EUPE Corporation Berhad
Business Associate Due Diligence Form Version: July 2026-DT

Objectives	To assess governance & integrity attributes that meet EUPE group's Anti-Bribery & Anti-Corruption ('ABAC') Policy requirements.		
Business Unit/ Department			
Nature of business dealing			
1	Name of individual/ entity that EUPE is planning to enter into contractual/ business relationship ('Business Associate')		
2	List the name of directors of the entity and their role (executive/ non-executive)	a. b. c. d. e.	
3	If the entity is part of a larger business group, state its immediate holding company and the group's name		
4	List the name of directors at immediate holding company	a. b. c. d e.	
5	Request for SSM registration records (to attach as Appendices) (I) Superform (Section 14) (II) Annual return (Section 68)		
6	List the name(s) of primary contact of business associate (and their designation) who will be dealing with EUPE group in the business transaction(s). Also identify any business partner of business associate who will be involved in the business transaction with EUPE.	Name	Designation/ Role
		a.	
		b.	
		c.	
		d.	
		e.	
		f.	
		g.	

<table>
<tr><td>7</td><td>Conduct online search using credible AI-powered search engine on:-

(I) Prospective entity/ individual - [Item 1]
(II) Individual director - [Item 2)
(III) Immediate holding company & group (where applicable) – [Item 3]
(IV) Directors of immediate holding company – [Item 4]
(V) Individual primary contact/ business dealing person/ business partner of business associate – [Item 6]

To determine whether the entity or any individual director and key personnel was or currently involved or suspected to be involved in corruption, bribery, or integrity related matters.</td><td colspan="3">Document results from online search on publicly available information</td></tr>
<tr><td></td><td></td><td>Is there any negative/ unfavourable/ red flags noted from online search?</td><td>YES</td><td>NO</td></tr>
<tr><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td></td><td></td><td colspan="3">If YES, Summarise the findings here and include details of online search results in a separate attachment.</td></tr>
<tr><td>8</td><td>Conduct online searches against Malaysia government sanction list, such as Ministry of Home Affairs (‘MOHA’), BNM, Securities Commission.</td><td>Is there any matching of name searched against the sanction list?</td><td>YES</td><td>NO</td></tr>
<tr><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td></td><td></td><td colspan="3">If YES, please provide further information and details.</td></tr>
<tr><td>9</td><td colspan="2">Determine if there are other red flags such as:-</td><td>YES</td><td>NO</td></tr>
<tr><td></td><td colspan="2">a. Suspicious payment arrangement (e.g request for large commission or payment in cash or to a secret or offshore account).</td><td></td><td></td></tr>
<tr><td></td><td colspan="2">b. Refusal to disclose owners, partners or principals.</td><td></td><td></td></tr>
<tr><td></td><td colspan="2">c. Request that other parties are named in the contract/to receive any monies due and payable under the contract.</td><td></td><td></td></tr>
<tr><td></td><td colspan="2">d. Attempted to re-negotiate or get around contractual terms relating to penalties for corruption.</td><td></td><td></td></tr>
<tr><td></td><td colspan="2">e. Business associate was referred to EUPE by a government official or officer of a public body, or a relevant customer.</td><td></td><td></td></tr>
<tr><td></td><td colspan="2">f. Any other situation which you are not comfortable with? Please specify.</td><td></td><td></td></tr>
</table>

Risk Rating	Low	Medium	High
Conclusion and decision (please state rationale and circle one of the risk ratings):	Accept business associate & proceed to next stage	Hold-on & seek GMD approval	Reject business dealing with business associate
Name: Designation: Reviewed & Approved Date: [Signature]	[Signature]	[Signature]	[Signature]

Guidance note:

a. *Risk rating determination – any red flags identified; exceptional/ adverse information; or negative feedback received on items 7, 8, 9 (of table above) shall be labelled as 'Medium / High' risk, which must be escalated to Group MD for approval before accepting as business associate for formal business transaction & relationship. All newly approved business associates (of medium risk rating) shall be compiled for RMAC notification (at quarterly RMAC meeting).*