## 10. Training & Communication

Training:

All employees, directors, and contractors will receive regular training on the Anti-Bribery and Corruption Policy to ensure full understanding and compliance.

Communication:

This policy will be communicated clearly to all employees, partners, and relevant stakeholders

and will be made publicly available on the company's website.

## 11. Monitoring & Review

### Internal Audits:

Periodic internal audits will be conducted to ensure compliance with this policy. Any gaps identified will be addressed promptly with corrective actions.

### Policy Review:

This policy will be reviewed annually to ensure it remains up-to-date with legal requirements and industry standards.

## 12. Penalties for Non-Compliance

Any violations of this policy will result in disciplinary action, up to and including termination of employment or business relationships. Legacy Energies Inc. reserves the right to report any illegal activities to relevant law enforcement authorities, which may result in fines or imprisonment under applicable laws.