

Anti-Bribery & Anti-Corruption Policy

Introduction

Sektor Group Limited, and its wholly owned subsidiaries Sektor Ltd (New Zealand), Sektor Pty Ltd (Australia), Sektor Distributors Sdn. Bhd. (Malaysia), and Sektor (Thailand) Co. Ltd, (together the “Company”) are a quality focused group of companies committed to the conduct of its business in an honest and ethical manner. The Company takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its dealing’s wherever it operates.

It is the Company’s policy to comply with the New Zealand Anti Bribery Act 2015 and all other bribery and corruption laws in the countries where the Company does business, namely:

- Australia; (Schedule s 70.2 to the Criminal Code Act 1995 (Cth)
- New Zealand; (New Zealand Anti Bribery Act 2015)
- Thailand; (Act Supplementing the Constitution Relating to the Prevention and Suppression of Corruption B.E. 2561 (2018) (the “New Anti-Corruption Law”))
- Malaysia; (Malaysian Anti-Corruption Commission (Amendment) Act 2018)

Application of Policy

This policy applies to individual employees, consultants, contractors, associates, business partners and suppliers or any other people or bodies associated with the Company.

Your compliance obligations

To achieve its commitment, the Company requires compliance of the following code of conduct from all its employees, consultants, contractors, associates, business partners and suppliers:

- Never engage in any form of bribery, either directly or through any third party;
- Never offer or make an improper payment, or authorise an improper payment (cash or otherwise) to any individual, including any local or foreign official anywhere in the world;
- Never attempt to induce an individual, or a local or foreign official to act illegally or improperly;
- Never offer, or accept, money or anything of value, such as gifts, kickbacks or commissions, in connection with the procurement of business or the award of a contract;
- Never offer or give any gift or token of hospitality to any public employee or government official or representative if there is any expectation or implication for a return favour;
- Never accept any gift from any business partner if there is any suggestion that a return favour will be expected or implied;
- Never facilitate payments to obtain a level of service that one would not normally be entitled to;
- Never disregard or fail to report any indication of improper payments to the appropriate authorities;
- Never induce or assist another individual to break any applicable law or regulation.

This policy does not prohibit the giving and receiving ordinary and usual business hospitality or entertainment and promotional or other business expenditure that seeks to improve the image of the Company and its services, or to establish or cement cordial relations, recognised as an established part of doing business.

The Company's policy does not prohibit reasonable and proportionate hospitality and promotional or other similar business expenditure (offered or received) intended for any of the foregoing purposes.

Raising Concerns

Employees, consultants, contractors, associates, business partners and suppliers are encouraged to raise concerns about any issue or suspicion of malpractice, or contravention of this Policy by any party, at the earliest possible stage.

In accordance with the Company's Whistleblower Policy, no employee, consultant, contractor, associate, business partner or supplier will suffer any detriment resulting from raising a genuine concern about bribery or corruption, even if they turn out to be mistaken.

Internal control systems and procedures will be subject to audit under internal audit process.

All employees, consultants, contractors, associates, business partners and suppliers are responsible for the success of this Policy and should ensure they use it to disclose any suspected concerns or wrongdoing to the respective General Manager, and in the case of a General Manager – to the Group Chief Executive Officer directly, or by email to legal@sektor.co.

Failure to comply with this policy may result in disciplinary action, including dismissal (employees), or termination of service agreements (contractors, consultants, suppliers), appropriate sanctions (business partners) in addition to civil or criminal charges.

Variations

This policy will be regularly reviewed by the Board of Directors of Sektor Group Limited.

Sektor reserves the right to vary or replace this Policy from time to time.

Policy version and revision information

Policy authorised by: Board of Directors, Sektor Group Ltd.

Revised April 2024