



NO GIFT POLICY

Cosmo Restaurants Sdn Bhd and its subsidiaries ("Cosmo Restaurants" or the "Group") are committed to serving our customers, working with our partners and conducting our business professionally, ethically and with the highest standard of integrity. Cosmo Restaurants practices "No Gift Policy", a zero-tolerance approach against all forms of bribery and corruption, and upholds all applicable laws in relation to anti-bribery and corruption.

This "No Gift Policy" ("No Gift Policy") is applicable to:

- (i) every employee of the Group (whether in Malaysia or outside Malaysia and whether permanent, fixed-term or temporary basis) ("Employees");
- (ii) every director of the Company and each of the subsidiary companies within the Group (including executive and non-executive director) ("Directors");
- (iii) business associates of the Group, which includes associated and affiliated companies of the Group, franchisees, partners, vendors, suppliers, contractors, sub-contractors, professionals, consultants, agents, representatives, company secretaries and others performing work or services for or on behalf of the Group ("Business Associates"); and
- (iv) any third party that may have direct, indirect or potential business interest or relationship with the Group ("Third Parties")

GENERAL RULE

The Policy prohibits the exchange of gifts directly or indirectly both within and outside of the work premises in the course of their official duties and business dealings which may influence in a decision-making process or put the Directors, Employees or Business Associates in a position of conflict or appearance of such conflict or obligation.

Directors or Employees are not allowed to give and/or accept gifts in exchange of doing or promising to do anything relating to the business or affairs of Cosmo Restaurants for potential or existing customers, suppliers, vendors, agents, service providers and any other individual or organization.

Directors, Employees or Business Associates are to avoid conflict of interest or the appearance of conflict of interest for either party in an on-going potential business dealing between Cosmo Restaurants and third parties as a gift can be seen as a bribe that may tarnish Cosmo Restaurants' reputation or in violation of anti-bribery and corruption laws.

EXCEPTIONS TO THE NO GIFT POLICY

Gifts to Business Associate or to Third Parties shall only be given mainly as an act of appreciation or common business courtesy associated with festive seasons or other ceremonial occasions. Any gifts offered shall be unsolicited and not affecting, or be perceived as affecting business judgment.

All expenses incurred to provide the gifts must be properly documented, receipted and recorded, in accordance with and complies with Cosmo Restaurants' standard operating procedures, detailing the following:

- (i) details of the gift;
- (ii) the value of the gift;
- (iii) the purpose and occasion such gift were given; and
- (iv) the counterparty receiving the gift, including the organisation or entity he/she belongs with and its role in the Group's business.

Employees and Directors may receive gifts in the following situations, without having to report to the Board of Directors and recording the same:

- (i) corporate gift such as token gifts or promotional items that bears the company's name and logo and are of nominal / appropriate value such as diaries, table calendars, pens, notepads and plaques;
- (ii) sample for the purposes of product quality and market value experiments only

provided that such gifts are placed in common area and shared amongst the Employees as well as are not extended and/or accepted for the purpose of or with intention to:

- (i) influence a particular Employee and Director's present or future act or decision;
- (ii) inducing that particular Employee or Director to perform or omit any act in violation of his/her proper duties and responsibilities; or
- (iii) inducing that particular Employee or Director to use or direct any person to use his influence with the government, or any of its representatives, divisions or agencies to affect or influence any act or decision of any such government, representative, division or agency and in any or all of the above cases, for the purpose of expediting, benefiting, prejudicing or influencing in any way whatsoever whether directly or indirectly the business dealings or relationship of the gift provider with the Group.