

ANTI-FRAUD, BRIBERY AND CORRUPTION

<p>1. Commitment Statement and Policy on Fraud, Bribery and Corruption</p>	<ul style="list-style-type: none"> (i) Kenanga Investment Bank Berhad and its subsidiaries (“KIBB Group”) is committed to ensure that all its businesses and operations are conducted lawfully, ethically and with integrity. (ii) KIBB Group takes a zero tolerance approach to all forms of fraud, bribery and corruption (collectively referred to as ‘financial crimes’) and requires the same approach from its Board of Directors, senior management as well as its employees. Similarly, KIBB Group expects the same commitment from all third parties that it deals with on any matter and in any manner. (iii) The ‘Group Anti-Fraud, Bribery and Corruption Policy’ is KIBB Group’s expression and testament of this commitment and policy.
<p>2. KIBB Group’s Anti-Fraud, Bribery and Corruption Principles and Standards</p>	<ul style="list-style-type: none"> (i) All transactions involving KIBB Group must be conducted in compliance with the applicable laws, rules, regulations and guidelines as well as the relevant internal policies and procedures. (ii) Any person from KIBB Group as well as a third party seeking or doing business with KIBB Group must not, directly or indirectly, <ul style="list-style-type: none"> - offer, give, receive or solicit any item of value or gratification to influence the decisions or actions of KIBB Group; or - engage in activities that are intended to fraudulently or dishonestly defraud any other person in a transaction. (iii) The principles and standards in the Group Anti-Fraud, Bribery and Corruption Policy are applicable to any transactions regardless whether they are with private or public sector organisations or government entities. Naturally, any dealings with a person of a public sector organisation or government entity require a greater degree of care and due diligence. (iv) Where appropriate, KIBB Group may require adoption and implementation of specific procedures and controls on anti-fraud, bribery and corruption on any third parties seeking or doing business with KIBB Group.
<p>3. Controls in Relation to Gifts, Sponsorships and Donations And Prohibition of Facilitation Payments</p>	<ul style="list-style-type: none"> (i) The giving and accepting of gifts, sponsorships or donations to or from any parties in relation to KIBB Group must always comply with the relevant laws, regulations, policies and procedures. (ii) Gifts, sponsorships or donations must not be used to disguise gratification, bribe, illegal payments or as incentives to commit deceptive or fraudulent acts. All transactions involving gifts, sponsorships or donations must be done in a fair and transparent manner which commensurate with principles of ethics and integrity. (iii) KIBB Group does not make and will not tolerate any person from KIBB Group as well as any third party seeking or doing business with KIBB Group from offering, giving, receiving or soliciting any kind of facilitation payments to or from any persons.

4. Conduct of Due Diligence and Management of Conflict of Interest

- (i) KIBB Group requires conduct of appropriate due diligence on the relevant persons and transactions to ensure that any dealings by and with KIBB Group are with persons of high ethics and integrity.
- (ii) The appropriate and adequate due diligence must be conducted prior and subsequent to the establishment of a relationship with any party so as to ensure that KIBB Group does not deal or affiliate itself with any person known or suspected for involvement with the financial crimes.
- (iii) Any person from KIBB Group as well as any third party seeking or doing business with KIBB Group is required to properly manage and declare possible conflict of interest situations involving any transactions as well as relationships in relation to KIBB Group.

5. Training and Awareness

- (i) KIBB Group requires its employees to undergo training and organises various programs to raise awareness in order to ensure that the employees are aware of their roles and the collective responsibility they play in fighting fraud, bribery and corruption,
- (ii) KIBB Group expects the third parties that it deals with to similarly provide training to its employees to raise awareness on financial crimes.

6. Reporting and Investigation of Financial Crimes and Actions Taken by KIBB Group

- (i) Any party with knowledge of breach or potential breach of the Group Anti-Fraud, Bribery and Corruption Policy or of any commission of or attempt to commit financial crimes, must report such matter to KIBB Group through the KIBB Group's whistleblowing channels that are available [here].
- (ii) KIBB Group will carry out the appropriate investigations in relation to the reports made and it prohibits any form of retaliation against persons who has made reports in good faith.
- (iii) KIBB Group may take any actions for conduct which is against the Group Anti-Fraud, Bribery and Corruption Policy notwithstanding any actions taken by the relevant authorities.