

ANTI-BRIBERY AND CORRUPTION POLICY

SCOPE OF APPLICATION

This policy applies to all members of the Board of Directors and employees of Kulim (Malaysia) Berhad and its Group of Companies ("Kulim") at all levels and grades.

POLICIES

Kulim (Malaysia) Berhad and its Group of Companies ("Kulim") is committed to adopting the Anti-Bribery and Corruption Policy and conducting activities and business dealings with the highest ethical standards to ensure any possibilities for corruption can be addressed effectively and efficiently.

1. This policy applies to all Kulim employees, including stakeholders who involved in any dealings with Kulim and is used as a framework in positioning, reviewing and achieving the Anti-Bribery and Corruption objectives.
2. Kulim is committed to comply with the provisions of Malaysian Anti-Corruption Commission Act 2009 and any other anti-bribery and corruption relevant laws in which we operate.
3. Kulim's Board of Directors and the Management are committed to implementing all policies and procedures to prevent any form of corruption as well as to undertaking continual improvement through the Anti-Bribery Management System (ISO 37001: 2016).
4. Through our Whistle-blowing Policy, Kulim will continuously provide opportunities to all employees and stakeholders to disclose and report any practice of corruption.
5. The Integrity Unit of Kulim is established to monitor and ensure the Anti-Bribery Management System is implemented and subsequently to report to Management for evaluation and improvement.
6. An appropriate action will be taken against any Kulim's employees who fail to comply with this Anti-Bribery and Corruption Policy.