

PADINI HOLDINGS BERHAD
BRIBERY POLICY FOR SUPPLIERS, VENDOR AND SERVICE PROVIDER

1. This policy is developed as part of PADINI's anti bribery and anti corruption program.
2. PADINI does not condone bribery and corruption and expects its suppliers to adhere to the same principles in their business conduct with PADINI.
3. This policy should be read together with all contracts executed between PADINI and yourself.
4. Specifically, please note that in terms of gift and entertainment:
 - (a) cash and cash equivalent gifts; and/or
 - (b) any gifts or entertainment of value offered with a view to improperly influence PADINI's employees or agents' decisions to your advantage, is strictly prohibited.
5. PADINI does, however, recognise courtesies designed to promote goodwill and better relationships among business partners. As such, PADINI employees and agents are allowed to accept corporate gifts or promotional items of nominal value eg. T-shirts, pen, plaque, diary, trade show bag and other tokens with your company name and logo that do not exceed value of RM500.
6. PADINI employees and agents are further allowed to accept modest meals from you or your company in the interest of building a positive business relationship; provided the meals are extended in an open and transparent manner, proportionate to his or her seniority and position, and is not offered or perceived to be offered with a view to improperly influence their decisions to your advantage.
7. You must avoid any conduct which could give rise to a perceived impropriety. For example, buying the same PADINI employee or agent a meal every month when you have business dealings with PADINI during that period.
8. Any food and flower gifts offered during festive period must be delivered to PADINI's office and not the residential address of PADINI employee or agent. The value of the gift is capped at RM500.
9. You are expected to keep complete and accurate records of all gifts and entertainment extended to PADINI employees and PADINI may from time to time, request for the records for audit purpose.
10. This policy is broad based and do not cover all possible situations so you should seek assistance or clarification from PADINI when you are unsure whether you can offer gifts or pick up the entertainment tab for a PADINI employee.
11. Compliance with this policy is mandatory and non-compliance may result in termination of PADINI's business relationship with you.