

## **Anti-Corruption Policy**

It is the policy of Singular Asset Management Sdn Bhd (“SAM”) that directors and employees conduct all of its business in an honest and ethical manner, in line with the laws and against corruption and bribery.

Directors and Employees are required to adhere to SAM’s Anti-Corruption Policy and Procedure for all business dealings including dealings with third parties. In this regard, SAM also expects that all third parties acting for or on its behalf, share our values and ethical standards.

As a rule of thumb, all forms of gratification involving SAM, its directors and employees are strictly prohibited. SAM’s employees, including directors, shall not, whether directly or indirectly, offer, give, receive or solicit any item of value, in the attempt to illicitly influence the decisions or actions of a person in a position of trust within an organisation, either for the intended benefit of SAM or the persons involved in a transaction. Any breach to the Anti-Corruption Policy and Procedure may result in disciplinary actions.

SAM has put in place reporting channels for all employees and third parties who wish to disclose any act of corruption and/or bribery in a confidential manner to protect whistleblowers from any risk and reprisals. Any employees or third parties who suspect or become aware of any potential corruption involving SAM, the employees or third parties may report their suspicion or awareness by submitting the relevant employee reporting form (for SAM’s employees only) or by sending the relevant information on such act of malpractice to [whistleblowing@singular.com.my](mailto:whistleblowing@singular.com.my).

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