



KJTS GROUP BERHAD

(202201020004) (1465701-T)

(Incorporated in Malaysia)

ANTI-BRIBERY ANTI-CORRUPTION POLICY

KJTS Group Berhad and its subsidiaries ("KJTS Group") are firmly committed to maintaining the highest standards of integrity, transparency, and ethical conduct across all operations, including facilities management, cooling and district cooling services, energy optimization, and technical engineering services. We adopt a zero-tolerance approach towards bribery and corruption in all business dealings and relationships, whether conducted directly or through third parties.

1. Prohibition of Bribery

We strictly prohibit bribery, corruption, kickbacks, facilitation payments, or any improper advantage, whether direct or indirect, offered, promised, given, requested, or received by any party acting on behalf of the Group.

2. Compliance with Applicable Laws

We commit to complying with all applicable anti-bribery and anti-corruption laws, regulations and government-issued guidelines in the jurisdictions in which we operate, including but not limited to:

- Malaysia: Malaysian Anti-Corruption Commission Act 2009 (Act 694)
- Singapore: Prevention of Corruption Act 1960 (Chapter 241)
- Thailand: Organic Act on Anti-Corruption B.E. 2561 (2018)

3. Commitment to ISO 37001:2025 ABMS

We commit to fulfilling the applicable Anti-Bribery Management System (ABMS) requirements under ISO 37001:2025 and to continually improving the effectiveness, adequacy and suitability of our ABMS across the Group.

4. Framework for Anti-Bribery Objectives

This policy provides the foundation for establishing, monitoring and reviewing anti-bribery objectives that are aligned with:

- the Group's operational context and nature of business;
- the strategic direction of KJTS Group; and
- expectations of stakeholders, regulatory bodies, and clients.

These objectives shall be reviewed periodically for continued relevance and effectiveness.

5. Speak-Up Culture

We encourage employees, contractors, business partners, and third parties to raise concerns or report suspected bribery in good faith without fear of reprisal. Reports may be made confidentially or anonymously to whistleblow@kjts.com, internal portal or postal submission to Group Compliance Office, and retaliation of any kind is strictly prohibited.



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6. Anti-Bribery Function Authority

We ensure the Anti-Bribery Function has the independence, authority, access and resources to effectively perform its responsibilities. The Function shall report directly to Top Management and the Governing Body where appropriate, ensuring objectivity and oversight.

7. Consequences of Non-Compliance

Any violation of this policy shall result in disciplinary action, termination of employment or business transactions and may include reporting the matter to relevant enforcement authorities. KJTS Group will not hesitate to pursue legal or regulatory action where necessary.

8. Availability of Policy

This policy shall be communicated internally to all personnel and made available to relevant external stakeholders.

Lee Kok Choon

Group Managing Director