

SAMAIDEN GROUP BERHAD
Anti-Corruption And Anti-Bribery Policy

1. Objective

Samaiden Group Berhad and its subsidiaries, associates company and joint venture (collectively known as “SAMAIDEN or the Company”) takes a zero-tolerance approach towards bribery and corruption, and is committed to behaving professionally, fairly and with integrity in all our business dealings and relationships wherever SAMAIDEN operates, and implementing and enforcing effective systems to counter bribery and corruption.

The Anti-Corruption and Anti-Bribery Policy (the “Policy”) is to state the various policies of SAMAIDEN with the aim to prevent, detect and take action against all bribery and corruption issues as well as to ensure compliance with the relevant and applicable laws and regulations. All employees and business associates of SAMAIDEN are expected to adhere to the general principles as well as to comply with all the specific provisions of the Policy that are applicable to them and other policies adopted by SAMAIDEN.

2. Conflict of Interest

Employees should avoid any situation that involves, or appears to involve, a conflict between their personal interest and the interest of the Company. This means employees should avoid circumstances that might affect their judgement or impartiality when performing their jobs.

If an employee discovers that, as a result of changed circumstances or otherwise, he/ she has become involved in a conflict of interest or is in competition with the Company, the employee must declare to the Company as soon as the matter comes to his/ her knowledge.

3. Whistleblowing Policy

Kindly refer to [SAMAIDEN's Whistleblowing Policy and Procedures](#) which can be downloaded from www.samaiden.com.my.

4. Donations & Sponsorships

Donations and Sponsorships in cash or in kind shall be approved by the Management. Notwithstanding the above, any form of political donation, contribution or sponsor shall be avoided unless approval is granted by Management on a case by case basis.

5. Facilitation Payments

Facilitation payments means indirect/unofficial payment to any parties with the objective to expedite the operations or application process or reduce the waiting time. Facilitation payments in whatever manner are strictly prohibited by SAMAIDEN.

6. Gift, Benefits or Entertainment

Employees shall not be influenced by receiving favors nor shall they try to improperly influence others by providing favors. Employees and/or members of their families are prohibited from receiving any form of gifts, benefits or entertainment or hospitality from any third parties, although at times he/she may accept gifts of nominal value such as inexpensive novelty or promotional items. These could include pens, coffee mugs, calendars, diary book or inexpensive business meals and festive hampers. Accepting gifts, benefits or entertainment or hospitality of higher than nominal value may be construed as a corruption which is a criminal offence. Price discounts on any goods or services offered or free goods or services shall not be accepted unless the same benefits are available to all other employees.

7. Dealing with Third Parties

Third parties in this Policy consists of Business associate and officer of a public body.

7.1 Business associate

A business associate is an external party who has or plans to have any form of business relations with SAM AIDEN, such as customers, partner, contractor, sub-contractor, consultant, supplier, investor, service provider and others.

Below are the requirements when dealing with Business associate:

- SAM AIDEN expects all Business associate to refrain from bribery and corruption.
- SAM AIDEN shall endeavor to include clauses in all its contracts or purchase orders, if applicable which will enable the SAM AIDEN to terminate any contract or to cancel the purchase order if it is proven bribery or corruption is involved prior to entering into the contract.

7.2 Government Official

The term "Government Official" as used above refers to an officer, employee, agent or representative of any governmental authority, including a department or agency of any government or a government-owned or controlled entity, a candidate for political office, a political party, any official of a political party, any state-owned enterprise, social or public organization, or any member of a Government Official's immediate family. Examples of Government Officials include police officers, persons responsible for issuing official permits or licenses, health inspectors, labor/employment authorities, and employees of companies or entities owned by the government such as oil or utility companies, the news media, transportation entities, hospitals, schools and universities.

Below are the requirements when dealing with Government official or his/her immediate family members:

- Employees shall refrain from offering and/or receiving bribe to/from Officer of a public body in return for the benefits of SAM AIDEN or his/her personal benefits.
- Nevertheless, gift which include but not limited to corporate gift such as pens, coffee mugs, calendar, diary book, festive hamper and other inexpensive items are permitted to be given to Officer of a public body.
- A courtesy business meal offered to the Officer of a public body is allowed.
- Discounts, provisions of free products and services provided to the Officer of a public body which are also applicable to SAM AIDEN's customers or Business associate shall not be construed as bribe.

8. Anti-Money Laundering

SAM AIDEN will to the best of its ability and knowledge, conduct business with its business partners with legitimate funds for legitimate business purpose. SAM AIDEN will report to the relevant regulatory authority on any suspected money laundering activities in our business dealings.

9. Procurement

Any solicitation and acceptance of bribes by SAM AIDEN's employees or their contract employees or appointed authorized representative are strictly prohibited. Selection of contractor, sub-contractor, consultant, supplier, vendor, service provider is purely based on merits after due process is carried out to assess their credentials, capability to deliver and price quoted. Every employee or contract employee or appointed representative shall not abuse their position to influence or dictate the Company in favouring a vendor or contractor in return for a personal gain.

10. Recruitment of Employees

A due diligence shall be undertaken prior to appointing an employee. SAM AIDEN shall, depending on the person's position or scope of works and corresponding bribery and corruption risk, take reasonable steps to ascertain whether the prospective employee has been involved in bribery or any criminal offence.

11. Management of Support Letter

It is a request for a "special pass" provided by an influential individual or party to another party to support an application or influence a consideration involving SAM AIDEN's business affairs. Employees shall not offer bribe nor exercise undue pressure to the influential individual or party to secure the support letter. The support letter shall be provided by them to SAM AIDEN in good faith after due consideration of the our credentials and capability.

12. Referral to Authorities

In the event of any non-compliance of the Policy, the Company shall report the case to the relevant regulatory authority in addition to termination of employment or business contract. In this regard, SAM AIDEN shall provide full co-operation to the aforesaid regulatory authorities to facilitate their investigation.

Approved by the Board on 21 February 2024.

EMPLOYEES ACKNOWLEDGEMENT FORM

I hereby acknowledge that I have read the SAM AIDEN’s Anti-Corruption And Anti-Bribery Policy (“Policy”) and fully understand the contents herein.

I hereby declare that I have complied and agree to continue to comply with the Policy.

I understand that if I fail to comply with any part of the Policy, I may be subjected to appropriate disciplinary action under the circumstances, including possible dismissal from my employment with SAM AIDEN.

Name :

Signature :

NRIC No./Passport No. :

Date :

Note: If you have not or are unable to fulfill any section of the Policy indicated above, please contact the Management immediately for clarification and remedial measures to be taken.