

LIKEI LOGISTIC SERVICES BERHAD

Registration No. 202101036465 (1436765-X)
(Incorporated in Malaysia)

ANTI-BRIBERY AND CORRUPTION POLICY

LIKEI LOGISTIC SERVICES BERHAD (“**the Company**”) and its subsidiaries (“**the Group**”) are committed to maintaining, improving, promoting, and protecting high standards of social governance within the Group. The Board of Directors of the Company (“**the Board**”) ensures that all employees and vendors understand the Group’s stance against any wrongdoing, regardless of their position, authority, and connection entrusted to them. This Anti-Bribery and Corruption Policy (“**this Policy**”) sets out the guideline and principles that support the Company’s zero-tolerance approach to all forms of bribery and corruption involving any of its stakeholders. This Policy complements and must be read in conjunction with the Code of Ethics and Conduct and the Whistleblowing Policy adopted by the Group.

OBJECTIVES

The objectives of this Policy are:-

- (1) to set out the Group’s position on bribery in all its forms, and matters of corruption that may be faced in the course of its operations; and
- (2) provide information and guidance on how to recognise and deal with potential acts of bribery and corruption.

SCOPE

All Directors include both executive and non-executive, key senior management, employees include permanent, part-time and contract (fixed-term) employees and business associates which include but not limited to, customers, suppliers, vendors, agents, consultants, outsourced personnel and other representatives (collectively, referred to as “**Business Associates**”) as well as public officials, trustees, board of any regulated body, are subject to clear contractual terms, including specific provisions that require them to comply with bribery and corruption practices relating to the Malaysian Anti-Corruption Commission (“**MACC**”) Act 2009 and the MACC (Amendment) Act 2018 and any other local anti-bribery or anti-corruption laws that may be applicable.

GUIDELINE AND IMPLEMENTATION

Strictly Prohibited Benefits – Receiving or Providing (Non-exhaustive)

No	Description	Value
1	Money – any form	Any Amount
2	Jewelries/Luxury items	Any Amount
3	Holiday Package	Any Amount

The Group has adopted a “No Gift Policy” whereby, subject only to specified exceptions, all Directors, key senior management, employees and their immediate family members are prohibited from, directly or indirectly receiving or providing gifts from or to external parties.

It is the responsibility of Directors, key senior management and employees of the Group to inform external parties involved in any business dealing with the Group that the Group practices a “No Gift Policy” and to request the external party for their understanding and attentiveness for and adherence to this Policy.

Permissible Benefits – Receiving and Providing (Non-exhaustive)

No.	Description	Approval Limit
1	Meals, refreshments and entertainment for business purposes	RM1,000.00 and below – Head of Department
2	Commissions for business purposes	RM10,000.00 and below – Executive Director
3	Declared tokens of appreciation (e.g. hampers, festive gifts, vouchers, tickets, diaries, calendars and the like)	Above RM5,000 – Any two Executive Directors
4	Contributions related to official events (e.g. annual dinners, conferences, exhibitions and the like)	Above RM10,000 – Any two Executive Directors

Charitable Contributions

All of charitable contributions related to the corporate social responsibilities, donation and sponsorship must be legal and ethical and must not be used to facilitate and conceal acts of bribery and corruption as well as money laundering. The transaction related to the donations and sponsorship must properly recorded in accounting records by Accounts Department with details of organisation the donation or sponsorship is contributed and be disclosed publicly when required.

Political Contributions

The Group does not allow donations, whether in cash, kind, or by any others, to support any political parties or candidates. In very limited circumstances, if any contribution is to be made, it must be approved by any of the Executive Directors of the Company, permissible under applicable laws and must not be made with any promise or expectation of favourable treatment in return and must be accurately reflected in the contributor's accounting books and records.

Prohibition of Facilitation Payment

Facilitation payments are typically small, unofficial payments made to public officials to expedite or secure the performance of a routine or necessary action to which the payer is legally entitled, such as processing permits, visas, or customs clearances. These payments are often made to obtain services that should be provided without any inducement.

The Group prohibits accepting or obtaining, either directly or indirectly, any kinds of facilitation payments from any person for the benefit of the employee himself/herself or for any other person. The reason underlying this prohibition is that facilitation payment is seen as a form of bribery and corruption.

All employees must not offer, promise, give, request, accept or receive anything which might reasonably be regarded as a facilitation payment. If an employee receives a request or is offered facilitation payments, he/she must immediately report such incident(s) to the Head of Department/Supervisor/Manager.

Responsibilities of Directors, Key Senior Management and Employees

Directors, key senior management and employees of the Group are required to carry out those responsibilities and complying with this Policy, in particular the roles of all Directors, key senior management and employees including the followings:

- Familiar with applicable requirements of this Policy and communicate them to subordinates and Business Associates.

- Promptly record all transactions and payments in the Group's books and record accurately and with reasonable details.
- Ask the Human Resources ("HR") department if any questions about this Policy arise or if there is a lack of clarity about the required action in a particular situation.
- Always raise suspicious transactions and other "red flags" (indicators of bribery or corruption) to immediate superiors for guidance in the next course of action.
- Be alert to indications or evidence of possible violations of this Policy.
- Promptly report violations or suspected violations through appropriate channels.
- Attend anti-bribery and corruption training as required according to position
- Not to misuse their position or the Company's name for personal advantage.

Procurement Process

To uphold the highest standards of integrity and transparency in the selection and engagement of Business Associates, the Group has established the financial controls, non-financial controls and due diligence process to mitigate bribery and corruption risks.

(a) Financial Controls

The Group shall implement relevant financial controls (documented in the relevant standard operating procedures) that manage bribery and corruption risks.

(b) Non-Financial Controls

The Group shall implement relevant non-financial controls (documented in the relevant standard operating procedures) that manage bribery and corruption risks with respect to such areas as procurement, operational, sales, commercial, human resources, legal and regulatory activities.

(c) Due Diligence Process

Due diligence (documented in the relevant standard operating procedures) will be conducted on Directors, key senior management, employees and Business Associates before entering into any official relationship with the Group.

Business Associates are selected based on objective criteria, including quality, pricing, capability, track record, and relevant experience, ensuring that all engagements serve the best interests of the Group.

As part of the Group's commitment to ethical conduct, due diligence is an integral component of the selection process for new Business Associates. Periodic reviews may also be conducted on existing Business Associates to ensure continued compliance with the Group's anti-bribery and corruption standards.

Compliance and Reporting a Concern

The Group takes combatting corruption and bribery very seriously. Any violation of this Policy will be regarded as a serious matter by the Group and is likely to result in a review of relationships, including disciplinary action, dismissal, or termination, consistent with applicable laws and regulations.

All the Group's Directors, key senior management, employees and Business Associates are required to be familiar with and comply with this Policy.

An employee must notify his/her superior as soon as possible if he/she believes or suspects that a breach of this Policy has occurred or may occur. Alternatively, the employee may raise his/her concerns through the Group's Whistleblowing Policy.

The Group's Directors, key senior management, employees and Business Associates may also raise their concerns regarding any known breaches or suspected breaches of this Policy through the Group's

Whistleblowing Policy, which is available on the Group's corporate website. Whistleblowers shall be accorded the protection as set out in the Whistleblowing Policy.

Record-Keeping

The Group must maintain accurate financial records and have appropriate internal controls to provide evidence and support to all legitimate payments made to third parties.

All expense claims related to hospitality, gifts, or entertainment involving third parties must be submitted in accordance with the Group's applicable policies and procedures.

All accounts, invoices and other records/ documentation dealings with Business Associates must be prepared and maintained with accuracy and completeness.

Directors Declaration

All Directors of the Group must read, understand and comply with the information contained within this Policy. Upon their appointment, and whenever there are material updates or changes to this Policy, each Director must complete and sign a Director Declaration Form to confirm their acknowledgment and commitment to adhere to the Policy. A copy of their declaration by the Director shall be properly documented and retained by the HR Department for the duration of the Director's tenure with the Group.

Employees Declaration

All employees of the Group must read, understand and comply with the information contained within this Policy. A copy of their declaration by the employee shall be documented and retained by the HR Department for the duration of the employees' employment.

Training and Communication

From time to time and as determined by the Group, Directors, key senior management, employees and Business Associates, shall be provided with relevant training and communicated with them at the outset of their relationship with the Group, to ensure effective implementation and adherence to this Policy.

The Group values and promotes integrity among the Directors, key senior management, employees and Business Associates. Accordingly, recruitment, training, performance evaluations, remuneration, recognition and promotion for employees shall be conducted fairly and objectively, without favoritism.

The Group will not offer employment to prospective employees in return for any past favor or as a reward for having improperly favored the Group in a previous role.

Breach of this Policy

This Policy sets out the minimum standards to which all Directors, key senior management, employees and Business Associates must adhere to at all times. Complete and strict compliance with this Policy is mandatory. Any suspected breach or breach of this Policy can be reported directly to the respective head of department or superior as soon as possible. Alternatively, can raise such concerns through the Group's Whistleblowing Policy, which is available on the Group's corporate website. Whistleblowers shall be accorded the protection as set out in the Whistleblowing Policy. The Directors, key senior management, employees and/or Business Associates acting in breach of this Policy shall be liable to face the consequences prescribed by this Policy or where applicable, the terms of his or her employment with the Group and by any penal and non-penal consequences prescribed by the relevant and applicable laws.

Governance and Custodian of this Policy

The Chief Executive Officer, with the assistance of the Chief Financial Officer, shall review and recommend updates to the Audit and Risk Management Committee (“**ARMC**”) in response to material developments or emerging trends related to integrity, anti-bribery, and anti-corruption to ensure the continued governance, effectiveness, and relevance of this Policy.

This Policy shall be read together with the Group’s Code of Ethics and Conduct, the Whistleblowing Policy, and the Conflict of Interest Policy. Where any conflict arises between the provisions of this Policy and applicable laws or regulations, the mandatory laws shall prevail.

REVIEW OF THIS POLICY

This Policy shall be reviewed and assessed periodically by the ARMC, as and when required and recommend any update for the approval by the Board in accordance with the needs of the Group or any new or changes in regulations in relation to anti-bribery, and in any event, at least once every three (3) years pursuant to the ACE Market Listing Requirement of Bursa Malaysia Securities Berhad, to ensure the overall effectiveness of the Policy.

All the Group’s Directors, key senior management, employees and Business Associates are responsible for the success of this Policy and should ensure they use it to disclose any suspected unethical business practices or wrongdoing. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

This Anti-Bribery and Corruption Policy was approved by the Board on 12 August 2025.



**LIKEI LOGISTIC SERVICES BERHAD (“THE COMPANY”) AND
ITS SUBSIDIARIES (“THE GROUP”)**

DIRECTOR DECLARATION FORM

I, _____, hereby declare that I have read and understood the Group’s Anti-Bribery and Corruption Policy (“**Policy**”) and the responsibilities required of me as a Director in relation to the said Policy.

I agree to abide the requirements and provisions set out in the Policy which shall be read together and forms part of my letter of appointment with the Group.

I hereby confirm that I will:-

- a) comply with all applicable laws, regulation and sanction relating to anti-bribery and anti-corruption including but not limited to Malaysian Anti-Corruption Commission (“**MACC**”) Act 2009 and the MACC (Amendment) Act 2018 (collectively, referred to as “**Act**”) or any equivalent law I am/it is subject to;
- b) not engaged in any activity, practice or conduct which would constitute an offence under the Act or equivalent laws;
- c) take zero tolerance approach to bribery and corruption and observe the highest ethical standard, in my activities/its own business activities and agree that neither I/it nor any associated person have/has offered, promised or accepted any payment or gift to or from any person (directly or indirectly) for the purpose of influencing a decision;
- d) take and implement appropriate measure to ensure compliance with the anti-corruption law; and
- e) undertake to promptly inform/report to the Group of any breach of law in relation to bribery and cooperate with the group in any investigation.

I understand that if I am party to any breach of the Policy during the term of my appointment, then it could be regarded as major misconduct which may result in disciplinary action, up to and including removal from office, and may be subject to criminal or civil liability.

Signature : _____

Name : _____

MyKad/Passport No. : _____

Date : _____



**LIKEI LOGISTIC SERVICES BERHAD (“THE COMPANY”) AND
ITS SUBSIDIARIES (“THE GROUP”)**

EMPLOYEE DECLARATION FORM

I, _____, hereby declare that I have read and understood the Group’s Anti-Bribery and Corruption Policy (“**Policy**”) and the responsibilities required of me in relation to the said Policy.

I agree to abide the requirements and provisions set out in the Policy which shall be read together and forms part of my employment contract with the Group.

I hereby confirm that I will:-

- a) comply with all applicable laws, regulation and sanction relating to anti-bribery and anti-corruption including but not limited to Malaysian Anti-Corruption Commission (“**MACC**”) Act 2009 and the MACC (Amendment) Act 2018 (collectively, referred to as “**Act**”) or any equivalent law I am/it is subject to;
- b) not engaged in any activity, practice or conduct which would constitute an offence under the Act or equivalent laws;
- c) take zero tolerance approach to bribery and corruption and observe the highest ethical standard, in my activities/its own business activities and agree that neither I/it nor any associated person have/has offered, promised or accepted any payment or gift to or from any person (directly or indirectly) for the purpose of influencing a decision;
- d) take and implement appropriate measure to ensure compliance with the anti-corruption law; and
- e) undertake to promptly inform/report to the Group of any breach of law in relation to bribery and cooperate with the group in any investigation.

I understand that if I am party to any breach of the Policy during the term of my employment, then it could be regarded as major misconduct which may result in disciplinary action, up to and including dismissal against me.

Signature : _____

Name : _____

MyKad/Passport No. : _____

Designation : _____

Company Name : _____

Date : _____