



PUNCAK NIAGA HOLDINGS BERHAD'S GIFT POLICY

Gifts

- (a) Puncak Niaga's and/or Puncak Niaga Group's Employees may provide a small gift or item with or without Puncak Niaga's and/or Puncak Niaga Group's logo which may include items such as flowers, potted plants, books or food to a GO if the following criteria are met:-
- i. The gift is given in an open and transparent manner.
 - ii. The gift is given as a sign of bona fide corporate hospitality, business gratitude, or token of appreciation.
 - iii. The gift does not exceed RM1,000 in value to a single GO within a calendar year.
 - iv. The giving of the gift is pre-approved by the Head of Division/Executive Director and/or Managing Director and/or the Executive Chairman.
 - v. Under special circumstances and with the pre-approval of the Executive Chairman, the gift may be up to RM3,000 in value to a single high level GO within a calendar year.
 - vi. Any gifts received by employees must be declare to Finance Department by the recipient of the gift within three (3) working days using the gift declaration form of this policy (such as festive hamper and perishable foods & goods).
 - vii. The expenditures on gifts to GOs will be recorded in the GO Expenditure Ledger Account by the Finance Department and monitored by the Finance Department and reported by the Finance Director to the EXCO and Board on quarterly basis.
 - viii. At any time, if the expenditures on gifts to a single GO exceed RM1,000 within a calendar year of RM3,000 to a single high level GO within a calendar year in the case of special circumstances which had been pre-approved by the Executive Chairman, the matter should be reported immediately by the Finance Director to the Executive Chairman, Managing Director, EXCO and Board.
 - ix. It is mandatory for Puncak Niaga's and/or Puncak Niaga Group's Employee who receive a gift that exceed RM300.00 in value and above to be declare to the Company.
- (b) All Directors and Employees shall exercise due care and good judgement when receiving a gift from a third party. A gift may be received or accepted by a Director or Employee so long as the gift is reasonable in value, given during festive seasons or special occasions, infrequent in nature, transparent and open, is a bona fide hospitality and not given to influence or obtain an unfair advantage in the third party's business dealings with Puncak Niaga and/or Puncak Niaga Group.

Date: 24 November 2022