

## **SILVER RIDGE GROUP OF COMPANIES ANTI-BRIBERY & ANTI-CORRUPTION POLICY**

### **1. SILVER RIDGE'S ANTI-BRIBERY AND ANTI-CORRUPTION STATEMENT**

- a. **Silver Ridge Holdings Bhd** (Company No. 667785-W) and its group of companies ("**Silver Ridge**") places the highest priority on transparency and integrity. We advocate good corporate governance, business ethics and social responsibility in our organization and its undertakings.
- b. We do not tolerate any form of corruption (including the giving and receiving of bribes) and take the most serious view of any attempt to do so whether by members of our staff, contractors, agents or business partners. Alleged or suspected cases will be investigated and appropriate action will be taken when necessary, including reporting such cases to the appropriate authorities, imposition of disciplinary action, termination, prosecution and recovery of losses.

### **2. ABOUT SILVER RIDGE'S ANTI-CORRUPTION & ANTI-BRIBERY POLICY**

- a. Our policy on anti-bribery and anti-corruption applies to all Personnel and Associated Persons. It is aimed at addressing and managing the giving and acceptance of gifts, entertainment, hospitality and facilitation payments.
- b. This policy is not a stand-alone policy, it forms part of our other codes, policy and regulations. It shall supersede all our prior policies, codes or regulation on bribery and corruption.

### **3. DEFINITIONS**

- a. "Associate Companies" means companies or organizations in which no majority or controlling stake is held by Silver Ridge and/or its nominee(s);
- b. "Associated Person" means Persons employed by or serving Associate Companies whose shareholders have unanimously or by majority agreed to exclusively adopt and comply with this Policy;
- c. "Connected Person" means any person not being a Personnel that has dealings with Silver Ridge as its business partners, joint venture partners, agents, intermediaries, service providers, suppliers, contractors, sub-contractors, vendors;

- d. "Gift" includes tangible and non-tangible items such as money, sponsorships, contribution, physical gift, loan, fee or reward;
- e. "Entertainment" means and includes any event, activity or performance designed to entertain, amuse or provide enjoyment including the giving or acceptance of food, drink or recreation of any kind; and
- f. "Hospitality" means any form of accommodation or travel.
- g. "Personnel" means all private individuals not being a Connected Person(s) who is employed by or serving Silver Ridge at all levels and grades whether on permanent, contract, secondment, temporary or assignment basis including interns, trainees, workers, executives, supervisors, managers, officers, chairman and directors (executive and non-executive) wherever they are located;

#### **4. SILVER RIDGE'S POLICY ON THE GIVING AND ACCEPTING OF GIFTS, ENTERTAINMENT, HOSPITALITY AND FACILITATION PAYMENTS**

- a. No Gift, Entertainment and/or Hospitality are to be given or accepted unless the Gifts, Entertainment and/or Hospitality itself and the giving or accepting thereof:
  - i. is approved in accordance with Limits of Authority; AND
  - ii. meets the following underlying principals and purposes:
    - 1. ethical and lawful;
    - 2. customary, infrequent and culturally appropriate;
    - 3. modest, reasonable and not inappropriate or excessive;
    - 4. will not place Silver Ridge or its people in any position of conflict;
    - 5. will not give rise to the expectation of any improper or unmerited favor or advantage from Silver Ridge or its people;
    - 6. will not cause Silver Ridge or its people to be in violated of any laws or regulations;
    - 7. will not unlawfully affect the judgement, decision or action of any relevant person including Silver Ridge or its people;
    - 8. is not and will not be perceived as a bribe; and

9. intended for the following purposes:

- a. promotion, management or sustaining of business;
- b. gestures of goodwill
- c. token of appreciation
- d. commemoration
- e. customary practice; and/or
- f. such other lawful purposes as determined by our Audit Risk Management Committee (ARMC)

iii. Before approving the giving or acceptance of any Gift, Entertainment and/or Hospitality due consideration will be given to the following on a case to case basis:

1. the scale and value;
2. the actual recipient or provider; and
3. the timing;
4. the character of the Gift, Entertainment and/or Hospitality;
5. the business context; and
6. the element of reciprocity

## **5. REJECTION**

- a. All Gifts, Entertainment and/or Hospitality that do not meet the provisions of this Policy will be rejected.

## **6. TREATMENT OF ACCEPTED GIFTS**

- a. Treatment for Gifts that have been accepted shall be in accordance with the following methods:
  - i. Shared or consumed;
  - ii. Donated;
  - iii. Applied or used as prizes for any Silver Ridge event or activity;
  - iv. Retained by the beneficiary;
  - v. Retained for display purposes; or
  - vi. Such other treatment as deemed fit by the relevant Key Management Personnel

Receipt of personal gifts via Silver Ridge is not encouraged.

## 7. GIVING AND ACCEPTANCE OF FACILITATION PAYMENTS

- a. No giving or accepting of offering, extortion, promising, paying or requesting for any Facilitation Payment(s) for direct or indirect benefit of Silver Ridge or any of our people is permitted

## 8. REPORTING CHANNELS

- a. We will ensure that all cases of corruption are managed in accordance with this policy. Regardless of whether the outcome of an investigation reveals any corruption or otherwise, there will be no retaliation against or adverse consequence at our end for the person reporting the incident in good faith. Further, no employee or ours will suffer any retaliation or adverse consequences for refusing to pay or accept a bribe.
- b. All management and staff as well as those who have dealings with Silver Ridge, are encouraged to report all cases of corruption involving Silver Ridge to us in the following manner or to the relevant authorities:

By Mail:	<b>SILVER RIDGE HOLDINGS BHD</b> (Company No. 667785-W) 4-6, Jalan 28/70a, Desa Sri Hartamas, 50480 Kuala Lumpur Wilayah Persekutuan Kuala Lumpur
By Telephone:	03-2300 0163
By Email:	<a href="mailto:corporate@silverridge.com.my">corporate@silverridge.com.my</a>

## 9. ENQUIRIES

- a. For any enquiries on Silver Ridge's Policy on Anti-Bribery and Anti-Corruption, please contact our Corporate Affairs Officer at [corporate@silverridge.com.my](mailto:corporate@silverridge.com.my) or at the address or telephone abovementioned.