

ANTI-BRIBERY AND CORRUPTION POLICY

Ewein Berhad and all its subsidiaries (“Ewein” or “Group”) advocate sustainable business developments by keeping a balance among social, economic, and environmental factors. Furthermore, Ewein firmly believes in conducting its business in a manner that is fair, transparent, ethical, and with integrity. Beyond complying with the relevant legal and regulatory requirements, Ewein also promises to practice the highest degree of integrity in all of its business dealings and relationships.

The Board of Directors (“the Board”) and management of Ewein are committed to cultivating the five (5) fundamental principles for the whole Group. These five core values are as follows:

- I – Integrity
- A – Accountability
- C – Courage
- T – Trust and Respect
- G – Gratitude and Care

Ewein adopts a zero-tolerance approach to all forms of corruption. Hence, in addition to the cultivation of the five core values noted above, stringent processes have been established in Ewein’s Anti-Bribery policies (the “Policies”) to effectively prevent, detect, and mitigate bribery and corruption risks.

The essence of the implemented Policies obliges Ewein to abide by the following:

- Refrain from receiving or soliciting bribes, gifts or any other item of value that was received/ given in the view of influencing business decisions of our employees and associated third parties acting on or behalf of Ewein without exception.
- Any employee who is found to engage in any form of bribery and corruption acts shall be subjected to appropriate disciplinary actions, including termination of employment. Penalties involving termination of contracts and legal proceedings may be initiated to external parties who are implicated in such acts.
- Any employee or associated third party who refuses to participate in soliciting and receiving bribes or any other illicit activities shall not be penalised.
- Establish and maintain reporting channels for all parties to raise their concerns or incidents of any improper conduct in Ewein, such as Ewein’s long-standing Whistleblowing Policy.
- All prospective employees and associated third parties shall be subjected to reasonable due diligence checks prior to or throughout their engagement with Ewein.
- Employees must avoid situations in which their personal interest would conflict with their duties and responsibilities. Employees must not use their position, official working hours, the Group’s resources and assets, or information available to them for personal gain or to the Group’s disadvantage.
- Our stance in endorsing a corruption-free business environment shall be clearly communicated and continuously instilled in all related parties through an approach of leading by example.

ANTI-BRIBERY AND CORRUPTION POLICY

Periodic reviews shall be conducted by Ewein's compliance function to ensure the functionality, effectiveness, and improvement of the Policies.

The Anti-Bribery and Corruption Policy has been adopted by the Board on 24 May 2022.