

ANTI-BRIBERY & ANTI CORRUPTION POLICY

Hiap Huat Holdings Berhad is committed to carry out its business honestly and openly and has a zero tolerance of bribery and corruption. In line with the requirements and or the provisions of the Malaysian Anti-Corruption Commission Act 2009, Hiap Huat Holdings Berhad has established Code of Conduct and Ethics to highlight that during performing his duties. This policy shall apply to all Hiap Huat Holdings Berhad subsidiaries and related companies, employees including but not limited to all individuals at all levels and grades.

Hiap Huat Holdings Berhad should at all times observe the following codes:

- i. Shall not be engaged in any form of bribery or corruption either directly or indirectly through any third party (such as agent, contractor or distributor)
- ii. Should neither divert to his own advantage any business opportunity that the company is pursuing, nor may he use confidential information obtained by reason of his office for his own advantage or that of others;
- iii. Should at all times act with utmost good faith towards the company in any transaction.
- iv. Shall not accept gifts or any form of inducement from third party in consideration for awarding business dealings and advantage over competitors.
- v. Shall not participate in any activity that might lead to a facilitation payment or kickback being made.

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Dato' Chan Say Hwa
Managing Director
1st July 2020
