

The logo for SINKUNG, with 'SINK' in green and 'KUNG' in blue, set against a background of a futuristic, brightly lit tunnel with glowing rectangular panels on the ceiling and floor.

SINKUNG

World Without Boundaries

ANTI-BRIBERY AND CORRUPTION POLICY

www.sinkung.my

Sin-Kung Logistics Berhad
Company Registration No. 199401035432 (321115-P)
Incorporated in Malaysia

Name of policy: Sin-Kung Group of Companies – Anti-Bribery and Corruption Policy
Version: 1

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1. INTRODUCTION

Sin-Kung Logistics Berhad (the “**Company**”) and its subsidiaries (the “**Group**”) are committed to conduct business ethically and honestly by upholds all applicable laws and regulations in the countries where it does business.

These laws include but are not limited to the Malaysian Penal Code (revised 1977) (and its amendments), the Malaysian Anti-Corruption Commission Act 2009 and its amendment and the Companies Act 2016. These laws prohibit bribery and acts of corruption, and mandate that companies establish and maintain accurate books and records and sufficient internal controls. In cases where there is a conflict between mandatory laws and the principles contained in this and other policies, the law shall prevail.

The Group does not condone any form of bribery or corruption. This Anti-Bribery and Corruption Policy (“**Policy**”) provides guidance on preventing, addressing, and combating bribery and corruption in the course of business.

2. SCOPE

This Policy apply to all the Group’s Directors, employees, suppliers and Business Associates of the Group (“**Associated Persons**”).

The term “Director” includes a director of the Company and its subsidiaries.

“Employee” means any person at all levels and grades, including senior managers, managers, executives, non-executives, workers, and employees, whether full time, part time, contract or temporary.

“Supplier” refers to the Group’s suppliers of trade and non-trade goods.

“Business Associate” means any persons performing services for or on behalf of the Group, apart from the Group’s employees, including consultants, contractors or subcontractors, trainees, seconded staffs, volunteers, interns, agents, sponsors, service providers, associates, and business partners.

3. OBJECTIVES

The Group maintains a zero-tolerance policy towards bribery and corruption. All Associated Persons must fully comply with all applicable laws and regulations as stated in Section 1 as above.

4. CONFLICT OF INTEREST

A conflict of interest arises when personal interests clash with professional responsibilities. Conflicts can be actual, potential, or perceived, and may be financial or non-financial. The Group and all Associated Persons are responsible for avoiding conflicts of interest and ensuring no other interest conflicts with their obligations to the Group. Associated Persons must:

- (a) Avoid any situation or activity where personal interests conflict (or could conflict) with the interests of the Group, or compromise their judgment or ability to act in the best interest of the Group;
- (b) Avoid engaging in activities that provide direct or indirect profit, commercial, or business advantages to competitors of the Group;
- (c) Avoid actions that compromise the Group's legality and/or legal position;
- (d) Identify, disclose, and manage any conflicts of interest.

5. GIFTS, ENTERTAINMENT, HOSPITALITY AND TRAVEL

The offering or receiving of gifts, hospitality, entertainment, and sponsored travel that could be perceived as unfairly influencing a business relationship must be strictly avoided. These should only be provided and received where appropriate and for general relationship building. If there is any doubt about the appropriateness of a gift, Associated Persons should discuss the issue with the Management.

All Associated Persons must not offer or request any gifts or hospitality with the intent to induce support or reward improper conduct in connection with any business or anticipated future business involving the Group. The giving of gifts, entertainment, hospitality, and sponsored travel must be approved by the Management. Associated Persons must not pay for business gifts personally and must report and seek approval from the Management. All receipt of gifts, entertainment, hospitality, and sponsored travel must be declared to the Management as soon as practicable.

6. DONATIONS, SPONSORSHIPS AND CHARITABLE CONTRIBUTIONS

The Group does not make donations or sponsorships to any political parties. Associated Persons must not make or offer any political contributions, whether monetary or non-monetary, to any persons or organizations connected to political parties.

All donations, sponsorships, and charitable contributions must not be used as a cover for bribery or corruption. They must comply with the following:

- (a) Ensure such contributions are allowed by applicable laws;
- (b) Obtain necessary approvals from the Management to ensure transparency; and
- (c) Accurately account for these contributions in the records of the Group.

7. FACILITATION PAYMENTS

Facilitation payments, which are unofficial payments made to expedite a routine duty or function, are strictly prohibited. All Associated Persons must adhere to this prohibition.

8. KICKBACKS

Kickbacks, a form of bribery where money or something of value is exchanged for a favour, are strictly prohibited. This includes cash or any “in-kind” equivalents such as gifts, meals, or entertainment. All Associated Persons must adhere to this prohibition.

9. MONEY LAUNDERING PREVENTION

Money laundering is the process of disguising the origins of money obtained from criminal activities. The Group conducts business only with partners involved in legitimate business activities with funds from legitimate sources. The Group complies fully with all anti-money laundering laws, and all Associated Persons are expected to do the same.

10. REPORTING

The Group have established an accessible whistleblowing channel for raising concerns about real or suspected corruption incidents. The Group will not tolerate retaliation against any Associated Person for reporting in good faith.

If any Associated Person becomes aware of any actual or suspected breach of this Policy, they must report it immediately via the whistleblowing channel at whistleblowing@sinkung.com.my

Proper investigations will follow, and appropriate actions will be taken, which may include reporting the incident to the Malaysian Anti-Corruption Commission (MACC) and/or the police.

END.