

YKL GROUP OF COMPANIES



| | |
|-----|--|
| 1. | <p>Introduction</p> |
| | <p>This policy commits YKL Group of Companies (“YKL Group” or “the Group”) to conduct business in a lawful and ethical manner and as well to comply with all applicable laws.</p> <p>In response to the development of laws and regulations in relation to global fight against corruption, including the introduction of corporate liability in Malaysia via the Malaysian Anti-Corruption Commission Act 2009 (“MACC Act 2009”), YKL Group has established this Anti-Bribery and Corruption Policy (“ABC Policy”) that sets out its principles and stance and adequate procedures against bribery and corruption (collectively called as “corrupt gratification”) activities in the conduct of the business, both in Malaysia and abroad.</p> <p>This ABC Policy requires compliance with all applicable laws and regulations on bribery and corruption, including, inter-alia, guidelines issued by the Prime Minister’s Office, i.e. Guidelines on Adequate Procedures Pursuant to Section 17A (5) of the MACC Act 2009, as well as other international practices on anti-bribery and corruption.</p> <p>As it is committed to conducting business dealings with integrity, YKL Group aims to achieve the highest level of business ethics to prevent the occurrence of all forms of corrupt gratification activities in the conduct of the Group’s businesses in other countries that the Group operates.</p> |
| 2. | <p>The purpose of the ABC Policy</p> |
| 2.1 | <p>The purpose of this ABC Policy is to outline and explain the prohibitions against corrupt gratification in all of the YKL Group’s operations, to highlight the specific compliance requirements relating to these prohibitions, and to reinforce the Group’s commitment to conducting business, both in Malaysia and abroad, by upholding YKL Group’s zero-tolerance position and stance on corrupt gratification.</p> |
| 2.2 | <p>This ABC Policy provides a source of information and guidance for those working for YKL Group on how to recognise and deal with corrupt gratification issues as well as to understand their responsibilities.</p> |
| 2.3 | <p>YKL Group will undertake a corrupt gratification risk assessment across its business when appropriate to understand the risk it faces and ensure that it has adequate procedures in place to address the risk.</p> |
| 2.4 | <p>For the purpose of this ABC Policy, the terms below represent their respective definitions:</p> <ul style="list-style-type: none"> • Bribery means the act of offering, giving, promising, asking, agreeing, receiving, accepting or soliciting something of value or of an advantage so to induce or influence an action or decision. A bribe refers to any inducement, reward or object/item of value offered to another individual in order to gain or retain commercial, contractual, regulatory or personal business or advantage. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and accept it, he/she is also breaking the law. |

| 2.4 | <ul style="list-style-type: none"> <p>Business associate means an external party with whom YKL Group has, or plans to establish, some form of business relationship. This may include clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors. The definition of such Associated Persons accords with S17A (2) of the MACC Act 2009.</p> | | | | | | | | |
|---|---|--|---|--------------------|--------------------|--|--|--|---|
| | <ul style="list-style-type: none"> <p>Corruption means the act of soliciting, giving, promising to give, offering, accepting or receiving gratification, directly or indirectly, to/from a person in authority either in the form of money, services, favours, positions or valuable goods as an inducement or reward to or not to do an act in relation to the person's principal affairs or function. In short, corruption is essentially an "abuse of entrusted power or position to obtain a personal gain or benefit".</p> | | | | | | | | |
| | <ul style="list-style-type: none"> <p>Facilitating payment means any small or nominal payment made to a government official, typically to speed up and/or secure the performance of a non-discretionary "routine governmental action". Activities that constitute "routine governmental actions" are for example: obtaining permits, licenses or other official documents to qualify a person or entity to do business in a foreign country; processing governmental papers, such as visas and work orders; providing police protection, mail pick-up and delivery, or scheduling inspections; providing telephone services, power and water, loading cargo or protecting goods from deterioration. Facilitating payments are different from express payments, used to speed up a process. Express payments are legitimate payments, for which one can receive an invoice or receipt so that the transaction can be duly registered in our books.</p> | | | | | | | | |
| | <ul style="list-style-type: none"> <p>Gratification shall have the meaning as defined in Section 3 of the MACC Act 2009, which includes but is not limited to anything of monetary and non-monetary value or benefit to the person. Gratification does not have to be directly given or received by an employee, but it can also be given or received by anyone related to the employee that is beneficial, of value or advantageous to the employee.</p> <p>Gratification can be subdivided into the following categories (without limitation to):</p> <table border="1"> <thead> <tr> <th>Monetary</th> <th>Of Monetary Value</th> <th>Employment</th> <th>Non-Monetary Value</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> Money Donation Gift Loan Fee Reward Financial benefit Valuable security </td> <td> <ul style="list-style-type: none"> Property - Can be movable or immovable. e.g. Movable : house, land Immovable: cars, shares in a company </td> <td> <ul style="list-style-type: none"> Office or position in an organisation that is lucrative Dignity or title Employment Contract for service Agreement to give employment or render services </td> <td> <ul style="list-style-type: none"> Undertaking to do or not to do something (whether orally or in writing, with condition or without) Favours </td> </tr> </tbody> </table> | Monetary | Of Monetary Value | Employment | Non-Monetary Value | <ul style="list-style-type: none"> Money Donation Gift Loan Fee Reward Financial benefit Valuable security | <ul style="list-style-type: none"> Property - Can be movable or immovable. e.g. Movable : house, land Immovable: cars, shares in a company | <ul style="list-style-type: none"> Office or position in an organisation that is lucrative Dignity or title Employment Contract for service Agreement to give employment or render services | <ul style="list-style-type: none"> Undertaking to do or not to do something (whether orally or in writing, with condition or without) Favours |
| | Monetary | Of Monetary Value | Employment | Non-Monetary Value | | | | | |
| <ul style="list-style-type: none"> Money Donation Gift Loan Fee Reward Financial benefit Valuable security | <ul style="list-style-type: none"> Property - Can be movable or immovable. e.g. Movable : house, land Immovable: cars, shares in a company | <ul style="list-style-type: none"> Office or position in an organisation that is lucrative Dignity or title Employment Contract for service Agreement to give employment or render services | <ul style="list-style-type: none"> Undertaking to do or not to do something (whether orally or in writing, with condition or without) Favours | | | | | | |
| <ul style="list-style-type: none"> <p>Hospitality means the considerate care of guests, which may include refreshments, accommodation and entertainment at a restaurant, hotel, club, resort, convention, concert, sporting event or other venue such as company offices, with or without the personal presence of the host. Provision of travel may also be included, as may other services such as provision of guides, attendants and escorts; use of facilities such as a spa, golf course or ski resort with equipment included.</p> | | | | | | | | | |
| <ul style="list-style-type: none"> <p>Kickback means the return of a sum already paid or due as a reward for awarding further business.</p> | | | | | | | | | |

| | |
|------------|--|
| 3. | ABC Policy statement |
| 3.1 | <p>YKL Group is committed to complying with the relevant anti-bribery and corruption laws and regulations, breaches or violation of which may cause great damages to the Group. The consequences may include reputational damages, legal fines, imprisonment for persons responsible, eventual loss of business or key talents in the Group, etc. Accordingly, YKL Group has adopted the following position and stance on bribery and corruption:</p> <ul style="list-style-type: none"> · YKL Group's Board of Directors adopts a zero-tolerance approach towards bribery and corruption and the Group shall not pay nor receive any corruption gratification to or from anyone for any purpose as these are illegal. The Group must not authorise or tolerate any business practice that does not comply with this ABC Policy. · YKL Group shall uphold this position and stance across its business seriously and expects the same from stakeholders, both internal and external to the Group's business, extending to all the Group's business dealings and transactions in the countries the Group operate; · Directors, Employees, Business Associates and any third parties working with or for YKL Group shall adhere to and observe YKL Group's anti-bribery and corruption position and stance and relevant provisions set out in its Policy; and · YKL Group treats any violation of this ABC Policy seriously and shall undertake necessary actions, including, but not limited to, review of employment or appointment, contracts (including termination of contracts), disciplinary actions, dismissal, and reporting to the authorities, consistent with the relevant laws and regulations. |
| 3.2 | <p>YKL Group recognises that acts of corrupt gratification are punishable by way of pecuniary fines and/or jail sentences, as the case may be, upon conviction. If any entity in YKL Group or business associate with it is found to have taken part in bribery or corrupt activities to benefit the Group, either by way of obtaining or retaining a business or advantage in the conduct of the Group's business, YKL Group may subject to a monetary fine of not less than 10 times the sum or value of the corrupt gratification, and/or the officers concerned jailed not exceeding 20 years, upon conviction under the MACC Act 2009. There may well be other associated charges brought against the Group and/or its officers under other legislations in Malaysia or in the countries in which the alleged offence is committed. All these may lead to serious damage to the Group's reputation. It is with this in mind that YKL Group remains committed to preventing acts of corrupt gratification in the businesses, and take the Group's legal responsibilities seriously.</p> |
| 4. | Scope |
| 4.1 | <p>This ABC Policy is applicable to YKL Group, business associate acting on YKL Group's behalf, the Board of Directors and all the Group's personnel no matter where they are located (within or outside of Malaysia). All associated companies and non-controlling joint-venture companies are encouraged to adopt similar principles. External providers are also expected to comply with this Policy in relation to all works conducted with YKL Group, or on YKL Group's behalf.</p> |
| 4.2 | <p>In the context of this ABC Policy, external provider refers to any individual or organisation YKL Group meets and works with. It refers to business associates and government and public bodies - this includes their advisors, consultants, representatives and officials, politicians and public parties.</p> |

| | | |
|------------|--|---|
| 5. | Address Risk on Corrupt Gratification | |
| | To address Corrupt Gratification Risk, YKL Group has taken the following steps: | |
| | a) | to implement this ABC Policy; |
| | b) | to take steps to implement training programme on this ABC Policy; and |
| | c) | to review and update this ABC Policy regularly. |
| 6. | Acceptable and NOT Acceptable | |
| 6.1 | Policy on acceptable or not acceptable actions are in respect of the following four (4) areas: | |
| | a) | Gifts, entertainment, hospitality and travel; |
| | b) | Facilitation payments; |
| | c) | Political contributions; and |
| | d) | Charitable contributions and sponsorships. |
| 6.2 | Gifts, entertainment, hospitality and travel | |
| | a) | YKL Group accepts normal and appropriate gestures of hospitality and goodwill (whether given to or received from third parties) and encourages the use of good judgement when giving or accepting these benefits with the guiding principles that they must be: |
| | i) | moderate and reasonable in value; |
| | ii) | infrequent in nature; |
| | iii) | transparent and open; not given to with an intention to exert improper influence or create a perception of expectation for certain outcomes beneficial to the business of YKL Group; |
| | iv) | respectful and customary. |
| | Hence, so long as the giving or receiving these benefits meet the following requirements: | |
| | i) | complies with local law; |
| | ii) | is given in the YKL Group's name, not in the name of a member of staff; |
| | iii) | does not include cash or a cash equivalents (such as gift certificates or vouchers); |
| | iv) | taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time; |
| | v) | is not made with the suggestion that a return favour is expected; |
| | vi) | is appropriate for the circumstances (e.g. giving small gifts around festive seasons or as a small thank to an organisation for helping with a large project upon completion); |
| | vii) | is given or received openly, not secretly; |
| | viii) | is not selectively given to a key or influential person, clearly with the intention of directly influencing them; |
| | ix) | accords with the limits of threshold, frequency and approval mandate as pre-determined by the Group; and |
| | x) | gifts should not be offered to, or accepted from, government officials or representatives without the prior approval of the directors based on the YKL Group's approval mandate. |

| 6.2 | b) | The Group shall ensure that all gifts, entertainment, hospitality and travel made are legal and ethical under local laws and practices, and that such expenses incurred are made in accordance with the Group's approval mandate. | | | | | | | | | | | | | | | | | | | | | |
|--------------------|---|--|------------------------------------|-------------------------------|------------------------------------|----------|-------|----|--------------------|-------|---------------------|---------|-------|---------------------|-------------------|-----|---------------------|-----------|-----|---------------------|---------------|-----|---------------------|
| | c) | An employee must obtain prior clearance and approval from the immediate supervisor and/or head of department vide email or WhatsApp before giving or receiving any gifts, hospitality or entertainment to or from any person which is not of any improper motive. However, where any gifts, hospitality or entertainment is not improper and received before prior approval can be obtained, an employee must always disclose such gifts to the immediate supervisor and/or head of department, regardless of its value; | | | | | | | | | | | | | | | | | | | | | |
| | d) | The Group recognises that the practice of giving and receiving business gifts varies amongst countries, regions, cultures and religions. As such, definitions of what is acceptable and not acceptable will inevitably differ for each. Hence, where it is difficult or inappropriate to decline the offer of a gift, hospitality or entertainment (i.e. when meeting with an individual of a certain religion/culture who may take offence), it may be accepted but it must be declared and/or surrendered to the employee's immediate supervisor and/or head of department, who will assess the relevant circumstances and take the necessary steps, including returning the gift on the employee's behalf, where appropriate or required to do so. | | | | | | | | | | | | | | | | | | | | | |
| | e) | Where it is inappropriate to decline the offer of a gift, entertainment, hospitality or travel (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift, entertainment, hospitality or travel may be accepted so long as it is declared to the Compliance Officer, who shall assess the circumstances, including whether it accords with the Group's pre-determined thresholds and frequency. | | | | | | | | | | | | | | | | | | | | | |
| | f) | As good practice, gifts, entertainment, hospitality and travel given and received should always be disclosed to the Compliance Officer. If there is any uncertainty, the advice of the Compliance Officer should be sought. | | | | | | | | | | | | | | | | | | | | | |
| | g) | YKL Group has formalised a policy which regulates the giving and acceptance of gifts, entertainment, hospitality and travel, with Permissible Values and Authority Matrix for the benefits given or received as follows: <table border="1" data-bbox="402 1255 1474 1591"> <thead> <tr> <th><i>Designation</i></th> <th><i>Permissible Value (RM)</i></th> <th><i>Approval if exceeding limit</i></th> </tr> </thead> <tbody> <tr> <td>Director</td> <td>2,000</td> <td>NA</td> </tr> <tr> <td>General Manager/FC</td> <td>1,500</td> <td>Respective superior</td> </tr> <tr> <td>Manager</td> <td>1,000</td> <td>Respective superior</td> </tr> <tr> <td>Senior Executives</td> <td>500</td> <td>Respective superior</td> </tr> <tr> <td>Executive</td> <td>300</td> <td>Respective superior</td> </tr> <tr> <td>Non-Executive</td> <td>100</td> <td>Respective superior</td> </tr> </tbody> </table> | <i>Designation</i> | <i>Permissible Value (RM)</i> | <i>Approval if exceeding limit</i> | Director | 2,000 | NA | General Manager/FC | 1,500 | Respective superior | Manager | 1,000 | Respective superior | Senior Executives | 500 | Respective superior | Executive | 300 | Respective superior | Non-Executive | 100 | Respective superior |
| | <i>Designation</i> | <i>Permissible Value (RM)</i> | <i>Approval if exceeding limit</i> | | | | | | | | | | | | | | | | | | | | |
| | Director | 2,000 | NA | | | | | | | | | | | | | | | | | | | | |
| General Manager/FC | 1,500 | Respective superior | | | | | | | | | | | | | | | | | | | | | |
| Manager | 1,000 | Respective superior | | | | | | | | | | | | | | | | | | | | | |
| Senior Executives | 500 | Respective superior | | | | | | | | | | | | | | | | | | | | | |
| Executive | 300 | Respective superior | | | | | | | | | | | | | | | | | | | | | |
| Non-Executive | 100 | Respective superior | | | | | | | | | | | | | | | | | | | | | |
| h) | Malaysia and international anti-bribery and anti-corruption laws impose strict restrictions on the value and level of corporate hospitality to be accorded to public officials. YKL Group is committed to complying with all applicable laws and the Group's employees must exercise special caution when providing corporate hospitality to public officials. The Group's employees must consult their immediate supervisor when offering any corporate hospitality to public officials. | | | | | | | | | | | | | | | | | | | | | | |

| | | |
|------------|--|---|
| 6.3 | Facilitation Payments and Kickbacks | |
| | a) | YKL Group does not allow the use of any form of facilitation payments (also known as grease payments) of any nature. The Group recognises that facilitation payments as a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. Such payments may be considered a customary way of doing business in some countries with intention of speeding up the performance of a certain duty or action, but it is important to understand that the anti-bribery laws of many countries prohibit such payments. Employees and third parties, in particular third-party intermediaries, are prohibited from making facilitating payments on the Group's behalf. |
| | b) | YKL Group does not allow kickbacks to be made or accepted. The Group recognises that kickbacks are typically made in exchange for a business favour or advantage. |
| | c) | YKL Group recognises that despite its strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their or their family's personal security at risk. Under these circumstances, the following steps must be taken: |
| | | <ul style="list-style-type: none"> i) keep any amount to the minimum; ii) ask for a receipt, detailing the amount and reason for the payment; iii) create a record concerning the payment; and iv) report this incident to the superior. |
| 6.4 | Political Contributions | |
| | YKL Group will not make donations, whether in cash, kind or by any other means, to support any political parties or candidates. The Group recognises this may be perceived as an attempt to gain an improper business advantage. | |
| 6.5 | Charitable or Educational Donations and Sponsorships | |
| | a) | YKL Group will only provide charitable or educational donations and public welfare sponsorships if they are ethical and legal under applicable laws. All donation and sponsorship expenses must be done with the approval of the executive director(s) and it must be done in a transparent manner for social and moral responsibility. |
| | b) | Employees must be careful to ensure that donations or sponsorships are not used to in exchange for any business implications to the YKL Group, whether it is to obtain a business, or to obtain some form of advantage of the business of the Group. The use of donations or sponsorships in this manner is strictly prohibited under this ABC Policy. If in doubt, check with the Compliance Officer. |
| 7. | Tender Process | |
| | All employees involved in tender processes participated by any company under YKL Group should be done in a transparent manner in the bidding process. | |

| | | |
|------------|--|---|
| 8. | Employee Responsibilities | |
| 8.1 | All employees of YKL Group must ensure that they read, understand and comply with the information contained within this ABC Policy, and with any training or other anti-bribery and corruption information they are given from time to time. | |
| 8.2 | All employees and those under YKL Group's control are equally responsible for the prevention, detection and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this ABC Policy. | |
| 8.3 | If having reasons to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this ABC Policy, the concerned employee must notify the Compliance Officer. | |
| 9. | Whistleblowing Policy | |
| 9.1 | Whistleblowing policy covers 3 areas: | |
| | a) | Procedures of whistleblowing; |
| | b) | Procedure for a victim of bribery or corruption; and |
| | c) | Protection. |
| 9.2 | Procedures of whistleblowing | |
| | a) | Where there are reasonable grounds and genuine reasons to suspect that there is a violation of this ABC policy, employees of YKL Group are encouraged to report the particulars of such suspicions to the Group's dedicated channel for reporting. Any such reports will be read and addressed by a dedicated Compliance Officer or director(s) in the Group. However, If employees are uncertain about whether a certain action or behavior could be considered bribery or corruption, they should speak to their superior, the Compliance Officer, the director(s). |
| | b) | YKL Group shall, via the Compliance Officer, familiarise all employees with its whistleblowing policy and procedures so that employees can vocalise their concerns swiftly and confidentially. External stakeholders as well as the public to report any actual or suspected wrongdoing in good faith without fear of reprisals to director(s) of the Group. |
| | c) | Any reports made for violation of this ABC Policy will be treated in confidential manner and investigated immediately. Whistleblower's anonymity will be protected unless the disclosure is required by law pursuant to an investigation or legislation, but the whistleblower may be required to provide a statement as supporting evidence to any investigation. Any retaliation directed against anyone making such report will not be tolerated |
| | d) | Whistleblowers are responsible to ensure that: |
| | | i) they exercise sound judgment that it is a genuine threat and violation of the ABC Policy; |
| | | ii) they have evidence to support their allegations of any violations of the ABC Policy; |
| | | iii) they are available to provide evidence in any inquiry of such violations; and |
| | | iv) they are not frivolous reports with the motive to scandalise. |
| 9.3 | Procedure for a victim of bribery or corruption | |
| | The victim must tell the Compliance Officer as soon as possible if he/she is | |
| | a) | offered a bribe by anyone, |
| | b) | asked to make one, |
| | c) | suspect that may be bribed or asked to make a bribe in the near future, or |
| | d) | have reason to believe that he/she is a victim of another corrupt activity. |

| | | |
|-------------|---|---|
| 9.4 | Protection | |
| | a) | YKL Group ensures that there will be no retaliation or repercussions on the employee for making genuine reports on violation of this ABC Policy. Any genuine reports made will be kept strictly confidential and only informed to persons on a need-to-known basis to safeguard the interest of the Group and also to ensure that any processes undertaken will not be comprised. |
| | b) | YKL Group will ensure that no one suffers any detrimental treatment [#] as a result of refusing to accept or offer a bribe or other corrupt activities or because he/she reported a concern relating to potential act(s) of bribery or corruption. [#] <i>Detrimental treatment refers to dismissal, disciplinary action or unfavourable treatment in relation to the concern the individual raised.</i> |
| | c) | If any employee has reason to believe he/she has been subject to unjust treatment as a result of a concern or refusal to accept a bribe, he/she should inform the superior or the Compliance Officer immediately. |
| 10. | Training and communication | |
| 10.1 | This ABC Policy is a public document which shall be communicated to all YKL Group's employees and business associates and external providers. They must read and understand the YKL Group's position on anti-bribery and anti-corruption. | |
| 10.2 | YKL Group will provide training on this ABC Policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this Policy, and will be asked annually to formally accept in writing that they will comply with this Policy. | |
| 10.3 | YKL Group's ABC Policy and zero-tolerance stance shall be clearly communicated to external providers comprising all suppliers, contractors, business associates and any third parties at the outset of business relations, and as appropriate thereafter. | |
| 10.4 | YKL Group shall provide relevant anti-bribery and corruption training to employees, etc., where they feel their knowledge of how to comply with the MACC Act 2009 or other requirements (e.g. Code on Corporate Governance (if any), Companies Act 2016, etc.) on anti-bribery and corruption needs to be enhanced. As good practice, all businesses in the Group shall provide its employees with anti-bribery training from time to time where there is a potential risk of facing bribery or corruption during work activities. | |
| 11. | Record keeping | |
| 11.1 | YKL Group shall keep detailed and accurate financial and other records, and shall have appropriate internal controls in place to act as evidence for each transaction involving the Group's business and/or the deployment of the Group's assets. The Group shall declare and keep a written record of the amount and reason for gifts, entertainment, hospitality and travel accepted and given, including donations, sponsorships and expenses of similar nature by whatever name called, and understand that such expenses are subject to managerial review and be promptly entered into the Group's records before they are reimbursed. The record shall document the following as a minimum: | |
| | . | Identify of the giver and recipient (names of individuals and corporations they represent); |
| | . | The actual amount expended or best estimate (in respect of gifts, entertainment, hospitality and travel received); |
| | . | Purpose of the giving or receiving; and |
| | . | Frequency of the giving or receiving. |
| 11.2 | All expenses must be accurately accounted for, include appropriate supporting documentation and be promptly entered into the Group's records before they are reimbursed. | |

| | |
|-------------|---|
| 12. | Monitoring, reviewing and enforcement |
| 12.1 | YKL Group's Board of Directors and its Compliance Officer will be monitoring compliance with this ABC Policy and shall review its implementation on a regular basis, including assessing its suitability, adequacy and effectiveness. There is no tolerance or excuse for non-compliance with this Policy. |
| 12.2 | Internal control systems and procedures designed to prevent acts of corrupt gratification are subject to regular internal audits to ensure that they are effective in practice. |
| 12.3 | Any need for improvements shall be applied immediately. Employees are encouraged to offer their feedback on this ABC Policy if they have any suggestions on how it may be improved. Feedback of this nature should be addressed to the Compliance Officer. |
| 12.4 | This ABC Policy does not form part of an employee's contract of employment and the Group may amend it at any time so as to improve its effectiveness at combatting bribery and corruption. |
| 12.5 | Any violation of this ABC Policy by employees of the YKL Group will attract serious repercussions and disciplinary action after due inquiry. Where there is strong evidence of bribery and corruption committed by any employee of the Group, the employee can be summarily dismissed and will not be allowed to be employed in any other companies of the Group. |
| 12.6 | Employees who are found to have assisted or facilitated the violation of this ABC Policy, whether actively or by way of negligence or omission, will also be deemed to have violated the Policy and committed a misconduct that is liable for dismissal from their employment with the YKL Group. |
| 12.7 | This ABC Policy will be reviewed from time-to-time, and at least once every three years to ensure that it continues to remain relevant, appropriate and effective in the enforcement of the principles herein and to ensure continued compliance with the prevailing law. |

This ABC policy is made available for reference at YKL Group's website as follows:
<https://welcome.yklgroup.com.my/>