

KAMDAR GROUP (M) BERHAD

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Kamdar Group (M) Berhad and its subsidiaries (“Kamdar”) are committed to conducting our business dealings fairly and with integrity. This means avoiding practices of bribery and corruption of all forms in our daily operations.

Zero Tolerance

Kamdar has a zero tolerance approach towards bribery and corruption activities regardless of the circumstances. We conduct business in an ethical and honest manner and comply with all anti-bribery and anti-corruption laws that are currently in force.

Bribery is a crime and penalties can be severe including prison sentences and large financial penalties. All Directors and Employees are reminded that he/she will be subject to stern disciplinary action, including dismissal as well as civil and criminal liability, if he/she is found in violation of this policy.

Gifts, Entertainment and Hospitality

Kamdar accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts/hospitality/entertainment is in compliance with law, must not violate the giver's and/or receiver's policies on the matter, and be consistent with local custom and practice.

Some examples of acceptable gifts/hospitality/entertainment are as follows:-

- Token gifts or promotional items (eg. pens, calendars, notebook etc) bearing company logo or brand;
- Fruits, flowers, hampers of appropriate value during festive seasons or other ceremonial occasions; and
- Meals for business purposes.

As a general principle, Directors and Employees should not accept or give any gifts/hospitality/entertainment to a third party if it is made with the intention of influencing the third party to obtain or retain business, or in exchange for favours or benefits.

Facilitation Payments

Facilitation payments are payments given to secure or expedite the performance of a routine or administrative function. Any such payment in the course of Kamdar's business is strictly discouraged.

Charitable Contributions and Donations

Corporate responsibility, sponsorship, donation contribution is acceptable, whether of in-kind services, knowledge, time, or direct financial contributions. However, Directors and Employees must be careful to ensure that such contributions are not used as a scheme to conceal bribery. No such contribution can be offered or made without the prior approval of the Management.

Responsibilities

All Directors, Employees and persons associated with Kamdar (including third parties) are responsible for understanding and complying with this policy and are required to avoid any activities that could lead to, or imply, a breach of this policy.

Kamdar reserves the right to terminate a contractual relationship with a Director, an Employee or persons associated with Kamdar (including third parties) if they breach this policy.

Periodic Monitoring And Review

Kamdar shall review its Anti-Bribery And Anti-Corruption Policy every three (3) years or as and when deemed necessary by the Board of Directors or update/change in the regulations.