



## ANTI-BRIBERY AND CORRUPTION POLICY

TDM Berhad and its subsidiaries (“TDMB Group”) are committed to prevent all forms of bribery and corruption in our daily business activities. This is consistent with the Company’s Core Values to promote good governance. Directors and employees shall uphold a high level of integrity in all business interactions and decisions.

In principle, the Group:

- (a) is committed to comply with all applicable anti-bribery and corruption laws in the countries where we operate;
- (b) is committed to dealing with business associates in a fair, transparent and ethical manner;
- (c) prohibits any receiving, giving or promising of facilitation payments;
- (d) adopts “No Gift” Policy;
- (e) prohibits offering or accepting hospitality and entertainment, subject to certain limited exceptions;
- (f) prohibits any political donations. However, we allow charitable donations and sponsorships for legitimate reasons;
- (g) shall conduct due diligence on employees of the Group, its business associates, projects and business activities, particularly where there is a significant exposure to bribery and corruption risk;
- (h) provides channel to all stakeholders to disclose any suspected cases of bribery and corruption within the Group without fear of retaliation or reprisal; and
- (i) promotes a culture of integrity by conducting an awareness programme for all our employees on the Group’s standing with regards to anti-bribery and corruption.

***This revised policy was approved by the Board of Directors of TDM Berhad on 7 December 2020.***