

Ethic Statement Regarding Anti-Bribery and Anti-Corruption

Senheng does not participate in any form of bribery or corruption. It is our policy to comply with all laws, rules and regulations governing bribery and corruption in all the countries in which we do business. Acts of corruption and bribery are increasingly being made illegal throughout the world and penalties for breaching those laws are severe.

Senheng will deal with any instance of suspected bribery or corruption seriously. Any actual instance will result in disciplinary action against those involved, up to and including termination of employment or contract, and reporting of those persons to relevant regulatory and criminal authorities. Senheng will support those authorities in any prosecution brought against those persons. Senheng operates a zero tolerance policy toward bribery and corruption.

This policy extends to all of our business dealings and transactions in all countries in which Senheng operates. Local custom and practice is never a justification for departing from this policy.

You will never be penalised for compliance with these policies and procedures, even if Senheng loses business or money as a result. If you have concerns or suspicions about anyone's conduct or instances where there may be non-compliance with these policies, it's important you report them quickly to allow those concerns and suspicions to be promptly investigated and responded to.

Each of us must take personal responsibility for abiding with this policy. This includes our most senior managers and directors.

If you have such suspicions and you do not report them through BDO-Senheng Whistle Blowing channel, you could face disciplinary action up to and including termination of your employment.

Senheng will routinely assess the risks of becoming embroiled in bribery and corrupt practices. Based on such assessments we will take action.

If any instance of bribery or corruption is identified, Senheng will take remedial and disciplinary steps immediately. For the avoidance of doubt, if bribery or corruption is established, we shall seek legal advice with a view to dismissing any employee involved and our responsibilities to refer such matters to the authorities for them to deal with under law.

Senheng encourages and supports our employees to make decisions in line with our stated position on bribery and corruption. Senheng has zero tolerance against bribery and corruption at all times and in any form, whether direct or indirect, including through agents, suppliers, vendors, business partners and other intermediaries.

Bribery is the offering, promising, giving or accepting of any undue monetary or other advantage to or by another person such as but not limited to:

- A public official, at national, local or international level;
- A political party, party official or candidate; and,
- A director, officer, employee or agent of another organisation or an individual in order to obtain or retain a business or other advantage other than by legitimate and proper means.

Corruption includes solicitation of a bribe, whether or not coupled with a threat if the demand is refused.

Senheng presumes that any 'kick back' (in cash or in kind) to government officials or to employees of the other contracting party is a bribe.

Senheng also presumes that the engagement of intermediaries such as agents, subcontractors, consultants or other third parties, to channel payments to government officials, or to employees of the other contracting party, their relatives, friends or business associates is a bribe.

Any payment or other advantage made to any person who is not fully and properly recorded in the terms of the contract by which we do business with them shall be presumed by us to be a bribe.

No Senheng employee will ever suffer demotion, penalty, or other adverse consequences for refusing to pay bribes even if such refusal may result in Senheng losing business.

Every employee is covered by this HR's Ethic Statement and our Anti-Bribery and Anti-Corruption Policy where this policy applies to all staff, officers, directors, and employees (including contractors and temporary workers/interns) in our business worldwide. It applies to our agents, suppliers, business partners, resellers, distributors, contractors, and other intermediaries acting on our behalf or representing Senheng. All activities carried out on Senheng behalf must be compliant with this policy regardless of local laws or culture. Senheng operates a policy of individual accountability. We are each accountable for compliance with this policy. If you have any concerns or enquiries on the Anti-Bribery and Anti-Corruption Policy, please consult Corporate Compliance & Management.

Compliance with this code is a mandatory requirement.