



1. Introduction

At Panda, we are committed to conducting our business with the highest standards of integrity, transparency, and ethical conduct. This Anti-Bribery, Corruption, and Ethics Policy outlines our firm stance against bribery and corruption in any form and sets forth the principles that all employees, partners, contractors, and representatives of Panda must adhere to in their business dealings.

2. Anti-Bribery and Anti-Corruption Commitment

Panda strictly prohibits any form of bribery or corruption, whether directly or indirectly, and in any sector of our business operations. This policy applies to all employees, officers, directors, consultants, agents, contractors, and business partners associated with our company.

3. Definition of Bribery and Corruption

For the purposes of this policy, bribery and corruption refer to the offering, giving, solicitation, or acceptance of any improper or unethical advantage or inducement, financial or non-financial, to influence the actions or decisions of any individual or organization, public or private, in order to gain an unfair business advantage or favor.

4. Compliance with Laws and Regulations

All employees and representatives of Panda must comply with all applicable anti-bribery and anti-corruption laws and regulations in the countries in which we operate. This includes but is not limited to

the Malaysian Code of Ethics, the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and other relevant international and local laws.

5. Prohibited Conduct

The following actions are strictly prohibited under this policy:

- a. Offering, promising, or giving anything of value, directly or indirectly, to any individual or organization to influence their actions or decisions improperly.
- b. Soliciting, accepting, or agreeing to receive anything of value, directly or indirectly, in exchange for acting improperly in any business transaction.
- c. Engaging in any form of corrupt practices, including extortion, embezzlement, or kickbacks.
- d. Making facilitation payments or "grease payments" to expedite routine governmental actions.
- e. Engaging in any activity that would violate the spirit or letter of applicable anti-bribery and anti-corruption laws.

6. Gifts, Hospitality, and Donations

Gifts, hospitality, and charitable donations are acceptable as long as they are modest, legal, and given with genuine goodwill. However, no such offerings should be made with the intent of influencing or receiving preferential treatment in return.



7. Due Diligence

PandA will exercise due diligence when engaging with third parties, such as suppliers, agents, consultants, and business partners, to ensure they align with our ethical standards and comply with anti-bribery and anti-corruption laws.

8. Reporting Suspected Violations

Any employee or representative who suspects or becomes aware of a potential violation of this policy must report it immediately to their supervisor, manager, or the designated compliance officer. Whistleblowers will be protected, and confidentiality will be maintained to the extent allowed by law.

9. Consequences of Violation

Violations of this policy will not be tolerated and may result in disciplinary action, up to and including termination of employment or business relationships. Additionally, individuals involved in violations may face civil or criminal penalties under applicable laws.

10. Training and Awareness

PandA will provide regular training and awareness programs to ensure that all employees and representatives are familiar with this policy and understand their responsibilities in upholding our commitment to anti-bribery, corruption, and ethics.

11. Review and Updates

This policy will be regularly reviewed and updated as needed to reflect changes in laws, regulations, and business practices.

By adhering to this Anti-Bribery, Corruption, and Ethics Policy, we demonstrate our dedication to maintaining the highest ethical standards in all aspects of our business operations.

This policy is effective from 20 July 2023.

