

KCC Realty

Anti-Bribery and Anti-Corruption Policy

Revision History

Version	Effective Date
1.0	1.7.2025

KCC Realty
Anti-Bribery and Anti-Corruption (ABC) Policy
Effective Date: 1 July 2025

1. Policy Statement

KCC Realty ("the Group") is committed to conducting business with integrity, transparency and in full compliance with applicable anti-bribery and anti-corruption laws. This policy establishes a framework to prevent, detect and address bribery and corruption risks within the organisation. The Group strictly prohibits any form of bribery or corrupt practices in all its dealings and expects all employees, directors and third parties to adhere to the highest ethical standards.

2. Scope and Applicability

This policy applies to all employees, directors and third parties engaged with KCC Realty, including vendors, suppliers, agents, consultants and business partners. It is aligned with the Malaysian Anti-Corruption Commission Act 2009 and other relevant regulatory requirements. All third parties engaged by the Group must adhere to this policy as a condition of their business relationship.

3. Definition of Bribery

Bribery refers to offering, giving, receiving, or soliciting anything of value to unduly influence a business decision. This can include monetary payments, gifts, hospitality, employment opportunities, donations, or any other benefits intended to secure an unfair advantage. Bribery is a criminal offense and individuals involved in such acts may be subject to severe legal penalties.

4. Acceptable and Unacceptable Practices

4.1 Gifts and Hospitality

Gifts and hospitality are common business courtesies, but they can sometimes create undue influence or perceived conflicts of interest. Employees may accept or provide gifts or hospitality only if the following conditions are met:

- The gift or hospitality is not intended to influence a business decision or gain an unfair advantage.
- It is compliant with all applicable laws and regulations.
- The value is reasonable, proportionate and infrequent, ensuring that it does not create an obligation or expectation of reciprocity.
- It is declared and approved according to internal policies to maintain transparency.

4.1.1 Exemptions

Certain business-related courtesies, such as corporate-branded merchandise, meals provided at official events and minor seasonal gifts, may be accepted. However, employees must report any significant gifts (RM500 and above) or hospitality through the Gift Declaration Form to ensure compliance.

4.2 Facilitation Payments and Kickbacks

Facilitation payments, also known as "grease payments," are small payments made to expedite routine government processes. These payments, along with kickbacks (payments made to secure business favors), are strictly prohibited by KCC Realty. Employees must refuse such payments and report any attempted solicitation of facilitation payments to their immediate supervisor or the Compliance Officer.

4.3 Donations and Sponsorships

The Group supports charitable contributions that align with its corporate social responsibility objectives. However, such contributions must be carefully managed to ensure they are not used as a cover for bribery. All donations and sponsorships must:

- Be legitimate and unconnected to securing a business advantage.
- Comply with all applicable laws and governance policies.
- Be approved by the Board of Directors before disbursement.

5. Business Relationships and Third Parties

KCC Realty expects all third parties with whom it conducts business to share its commitment to anti-bribery and anti-corruption principles. The Group will undertake due diligence before engaging third parties to assess the risk of bribery and corruption. All third parties must acknowledge their compliance with this policy through the Anti-Bribery and Anti-Corruption Declaration Form.

To ensure efficiency, the Head of Department (HOD) has discretion to determine when the declaration form is necessary, based on a risk assessment of the business relationship.

6. Conflict of Interest

Employees must disclose any personal, financial, or business interests that could interfere with their ability to make impartial decisions in the best interest of KCC Realty. A conflict of interest arises when an employee or their close associates have relationships with competitors, vendors, or regulatory bodies that could affect their professional judgment. Any potential conflicts must be promptly reported and documented for review.

7. Dealing with Public Officials and Politically Exposed Persons (PEPs)

Employees and representatives of KCC Realty must exercise extra caution when engaging with public officials or Politically Exposed Persons (PEPs), as these individuals hold positions of influence that could pose bribery and corruption risks. Any interactions with government authorities must be:

- Conducted with full transparency and proper documentation.
- In compliance with all regulatory requirements.
- Reviewed for potential conflicts of interest or undue influence.

8. Political Contributions and Donations

The Group does not permit political contributions without explicit approval from the Board of Directors. Employees are prohibited from using company funds or resources to support political parties or candidates. If an employee wishes to engage in political activities, it must be done in a personal capacity without implying company endorsement.

9. Responsibilities and Compliance Oversight

9.1 Directors' Responsibilities

The Board of Directors is responsible for:

- Ensuring that the company maintains high ethical standards in line with this policy.
- Appointing a Compliance Officer to oversee the policy's implementation.
- Regularly reviewing the policy to ensure its effectiveness and alignment with current regulations.

9.2 Responsibilities of the Compliance Officer

- Conducting training programs to educate employees on anti-bribery and anti-corruption practices.
- Implementing procedures for monitoring compliance with this policy.
- Investigating reports of suspected bribery or corruption.
- Providing guidance on ethical business conduct.

10. Reporting Violations and Protection

Employees are encouraged to report any suspected bribery or corruption through the Whistleblowing Channel. Reports can be made confidentially and without fear of retaliation. The Group ensures that all reports will be investigated fairly and, where necessary, corrective action will be taken.

11. Monitoring and Review

This policy will be reviewed at least every three years or as required to maintain compliance with evolving legal and ethical standards. The Compliance Officer will be responsible for monitoring its implementation and effectiveness.