

## **FACILITATION PAYMENTS POLICY**

### **KINABALU INTERNATIONAL HOTEL SDN. BHD.**

#### **1. OBJECTIVE**

Facilitation Payments are considered a form of bribery and are illegal. As part of the Company's zero-tolerance approach to bribery and corruption, KIH adopts a strict stance that disallows facilitation payments. Paying facilitation payments could cause serious harm to KIH.

#### **2. FACILITATION PAYMENTS POLICY**

- 2.1 All KIH Board of Directors, Personnel and Business Associates are prohibited from, directly or indirectly, accepting or obtaining or attempting to accept or obtain facilitation payments from any person for yourself or for any other person subject to this policy.
- 2.2 All KIH Board of Directors, Personnel and Business Associates must not offer, promise, give, request, accept or receive anything which might reasonably be regarded as a facilitation payment.
- 2.3 Facilitation payments need not involve cash or other financial asset.
- 2.4 All KIH Board of Directors, Personnel and Business Associates is required to immediately report to Managing Director and in the case of Board of Directors or Business Associates to Company Secretary, if receive a request or are offered facilitation payment.

#### **3. BREACH OF POLICY**

It is the duty of the Board of Directors, Personnel and Business Associates to report any breach of this policy via the KIH's Whistleblowing Policy.