

KECK SENG (MALAYSIA) BERHAD GROUP

Subject: Anti-Bribery & Anti-Corruption	Policy No: 08-00
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Date: 27 Feb 2020	Approved by: Dato' Ho Cheng Chong @ Ho Kian Hock

Objective:

To prevent acts of bribery and corruption.

INTRODUCTION

Furtherance to our Code of Conduct Policy, this policy:

- sets out the responsibilities of Keck Seng (Malaysia) Berhad Group (KSM), its Directors and those who work for and with us in observing and upholding our **zero-tolerance** position on bribery and corruption.
- provides guidance on the standards of behaviour to which we must all adhere.
- helps to identify when something is prohibited so that bribery and corruption is avoided.
- provides guidance if you are unsure whether there is a problem and you need further advice.

POLICY STATEMENT

KSM:

- is committed to conducting business in an ethical and honest manner.
- discourages bribery and corruption activities.
- is committed to upholding all laws relating to anti-bribery and anti-corruption in all jurisdictions in which we operate.
- prohibits all forms of criminal activities.

WHO DOES THIS POLICY APPLIES TO?

- Directors;
- All employees, whether temporary, fixed/permanent or casual, seconded;
- Consultants;
- Contractors;
- Suppliers;
- Trainees;
- Agents / agency staff;
- Volunteers;
- Sponsors; or
- Any other person or persons associated with us (including third parties — actual and potential).

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DEFINITION OF BRIBERY

Bribery is an act of offering, giving, promising, asking, agreeing, receiving, accepting or soliciting something of value or advantage so to induce or influence an action or decision, that the recipient would otherwise not offer.

A bribe is an inducement, reward or anything of value bestowed to influence the recipient's conduct or to gain commercial, contractual, regulatory or personal advantage.

It does not matter if the bribe is given or received directly or through a third party or for the benefit of the recipient or some other person.

Bribery is not only offering a bribe but also on receiving and accepting a bribe.

Bribery is illegal and therefore all parties must not be engaged in any form of bribery.

WHAT IS AND WHAT IS NOT ACCEPTABLE

An employee, whether on or off duty, is not permitted to **SOLICIT** or **ACCEPT**, directly or indirectly, from the public, competitors, suppliers, agents and customers, any commission, rebates, gifts, favours, gratuity exceeding the minimal value unless it appears that to refuse the gift would likely cause offense or embarrassment or otherwise adversely affect the relation between the Company and the outside source.

a) Gifts and Hospitality

Notwithstanding the abovesaid, gifts or hospitality are deemed acceptable if it meets the following requirements:

- it is not made with the intent to influence the party in which it is given.
- it is not made with the suggestion that a favour is to be returned.
- it is in compliance with the local law.
- it is given in the name of the company and not in an individual's name (it thus becomes the company's property).
- it does not include cash or cash equivalent (e.g. gift vouchers).
- it is given for a genuine purpose, reasonable and received openly in the ordinary course of business.
- KSM understands that the practice of giving and receiving business gifts varies between countries, regions, cultures and religions. Therefore, what is acceptable or unacceptable will inevitably differ for each company. It is good practice to **declare** what is given or received to an authorised company personnel.
- The restriction of receiving gifts or hospitality extends to spouses and dependents of the employee.

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b) Facilitation Payments and Kickbacks

We do not encourage facilitation payments and kickbacks in any form.

c) Political Contributions

We do not encourage political contributions or donations whether in cash, kind or by any means.

d) Charitable Contributions

KSM accepts and encourages the act of donating to charities whether through service, time, direct contributions and agrees to disclose all charitable contributions it makes when required.

However, care must be taken to ensure that such contributions are not used to facilitate and conceal acts of bribery.

All acts of charitable contributions made must be legal and ethical under local prevailing laws and practices.

e) Criminal Activities

Any other criminal activity, such as extortion, collusion, breach of trust, abuse of power, embezzlement, trading in influence or money laundering is prohibited.

RESPONSIBILITIES

a) Top Level Management

- ensure that the highest level of integrity and ethics are practiced.
- fully comply with applicable laws and regulatory requirements on anti-corruption.
- manages key corruption risks.

b) Company

- ensure that detailed and accurate financial records are kept.
- ensure that adequate and appropriate internal controls (financials and non-financials) are in place.
- declare and keep a record of the amount and reason for the approved gifts and hospitality given or received.

c) Employees

- ensure that they read, understand and comply with the information contained in this policy.
- are responsible for the prevention, detection and reporting of bribery and any other forms of corruptions.

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WHAT TO DO IF THERE IS A SUSPECTED BREACH OR BREACH OF THIS POLICY?

Any suspected breach or breach of this Policy can be reported directly to your immediate superior, Top Level Management or through the Company's whistleblowing channel. Please refer to the Company's Whistleblowing Policy.

CONSEQUENCES OF A BREACH

Violation of this Policy whether or not it is intentional, may result in disciplinary action (up to and including dismissal), and criminal liability for the individual involved.