

Lee Swee Kiat Group Bhd

Anti-Corruption & Bribery Policy – Feb 2023

1 INTRODUCTION

The Board of Directors (“the Board”) intends to establish this policy in compliance with the Malaysian Anti-Corruption Commission (Amendment) Act 2018. This policy serves to provide guidance on how to recognize and deal with bribery and corruption issues and act as a deterrent to such practices. This is to promote fair and equitable business practices with business ethics.

2 Definition

- a) Corruption – a form of dishonesty or criminal offence undertaken by a person or organisation entrusted with a position of authority, to acquire illicit benefit or abuse power for one’s private gain.
- b) Bribery – an illegal or unethical gift or lobbying effort presented to influence the recipient’s conduct.

3 Scope

This policy is applicable to all Directors, officers and employees, full time or part time of all companies within the Group, including all business associates, inter alia, customers, suppliers, consultants and contractors.

4 Gift, Entertainment and hospitality

- a. Gift, entertainment and hospitality given or enjoyed in the ordinary course of business is acceptable subject to the following conditions
 - i. reasonable in value
 - ii. respectful and customary
 - iii. not to obtain personal gain
- b. if in any instances the Directors, officers and employee is unsure about what constitute reasonable, please report to the relevant authorized persons as per clause 6 below to seek clearance.

5 Responsibilities

- i. The Group takes corruption and bribery very seriously. Any violation of this Policy will be regarded as serious matter by the Group and is likely to result in disciplinary action, including termination of service, consistent with local law.
- ii. All Directors, officers and employee of the Group is required to sign a declaration to abide by this policy.
- iii. For external business associates, the Managing Director would decide whom shall be required to sign the declaration based on his judgment as the case maybe.
- iv. The Audit Committee Chairman, Managing Director and Internal Auditor are responsible for checking and monitoring the compliance with this Policy. Every Directors, officers and employee is required to be familiar with and comply with this Policy.
- v. Bribery is a criminal offense. An employee will be accountable whether he/she pays a bribe himself/herself or whether he/she authorizes, assists, or conspires with someone else to violate an anti-corruption or anti-bribery law. Punishment for violating the law are against him/her as an individual and may include imprisonment, probation, mandated community service and significant monetary fines which will not be born by the Group.

6 Monitoring and Reporting

- a. All Directors, officers and employees are responsible for the success of this Policy and should ensure they use it to disclose any suspected danger or wrongdoing.
- b. Any suspected breach of this policy shall be reported to any of the following personnel, as relevance
 - i. The internal auditor wong@lsk.com.my
 - ii. The Managing Director eric@lsk.com.my
 - iii. The Audit Committee Chairman yswong8989@gmail.com
- c. The whistle blower will be protected under the Group's Whistle Blowing Policy.