



Anti-Bribery and Corruption Policy

1. Scope:

This policy is applicable to MS Refining Sdn Bhd. MS Refining operates on a nationwide scale and takes pride in its commitment to integrity and honesty in all business endeavours. Upholding our reputation is of utmost importance and is considered a significant competitive advantage. It is crucial for all employees and affiliates of MS Refining to safeguard our reputation.

Bribery and corruption are criminal acts that carry severe consequences. In addition to potential fines, penalties, and damage to our reputation, bribery and the misrepresentation of the origin of refining materials can contribute to human rights abuses and the financing of conflicts, as outlined in our Precious Metals Procurement Policy. Employees involved in bribery and corruption may face disciplinary action, including termination of employment, imprisonment, or fines. Third parties engaged in business with us are expected to comply with laws, adhere to our policies, and comply with contractual provisions related to the prevention of bribery and corruption. Failure to do so may result in the termination of the business relationship.

MS Refining employees and those acting on its behalf must refrain from offering, promising, or giving bribes, and must not request, agree to accept, or receive bribes from others.

2. Commitments:

MS Refining maintains a zero-tolerance policy towards bribery and corruption and pledges to:

- Conduct all business dealings and relationships in a fair, honest, transparent, and ethical manner.
- Uphold relevant national and international laws and regulations aimed at countering bribery and corruption, regardless of our operational location.
- Implement and enforce effective systems within MS Refining to mitigate the risk of bribery and corruption.
- Prohibit the use of our businesses and services for money laundering, terrorist financing, or any other illegal activities conducted through commercial transactions, including those involving suppliers of refining materials.

3. Governance:

We require that all MS employees, contractors, suppliers, and other third parties comply with this policy. In cases where issues are identified, appropriate measures will be taken to protect our integrity and reputation, including the potential termination of employment or contracts.

Date: 16 June 2023