

## THIRD PARTY INTEGRITY DECLARATION

Our company, .....Registration No.: .....,  
the contractors/ vendors/ suppliers/ solicitors/ agents/ consultants/ introducers (hereinafter “Company”  
which includes its director, officers and employees) who intend to conduct Business Transaction(s)\*  
with Kumpulan Fima Berhad Group (“KFIMA Group”) hereby:

### **1. PLEDGE AND UNDERTAKE THAT:**

- a) we have read and understood, agree, accept and shall:
  - i. comply with all applicable laws and regulations relating to anti- bribery, fraud and corruption as well as to all KFIMA Group’s policies, standard of procedures and governance;
  - ii. comply with the following anti-corruption principles:
    - a. committing to promote values of integrity, transparency, accountability and good corporate governance;
    - b. Strengthening internal systems that support corruption prevention;
    - c. Prevention of corruption and fighting any form of corrupt practice;
    - d. Supporting anti-corruption initiatives led by the government and the authorities;  
(*hereinafter collectively referred to as the “Requirements”*)
- b) we shall not offer, give, agrees to give, promises or offers to any KFIMA Group’s personnel or any other individuals any bribe, gift and/or gratification to influence the decision in favour of our Company for this provision.
- c) we will ensure our subsidiaries, affiliates and all other parties that we appoint to conduct work with KFIMA Group also comply with the Requirements.
- d) we have not been convicted nor are we subject to any investigation, inquiry or enforcement proceedings by the relevant authorities of any actual or suspected breach to the Requirements and will report any actual or suspected breach to the Requirements as soon as reasonably practicable and to the extent permitted by law, to KFIMA Group.
- e) none of our shareholder(s), director(s), staff including the spouse and other family members have any direct or indirect interest in any KFIMA Group (including associate companies) and its employees. A conflict of interest is defined as any interest that conflicts with the purpose, policies, or operations of your service with KFIMA Group (including associate companies) and its employees. Conflicts apply equally to business relationships and personal activities.



PLEASE SCAN HERE FOR FIMA’S ANTI-BRIBERY  
E-LEARNING AND ANTI-BRIBERY POLICY

- f) we understand that KFIMA Group of Companies aims to ensure that its contractors and suppliers meet material standards with respect to the conduct of their business and their management of social and environmental issues consistent with the requirements of the Malaysian Sustainable Palm Oil (“MSPO”) standards. In view of this, we hereby confirm the commitment of our company, to adhere to the requirements laid out in the MSPO Policies and Procedures established by the KFIMA at all times.

apart from the actual, potential, or perceived conflict of interest situations declared in **Appendix A**, I/we are not aware of any other actual, potential, or perceived conflict of interest situations with KFIMA Group or other stakeholders of the KFIMA Group’s businesses. We shall notify KFIMA Group, as soon as practicable, on any emerging or new actual, potential, or perceived conflict of interest situations that arise.

**2. WE FURTHER AGREE THAT:**

- a) KFIMA Group has the right to suspend or revoke or terminate the contract or agreement or job for the Business Transaction without any liability whatsoever on the part of KFIMA Group and we may be disqualified from tendering for future contracts or jobs if we were found to have breached the Requirements or any other terms and conditions implemented by KFIMA Group.
- b) In the event the supplier or contractor is unable to comply to the MSPO Policies and Procedures or any part thereof, or subsequently discover that they fall short of one or more requirements, the supplier or contractor is expected to inform KFIMA Group of the fact and to undertake remedial action as soon as reasonably possible. Likewise, in the event of KFIMA Group become aware of supplier or contractor’s non-compliance with any aspect of the MSPO Policies and Procedures, KFIMA Group reserves the right to demand corrective measures.
- c) We shall promptly inform KFIMA Group of any breach and/or alleged/ suspected breach of the Requirements and cooperate with KFIMA Group in any investigation of such breach involving KFIMA Group’s staff.
- d) The provision set out in this declaration form shall form part of the terms and conditions of our appointment and/or contract of service.

For and on behalf of the Company,  
Yours sincerely,

.....  
Name of Company Director (or equivalent):  
NRIC:  
Designation:  
Company stamp:

*\*Note:* Business Transaction(s) refers to any transactions contemplated entered/to be entered with KFIMA Group company pursuant to any contracts, employment letter, letter of offer/award, letter of appointment, engagement letter, purchase order or any official document to the similar effect.

## Appendix A – Declaration of Conflict of Interest Situations

You are required to disclose any conflict of interest situations with KFIMA Group, which may include, but not limited to, the following:

- a supplier or a business associate having a Close Relationship with a Director or an Employee of KFIMA Group;
- a Business Associate who performs services on behalf of KFIMA Group having a close relationship with an external stakeholder with whom KFIMA Group has business interest, e.g. contract of large volume, a licence, or permit; and
- a supplier or business associate having a Close Relationship with a recipient of donation or sponsorship made by KFIMA Group.

### Note:

- (a) “Business Associate” includes KFIMA Group’s contractors, sub-contractors, consultants, distributors, agent representatives, or any parties performing work or services for or on behalf of KFIMA Group, KFIMA Group’s joint-venture entities, joint-venture partners, and business partners.
- (b) “Close Relationship” refers to any of the following situations:
  - (i) being a family member of the other person, where “family” shall have the definition provided in Bursa Malaysia Securities Berhad’s Main Market Listing Requirements, i.e.
    - 1) spouse;
    - 2) parent;
    - 3) child including an adopted child and step-child;
    - 4) brother and sister; and
    - 5) spouse of the person referred to in 3) and 4) above.
  - (ii) being a director, major shareholder, partner, or a person with executive power of an entity or organisation;
  - (iii) being a family member of the person referred in (ii) above; and
  - (iv) being a person who is accustomed or under an obligation, whether formal or informal, to act in accordance with the directions, instructions, or wishes of the other person.