

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

1. EE JIA'S ANTI-BRIBERY AND ANTI-CORRUPTION STATEMENT

- 1.1 Ee Jia Housewares (M) Sdn Bhd (the Company), includes the subsidiaries, associated, related and affiliated companies (collectively known as "Ee Jia") places the highest priority on transparency and integrity. We advocate good corporate governance, business ethics and social responsibility in our organization and its undertakings.
- 1.2 Ee Jia adopts a zero-tolerance policy against all forms of corruption (including the giving and receiving of bribes) throughout its businesses, regardless of country of operations. Ee Jia prohibits all its Personnel and Associated Persons from undertaking any forms of bribery or corrupt conduct when conducting business with, for, or on behalf of Ee Jia. Alleged or suspected cases will be thoroughly investigated and appropriate action will be taken where necessary, including reporting such cases to the appropriate authorities, imposition of disciplinary action, termination, prosecution and recovery of losses.

2. CORRUPTION & BRIBERY

- 2.1 We see corruption as the abuse of entrusted power for private gain whereas bribery on the other hand is perceived as the act of corruptly offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action, which is illegal, unethical, or a breach of trust.
- 2.2 Corruption and bribery can be in its various forms which includes: Facilitation payment, Kickbacks, Gifts, Hospitality, Entertainment, Political Donation and Charitable Contribution.

3. EE JIA'S ANTI-CORRUPTION & ANTI-BRIBERY POLICY

- 3.1 Our policy on anti-bribery and anti-corruption applies to all Personnel and Associated Persons, no matter where they are located. It is aimed at addressing and managing the giving and acceptance of gifts, entertainment, hospitality and facilitation payments.
- 3.2 This policy is not a stand-alone document and forms part of our other codes, policies and regulations. It shall supersede all our prior policies, codes or regulation on bribery and corruption.
- 3.3 For the purposes hereof and in addition to the words already defined:
 - 3.3.1 "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;
 - 3.3.2 "Personnel" means all private individuals not being a Connected Person(s) who is employed by or serving Ee Jia 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;

3.3.3 “Bribery” means an act of giving, offering, receiving or soliciting an undue reward with the intention of influencing the behavior of another in order to obtain or retain a commercial advantage. It can also be defined as the abuse of entrusted power for private gain;

3.3.4 “Facilitation” means an unlawful gesture made to secure or expedite the performance by a person performing a routine or administrative duty or function;

3.3.5 “Gifts” means and includes tangible and non-tangible items such as money, sponsorship, contribution, physical gift, loan, fee or reward;

3.3.6 “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

3.3.7 “Hospitality” means any form of accommodation or travel.

4. EE JIA’S POLICY ON THE GIVING AND ACCEPTANCE OF GIFT(S), ENTERTAINMENT, HOSPITALITY AND FACILITATION PAYMENT(S)

4.1 GIVING & ACCEPTANCE OF GIFT, ENTERTAINMENT AND/OR HOSPITALITY

4.1.1 “No Gift Policy”, Entertainment and/or Hospitality are to be given or accepted unless the Gift, Entertainment and/or Hospitality itself and the giving or acceptance thereof:

4.1.1.1 meets the following underlying principles and purposes:

- (i) ethical and lawful;
- (ii) customary, infrequent and culturally appropriate;
- (iii) modest, reasonable and not inappropriate or excessive;
- (iv) will not place Ee Jia or its people in any position of conflict;
- (v) will not give rise to the expectation of any improper or unmerited favor or advantage from Ee Jia or its people;
- (vi) will not cause Ee Jia or its people to be in violation of any laws or regulations;
- (vii) will not unlawfully affect the judgement, decision or action of any relevant person including Ee Jia or its people;
- (viii) is not and will not be perceived as a bribe; and

4.1.1.2 intended for the following purposes:

- (a) promotion, management or sustaining of business;
- (b) gesture of goodwill;
- (c) token of appreciation;

- (d) commemoration/ door gifts;
- (e) customary practice; and/or
- (f) such other lawful purposes as determined from time to time by our Risk Management and Sustainability Committee (RMSC).

4.2 REJECTION

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

4.3 GIVING AND ACCEPTANCE OF FACILITATION PAYMENTS

No giving or accepting of offering, extortion, promising, paying, receiving or requesting for any Facilitation Payment(s) for direct or indirect benefit of Ee Jia or any of our people are permitted.

5. REPORTING CHANNELS

- 5.1 We believe it is essential to have an environment in which everyone connected with us feels that they can raise any matters of genuine concern in respect of corruption without fear of disciplinary action being taken against them or fear of reprisal.
- 5.2 We will ensure that all cases of corruption are managed in accordance with this policy. Rest assured, regardless whether the outcome of an investigation reveals any corruption or otherwise, there will be no retaliation against or adverse consequences at our end for the person reporting the incident in good faith. Further, no employee of ours will suffer any retaliation or adverse consequences for refusing to pay or accept a bribe.
- 5.3 All management and staff as well as those who have dealings with Ee Jia (including suppliers, service providers and business partners) are encouraged to report all cases of corruption involving Ee Jia (including suspected and attempted cases) to us in the following manner or to the relevant authorities:

By Mail	Chief Executive Officer Ee Jia Housewares (M) Sdn. Bhd. Plot 243A (Lot Lama 7064) Jalan Perindustrian Bukit Minyak 3 Bukit Minyak Industrial Park 14100 Seberang Perai Tengah, Penang
By Phone	(+60) 4-508 8466; (+60) 4-508 8477; (+60) 4-502 3488
By Email	whistleblowing@ee-jia.com

6. ENQUIRIES

- 6.1 For any enquiries on Ee Jia's Policy on Anti-Bribery and Anti-Corruption, please contact:

Ee Jia Housewares (M) Sdn. Bhd.

Plot 243A (Lot Lama 7064)
Jalan Perindustrian Bukit Minyak 3
Bukit Minyak Industrial Park
14100 Seberang Perai Tengah, Penang

Attn: Chief Strategy Officer (CSO)

Tel: (+60) 4-508 8466; (+60) 4-508 8477; (+60) 4-502 3488

Email: edmond@ee-jia.com