

**KJTS GROUP BERHAD**  
**(202201020004) (1465701-T)**  
(Incorporated in Malaysia)

**ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

**1. Introduction and Top-Level Commitment**

KJTS Group Berhad and its subsidiaries ("KJTS Group") adhere to a zero-tolerance policy against all forms of corruption and bribery. KJTS Group is committed to ensuring the effective implementation of this policy across all levels of its subsidiaries. This policy is developed to provide detailed processes and procedures in line with applicable laws and regulations in Malaysia. The Board of Directors and Management at all levels of KJTS Group adopt a tone-from-the-top approach and demonstrate the importance of integrity and ethical values through their actions and behaviour in support of the policy.

KJTS Group has implemented and enforced a comprehensive anti-corruption program which is guided by the Guidelines on Adequate Procedures pursuant to subsection (5) of section 17A of the Malaysian Anti-Corruption Commission Act 2009 ("MACC Act 2009"), as stated in the Malaysian Anti-Corruption Commission (Amendment) Act 2018 ("MACC Amendment Act 2018") to prevent, deter, and monitor bribery and corruption in KJTS Group business activities.

The scope of this policy is for the Employees of KJTS Group and all parties engaged by KJTS Group or performing work or services for or on behalf of KJTS Group. It is mandatory for all parties to comply with this policy when performing work or services.

**2. The Law**

**Section 17A(1) – A commercial organisation commits an offence if a person associated with the commercial organisation corruptly gives, agrees to give, promises, or offers to any person any gratification whether for the benefit of that person or another person with intent:**

The main offences under the MACC Act are:

**a) Soliciting or receiving gratification**

- any person who solicits or receives or agrees to receive (for himself or any other person) or gives, promises or offers to any person any gratification as an inducement to or a reward for any person doing or forbearing to do anything;
- any person accepts or obtains, or agrees to the same, any gratification as an inducement or reward for doing or forbearing to do, any act in relation to his principal's affairs or business, or for showing or forbearing to show favour or disfavour to any person in relation to his principal's affairs or business commits an offence;

b) Offering or giving gratification

- any person who gives or agrees to give or offers any gratification to any agent as inducement or reward for doing or forbearing to do, or for having done or forborne to do the same in relation to his principal's affairs or business, or for showing or forbearing to show favour or disfavour to any person in relation to his principal's affairs or business;

c) Intending to deceive

- Any person who gives to an agent, or being an agent, he uses with intent to deceive his principal, any receipt, account or other document in respect of which the principal is interested, and which he has reason to believe contains any statement which is false or erroneous or defective in any material particular, and is intended to mislead the principal;

d) Using office or position for gratification (abuse of position);

e) Failing to report when offered bribery

- Any person to whom any gratification is given, promised, or offered in contravention of MACC 2009 shall report the same.

Upon section 17A of the MACC Act coming into effect, a commercial organization commits an offence if a person associated with the commercial organization corruptly gives, agrees to give, promises, or offers to any person any gratification whether for the benefit of that person or another person with intent.

- to obtain or retain business for the commercial organization; or
- to obtain or retain an advantage in the conduct of business for the commercial organization.

Where an offence is committed by a commercial organization, a person:

- who is its director, controller, officer, or partner; or
- who is concerned in the management of its affairs,

at the time of the commission of the offence, is deemed to have committed that offence unless the person proves that the offence was committed without his consent or connivance and that he exercised due diligence to prevent the commission of the offence as he ought to have exercised, having regard to the nature of his function in that capacity and to the circumstances.

Section 17A (6) defines a person associated as a director, partner, employee, or person who performs services for or on behalf of the commercial organization.

In relation to anti-bribery and corruption, KJTS Group requires all employees and related parties to:

- Act lawfully, ethically, and in the public interest
- Prohibit bribery and corruption; and
- Not tolerate illegal or unethical behaviour by clients, suppliers, or public officials.

### **3. Risk Assessment**

KJTS Group shall conduct regular risk assessments to identify, evaluate, and prioritize potential risks of corruption within its operations. This includes, but is not limited to, assessing risks associated with business transactions, third-party relationships, employee conduct, financial activities, and regulatory compliance. Identified risks will be documented and addressed through the implementation of appropriate control measures.

The organization will maintain a risk register and conduct periodic reviews of the risk assessment process to ensure its effectiveness. Employees are required to report any potential corruption risks to management through established reporting channels. Assessing the risk of bribery is the crucial part of making sure adequate anti-bribery and anti-corruption programme are effectively implemented. It allows KJTS Group to have a systematic approach on how to design policies and procedures accordingly. A continuous risk assessment will allow this programme to effectively combat the changing environment and risks.

KJTS Group will develop a Risk Assessment team where its members will clearly understand that they have a duty to ensure effective implementation of this programme by identifying potential and/or real internal and external bribery and corruption risks within KJTS Group, and will continuously conduct planned risk assessments on the organisation, and record and document these results to establish processes and controls to mitigate the risks. Its findings will be reported to the Directors.

### **4. Control Measures**

The KJTS Group will establish appropriate controls and contingency measures that are reasonable and proportionate to the organization's nature and size, addressing any corruption risks resulting from weaknesses in governance, processes, and procedures.

#### **a. Due Diligence**

KJTS Group will conduct due diligence on third parties, including business partners, suppliers, and agents, to confirm their alignment with the organization's anti-corruption standards.

Key criteria for due diligence on any relevant parties such as the board of directors, agents, vendors, contractors, suppliers, consultants, and senior public officials will be established prior to entering any formalized relationships. Due diligence methods may involve background checks, document verification, and interviews for individuals assuming key roles with identified corruption risks. Records of all due diligence activities will be maintained and documented.

#### **b. Reporting Channel**

KJTS Group will provide avenues for its employees, any parties acting for and on behalf of KJTS Group, and members of the public to make reports on any improper conduct within KJTS Group. This reporting mechanism is governed by the KJTS Group whistleblowing policy and procedure. The identity of the informants will be held in strict confidentiality.

The Parties who encounter actual or suspected violations of this policy are required to report their concerns. The parties are responsible for ensuring that suspected bribery or corruption incidents are reported promptly via the channels set out in the whistleblowing policy.

Reports made in good faith, either anonymously or otherwise, would be addressed in a timely manner and without incurring fear of reprisal regardless of the outcome of any investigation.

#### **c. Violation**

KJTS Group will take stern disciplinary action against employees and terminate business transactions with any party found in breach of this policy.

KJTS Group requires all employees and other related persons to:

- Avoid any situation or activity that compromises, or may compromise, their judgment or ability to act in the best interest of KJTS Group.
- Avoid being in a position where their personal interests are in conflict (or could be in conflict) with the interests or business of KJTS Group.
- Avoid engaging in activities that will bring direct or indirect profit, commercial, or business advantages to the KJTS Group competitor.
- Avoid acting in ways that may compromise KJTS Group's legality.
- Identify and disclose any conflicts of interest.
- Carefully manage any conflicts of interest.

#### **d. Managing Gifts**

KJTS Group Berhad is committed to conducting its business with the highest standards of integrity and transparency. To avoid any conflicts of interest or perceptions of impropriety, the company maintains a general prohibition against the exchange of gifts and hospitality that could influence, or be seen to influence, business decisions.

All employees are required to avoid situations where the giving or receiving of gifts, hospitality, or other benefits could potentially compromise their ability to act in the best interest of the company. In circumstances where gift exchange is unavoidable due to cultural or customary practices, employees must ensure that such exchanges are conducted transparently and reported in accordance with company guidelines.

Details regarding acceptable gifts, hospitality, and donations, including specific limits and reporting requirements, will be outlined in the separate **Gift and Donation Policy**.

## **5. Monitoring and Review**

KJTS Group will conduct continuous monitoring and periodic reviews of its anti-corruption policies, procedures, and control measures to ensure their effectiveness and compliance with MACC Act Section 17A. The organization will use insights from monitoring and review activities to continuously improve its anti-corruption program.

### **a. Audit Programme**

KJTS Group shall plan and conduct audit on the Policy and applicable procedures and will report the audit findings to the Management for the purpose of continual improvement.

Regular audits will focus on high-risk areas such as financial transactions, procurement, and third-party relationships. Findings from monitoring and reviews will be documented, and corrective actions will be implemented as necessary. Progress and outcomes of corrective actions will be tracked and reported to senior management and the board of directors.

### **b. Policy Review**

KJTS Group will conduct regular reviews of its anti-corruption policies and procedures to ensure their continued effectiveness and alignment with legal and regulatory requirements. Policy reviews will take into account findings from monitoring, audits, and feedback from employees and other stakeholders. Any necessary updates and revisions will be promptly implemented to maintain the integrity and compliance of the anti-corruption programme. This policy shall be reviewed during Management Review Meeting annually. This policy will be reviewed periodically to assess its effectiveness, and in any event, at least once every 3 years.

## **6. Communication and Training**

KJTS Group shall conduct regular programmes, activities, and training on anti-corruption as part of their implementation process to promote a culture of integrity. The awareness and training should cover legal requirements, internal policies, and reporting mechanisms for suspected corruption. All the records of training attendance and participation shall be recorded.

## **7. Record Keeping**

KJTS Group will maintain comprehensive and accurate records of all anti-corruption activities, including risk assessments, due diligence, monitoring, and review processes. Records will be securely stored and easily accessible for audits and reviews. The organization will retain these records for the required duration in accordance with legal and regulatory requirements and use them to demonstrate compliance with MACC Act Section 17A.

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