

THUBA SEA SDN BHD

ANTI-BRIBERY AND ANTI-CORRUPTION ACKNOWLEDGEMENT AND DECLARATION

TO OUR VALUED BUSINESS PARTNERS / CUSTOMERS

thuba SEA Sdn Bhd is committed to conduct business ethically and with the utmost integrity in all its operations and has adopted a zero-tolerance approach against all forms of bribery and corruption. In order to maintain this, we look forward to your co-operation to help us promote business ethics and integrity in the following areas:-

1. Do not, either directly or indirectly, promise, offer, give to or accept from any person from our Company or any other person representing us any form of gifts, entertainment, hospitality, travel or any other benefits which could be reasonably perceived as a bribe, or be seen as having the purpose of influencing business decisions.

Business partners and customers shall ensure that they adhere to the following:-

Gifts

- a) Any gift must be unsolicited and not affect, or be perceived as affecting, business judgment. Gifts should only be offered to and received in connection with a customary business or cultural occasion. Cash, loans, kickbacks or the equivalent advantages are absolutely prohibited.
- b) Gifts must not exceed RM100 and in any event, must not occur more than 3 times a year with the same person.
- c) No gift must be given to government officials on our behalf.

Hospitality (meals and entertainment)

- d) Hospitality must be unsolicited and not affect, or be perceived as affecting, business judgment. Meals and entertainment should only be offered to and received from our representative dealing with the business partners and customers in their role in our Company, is for purposes supported by us and may only be offered in conjunction with legitimate business meetings, conferences or events hosted, supported or sponsored by us.
- e) Hospitality must not exceed RM100 and in any event, must not occur more than 3 times a year with the same person.

Political Contributions

Please note that our Company has adopted a policy prohibiting the making of political contributions to political parties or candidates.

2. Improper cash payments or incentives given to or given by any person from our Company or any other person representing us, or any other acts of bribery or corruption, or acts that could be perceived as bribery or corruption will not be tolerated.
3. To exercise reasonable care to avoid any actual or potential conflicts of interest in executing any duties with and on behalf of our Company.
4. If any business partners and customers are found to have contravened these requirements or any of our policies and procedures, we reserve the rights to take necessary action against the said business partners and customers.

5. If you have any concerns, suspicions or any other information regarding ethical issues or dishonest behaviour by any person from our Company or any other person representing us, including our business partners and any person representing you; or are aware of any violation of weakness or inadequacies in our anti-bribery and corruption control measures, processes and procedures; please promptly lodge a report with us via our email ethics.thuba@thuba.com.my. Any information provided by you, including your identity will be kept confidential and will only be shared on a 'need-to-know' basis. We assure you that your business relationship with us will not be affected by any report made in good faith or on the basis of reasonable belief against anyone regarding any actual, attempted or suspected improper conduct.

We would appreciate it if you could circulate this Notice to any person in your organisation who have business relationship with our Company and ensure they have read and understand the terms and conditions herein.

Yours sincerely
THE MANAGEMENT
THUBA SEA SDN BHD