

JIANKUN INTERNATIONAL BERHAD

Anti – Corruption, Gifts and Anti – Bribery Policy

Jiankun International Berhad (JIB) is committed to conduct its business with integrity

In line with that commitment and the Section 17A of the Malaysian Anti – Corruption Commission Act 2009 and amendment there after MACC Act, JIB has developed its Anti-Corruption, Gifts and Entertainment Policy (“ACP”). As a contractor, service provider, customer and stakeholders of JIB, you shall comply with the terms of this policy for your dealing with JIB.

Introduction

- a) This Policy applies to all Directors (“BOD”), employees, agents, business partners, contractors, consultants and stakeholders of Jiankun International Berhad and/or Jiankun International Group of Companies (hereinafter referred to as “Jiankun”), domestically or outside Malaysia.
- b) This policy provide reference and ensure proper processes for protecting both the organization, senior management and staffs from the obligations currently resulting from the MACC Act.
- c) The goal of this policy is to encourage the practice of a corruption-free business environment, as well as to urge all business associates to adopt appropriate and corresponding steps to guarantee that their organization do not engage in corruption activities for their personal interest and gain. To ensure the effectiveness, steps should be taken and implemented as policies and procedures, including but not limited training, communication, and compliance.
- d) In the case that a business is held accountable under of the MACC Act, the clause in the policy states that the organization with proper processes may use it as a defense against corporate liability. In this regard, the company must demonstrate that the required measures were in existence to prevent its employees and/or associated individuals from engaging in fraud related to its business operations.

Scope

This policy is applicable to all directors, employees, managers, business associates and stakeholders of Jiankun International Berhad in all actions originating from their position or duties, including those investee businesses over whom the company has functional authority, within the limitations set for in the relevant legislation.

The Policy may apply to individuals or organizations who do not belong to Jiankun if they have a business or professional relationship with the company and their actions present a risk or

responsibility for the business or may directly or indirectly impact the company's image or good name, and the contract is adopted at the proper level.

Employees, Customers and suppliers shall ensure that they adhere to the following –

1) Gifts, Entertainment and Corporate Hospitality

Jiankun International Berhad outlaws the offering and acceptance of gifts (in cash or in kind) that establish a duty to endorse or that others may use to charge favoritism, cronyism, prejudice, collaboration, or other improper acts by the corporation.

Gift Policy

The objective of this Gift Policy is to avoid conflicts of interest or impressions of misconduct resulting from the exchange of gifts between workers and clients, suppliers, or other business partners. This policy aims to maintain the highest levels of integrity and competence.

- i) Any gift must be unsolicited and not affect, or be perceived as affecting, business judgment. Gifts should only be offered to and received in connection with a customary business or cultural occasion.
- ii) All employees should not accept or receive gifts from any individuals or organization that involves in business directly or indirectly with Jiankun.
- iii) To prevent any conflict of interest that may be seen as bribery, every employee must understand and follow this policy in order to avoid any conduct regarding these matters.
- iv) Any gifts in the form of cash and cash value, loans, kickbacks or the equivalent advantages are strictly prohibited except for Hari Raya, New year and other celebration without compromising any management decision and justification.
- v) Foods, flowers and hampers, and other promotional things valued at no more than RM500 are permissible. Hari Raya/New Year presents worth up to RM500 sent to the workplace must be shared among current staff members in the office. If a gift is addressed to an officer or Head of Department, the receiver must inform the Human Resources Department if it has not been shared with other employees.
- vi) Employees must not accept gifts that could compromise their integrity or the company's reputation, including cash or cash equivalents (e.g., gift cards), extravagant items, or gifts given in secret.
- vii) If an employee is unable to deny or return a gift with a probable worth of more than RM500, the employee must disclose and submit the gift to the Human Resources Department ("HRD"). HRD will seek guidance from the Executive Director ("ED") or Chief Executive Officer ("CEO") on decision.

Providing gifts, entertainment and hospitality

- i) In general, all staff are not allowed to offer presents to third parties, with the exception of Jiankun's corporate gifts, which are delivered as a company

politeness or during corporate events (carrying Jiankun International Berhad's name and a logo).

- ii) Expenses related to corporate gifts must be documented and subject to audit.
- iii) Hospitality must be unsolicited and not affect, or perceived as affecting business judgment. Gifts and entertainment should only be offered to and received from the Jiankun representative dealing with the customer or service provider in their role in Jiankun, is for purpose supported by Jiankun and may be only be offered in conjunction with legitimate business meetings, conferences or events hosted, supported or sponsored by company.

Dealing with Public Officials

- i) Any commercial contact with Jiankun that involves the interests of Public Officials who have an immediate connection with Jiankun and whose interests are not prohibited by the company's Code of Conduct Policy.
- ii) All employee is restricted from soliciting for non-business trips, entertainment, or accommodation for any public figure or his or her family members.
- iii) Jiankun shall not attempt to improperly influence public officials / government in order to obtain an advantage in commerce or business favour, or to give, offer, pay, or promise to issue bribes, including lavish and extravagant gifts, to them using personal funds or resources to make facilitation payments or bribes.

2) CSR, Donations and Sponsorships

Jiankun International Berhad as a responsible organization to care of community may involve in charitable activities. Sponsorships, contributions to charities, and corporate social responsibilities shall not be concealed as bribery payments, may unlawfully influence company decisions, or as a connection to fund illegal activities that violate Jiankun's policies and procedures, as well as the corresponding regulations and laws.

- i) Any CSR, contribution, or sponsorship activity must not be utilized to avoid or dodge legal and regulatory responsibilities. Ultimately, it will not be used to enable corruption, unlawful activity, or money laundering.
- ii) All of these activities must be approved by the respective Executive Director ("ED") and/or CEO of the business segment for legitimacy and genuineness and not be made to improperly influence a favorable business outcome.

Political Contribution & Donation

- i) Jiankun prohibits the support and giving of contributions or offerings to any political candidate, political party, or election campaign for the purpose of gaining any business or commercial advantage, or where the politician is expected to promote the interests of the person who made the donation, which is potentially in violation of their official responsibilities.

- ii) Jiankun has adopted a global policy prohibiting their employee from making any political contributions to political parties or candidates using JIB funds.

3) Facilitation Payment

- i) Never make or use third parties to make an unofficial payment in order to secure or expedite routine administrative actions, such as customs clearances, visas, permits or licenses.
- ii) Accepting or getting facilitation payments from any person, either directly or indirectly, for the advantage of the employee or another person is prohibited under Jiankun since it is considered as bribery.
- iii) All employees shall not provide, promise, offer, seek, accept, or receive anything that may be legitimately interpreted as a facilitation payment. If an employee gets a request or is given facilitation fees, he or she must immediately notify the Head of Division ("HOD") or CEO.

4) Due Diligence on Third Parties

- i) Conduct due diligence to examine the reliability of Jiankun's possible business counterparts, which include customers, contractors, vendors, suppliers, solicitors, agents, consultants, joint venture partners, and government intermediaries (hereafter referred to as third parties).
- ii) All other parties must be fully understanding Jiankun's Directors Code of Conduct, as well as its Integrity and Anti-Corruption Policy. Third parties must sign the declaration form to acknowledge and certify that they will follow all anti-corruption measures through their commercial interactions.
- iii) Identify issues during the course of due diligence, and any issues that arise must be adequately mitigated by third parties before progressing with business deals.
- iv) Where the division engaged determines that the risk could not be reduced despite all non-exhaustive steps, the agency shall not conduct business with the third party.

5) Corruption Risk Management

- i) Frequently and ongoing evaluations of the type and severity of the risk of corruption and bribery, as well as the amount of being exposed, are required to be aware of possible hazards both internally and externally.

6) Record Keeping

- i) Every department must ensure that all business and transactions are properly documented and traceable. They must keep all records, operating papers, other

- documents, and transactions so that Jiankun will comply with and respond to any inquiries from the relevant authorities.
- ii) Records on client identity, company interactions, and safety documents must be preserved by appropriate departments after the business transactions are ended, or completed.
 - iii) There should be no entries in Jiankun's books and records that alter or conceal the genuine nature of the transaction. Hidden, undeclared, or undocumented transactions are severely banned.

7) Employee Recruitment

- i) Proper background checks must be conducted to ensure that potential employees have not been convicted in any bribery or corruption cases.
- ii) When recruiting managers, more extensive background checks are required.
- iii) All employees are required to sign the integrity & anti – corruption declaration form.

8) Communication and Training

Jiankun International Berhad's objectives are to expand personnel's understanding of the relevant laws and corporate policy, as well as to allow personnel to recognize, avoid address, and deal with risk situations or proof of corruption and bribery within the organization.

- i) Jiankun will communicate and explain the integrity and anti-corruption policies to all staff. They will be trained on the terms and implementation of the policy, as well as the appropriate reporting processes.
- ii) Employees shall attend seminars and online training sessions indicated to familiarize them with anti-corruption regulations and the consequences of violation if needed.
- iii) HR shall ensure the employee understand the policy during the induction program.