

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. INTRODUCTION

Ken Holdings Berhad and its subsidiaries (“the Group”) are committed to conducting business dealings with integrity and consistent with the highest ethical standards, and in compliance with all applicable laws and regulatory requirements for the prevention of bribery and corruption.

This Anti-Bribery and Anti-Corruption policy (“Policy”) is not intended to provide definitive answers to all questions regarding bribery and corruption, but is envisioned to provide basic introduction to how the Group combats bribery and corruption in furtherance of its commitment to lawful, fair and ethical behaviour at all times, in addition to being designed to avoid situations in which bribery and corruption may take root. The Group has adopted a zero-tolerance approach against all forms of bribery and corruption and takes a strong stance against such acts.

2. SCOPE

This Policy applies to all Directors and employees of the Group (whether on a permanent, fixed term or temporary basis) as well as business associates who are performing work or services for or on behalf of the Group.

3. POLICY

- 3.1 This Policy strictly prohibits all forms of bribery and corrupt practices, and makes no distinction whether they are being made to persons in the public or private sectors.
- 3.2 Employees, Directors and business associates must not directly or indirectly pay, offer or promise any gratification to business associates or any other party as an inducement for or reward for acting improperly.
- 3.3 This Policy sets out the minimum standards to which all employees, Directors and business associates must adhere to at all times.

4. GIFTS, ENTERTAINMENT & CORPORATE HOSPITALITY

- 4.1 As a general rule, employees are prohibited from offering, giving or receiving, direct or indirectly, any gifts, entertainment or hospitality in connection with their job or work for the Group.
- 4.2 The offer and receipt of gifts, entertainment or hospitality must be avoided whenever they could affect or be perceived to affect the outcome of business transactions or dealings, or are not reasonable and bona fide.
- 4.3 KEN recognises that giving and receiving corporate gifts is a common practice within the business environment to foster business relationships and therefore, employees and Directors must always exercise good judgment when giving or receiving gifts and hospitality.

- 4.4 Corporate gifts may be given to business associates or other parties provided it fulfils the following conditions:
- a) made for the right reason – it should be clearly given as an act of appreciation or common courtesy associated with festive seasons or other ceremonial occasions;
 - b) no obligation – it must not be used to cause or induce the receiver to improperly or illegally influence any business action or inaction or cause others to perceive as an improper influence;
 - c) no expectation – there must not be any expectation of any favour or improper advantages from the receiver;
 - d) made openly – if made secretly and undocumented, then the purpose will be open to question;
 - e) reasonable value – the type of gift and its value must commensurate with the occasion and in accordance with general business practice; and
 - f) legal – it complies with applicable laws.
- 4.5 Employees should avoid giving or receiving gifts or hospitality (including entertainment, meals, business travel, tickets to social, entertainment or sports events etc) which is excessive in value, given too often, or leaves the employee or (as the case may be) the other person in a position of obligation or perceived obligation.
- 4.6 Gifts, entertainment or hospitality in the form of cash or cash equivalent are prohibited and must be avoided.
- 4.7 If any employee is unsure of how to consider the intention behind any gifts, entertainment or hospitality offered, the employee is expected to disclose and refer the matter to the immediate superior or Head of Department to obtain advice and also approval before proceeding.

5. FACILITATION PAYMENTS

- 5.1 Facilitation payments are form of payments made personally to an individual in control of a process or decision to secure or expedite the performance of a routine or administrative duty or function (e.g. influencing the timing of process or issuing of permits). Facilitation payments need not involve cash or other financial asset; it can be any sort of advantage with the intention to influence them in their duties.
- 5.2 Facilitation payment is strictly prohibited under this Policy. Employees, Directors and/or business associates must not directly or indirectly offer, promise, give, request, accept or receive anything which might reasonably be regarded as a facilitation payment to anyone for any purposes.

6. DONATIONS AND SPONSORSHIPS

- 6.1 Donations and sponsorships, including charitable contributions, made on behalf of the Group must adhere to an underlying principle to avoid any risk of actual or perceived bribery and be made only for bona fide purposes.
- 6.2 KEN will only provide donations or sponsorships that are legal and ethical under local laws and practices.
- 6.3 Employees, Directors and/or business associates must not use donations or sponsorships to obtain business or advantage of any kind or unduly influence the outcome of a business decision or cause others to perceive it as such. The use of donations or sponsorships in this manner is strictly prohibited under this Policy.

7. POLITICAL CONTRIBUTIONS

- 7.1 Employees, Directors and business associates must not make donation or funding of any kind to political parties or towards political campaign or initiatives on behalf of the Group.

8. BUSINESS PARTNERS AND THEIR CONDUCT

- 8.1 Employees and Directors must carry out proper due diligence process and comply with all applicable standard operating procedures of the Group before on-boarding any business associates.
- 8.2 Employees and Directors must monitor business associates' performance from time to time to be in compliance with this Policy, and where breach or suspected breach arises, immediate action must be taken.
- 8.3 The Group expects all business associates to comply with this Policy in relation to all dealings with the Group. Business associates must also refrain and procure its affiliates to refrain from taking any action that would result in violation with this Policy.

9. DEALING WITH GOVERNEMENT AND PUBLIC OFFICIALS

- 9.1 Employees, Directors and business associates must comply with all applicable laws, conduct themselves with integrity and apply the highest ethical standards whenever they deal or otherwise engage themselves with governments, government agencies, regulatory bodies, statutory bodies and any of its officials.
- 9.2 Employees, Directors and business associates must not directly or indirectly exert or attempt to exert any improper or illegal influence on public officials.
- 9.3 If any information is required by any government, government agencies, regulatory bodies or statutory bodies, employees must always consult their immediate superior before responding to such requests and ensure that all information provided is in good faith, truthful and accurate.
- 9.4 Any improper or secret payments or transfer of items of any value (including facilitation payments) to public officials is strictly prohibited. Employees are advised to refer to their Head of Department should they have any doubts on whether such payments constitute an improper, secret and/or facilitation payment.
- 9.5 Any improper or secret payments or transfer of items of any value through intermediaries or a third party, with the knowledge that all or part of the payment will contribute directly

10. CONFLICT OF INTEREST

- 10.1 Conflict of interest arise where there is personal interest that can be considered to have potential interference with objectivity in performing duties or exercising judgement.
- 10.2 Employees and Directors must avoid situations in which their personal interest would conflict with their duties and responsibilities. The use of their position, the Group's assets and resources, or information available to them for personal gain, or undue disadvantage to the Group is strictly prohibited.
- 10.3 Employees and Directors are required to make declaration of any conflict of interest immediately when they become aware of a conflict, regardless of whether such conflict is an actual, potential or perceived conflict of interest.

11. COMPLIANCE WITH LAW

Employees and Directors are responsible in ensuring that they always comply with all laws and regulations, in particular, to the Malaysian Anti-Corruption Commission Act 2009. No excuses or exceptions will be acceptable for non-compliance of any domiciled laws and regulations where the Group conducts its businesses.

12. ENFORCEMENT FOR NON-COMPLIANCE

- 12.1 KEN regards acts of bribery and corruption as a serious matter and will take appropriate actions in the event of non-compliance of this Policy.
- 12.2 For employees and Directors, non-compliance of this Policy may lead to disciplinary action and termination of employment.
- 12.3 For business associates, non-compliance of this Policy may lead to termination of contract and claim for damages.

13. REVIEW OF THE POLICY

The Policy will be periodically reviewed and updated in accordance with the needs of the Company and any new regulations to ensure it remains relevant and in line with best practices.