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KUMPULAN PERANGSANG SELANGOR BERHAD

(Company Registration No:197501002218/23737-K)

ANTI-BRIBERY AND CORRUPTION POLICY VERSION 3/2025

APPROVED BY BOARD
15 MARCH 2025

This Policy is applicable to KPS Berhad and Subsidiary Companies

ANTI-BRIBERY AND CORRUPTION POLICY

TABLE OF CONTENTS

<u>CONTENTS</u>	<u>PAGE</u>
1. Introduction	1 - 3
2. Objectives	3
3. Statement of Policy	3
4. Key Principles	4 - 5
5. Gift, Entertainment and Corporate Hospitality	6 - 8
6. Abuse of Powers	9
7. False Claim	9
8. Corporate Social Responsibility Sponsorships and Donations	9 - 10
9. Education Sponsorships	11
10. Political Contributions	11
11. Facilitation Payment	12
12. Money Laundering	12
13. Conflicts of Interest	13
14. Dealing with Third Parties	13
15. Mergers, Acquisitions and Investments	14
16. Recruitment of Employee	15
17. Record Keeping	15
18. Compliance	16
19. Amendment	16
20. Appendices	17 - 20

1.0 INTRODUCTION

1.1. Background

- 1.1.1. KPS Berhad ("KPS Berhad or the Company") upholds a strict zero-tolerance policy towards bribery and corruption. The Company is committed to conducting business professionally, fairly, and with integrity in all interactions and operations across KPS Berhad and its Group of companies ("KPS Berhad Group"), while implementing and enforcing robust systems to prevent and counteract bribery and corruption effectively.
- 1.1.2. This Anti-Bribery and Corruption Policy (the "**Policy**") intends to fulfil the requirements set forth in the Guidelines on Adequate Procedures issued on 10 December 2018 by the Prime Minister's Office pursuant to subsection (5) of section 17A of the MACC Act 2009.
- 1.1.3. This Policy is not intended to provide definitive answers to all questions regarding bribery and corruption. Rather, it is intended to provide guidance to directors and employees and persons who perform services for or on behalf of KPS Berhad Group (collectively "**persons associated with a commercial organisation**") concerning bribery and other corrupt activities (refer Appendix 2 for types of corruptions) and issues that may arise in the course of business.

1.2. Scope

- 1.2.1. The fundamental standards of integrity under which KPS Berhad operates do not vary depending on where KPS Berhad works or who it is dealing with.
- 1.2.2. This Policy is applicable to KPS Berhad, its controlled organisations, business associates acting on KPS Berhad's behalf, the Board and all KPS Berhad's employees.
- 1.2.3. Joint-venture companies in which KPS Berhad is non-controlling or co-venture and associated companies are encouraged to adopt these or similar principles. External providers are also expected to comply with this Policy in relation to all work conducted with KPS Berhad, or on KPS Berhad's behalf.

1.3. Responsibility

1.3.1. All directors and employees within KPS Berhad Group are primarily responsible for complying to this Policy; and

1.3.2. IGU is the owner of this Policy. It has full responsibility in the development and maintenance of this Policy including any reviews, changes, amendments, additions or deletions of any provision of this Policy.

1.4. Approving Authority

1.4.1. KPS Berhad

The Board is the approving authority of this Policy.

1.4.2. Subsidiary Companies

The subsidiary companies are to adopt this Policy upon approval by their respective board.

1.5. Date of Implementation

This Policy is effective immediately upon approval by the Board.

1.6. Review Frequency

This Policy will be reviewed by IGU every three (3) years at the latest, to ensure the effectiveness of the management and implementation of this Policy.

1.7. Reference

This Policy is to be read together with the current laws and policies of the Company, but not limited to the following:

1.7.1. Malaysian Anti-Corruption Commission Act 2009;

1.7.2. Anti-Money Laundering and Anti-Terrorism Financing Act 2001;

1.7.3. Whistleblower Protection Act 2010 (Laws of Malaysia Act 711);

1.7.4. Code of Business Conduct and Ethics

1.7.5. Corruption Risk Management Framework;

1.7.6. Employees Handbook;

1.7.7. Whistleblowing Policy and Guidelines;

1.7.8. Financial Authority Limit & Delegation of Authority;

1.7.9. Entertainment and Gift Policy;

1.7.10. Compliance Policy;

1.7.11. Conflict of Interest Policy; and

1.7.12. Personal Data Protection Policy.

1.8. Definition

The key terms and acronyms appeared in this Policy shall be defined as per Appendix I.

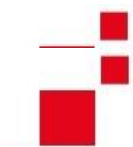
2.0 OBJECTIVES

This Policy aims to:

- 2.1. set out KPS Berhad's responsibilities, and the responsibilities of those working for or with KPS Berhad in observing and upholding KPS Berhad's position on bribery and corruption;
- 2.2. ensure that KPS Berhad has adequate procedures in place to prevent and detect bribery and corruption;
- 2.3. provide information and guidance to those working for or with KPS Berhad on how to recognise and deal with potential bribery and corruption issues; and
- 2.4. protect KPS Berhad against the possible penalties and repercussions resulting from acts of bribery and corruption or being associated with such behaviour.

3.0 STATEMENT OF POLICY

KPS Berhad commits to a high standard of professionalism and ethics in the conduct of our business and professional activities consistent with KPS Berhad's core values of **PRIDE, RESPECT, INTEGRITY, DISCIPLINE** and **EXTRA-MILE**. KPS Berhad will uphold all laws relevant to countering bribery and corruption in order to uphold honesty and integrity in its business.



4.0 KEY PRINCIPLES

This Policy establishes the overarching principles and commitment to action for KPS Berhad Group with respect to complying with the requirements and obligations imposed under Malaysian Anti-Corruption Commission Act 2009 (MACC) Act 2009 and Guidelines on Adequate Procedures issued pursuant to subsection (5) of Section 17A of MACC Act 2009, which include amongst others, the five guiding principles under **TRUST** acronyms:

4.1. Top level commitment

- 4.1.1. Directors and Key Management of KPS Berhad shall demonstrate a visible and active commitment to KPS Berhad's zero tolerance for bribery, corruption and anti-corruption programmes.
- 4.1.2. Directors and Key Management of KPS Berhad shall practice the highest level of integrity, ethics and comply fully with the applicable laws and regulatory requirement on anti-corruption.

4.2. Risk Assessment

- 4.2.1. All organisations are exposed to bribery and corruption risks. Bribery and corruption risks may exist at all levels of management, in all functions and activities, and potentially involve internal and external stakeholders.
- 4.2.2. KPS Berhad will undertake a bribery and corruption risk assessment across its business when appropriate to understand the bribery and corruption risks it faces and ensure that it has adequate procedures in place to address those risks.
- 4.2.3. Corruption Risk Management ("**CRM**") is a management process that helps to identify structural weaknesses that may facilitate corruption, provides a framework for all directors and employees to take part in identifying risk factors and treatments, and embeds corruption prevention within a well-established governance framework. CRM serves as an important pillar in corruption prevention initiative.

4.3. Undertake control measures

- 4.3.1. KPS Berhad puts in place the appropriate controls and contingency measures which are reasonable and proportionate to the nature and size of KPS Berhad in order to address any corruption risks arising from weaknesses in the KPS Berhad governance framework, processes and procedures. These should include the following items:

- a. Due Diligence
- b. Reporting channel
- c. Policies and procedures

4.4. **Systematic review, monitoring and enforcement**

- 4.4.1. KPS Berhad ensures that the Key Management continuously monitors the effectiveness and review the implementation of this Policy annually or at appropriate intervals, considering its suitability, adequacy and effectiveness.
- 4.4.2. In addition, KPS Berhad is committed in ensuring the proper implementation and enforcement of this Policy within KPS Berhad Group. Ensure that regular reviews are conducted to assess the performance, efficiency and effectiveness of anti-corruption programmes of KPS Berhad Group.

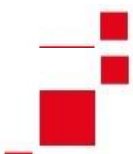
4.5. **Training and communication**

4.5.1. Training and Awareness

- a. KPS Berhad shall endeavour to conduct a training and awareness programme for all KPS Berhad directors and employees regarding anti-bribery, integrity and ethics on regular basis.
- b. Records on attendance and/or completion records of the training session(s) will be maintained to verify that all employees receive the necessary training to perform their responsibilities in compliance with the anti-corruption and bribery laws.

4.5.2. Communication

- a. Any reports on anti-corruption and bribery, will be reported via whistleblowing channel as per KPS Berhad's Whistleblowing Policy and Guidelines.
- b. KPS Berhad regularly communicate the requirements and obligations under this Policy and related policies to all directors and employees through various mediums and platforms which includes but is not limited to emails, newsletters, posters code of business conduct, KPS Berhad website and internal platforms.



5.0 GIFT, ENTERTAINMENT AND CORPORATE HOSPITALITY

5.1. Gift

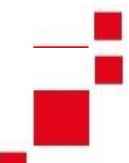
5.1.1. KPS Berhad does not solicit gifts, entertainment, or favours of any value from persons or firms with which KPS Berhad actually or potentially does business.

5.1.2. However, there are certain exceptions to the general rule whereby the receiving and provision of gifts are permitted that are customary business courtesies in the following situations and the value shall not be more than the threshold as set out in KPS Berhad's Entertainment and Gift Policy;

- a. Exchange of gifts at the company-to-company level (e.g. gifts exchanged between companies as part of an official company visit/courtesy call and thereafter said gift is treated as company property).
- b. Gifts from company to external institutions or individuals in relation to the company's official functions, events and celebrations (e.g. commemorative gifts or door gifts offered to all guests attending the event).
- c. Gifts from KPS Berhad to directors and employees and/or their family members in relation to an internally or externally recognised by KPS Berhad's function, event and celebration (e.g. in recognition of an employee's/ director's service to KPS Berhad).
- d. Token gifts of nominal value normally bearing the KPS Berhad's logo or (e.g. t-shirts, pens, diaries, calendars and other small promotional items) that are given out equally to members of the public, delegates, customers, partners and key stakeholders attending events such as conferences, exhibitions, training, trade shows etc. and deemed as part of the KPS Berhad's brand building or promotional activities; and
- e. Gifts to external parties who have no business dealings with KPS Berhad (e.g. monetary gifts or gifts in-kind to charitable organisations).

5.1.3. Even in the above exceptional circumstances, the directors and employees are expected to exercise proper judgment in handling gift activities and behave in a manner consistent with these general principles;

- a. Conscientiously maintain the highest degree of integrity.



- b. Always exercise proper care and judgment.
- c. Avoid conflicts of interest.
- d. Refrain from taking advantage of your position or exercising your authority to further your own personal interest at the expense of KPS Berhad.
- e. Comply with applicable laws, regulations and KPS Berhad policies and procedures.

5.1.4. Any corporate gift shall fulfil the following conditions:

- a. They are limited, customary and lawful under the circumstances.
- b. They do not have or are perceived to have (by either the giver or the receiver), any effect on actions or decisions.
- c. There must be no expectation of any specific favour or improper advantages from the intended recipients.
- d. The independent business judgment of the intended recipients must not be affected.
- e. There must not be any corrupt/criminal intent involved.
- f. The giving out of the gift and hospitality must be done in an open and transparent manner.

5.1.5. Directors and employees are required to ensure there is a clear distinction between the gifts given on a personal basis and those given on behalf of KPS Berhad. Under no circumstances are directors and employees to misrepresent personal gifts and/or use such customs to circumvent KPS Berhad's Entertainment and Gift Policy.

5.1.6. In these circumstances, directors and employees are expected to immediately declare and record the gift in accordance with KPS Berhad's Anti Bribery and Corruption Standard Operating Procedures (KPS/SOP/LCD/IGU/002).

5.2. Providing Entertainment

5.2.1. KPS Berhad recognises that providing modest entertainment is a legitimate way of building business relationships and as such a common practice within the business environment to foster good business relationship with external clients. As such, eligible directors and employees are allowed to entertain external clients through a reasonable act of hospitality as part of business



networking as well as a measure of goodwill towards the recipients.

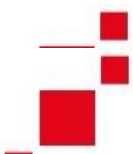
- 5.2.2. Directors and employees are strictly prohibited from providing or offering to provide entertainment with a view to improperly cause undue influence on any party in exchange for some future benefit or result. Any acts of this nature, whether provided directly or indirectly through an intermediary, may be construed as an act of bribery and contrary to the general values and principles of the KPS Berhad' Code of Business Conduct and Ethics.

5.3. Receiving Entertainment

- 5.3.1. KPS Berhad recognises that the occasional acceptance of a reasonable and modest level of entertainment provided by third parties in the normal course of business is a legitimate way to network and build good business relationships.
- 5.3.2. However, it is important for directors and employees to exercise proper care and judgment before accepting entertainment offered or provided by a third party. This is not only to safeguard KPS Berhad's reputation, but also to protect directors and employees from allegations of impropriety or undue influence.

5.4. Corporate Hospitality

- 5.4.1. KPS Berhad recognises that providing corporate hospitality to its stakeholders or occasional acceptance of an appropriate level of hospitality be it through corporate events, sporting events or other public events, is a legitimate way to network and build goodwill in business relationships.
- 5.4.2. While providing and receiving corporate hospitality is a reflection of KPS Berhad's courtesy and goodwill, the respective directors and employees must exercise proper care to protect KPS Berhad's reputation against any allegations of impropriety or the perception of bribery especially when the arrangements could influence or be perceived to influence the outcome of a business decision and are not reasonable and bona fide expenditures.
- 5.4.3. There should also be explicit, clear and internally transparent criteria to determine the selection of guests to be invited to KPS Berhad corporate hospitality event. Reasonable due diligence should be exercised, particularly when the arrangements involve public officials.



6.0 ABUSE OF POWER

- 6.1. KPS Berhad is committed to maintaining a fair and ethical workplace. All directors and employees are expected to uphold the highest standards of integrity and to avoid any actions that could be perceived as an abuse of power.
- 6.2. Abuse of power occurs when an individual misuses their position of authority or trust for personal gain or to benefit another person improperly. This includes, but is not limited to:
- 6.2.1. Coercion: Forcing someone to act against their will by using threats or intimidation.
 - 6.2.2. Favouritism: Granting unfair advantages to friends, family, or associates.
 - 6.2.3. Nepotism: Favouring relatives or friends, especially by giving them jobs.
 - 6.2.4. Retaliation: Punishing someone for reporting misconduct or for not complying with unethical demands.
 - 6.2.5. Misuse of Resources: Using company resources for personal benefit or unauthorised purposes.

7.0 FALSE CLAIM

Directors and employees are strictly prohibited from submitting false claims. False claims, defined as the submission of falsified or incorrect documents with the intent to deceive or defraud KPS Berhad. It will result in severe disciplinary actions, including but not limited to termination of employment and legal proceedings.

8.0 SOCIAL INVESTMENT INITIATIVES ("SII") SPONSORSHIPS AND DONATIONS

As a responsible corporate citizen, KPS Berhad is committed to contributing to the wellbeing of the people and nation in countries where it operates. It is however important that all SII, sponsorships and donations are made in accordance with the Sustainability Policy and receive prior authorisation by the authorised person as per Financial Authority Limit.

8.1. Social Investment Initiatives

Support of SII projects and the use of sponsorships and donations (collectively “contributions”) are part of KPS Berhad contribution to the wellbeing of the communities and the environment in which it operates. Such contributions, however, can never be promised, offered or made to secure a business advantage or for any other improper purpose such as to bribe or self-enrich.

8.2. Sponsorships and Donations

8.2.1. All sponsorships and donations shall not be used as a subterfuge for bribery or used to circumvent or avoid any of the provisions of the directors and employee Handbook (Code of Conduct), including in particular, the prohibition on bribery. KPS Berhad needs to be certain that donations to charities or beneficiaries are not disguised illegal payments to government officials and must ensure that the charity does not act as a conduit to fund illegal activities in violation of anti-money laundering, anti- terrorism and other applicable laws.

8.2.2. In accordance with KPS Berhad’s commitment to contribute to the community coupled with its values of integrity and transparency, all sponsorships and donations must comply with the following:

- a. ensure such contributions are allowed by applicable laws;
- b. obtain all the necessary internal authorisations;
- c. be made to well established entities having an adequate organisational structure to guarantee proper administration of the funds;
- d. be accurately stated in KPS Berhad’s accounting books and records; and
- e. not to be used as a means to cover up an undue payment or bribery;

8.2.3. The request is evaluated against KPS Berhad’s Guidelines on SII, Sponsorships and Donations and meets the following criteria: -

- a. The request does not fall under the list of activities which KPS Berhad does not support or contribute to;
- b. there is no risk of a perceived improper advantage for KPS Berhad; and
- c. the proposed recipient is a legitimate organisation and/or individual proper due diligence are made/background checks.

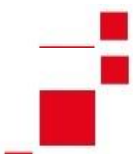


9.0 EDUCATION SPONSORSHIPS

- 9.1. KPS Berhad has a sponsorship programme with the objective to provide educational opportunities to deserving students to enable them to realise their potential and to contribute to the growth of the nation. The awarding of scholarships should be based on strict guidelines and due diligence to ensure that only the most qualified and deserving students receive the scholarship award. This is crucial to ensure that no element of corruption is involved in the giving out of scholarships.
- 9.2. The selection of sponsorship recipients should be based on approved criteria such as academic qualifications and assessment results. The process of selection should be transparent and the reasons for selection should be properly recorded and must be in compliance with the approved KPS Berhad sponsorship policy and procedures.

10.0 POLITICAL CONTRIBUTIONS

- 10.1. KPS Berhad does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office. Examples of prohibited political donations include but not limited to:
- 10.1.1. cash contributions;
 - 10.1.2. free or discounted use of KPS Berhad premises, equipment or other company resources; and
 - 10.1.3. payment of salary of a KPS Berhad employee working for a political party or candidate working during normal working hours (except if the employee in question takes a legally permissible paid leave).
- 10.2. Furthermore, charitable donations shall not be used as a subterfuge for prohibited political payments.

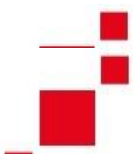


11.0 FACILITATION PAYMENT

- 11.1. KPS Berhad prohibits accepting or obtaining, either directly or indirectly, facilitation payments from any person for the benefit of the directors and employee himself or for any other person. The reason underlying this prohibition is that facilitation payment is seen as a form of bribery and corruption.
- 11.2. Facilitation payment is payments made to secure or expedite the performance by a person performing a routine or administrative duty or function. Offering, promising or requesting facilitation payments is just as prohibited as actually paying or receiving facilitation payments. Facilitation payments do not need to involve cash or other financial asset; it can be any sort of advantage with the intention to influence them in their duties.
- 11.3. In certain situations, individuals may have no choice but to make a payment to protect their life, physical well-being, or freedom. If such payments are made, they must be reported to the IGU as soon as possible.

12.0 ANTI-MONEY LAUNDERING

- 12.1. KPS Berhad strongly opposes to practices related to money laundering, including dealing in the proceeds of criminal activities. Money laundering is a serious crime and the laws governing it can have extraterritorial effect, i.e. the application of the law is extended beyond local borders. The penalties for breaching anti-money laundering legislation are severe and can include extradition and incarceration in foreign jurisdictions.
- 12.2. To avoid violating anti-money laundering laws, directors and employees are expected to always conduct counterparty due diligence to understand the business and background of KPS Berhad's prospective business counterparties and to determine the origin and destination of money, property and services.
- 12.3. Counterparty means any party that KPS Berhad is currently in relationship with or intends to do business within the future, either on a regular or once-off basis. Counterparties include but are not limited to customers, contractors, suppliers, consultants, agents, JV partners and any other business partners.



13.0 CONFLICTS OF INTEREST

Conflict of interest happen in situations where two or more competing interests' conflict and impair an individual's ability to make an objective decision. Generally, a conflict of interest arises when personal interests in any way interfere with KPS Berhad's interests. Conflict of interest do not necessarily have to result in unethical or illegal acts. A conflict of interest can arise when director(s) and employee(s) take actions or have interests that may make it difficult to perform their roles objectively. It is crucial for directors and employees to avoid conflicts of interest, including potential conflicts of interest that could create the perception of improper influence in their decision-making. For detail guidance, please refer to the Company's Conflict of Interest Policy.

14.0 DEALING WITH THIRD PARTIES

- 14.1. KPS Berhad's zero-tolerance approach to bribery and corruption should be communicated to all contractors, suppliers, agents, consultants, joint venture partners and vendors at the outset of business relationship and as appropriate thereafter.
- 14.2. KPS Berhad's dealings with third parties, which include contractors, suppliers, agents, vendors, consultants, joint venture partners, introducers/government intermediaries, must be carried out in compliance with all relevant laws and consistent with the values and principles of KPS Berhad's policies. As part of this commitment, all forms of bribery and corruption are unacceptable and will not be tolerated.
- 14.3. KPS Berhad expects that all third parties acting for or on its behalf to share KPS Berhad's values and ethical standards as their actions can implicate KPS Berhad legally and tarnish KPS Berhad's reputation. Therefore, where KPS Berhad engage third parties, such as contractors, agents, intermediaries or joint venture partners, we are obligated to conduct appropriate counterparty due diligence to understand the business and background of KPS Berhad's prospective business counterparties before entering into any arrangements with them to ensure that KPS Berhad are dealing with counterparties that subscribe to acceptable standard of integrity in the conduct of their business.

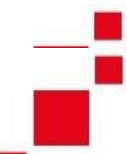
- 14.4. In circumstances where KPS Berhad retains controlling interest, such as in certain joint venture agreements, business associates are required to adhere to this Policy and all other relevant KPS Berhad's Policies. Where KPS Berhad does not have controlling interest, associates are encouraged to comply with the same.
- 14.5. Appropriate assessment shall be conducted to individuals or third parties to ensure the business and background of the potential business partners are free from bribery elements or conflict of interest prior to procurement process.
- 14.6. All procurement activities shall be in line with the Procurement Policy and procedures at KPS Berhad. A tender process includes an invitation for other parties to make a proposal, on the understanding that any competition for the relevant contract must be conducted in response to the tender, no parties having the unfair advantage of separate, prior, close-door negotiations for the contract where a bidding process is open to all qualified bidders and where the sealed bids are in the open for scrutiny and are chosen on the basis of price and quality.

15.0 MERGERS, ACQUISITIONS AND INVESTMENTS

Due diligence shall be conducted in evaluating mergers and acquisition transactions and/or any new investments with the prospective business partners to ensure compliance with anti-bribery and corruption laws.

15.1. Due Diligence for Pre-Acquisition

- 15.1.1. Anti-bribery due diligence is considered on a proportionate basis for all investments but on a risk-based approach, with the level of due diligence being proportionate to the investment and the perceived likelihood of risk of bribery.
- 15.1.2. The level of anti-bribery due diligence for the transaction is commensurate with the bribery risks. Anti-bribery due diligence starts sufficiently early in the due diligence process to allow for adequate due diligence to be carried out and for the findings to influence the outcome of the negotiations or stimulate further review if necessary.
- 15.1.3. The partners or the Board provide commitment and oversight to the due diligence reviews. Information gained during the anti-bribery due diligence is passed on efficiently and effectively to KPS Berhad's Key Management once the investment has been made.



15.2. Due Diligence for Post Acquisition

15.2.1. To conduct due diligence on a proportionate basis immediately after purchase to determine if there is any current bribery and if so, takes immediate remedial action.

15.2.2. To ensure that the target company has or adopts an adequate anti-bribery and corruption programme equivalent to KPS Berhad.

15.2.3. Bribery detected through due diligence is reported to the authorities.

16.0 RECRUITMENT OF EMPLOYEES

16.1. KPS Berhad being a diversified entity, provides equal opportunity for any qualified and competent individual to be employed by KPS Berhad from various multicultural and multiracial background, sourced externally, local and/or internationally.

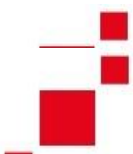
16.2. The recruitment of employees should be based on approved selection criteria to ensure that only the most qualified and suitable individuals are employed. This is crucial to ensure that no element of corruption is involved in the hiring of employees. In line with this, as and when applicable, a proper background checks should be conducted in order to ensure that the potential employee has not been convicted in any bribery or corruption cases nationally or internationally. Enhanced/ thorough background checks are required for candidates applying for management positions, as they will have decision-making responsibilities.

17.0 RECORD KEEPING

17.1. It is essential that KPS Berhad keep full and accurate records of all of its financial dealings including the giving and the receiving of payments and gifts at all times in line with KPS Berhad Employee Handbook and the relevant gift and entertainment related policy and/or procedures. Transparency is vital and any false or misleading records could be very damaging to KPS Berhad Group.

17.2. All departments have to maintain written records evidencing that due diligence has taken place and that any risks identified have been carefully considered and mitigated as practicably as possible.

17.3. Records should be retained for a significant period of time in order to comply with the local law as well as KPS Berhad's retention policy.



18.0 COMPLIANCE

- 18.1. All directors and employees are responsible for adhering to this Policy, performing their duties lawfully, and promptly reporting and escalating any concerns or issues related to corruption and bribery.
- 18.2. Since the principles of this Policy, are based on legal requirements, the consequences of bribery and corruption are severe, and may include imprisonment for individuals, unlimited fines, debarment from tendering for public contracts, and damage to the KPS Berhad Group's reputation. Therefore, KPS Berhad take its legal responsibilities very seriously.
- 18.3. Any alleged or suspected improper conduct must be reported immediately to the Head of Department and/or Legal and Compliance Department. If any party who have concern with regards to any malpractices or breach of this Policy can lodge their concern via a dedicated whistleblowing channel which will be evaluated and investigated independently.
- 18.4. Any employee found to have violated this Policy may be subject to disciplinary action, up to including termination of employment or contract, with or without prior notice or warning. In addition, KPS Berhad Group reserve the right to pursue any remedies available, at law or in equity, for violations of this Policy.

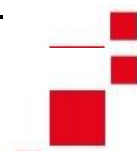
19.0 AMENDMENT

- 19.1. Any amendment of the Policy shall be approved by the Board except for modifications deemed operational in nature. 'Operational changes' refer to adjustments that do not alter the substantive content of the Policy, such as changes to wording, formatting, or other administrative updates.

KUMPULAN PERANGSANG SELANGOR BERHAD
ANTI-BRIBERY AND CORRUPTION POLICY

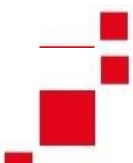
Appendix I: Definition

Terms	Definition
the Board of Directors or the Board	means the Board of Directors of KPS Berhad
Bribery & Corruption	means any action which would be considered as an offence of giving or receiving 'gratification' under the Malaysian Anti-Corruption Commission Act 2009 (MACCA 2009). In practice, this means offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person who is in a position of trust within an organisation. Bribery may be 'outbound', where someone acting on behalf of KPS Berhad attempts to influence the actions of someone external, such as a Government official or client decision-maker. It may also be 'inbound', where an external party is attempting to influence directors and employees of KPS Berhad Group such as a senior decision-maker or someone with access to confidential information.
Compliance	means conformity with requirements under law or contract terms affecting the Group's operations locally and abroad.
Director(s)	Means member of KPS Berhad Board unless otherwise stated.
Donation	An especially charitable gift, contribution, subscription, present, hand out, grant, offering, gratuity, endowment or other similar donation that can be perceived by a third party, to be for the purpose of bribery even if neither the giver nor the receiver intended it to be for this purpose. It can include giving or providing cash, venues, equipment, personnel time or other benefit.
Employee or staff	Any individual who is formally employed by KPS Berhad, whether on a full-time, part-time, temporary, or contractual basis, including interns and trainees
Gift	Money, movable or immovable property, vehicle, shares, travel tickets, entertainment, service, club membership, any form of discounts or commissions, hampers, jewellery, ornament, any gifts, souvenirs, or anything of value which is given to or received by an officer, his or her spouses or any other person on his behalf, without any or insufficient consideration known to the officer.
IGU	Integrity and Governance Unit of Legal and Compliance Department of KPS Berhad
Hospitality	A generous and friendly treatment, reception or entertainment that can be perceived by a third party, to be for the purpose of bribery even if neither the giver nor the receiver intended it to be for this purpose.
Key Management	Refers to person in any of the following positions: <ul style="list-style-type: none"> • Managing Director / Group Chief Executive Officer



KUMPULAN PERANGSANG SELANGOR BERHAD
ANTI-BRIBERY AND CORRUPTION POLICY

	(MD/GCEO) <ul style="list-style-type: none"> • Deputy Chief Executive Officer(s); and • Head of Department (HOD)
KPS Berhad or the Company	means Kumpulan Perangsang Selangor Berhad
KPS Group or the Group	means KPS Berhad and its subsidiary companies collectively, as defined in Section 4 of the Companies Act 2016
LCD	means Legal and Compliance Department of KPS Berhad
MACC Act	Malaysian Anti-Corruption Commission Act 2009 (Act 694)
Operational changes	<p>Wording Adjustments: Correcting typos, grammar, or punctuation errors.</p> <p>Formatting Changes: Modifying the layout, font style, or size for better readability.</p> <p>Administrative Updates: Updating contact information, job titles, or department names.</p> <p>Clarifications: Adding or refining definitions to ensure clarity without altering the policy's intent.</p> <p>Non-Substantive Edits: Reorganizing sections for better flow or coherence without changing the policy's meaning.</p>
Policies	Policies as issued and approved by the Board governing the conduct and management of KPS Berhad



Appendix 2: Types of Corruption

The United Nations Handbook on Practical Anti-Corruption Measures for Prosecutors and Investigators lists the more commonly encountered forms of corruption, which include:

a) Petty Corruption

Also known as administrative corruption, it involves the exchange of very small amounts of money and the granting of small favours.

b) Grand Corruption

Spreads through the highest levels of government, bringing about major abuses of power, disobedience of the rule of law, economic instability and the breakdown of good governance.

c) Active and Passive Corruption

The former refers to the act of offering or paying a bribe (where the payment of a bribe has taken place) and the latter refers to the request or receiving of a bribe (a bribe was offered but not accepted).

d) Bribery

Most common form of corruption, described as the act of conferring a benefit in order to influence an action or decision. It comes in the form of cash, company shares, inside information, sexual or other favours, entertainment, employment or future benefits such as a retirement job. The benefit can pass directly to the person bribed, or indirectly to a third party such as a friend, relative, associate, favourite charity, private business, political party or election campaign. Once bribery has occurred, it can lead to other forms of corruption.

e) Embezzlement, Theft and Fraud

Involves stealing by an individual exploiting his or her position of employment. Fraud involves the use of false or misleading information to induce the owner of property to part with it voluntarily. Theft is universally regarded as falling within corruption definitions where it occurs, carrying with it as it does, a breach of a fiduciary duty.

f) Extortion

Relies on coercion to induce cooperation, such as threats of violence or the exposure of sensitive information.



g) Abuse of Function/ Power

Performance of or failure to perform an act by a public official, in violation of the law, to obtain an undue advantage for himself/herself or for another person or entity.

h) Favouritism and Nepotism

Involve abuses of discretion, usually does not involve a direct personal benefit to an official but promote the interests of those linked to the official, be it through family, political party, tribe or religious group.

i) Creating and Exploiting Conflicting Interest

Most forms of corruption involve the creation or exploitation of some conflict between the professional responsibilities of an individual and his or her private interest. The offering of a bribe creates such a conflict where none may have existed hitherto. In both the public and private sectors, employees and officials are routinely confronted with circumstances in which their personal interest's conflict with their responsibility to act in the best interests of the state or their employer. Well-run organisations have systems to manage these situations, usually based on clear codes of conduct.

j) Improper Political Contribution

Donations made with the intention or expectation that the party will, once in office, unduly favour the interests of the donor, is tantamount to the payment of a bribe.

