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| COMPANY | Eversendai Corporation Berhad | DEPARTMENT | Human Resource and Administration |
| TITLE | Anti-bribery corruption policy | DOCUMENT TYPE | Policy |
| REF. NO. | ECB(ABC)001PY1 | REV. NO. | 01 |
| ORIGINATOR | Premnath Kumaran | APPROVER | Tan Sri A K Nathan |
| POSITION | Group HRAD Director | POSITION | Executive Chairman & Group Managing Director |

ANTI-BRIBERY CORRUPTION POLICY

1. Introduction

Eversendai Group of Companies (collectively and herein referred to as “the Eversendai Group”) is committed to conducting its business professionally, ethically and with the highest standard of integrity. The Group practices a zero-tolerance approach against all forms of bribery and corruption and upholds all applicable laws and regulations in relation to anti-bribery and anti-corruption in whichever country it conducts business, irrespective of the local work environment, culture, customs and traditions.

2. Definition of Bribery and Corruption

Bribery and corruption refer to the offering, promising, giving, accepting, or soliciting of undue advantage or gratification as an inducement or reward for a person acting or refraining from acting in relation to the performance of their duties. Such actions are considered illegal, unethical, or a breach of trust.

Forms of bribery include, but are not limited to, kickbacks, inflated commissions, expensive gifts, and excessive or inappropriate entertainment. Corrupt practices encompass extortion, collusion, breach of trust, abuse of power, trading under the influence, embezzlement, fraud, or money laundering.

3. Objective

The objective of this Anti-Bribery and Corruption (“ABC”) Policy is to provide information and guidance on how to recognize and deal with bribery and/or corruption. These guidelines are further outlined in the Group’s Code of Conduct.

The situations described in this ABC Policy are not intended to be exhaustive and may, therefore, cover other situations as and when there is a change in law or circumstances in which the Group is operating.

4. Scope

This ABC Policy is applicable to all directors and employees of the Group,(collectively referred to as “**Personnel.**”) It is also expected that all Business Partners, such as clients/customers, sub-contractors, suppliers, vendors, consultants, and other persons or entities performing work or services for or on behalf of the Group (“**Business Partners**”), comply with the relevant parts of this ABC Policy when performing such work or services.

The term “**Public Officials,**” when used in this ABC Policy, shall mean officials of any government, government agencies, or any regulatory, statutory, or administrative bodies, whether local or foreign. This includes elected and appointed officers or employees of national, municipal, or local governments (including individuals holding legislative, administrative, and judicial positions), officials of political parties and candidates for political offices, and employees of government or state-controlled companies and government-linked companies.

In the event of a conflict between this ABC Policy and any applicable anti-bribery and/or anti-corruption related law(s), the applicable law(s) shall prevail, and all Personnel and Third Parties shall comply with the applicable law(s).

5. Guidance on Common Forms of Bribery and Corruption

5.1 Gifts

All personnel are prohibited from receiving and/or offering the following, whether directly or indirectly, to obtain a business or business advantage of any kind:

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- (a) Any gift of cash or cash equivalent, including but not limited to gift certificates, vouchers, coupons, discounts, commissions, payment of credit card charges, shares, and loans;
- (b) Any gifts provided or received with a direct or indirect suggestion, hint, understanding, or implication that some expected or desirable outcome is required;
- (c) Any gifts involving parties during a tender or competitive bidding exercise;
- (d) Any gift that would be illegal or in breach of applicable laws; and
- (e) Any gift that is lavish and/or excessive or may adversely tarnish the reputation of the Group.

If in doubt about the acceptability, the gift must be rejected.

Corporate gifts/hampers, festive, or ceremonial gifts may be received from or given to Third Parties provided they fulfill the conditions stipulated below:

- (a) Made for the right reason – it should be offered or received as an act of appreciation or common courtesy (e.g., associated with festive seasons or other ceremonial occasions).
Providing Reasonable Gifts During Marriage - Acknowledging significant life events, such as marriages, is a thoughtful way to express goodwill and strengthen personal and professional relationships. Providing reasonable gifts during such occasions is appropriate and encouraged, provided that the value of the gift is modest, and it is given in the spirit of genuine celebration.
All gifts should comply with our company's policies on gift-giving, ensuring they are appropriate and do not create any conflicts of interest.
- (b) No expectation/obligation – there must not be any expectation of any favour or improper advantage from the receiver. 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 an improper influence.
- (c) Reasonable value – its value must be commensurate with the occasion and in accordance with general business practice.
- (d) Legal – it should comply with applicable laws in the countries of both the offeror and the recipient of the gift.

5.2 Hospitality and/or Entertainment

Hospitality encompasses food and beverages consumed during business meals, as well as travel expenses such as airfare, accommodations, and taxi or car fare incurred while entertaining clients for dinner. The purpose of such engagements is to cultivate and strengthen professional relationships, fostering trust, understanding client needs, and exploring business opportunities in a relaxed and personal setting. It is imperative that these dinners are conducted with the utmost professionalism and integrity, in alignment with our company's values and ethical standards.

Additionally, hospitality extends to corporate-related events or activities organized by the Group, which may involve entertaining employees and/or other parties for the benefit of the Group. Entertainment may include providing tickets or admissions to sporting or cultural events, whether as a spectator or participant.

The Group prohibits the receiving and/or offering of hospitality and/or entertainment in the following situations:

- (a) Any hospitality and/or entertainment provided or received with the aim of improperly causing undue influence on any party in exchange for some future benefit or result.
- (b) Any hospitality and/or entertainment provided or received with a direct/indirect suggestion, hint, understanding, or implication that some expected or desirable outcome is required.
- (c) Any hospitality and/or entertainment involving parties engaged in an ongoing tender or competitive bidding exercise.
- (d) Any hospitality and/or entertainment provided or received that would be illegal or in breach of any applicable laws.
- (e) Any sexually oriented hospitality and/or entertainment.
- (f) Any hospitality and/or entertainment provided or received that would be perceived as lavish or excessive or may adversely tarnish the reputation of the Group.

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The Group recognizes that providing hospitality through corporate events, sports events, or other public events, or the occasional acceptance of appropriate and proportionate entertainment provided by third parties in the normal course of business, is a legitimate way to network and build business relationships.

Notwithstanding, all personnel must exercise due care and judgment when receiving and/or offering hospitality and/or entertainment, as guided by the principles laid down under Section 5.1.

5.3 Donations

Donations and charitable support are acceptable (and indeed encouraged). However, directors and employees must be careful to ensure that donations and charitable contributions are not used as a scheme to conceal bribery.

5.4 Political Contribution

Subject to applicable laws governing political contributions, the Group is authorized to make contributions to political parties or candidates. Approval from the Group Managing Director is mandatory for all political contributions.

5.5 Facilitation Payment and/or Extortion Payment

The Group strictly prohibits the acceptance or provision, whether directly or indirectly, of any facilitation or extortion payments.

Facilitation payments constitute a form of payment made directly to an individual (including Public Officials) or group in control of a process or decision to expedite the performance of a routine or administrative duty or function (e.g., influencing the timing of processes or issuing permits). Extortion payments involve the demanding of gratification, whether or not coupled with a threat if the demand is refused.

In exceptional situations where Personnel have no alternative but to make facilitation payments to protect themselves from injury, loss of life, liberty, or damage to property, such instances must be promptly reported to the Group Managing Director.

6.0 Business Partners

All Business Partners, including clients/customers, sub-contractors, suppliers, vendors, consultants, and other persons or entities performing work or services for or on behalf of the Group, should be made aware of this ABC Policy.

7.0 Whistleblowing

Details can be referred to in the Whistleblowing Policy ECB(WMS)001PY1

8.0 Record Keeping

The Group must ensure the meticulous maintenance of accurate and complete records, encompassing accounts, invoices, and documents, for all payments. These records serve as evidence, substantiating that such payments were bona fide and not associated with corrupt or unethical conduct.

All Personnel are mandated to declare any gifts received or offered, to be recorded in a Gifts Register maintained at the respective Reception, Department, and/or Location. This Gifts Register will undergo internal audit review and will include pertinent details such as the date, the name of the receiver or offeror, a description of the gift, and the purpose for giving or receiving the gift.

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Concerning expense claims for hospitality and/or entertainment, it is imperative to meticulously record and obtain approval for the recipient's name, job position, company/business name, and the purpose of such expenditure in accordance with the Defined Approval Levels (DAL).

9.0 Violation and Investigation

Any conduct that is non-compliant or in violation of this ABC Policy and/or applicable laws will be treated with utmost seriousness and be subject to stringent disciplinary actions and/or a domestic inquiry, following the procedures outlined in the Group's Code of Conduct. This may potentially lead to termination of employment.

The process will be coordinated and investigated by Group Internal Audit and shall be reported to both Management and the Audit Committee.

10.0 Monitoring and Review

This ABC Policy is subject to periodic reviews, ensuring it is appropriately displayed, and made available and communicated to all relevant parties in the applicable local language. This encompasses presentations or workshops designed to reinforce awareness, understanding, and compliance.

Group Internal Audit will conduct periodic audits to monitor, review, improve, and assess the effectiveness of ongoing anti-bribery and anti-corruption efforts. The results of these audits shall be reported to the Audit Committee.

Eversendai Corporation Berhad

Tan Sri A K Nathan

Tan Sri A K Nathan
Executive Chairman & Group Managing Director

Effective Date: 03 Jun.2024

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