

## **GOVERNANCE**

### **Anti-bribery and Anti-corruption Policy**

The Group adopts a zero-tolerance approach to all forms of bribery and corruption. We have communicated the Anti-bribery and Anti-corruption policy to all our entities to ensure they are aligned within the Group.

The Master-Pack Group Anti-bribery and Anti-Corruption Policy (“ABC”) was first adopted in 2020. In order to have a clearer understanding of this ABC policy in conducting daily business, it is best read together with Master-Pack Code of Business Conduct (“The Code”).

The Code was first introduced in 2012 and the latest update 2023 approved by the Board is available in the company’s website. The Code which applies to the board and employees of the Group is not only available in English but in both Bahasa Melayu and Vietnamese for the comprehension of the employees. Our Code of Conduct outlines our expectations to all our employees and external stakeholders on our approach in human rights, anti-bribery and anti-corruption matters including the Competition Act while conducting business with the Group. The Code covers salient points such as gifts, entertainment, hospitality, sponsorships and conflict of interest. Training of the Code to employees is conducted in their own language especially for the migrant workers from Bangladesh and Nepalese. The Code is available in the company website.

An annual declaration by the board and the management team including the sales team will individually acknowledge that he/she have fully understood the contents of The Code and shall strictly abide to the procedures and guidelines stipulated in The Code. Similarly, approved vendors/suppliers are required to acknowledge that the suppliers have read and understood the terms set forth in this our Vendor Code of Conduct and pledge a commitment to abide by the Supplier Code of Conduct.

In addition, an audit on Anti-Bribery and Anti-Corruption policies and practices was also conducted in 2022 for the whole Group by the out-sourced internal auditor which reports directly to the Audit Committee. There was zero anti-bribery and anti-corruption case reported from 2021 to 2023.

A Whistle-blowing policy and procedures (updated in 2023) is also available in the company website. This channel allows employees and external stakeholders to report improprieties anonymously directly through email and by filling the website form. All grievance shall be treated with strict confidentiality and the employee shall be safeguarded from unwarranted retaliations. There is no repercussion or punitive action against the employee for reporting grievances.

### **Product and services responsibility**

Basically, our products are manufactured customized to the requirements of our customers. Corrugated cartons and wooden packaging manufactured by our Company’s plants are fully recyclable products. Our packaging is designed holistically with the product of our clients in

mind in order to optimize overall environment performance. The packaging that we produce would be designed to be effective, beneficial and safe for users and communities throughout its life cycle. We do not sell direct to consumers nor are the products sold on retail basis.

The product lifespan will be much dependent on conditions during use and storage of the product which is not within our company's control once the product is delivered into the hands of the customers. As a general rule, the company's product responsibility ends once the products are delivered and received by the customers.

### **Data Privacy and Cyber Security**

The management understands the importance of data privacy and security which entail the proper use and handling of data with sensitive information. This data includes personal, financial information including customer plans, drawings and any sensitive information that is provided during the course of business. The Company is bound by Non-Disclosure Agreements from various customers and duly respect that information provided shall be kept secured and confidential. We continue to upgrade our servers and backup systems for data safekeeping. In addition, we have also installed data protection software and comprehensive anti-virus solutions as part of the company's data security measures. Based on ongoing monitoring, there are no breaches or incidents reported in three years from 2021 to 2023.