

SEACERA GROUP BERHAD

(Company No.: 163751-H)

GIFT POLICY

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PURPOSE

The purpose of the Gift Policy is to enhance the standard of corporate governance and behaviour with a view to achieve the following objectives:

- 1) To establish standard of ethical conduct for directors and management based on acceptable belief and values that one upholds.
- 2) To uphold the spirit of transparency of the Company in line with the legislations, regulations and guidelines governing it.

GUIDELINES OF ACCEPTANCE OF GIFTS

Relevant interests in this context are as follows:

- 1) The conduct of individuals must not create suspicion of any conflict between their positions as a member of the Board and any private interest.
- 2) Board members acting as such must not give the impression that they have been influenced by a benefit to show favour or disfavour to any person or organisation having dealings with the Group.
- 3) Board members must not accept any benefit as an inducement or reward for taking any action (or specifically not taking any action) in their official capacity as a Board member.
- 4) Gifts other than of token value should generally be refused.

This Policy shall be reviewed and updated in accordance with the needs of the Company and upon any new regulation to be implemented.

This Policy is approved by the Board of Directors of Seacera Group Berhad on 22 November 2019 and is effective immediately.