EVERSENDAI

ANTI-BRIBERY AND CORRUPTION POLICY

Eversendai Corporation Berhad and all its subsidiaries (hereinafter referred to as Eversendai) prohibits bribery and corruption at all levels of employment and engagement of relevant stakeholders.

Eversendai complies strictly with all anti-bribery and anti-corruption laws and regulations applicable to the organisation in whichever country it conducts business irrespective of the local work environment, culture, customs and traditions.

All relevant stakeholders of Eversendai shall not accept and/or give bribes such as but not limited to products and services; gifts and hampers; food and drinks; entertainment and sponsorships for education; sponsorships for local and overseas travel; cash, credit facilities, discounts and monetary benefits of any kind for their personal, organisational and / or friends, family gains, and use or force anyone to accept or give bribes on their behalf.

All relevant stakeholders of Eversendai shall not encourage, engage in or promote corrupt practices such as but not limited to, cheating and stealing, collusion, extortion, breach of trust, conflict of interest, abuse of authority, embezzlement, trading under influence, falsifying documents, non-compliance with regulations, absconding during outstation / overseas work, submission of false claims, hiring illegal staff and workers, terrorist funding, fraud and money laundering for their personal, organisational and/or friends, family gains, and use or force anyone to encourage, engage in or promote corrupt practices on their behalf.

Any relevant stakeholder of Eversendai accused of accepting and/or giving bribes and/or encouraging, engaging in and promoting corrupt practices shall be subjected to a domestic inquiry and if found guilty shall be terminated from his/her employment.

Any relevant stakeholder of Eversendai who is a whistle blower and / or witness for reporting any acceptance and/or giving bribes and/or engaging in corrupt practices; shall be duly protected by Eversendai whistleblower policy.

This documented Eversendai Anti-Bribery and Corruption policy shall be reviewed periodically for control effectiveness and continual improvement, in meeting objectives and targets, displayed appropriately and made available to all relevant stakeholders, communicated in the appropriate language and trained for their understanding, acceptance and compliance.

APPROVED BY

TAN SRIA K NATHAN

Group Managing Director

03 April 2020

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