



SWIFT ENERGY GROUP OF COMPANIES

ANTI BRIBERY and ANTI CORRUPTION POLICY

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1. EMPLOYEE ACKNOWLEDGMENT

I,.....
hereby acknowledge receipt of **Swift Energy Sdn Bhd** (and all its subsidiaries, subsidiaries **Swift PMAS Sdn Bhd, Swift Solutions MSC Sdn Bhd, Swift Energy Oil & Gas Sdn Bhd, ALR Technologies Sdn Bhd, Swift Automation Sdn Bhd, Swift Energy Pte Ltd, Swift Energy Co. Ltd, Chongqing Swift Automation Technology Co. Ltd**) collectively referred to as the “Company”) Anti-Bribery and Anti-Corruption Policy and have read its contents.

It is my understanding that the Anti-Bribery and Anti-Corruption Policy contains guidelines, policies and best practices of the company covering some of our most important individual responsibilities and obligations as we go about our work and I confirm that I will abide by the Policy.

Signature : _____

Full Name : _____

Designation : _____

Date : _____

The signed original copy of this acknowledgement form shall be kept inside each employee’s Personal File.

This Policy is the property of the Company and shall be shared via all company electronic media and a hard copy will be placed at all notice boards and General Office for any employee to refer to.

2. POLICY STATEMENT

Swift Energy Sdn Bhd with all its subsidiaries (Swift PMAS Sdn Bhd, Swift Solutions MSC Sdn Bhd, Swift Energy Oil & Gas Sdn Bhd, ALR Technologies Sdn Bhd, Swift Automation Sdn Bhd, Swift Energy Pte Ltd, Swift Energy Co. Ltd, Chongqing Swift Automation Technology Co. Ltd) collectively referred to as the “Company” are committed to maintaining the highest standards of ethics and integrity in the way we do business around the world.

This **Anti-Bribery and Anti-Corruption Policy** (the “Policy”) contains policies and guidelines relating to the standards and ethics that all employees are expected to adhere to in the course of their work.

The Policy is not intended to be the one-stop center for all definitive answers. Rather, it is intended as an introduction to our employees, as well to the public at large, to the Group’s commitment to combat bribery and corruption.

“ALWAYS ASK WHENEVER IN DOUBT”

The Company reserves the right to amend, delete or augment any provision in this Policy and other Policies as and when it deems necessary.

3. WHO MUST COMPLY

This policy applies to all individuals working for Swift Energy Sdn Bhd with all of its subsidiaries and affiliates anywhere in the world (collectively referred to as the "**Company**") and at all levels and grades.

This includes (Board members, employees, agents, vendors, contractors, suppliers, consultants, senior managers, officers, directors, employees (whether regular, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home-workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as "**employees**" in this policy).

4. PERSONAL CONFLICT OF INTEREST

Conflicts of interest can arise if individuals have a personal interest in business dealings involving the company. Personal interest can be direct or indirect and refers not only to personal interests but to those of family members and friends.

An employee is also not permitted to engage in any activity, which can be detrimental, directly or indirectly, to the interest of the Company. Employees must disclose any personal conflict of interest or perceived conflict to the Human Resource Department or the CEO.

5. TRANSACTIONS WITH CUSTOMERS, SUPPLIERS, VENDORS AND OTHERS

The Company is committed to dealing fairly and honestly with its customers, suppliers and vendors. Employees are expected to conduct the Company’s business with such parties in a respectful, fair, and honest manner.

Employees are not to offer or accept any benefits, rewards or things of value from customers, which may violate the law, the customer's policies, or our business practices.

6. GIFTS, ENTERTAINMENT AND HOSPITALITY

6 (a) 'NO GIFT' POLICY

The Company adopts a "No Gift" Policy whereby, subject only to certain narrow exceptions, the Company employees, family members or agents acting for or on behalf of the Company employees or their family members are prohibited from, directly or indirectly, receiving or providing gifts.

The Company requires employees to abide by this policy to avoid conflict of interest or the appearance of a conflict of interest for either party in ongoing or potential business dealing between the Company and external parties as a gift can be seen as a bribe that may tarnish the Company's reputation or be in violation of anti-bribery and corruption laws.

6 (b) RECEIVING GIFTS

Token gifts of nominal value normally bearing the company's logo or (e.g. t-shirts, pens, diaries, calendars and other small promotional items) that are given out equally to members of the public, delegates, customers, partners and key stakeholders attending events such as conferences, exhibitions, training, trade shows etc. and deemed as part of the company's brand building or promotional activities may be accepted and when in doubt about the value of the token gift, please report to HR or the CEO.

6 (c) PROVIDING GIFTS

Generally, employees are not allowed to provide gifts to third parties with the exception of the Group MD/CEO/Heads of Department and any other officers identified by the Group MD/CEO.

7. DONATION AND SPONSORSHIPS

Employees are prohibited from acting on the below without first obtaining approval from CEO or Board Members:

- i) using their position with the Company to try to influence any other person (whether or not employed by the Company) to make political contributions or to support politicians or their parties in any country;
- ii) make any contribution or incur any expenditure using the Company resources to benefit any political campaign, party or politician in any country;
- iii) the use of Company facilities, equipment and resources for any political campaign or party functions.

The Company may make charitable donations but only if they are ethical and in compliance with this policy and local applicable laws.

8. FACILITATION PAYMENTS OR KICKBACKS

The Company prohibits accepting or obtaining, either directly or indirectly, facilitation payments from any person for the benefit of the employee himself or for any other person who is subject to the 'Policy'. All persons subject to the Policy must not offer, promise, give, request, accept or receive anything which might reasonably be regarded as a facilitation payment.

9. RESPONSIBILITIES OF EMPLOYEES

Employees must ensure that they have read and understood this policy and, must at all times comply with the terms and conditions of this policy. Any employee who breaches any of the terms of this policy will face disciplinary action, which could result in dismissal for gross misconduct.

10. RAISING A CONCERN OR COMPLAINT

Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, you should raise the matter with the Human Resource department or the CEO.

11. PROTECTION

The Company is committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in corruption, or because of reporting concerns under this policy in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any detrimental treatment as a result of refusing to take part in corruption, or because of reporting concerns under this policy in good faith, you should inform the Human Resources Department or the CEO of the Company immediately.

If the matter is not remedied, you should raise the matter by following the procedure laid out in the **Whistle Blower Policy**

12. WHO IS RESPONSIBLE FOR THE POLICY

The Board Members have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The head of the Human Resources Department has the responsibility for implementing this policy.

Management at all levels is responsible for ensuring that those reporting to them are made aware of and understand this policy.

13. TRAINING AND COMMUNICATION

Dissemination of this policy for new joiners shall be carried out at the time of induction. This policy will also be shared with all existing employees. All employees may be required to participate in anti-corruption education and training sessions.

The Company's zero-tolerance approach to bribery and corruption should be communicated to all agents, suppliers, contractors and business partners at the outset of the Company's business relationship with them and as appropriate thereafter.

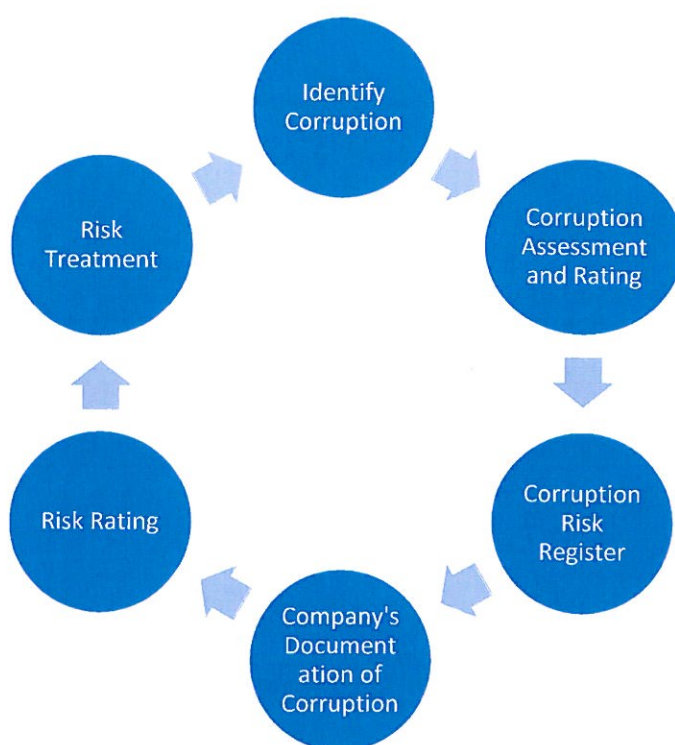
14. MONITORING AND REVIEW

The Board Members will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvement identified will be made and incorporated as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

15. CORRUPTION RISK ASSESSMENT

In order to enable Swift Energy Sdn Bhd to effectively address and manage the bribery and corruption risks in its subsidiaries, and operations units, the Company has established a process for the identification, evaluation and management of corruption risk areas, focusing on the Company's key corruption risk areas or areas where the Company is exposed to a higher risk of corruption. The Senior Management, comprising the Executive Director and Heads of Department, shall be responsible for the conduct of the Corruption Risk Assessment.

Corruption Risk Assessment Framework



Methodology

Identifying Corruption Risk Areas

When identifying Corruption risk areas, the business activities or processes within the value chain of the Company business segments or operations shall be considered in relation to the stakeholders involved in those business activities or processes. Amongst others, some business activities or situations with exposure to corruption risks are as follows:

- Interaction with Public Officials;
- Influence assurance results;
- Use of third-party agents;
- Joint-venture and strategic partnership arrangement;
- Obtain or retain sales; and
- Influence procurement arrangement.

Assessment and Rating Corruption Risk Areas

The assessment and rating of the Corruption Risk Areas shall consider the likelihood of the occurrence and consequence arising from the materialization of corruption risk, which considers, amongst others, the following:

- the Company's interest or stake in such transaction or activities;
- the magnitude of consideration value or amount;
- in relation to the Company's Governors, members of all Committees, Secretariat, suppliers/service providers or business associates performing service on behalf of the Company, the personal interest or benefit at stake in such transaction or activity; and
- the extent of the reputation of the external stakeholder involved in such transaction or activity (especially in relation to integrity and bribery).

Management of Corruption Risks

While the Company has a zero-tolerance against bribery and corruption, it will not be practical to expend unlimited resources on eradicating every possibility of bribery or corruption. Hence, the resources and effort put into managing the corruption risks shall be reasonable and proportionate with the risk exposure and risk rating, e.g. corruption risk areas with a greater exposure or higher risk rating shall be addressed with more rigorous controls to ensure the effectiveness of corruption risk management.

Corruption Risk Registers

The Company shall maintain and update records of the Corruption Risk Assessment in a register, including, amongst others, the following information:

- corruption risk areas;
- corruption schemes;
- potential activities;
- at-risk parties;
- gross risk rating (including likelihood and impact);
- anti-corruption controls;
- residual risk rating (including likelihood and impact);
- management action plan (additional controls to be implemented and person-in-charge); and
- implementation timeline.

Company's documentation of Corruption Risk Assessment.

Risk Parameters

In performing the corruption risk assessment, the following parameters shall be used as guidance in determining the likelihood of the risk occurring, its impact should the risk crystallizes, and the risk rating.

➤ Impact

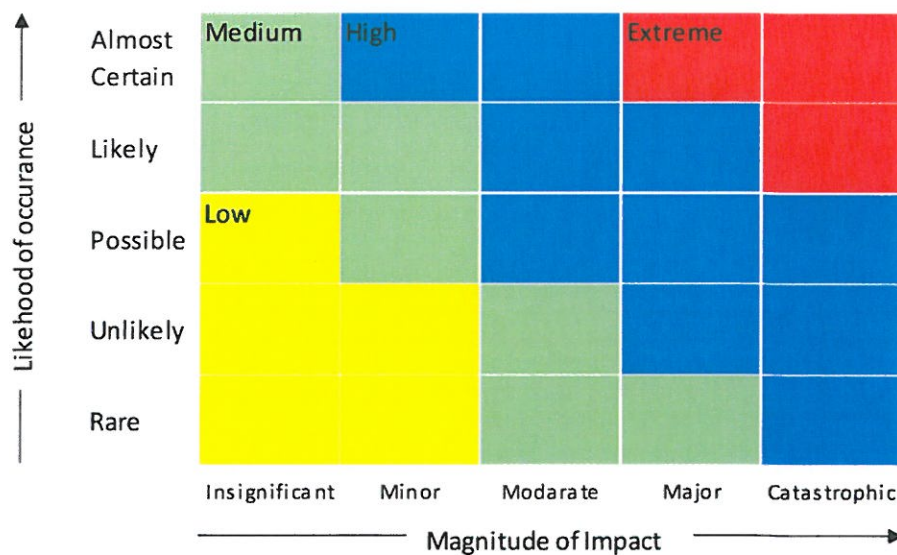
| Rating | Legal/Compliance | Reputation |
|---------------|--|---|
| Insignificant | <ul style="list-style-type: none"> • No litigation consequences • Issuance of advice letter | <ul style="list-style-type: none"> • Minimal/ no impact on the reputation |
| Minor | <ul style="list-style-type: none"> • Reprimand/ warning letter from authorities • Minor reduction in recognition from the international professional body | <ul style="list-style-type: none"> • Unfavourable information that would not disrupt routine operations |
| Moderate | <ul style="list-style-type: none"> • Public reprimand & warning letter from authorities • Moderate reduction in recognition from the international professional body | <ul style="list-style-type: none"> • Negative national media coverage • Complaints by industry practitioners that could disrupt the Company's routine activities in the short term |
| Major | <ul style="list-style-type: none"> • Temporary suspension of The Company's activities • Major reduction in recognition from the international professional body | <ul style="list-style-type: none"> • Serious national media coverage • Loss of trust in industry practitioner • The negative public image that could disrupt the Company's activities for a certain period of time |
| Catastrophic | <ul style="list-style-type: none"> • Closure of the Company • Permanent restriction on the Company's operation • Non-recognition by the international professional body | <ul style="list-style-type: none"> • Adverse international media coverage with authority's intervention • Loss of support from an industry practitioner • Sustained long-term/ permanent damage to the Company's image |

➤ Likelihood

| Rating | Descriptions |
|----------------|--|
| Rare | The risk may occur in exceptional circumstances and is unlikely to occur in the next five (5) years. |
| Unlikely | The risk is expected to occur less frequently but at least once in the next 3 years. |
| Possible | The risk is expected to occur at least once in the next 12 months. |
| Likely | The risk is expected to occur several times a year. |
| Almost Certain | The risk is expected to occur in most circumstances or at frequent intervals, at least monthly. |

➤ Risk Ratings

The Gross Risk Rating and Residual Risk Rating are derived using the following risk matrix:



The risk ratings are categorised into four categories, as shown in the table below, based on their impact and likelihood of occurrence.

| Risk Rating | Definitions |
|-------------|--|
| Low | Low risk of corruption or bribery occurring with minimal impact as a result |
| Medium | Moderate risk of corruption or bribery occurring with limited impact as a result |
| High | Corruption or bribery is likely to occur with significant impact as a result |
| Extreme | The occurrence of corruption or bribery is almost certain with catastrophic impact as a result |

Risk Treatment

The risk treatment options available for Management’s consideration comprise:

- **Avoiding:** Risks may be avoided by not engaging in the activities/ function with the attendant risks, for example, if bribery is inevitable in conducting a business activity, the risks may be terminated by terminating the business activity/ function;
- **Modifying:** The residual risk has exceeded the desired risk level based on the Board’s risk appetite and hence actions are to be taken to reduce the risk by lessening its likelihood or impact by the application of additional controls such as enhancing organisational procedures (e.g., segregation of functions), expansion of standard operating procedures, adopting of new or

revised policies, deploying an internal monitoring system and enlarging the scope of internal auditing, etc. or

- Retaining: Risks which are acceptable as they are within the desired risk levels, with full intent and purpose and we can make a conscious decision not to take any further action but monitor the existing controls and measures that are in place to manage the risk.

Frequency

Assessment of the Company's corruption risks shall be conducted on an annual basis, including consideration of any significant changes to the business environment, countries of operations, development in laws and regulations and industry developments.

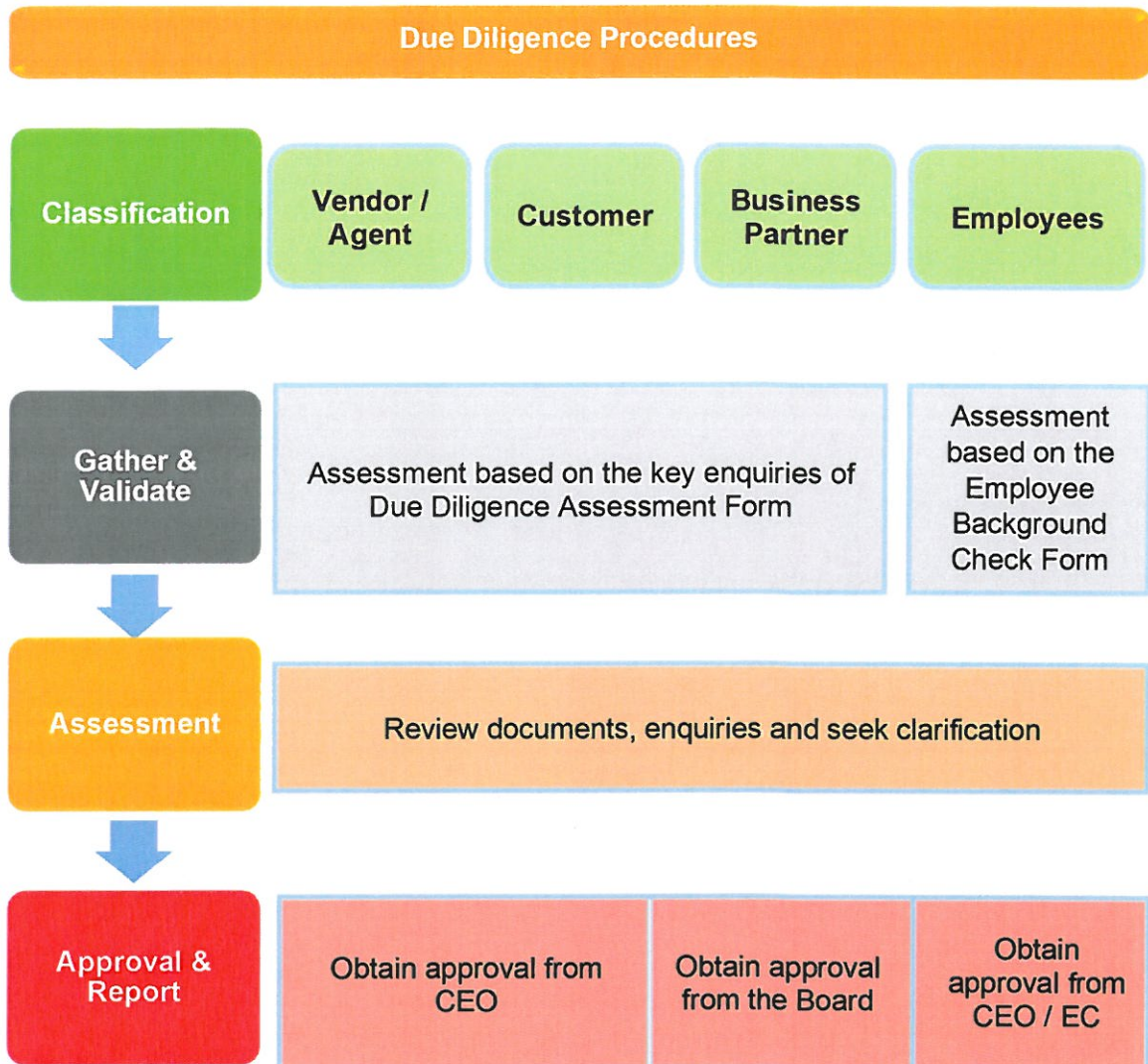
16. DUE DILIGENCE PROCEDURES AND DEALING WITH EXTERNAL PARTIES

Swift Energy recognises the objective of due diligence procedures on customers, business partners, vendors and employees to evaluate the risk of bribery and corruption associated with these parties. This also serves as a basis for decision making, whether to accept or reject before entering into any contractual arrangement or business dealing.

The Group shall require due diligence procedures to be applied on the key stakeholders below:

- Vendors or agents;
- Customers;
- Business partners; and
- Employees.

The diagram below depicts the due diligence process flow:



i. Dealing with Vendors or Agents

- a. Swift Energy is committed to uphold the highest standard of ethics and integrity in all aspects of its procurement activities by:
 - i. Adhering to the procurement policies and procedures;
 - ii. Avoiding dealing with any vendor, sub-contractors, or agents who known or reasonably suspected of corrupt practices;
 - iii. Ensuring that all new vendors/ sub-contractors/ agents are subject to background assessment and conflict of interest check prior to registration and acceptance;
- b. A Due Diligence Assessment shall be used in guiding Swift Energy employees to undertake an assessment on the vendors', sub-contractors, or agents' background and reputation, including their conflict of interest. The key components of vendor/ agent due diligence procedures cover the following but may vary depending on the circumstances:
 - i. Corporate profile;
 - ii. Company search via Suruhanjaya Syarikat Malaysia ("SSM") or equivalent authorities in the respective countries of operation;
 - iii. Financial background;
 - iv. Directorship;
 - v. Past records of criminal, bribery or corruption cases; and
 - vi. Potential conflict with existing employees or Director of the Group.
- c. The results and/ or any concern raised during this due diligence assessment shall be communicated to and with approval from the CEO prior to entering into the relationship.

ii. Dealing with Customers

- a. In ensuring that Swift Energy's dealings with its customers comply with relevant rules, regulations and the Policy & Guidelines requirements, the safeguard procedures below are required:
 - i. All new customers are subject to background assessment and conflict of interest check prior to entering into a business dealing; and
 - ii. A standard ABAC clause shall be included in all contracts/agreements entered with customers to enable the Group to terminate the contract in the event of any proven bribery or corruption activities.

- b. A Due Diligence Assessment shall be used in guiding the employee of Swift Energy to undertake an assessment on the customers' background and reputation, including their conflict of interest. The key components of customers due diligence procedures cover the following but may vary depending on the circumstances:
 - i. Corporate profile;
 - ii. Company search via SSM or equivalent authorities in the respective countries of operation;
 - iii. Financial background;
 - iv. Directorship;
 - v. Past records of criminal, bribery or corruption cases; and
 - vi. Potential conflict with existing employees or Director of the Group.
- c. The results and/ or any concern raised during this due diligence assessment shall be communicated to the CEO prior to entering into the relationship.

iii. Dealing with Business Partners

- a. To improve the background assessment, a due diligence process shall be carried out with regards to any business partner who intend to enter into long terms business relationship with Swift Energy.
- b. Due diligence assessment shall be carried out to ensure business partner is not likely to commit bribery and corruption activities in the course of its partnership with Swift Energy. A conflict-of-interest check shall also be carried out during due diligence and make declaration to the Board during evaluation. The key components of business partner due diligence procedures cover the following but may vary depending on the circumstances:
 - i. Corporate profile;
 - ii. Company search via SSM or equivalent authorities in the respective countries of operation;
 - iii. Financial background;
 - iv. Directorship;
 - v. Past records of criminal, bribery or corruption cases; and
 - vi. Potential conflict with existing employees or Director of the Group.

iv. Dealing with Public Officials

A 'public or government official' is defined in the CoC which includes, without limitation, candidates for public office, officials of any political party, and officials of state-owned enterprises other than Swift Energy. Caution shall be exercised when dealing with public officials. Providing gifts, entertainment or corporate hospitality to public officials or their family/ household members is generally considered a 'red flag' situation in most jurisdictions.

Swift Energy shall not provide non-business travel and hospitality for any government official or his/her family/household members without permission from the CEO in consultation with a lawyer.

Other Swift Energy's policies and procedures on a gift, entertainment and corporate hospitality shall also be abided by, copies of which can be obtained from the Human Resource Department.

If approval is given to provide a gift, entertainment or corporate hospitality to public officials, the Management shall ensure that the value of the gift, entertainment or corporate hospitality shall not exceed the statutory limit.

v. Dealing on Recruitment of Employees

- a. When required, background screening on the shortlisted candidate(s) for a managerial position and above is conducted during the evaluation stage of the recruitment process.
- b. Key considerations prior to acceptance of shortlisted candidate(s) cover the following:
 - i. Past criminal records (if any);
 - ii. Potential fraud, bribery or corruption committed in the previous organisation;
 - iii. Verification of past employment or institution of learning references, where applicable; and
 - iv. Conflict of interest, i.e. relationship with any employee, vendor, customer or Director of the Group.
- c. Recruitment due diligence result shall be vetted by the CEO prior to acceptance of the candidate holding managerial position and above.