

DONATIONS AND SPONSORSHIPS POLICY

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1. INTRODUCTION

All Donations and Sponsorships provided by LBS Bina Group Berhad (“**LBS**” or “**Company**”) and its subsidiaries (“**Group**”) must be ethical and legal under applicable laws without intention to influence any business decisions or cause other to perceive it as such

2. SCOPE

This policy applies to all Directors, employees (including those on contract terms, temporary, short-term and/or secondment), service providers, consultants, contractors, agents and/or any other business associates or persons acting on behalf of the Group, regardless of their location.

This Policy should be read in conjunction with the Anti-Bribery and Corruption Policy and the Whistleblowing Policy of LBS.

3. DEFINITIONS

“**Business Associate**” means an external party with whom the Group has, or plans to establish, some form of business relationship. This may include clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries, and/or investors.

“**Donations**” means voluntary contributions in the form of monetary or non-monetary gifts to a fund or cause.

“**Personnel**” means Directors and all individuals directly contracted to the Company on an employment basis, including permanent, temporary employees and interns.

“**Sponsorships**” means partnering with external organisations to deliver mutual benefits through exchange of monies, products, services, content, and/or other intellectual property.

4. DONATIONS AND SPONSORSHIPS

The Group makes donations to LBS Foundation, a registered non-profit organisation with the sole aim is to give back to the community through its 4 main pillars: Education, Community, Environment and Health.

Other Donations and Sponsorships requests will be assessed on a case-by-case basis and subject to the approval of the Executive Director.

4.1 Acceptable Donations & Sponsorships

- a) Any charitable or political Donation or Sponsorships made or offered on behalf of the Group must:
 - i) not be related to, dependent on, or made in order to win, or influence, or to retain, or gain improper advantage of a business deal or decision;
 - ii) be given directly to the relevant charity or organisation; and
- b) The Head of Department who handles the request for any Sponsorship or Donation shall conduct due diligence on the recipient to ensure that the recipient is a legitimate organisation, prior to obtaining approval from the Executive Director.

4.2 Non-Acceptable Donations & Sponsorships

- a) The Group shall not donate to private individuals or private accounts or to individuals or organisations that could prove detrimental to the reputation of the Group.
- b) The Group should not support via a sponsorship where the activities or proposals:
 - conflict with the Group's values or objectives;
 - will require the Group to give, or appear to presume a strong explicit endorsement of the products and services of the Recipient; or
 - do not demonstrate a genuine readiness or capability to carry out the obligations.

5. DONATIONS AND SPONSORSHIPS REQUESTS

All Donations or Sponsorships requests must be submitted in writing to the Group within a reasonable period prior to the anticipated commencement of the relevant event/action. Approval will only be granted upon obtaining satisfactory results from the due diligence conducted on the recipient, in accordance with the Group's guideline, and provided that such approval is permissible under applicable laws.

Any contribution or donation proposed by the Personnel, agents, consultants or third parties representing LBS must receive prior approval from two Executive Directors of LBS.

6. POLICY VIOLATION

Any violations of this Policy shall be reported in accordance with the reporting mechanism outlined in the Whistleblowing Policy.

7. REVIEW OF THE POLICY

This Policy has been approved by the Board and is available to all Personnel in the corporate website and local area network (LAN) system of LBS. This Policy is also available for viewing by other stakeholders and the public in the LBS' corporate website.

This Policy shall be reviewed by the Board once in every two years and be updated to align with the most current and relevant laws and regulations whenever necessary to ensure its effective implementation. Any subsequent amendments to the Policy shall be approved by the Board.

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