



ANTI-BRIBERY & CORRUPTION POLICY

1. Introduction

At Kucingko Berhad (formerly known as Kucingo Sdn Bhd) (“**Company**”) and its subsidiary(ies) (“**Group**”), we're all about doing business honestly and ethically. Whether you're a full-time employee, a freelancer, an intern, or a temporary staff member, as well as directors, these rules are for you to act professionally and with integrity.

We're serious about not getting involved in any corrupt activities that could benefit us unfairly. That's why we've got this Anti-Bribery and Corruption Policy (“**Policy**”) in place to make sure bribery and corruption have no place in our business dealings.

2. Policy Statement

This policy isn't meant to cover every aspect of personal behaviour you may encounter, but it serves as an ethical framework to guide your actions. It should be considered alongside our Code of Conduct and Code of Ethics at Kucingko Berhad for a complete understanding of our expectations.

3. Definitions

Bribery is when someone offers, promises, gives, accepts, or even hints at giving an unfair advantage, it's of financial or non-financial value, either directly or indirectly. Bribers try to influence or reward someone into doing or not doing something related to their job.

In Malaysia, we follow strict anti-corruption laws, specifically Section 17A of the Malaysian Anti-Corruption Commission (Amendment) Act 2018. According to this law, it's an offence if someone connected to our company ever tries to offer, agree to offer, promise, or give any kind of favour or reward, either for their own gain or someone else's, with the intention of:

- 3.1. Obtain or retain business for our Company.
- 3.2. Obtain or retain an advantage while conducting business for our Company.

4. Objective

The aim of this policy is simply to help you understand and deal with any improper solicitations, bribery, or corrupt activities that might pop up in our business world. It's crucial for you to keep in sync with all relevant laws, rules, and regulations that pertain to your job responsibilities.

KUCINGKO

Corporate Address

H-G-03 Glomac Square
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47301 Petaling Jaya
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maomao@kucingko.com



5. Application

This Policy isn't just for our Employees, it also extends to those who are part of our Group. That includes our team, as well as our third-party companions like customers, business partners, contractors, suppliers, consultants, agents, and anyone else lending us a helping hand (“**Third Parties**”). We keep our Third Parties informed on this Policy through written information and our website, counting on everyone to be on the same page when they work with or for our Group.

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6. Guidance on Common Forms of Bribery and Corruption

6.1. Hospitality, Gifts and Entertainment

We understand that sharing some good times and corporate hospitality can be a legitimate way to build those business bonds. Our Policy doesn't restrict on giving or getting normal hospitality, gifts, and entertainment, as long as we keep these ground rules in mind:

- 6.1.1 It's reasonable in value.
- 6.1.2 It's infrequent in nature.
- 6.1.3 It's transparent and open.
- 6.1.4 It's not given to influence or obtain an unfair advantage.
- 6.1.5 It's respectful and customary.

You should exercise caution and judgement when offering or accepting gifts, hospitality, or modest entertainment to protect the Group's reputation and ensure compliance with bribery and anti-corruption laws. Always think about the why behind these gestures. In all cases, you must report the receipt of any hospitality, gifts, and entertainment to the Head of Department or Executive Directors (collectively “**Management**”), transparency is key.

6.2. Facilitation Payments

Facilitation payments are the act of trying to pay someone to do their own job. You should never offer, promise, give, request, or accept a facilitation payment. But there are some situations where you might feel like you have to make a payment to protect yourself from harm. If you do have to make a payment like this, Management should be informed at the earliest opportunity if not immediately. And if someone tries to hand you a facilitation payment, don't hesitate to let Management know about it.

6.3. Recruitment, Promotion and Support of Employees

We value integrity at our Company. That's why our recruitment, training, performance evaluation, remuneration, recognition and promotion processes are all designed to recognise and reward Employees who act with integrity. We also don't offer employment to people who have improperly favoured us in the past.



6.4. Corporate Social Responsibilities, Sponsorships and Donations

We delve into some corporate social responsibility, sponsorships, and donations. We love to give back, whether it's money, time, services, or sharing knowledge, but it can't be a way to bribe people or fund illegal activities. That would be against our policies and the law.

The organisation we give to has to be legitimate, and we have to make sure the money is going to the right people and making a real difference. It is Management's responsibility to review and give the green light.

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7. Due Diligence

Third Parties are our business companions who provide us with goods and services. We need to be careful about bribery and corruption with these businesses. If you are someone who works with them, some documented research will be done before we start working with them. The amount of research we do will depend on how risky we think the business is. We might check databases, look for relationships with public officials, ask the business to fill out a form, and document why we chose them over other businesses. We'll also put a clause in all our contracts with business associates that says we can cancel the contract if they try to bribe us or anyone else.

8. Record Keeping and Documentations

When making payments to Third Parties, make sure you're keeping records of them. That way, it's crystal clear that these payments are legitimate and free of corruption. For any expenses related to hospitality, gifts, or other expenses incurred for Third Parties, remember to get approval from Management first.

9. Trading and Communication

Those who are in positions where they might be tempted to engage in bribery or corruption will receive regular, relevant training on how to avoid doing so. Our Human Resources Department will keep tabs of who attends the training and when, so not to worry. We'll spread our stance on bribery and corruption far and wide to all customers, suppliers, contractors, consultants, agents, representatives, and anyone else who does work for or on behalf of the Group.

10. Responsibilities of the Employees

As Employees, you have to:

- Be familiar with this policy and all the rules.
- Keep accurate records of all transactions and payments.
- Be on the lookout for any violations of this policy.
- Report any violations or suspected violations right away.



- Attend anti-bribery and corruption training.

When dealing with business associates, you should not:

- Show favouritism to certain individuals.
- Try to influence individuals by offering them money or gifts.
- Exert influence to obtain benefits.
- Directly or indirectly offer or give bribes, in cash, kind, or favours.

The leaders of the pack, known as C-level Executives, are responsible for ensuring that the requirements of this Policy are incorporated into their Company's policies and for monitoring compliance.

Your part as Employees, you have to give us a nod in writing to acknowledge your understanding and commitment to this Policy. Our trusty Human Resources Department will keep that declaration safe for as long as you're employed with us.

Conflict of interest is when your personal interests try to interfere with your work. No using your position, work hours, resources, secrets, or anything else for personal gain or at the Group's expense.

11. Compliance to the Laws

We're committed to playing by the rules, adhering to all applicable laws, regulations, and rules in the regions where it operates. As our Employees, you're expected to be familiar and follow the Malaysian Anti-Corruption Commission Act 2009, including any amendments to it. If we ever spot anything fishy, we'll be reporting said actions or activities to the police or relevant authorities.

To keep our anti-bribery and corruption standards strong, we'll be assigning a team right within our Human Resources Department. They will be the brainpower behind designing, implementing and managing this Policy.

You'll be our eyes and ears on the ground. Should you encounter or suspect violations of this Policy during work, report your concerns through the reporting channels outlined in our Whistleblowing Policy and Procedure. We're here to listen and take action on any information we receive.

Reports made with good intentions, anonymously or not will be handled promptly and thoroughly. You should never fear any kind of retaliation, no matter how things turn out in any investigation. We have a strict no retaliation policy in place for that, so speak up with confidence.

We don't take it lightly when someone tries to intentionally act against a reported violation in good faith. They might face disciplinary action of demotion, suspension, or even dismissal. And, if necessary, we won't hesitate to take legal action.

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12. Monitoring and Review

The Board of Directors of Kucingko Berhad will oversee the enforcement of this Policy and routinely review it to ensure it remains relevant and effective.

Our Human Resources Department is your go-to when it comes to combating bribery and corruption. They're the experts on guiding and advising you on all things related to this Policy. They will also keep a watchful eye to make sure this Policy is working as intended through extensive monitoring, measurement, analysis and evaluation. They'll also keep top Management and the Audit and Risk Management Committee in the loop of its performance.

Consequences await those who fail to comply with this Policy. This could mean disciplinary action, and in some cases, the attention of relevant authorities who could initiate criminal proceedings.

We'll be keeping tabs on assessing compliance with this Policy with regular audits. These audits may be done by our own team, and they'll include action plans to further improve our performance in the documentation.

When we spot any non-compliance, whether it's through an audit or any other means, the Management and the Audit and Risk Management Committee will be notified promptly. We'll also assess the level of risk where depending on the situation, penalties of contract termination may be applied to external parties who don't follow the rules. Should an individual or organisation cause us harm to our interests through non-compliance, we'll be ready to pursue legal action.

This Policy was adopted by the Board on 22 November 2023.

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Appendix 1

Declaration Form

I, _____, (NRIC No: _____) hereby declare that I have read and understood Kucingko Berhad's Anti-Bribery and Corruption Policy and shall abide by the requirements and provisions set out in the said Policy throughout the duration of my employment/dealings with Kucingko Berhad and its group of company and as required by my employment contract/contract.

Name:

Date:

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