

ANTI-BRIBERY AND CORRUPTION POLICIES & PROCEDURES ("ABC POLICIES")

Scope and Application

Thriven Group adopts a zero-tolerance approach towards all forms of bribery and corruption and undertakes to comply with all the relevant applicable anti-bribery and anti-corruption laws in all the jurisdictions the Group operates in, recognising that any failure to comply would have serious adverse consequences to it as a company.

Therefore, all of Thriven Group's Directors, Employees and Business Partners are expected to strictly comply with the applicable anti-bribery and corruption laws and should not assume that Thriven Group's interest would require otherwise. Failure to comply with these ABC Policies, whether intentional or not, may lead to disciplinary action and criminal liability for the individual(s) involved.

All Thriven Group's Directors, Employees and Business Partners must avoid any personal, financial or other interest which may be in conflict with their duties and responsibilities to Thriven Group.

It is therefore the fundamental responsibility of all Thriven Group's Directors, Employees and Business Partners to read these ABC Policies carefully so that the ABC Policies can be complied with at all times.

For the Business Partners, Thriven Group's ABC Policies are attached together with the Letter of Engagement. In any event, the ABC Policies are also available on the Thriven Group's website at www.thriven.com.my for reference.

For Thriven Group's Directors and Employees, the ABC Policies are available in the Company's shared server. The Employees without access to the company's shared server may contact the ABC Compliance Team and/or Thriven Group's Human Resource and Administration Department who can provide this information.

These ABC Policies shall be read in conjunction with the Company's Corporate Code of Conduct, Whistleblowing Policy and the Malaysian Anti-Corruption Commission Act 2009 and will be reviewed at least once every three (3) years to ensure its effectiveness and consistency with the applicable legislation and regulatory requirements, reputational demands and changes in the business.

If there are any question about the ABC Policies or determinations under them, please contact the ABC Compliance Team at compliance@thriven.com.my.

Reviewed and adopted by Board: 21 November 2023