

NO GIFT POLICY

Reach Energy Berhad ("Reach Energy" or "the Company") is committed to conduct its business in the highest standard of integrity and good governance.

The objectives of the No Gift Policy are to avoid any conflict of interest and demonstrate the Company's commitment to provide equal treatment to all individuals or organizations that we deal with for our business.

"Gift" means something that is given to another person including but not limited to cash, vouchers or any item (e.g. pens, hampers, concert tickets, etc.) having any cost or financial value, including food or beverages (e.g. supplier or sub-contractor sponsoring meals and entertainments) as well as any items of value.

In this regard, employees of Reach Energy shall not solicit or receive any gifts from current or potential vendors, consultants, suppliers or business partners/associates, either directly or indirectly, which may influence the employee's judgement in a decision-making process or put the employees in a position of conflict.

If an employee receives a gift:

- If feasible, the gift is returned to the current or potential vendor, consultant, supplier or business partner/associate.
- If not feasible to return the gift, the gift must be raffled off to all employees. Proceeds from the raffle will be donated to charities that have been approved by the Company. If employees are uninterested in the raffled item, the gift will be donated to the designated charities.
- Plants or flowers will be displayed in the lobby, or at another central location where all employees may enjoy their presence.
- Gifts of food that may arrive during the holidays, and at other times of the year on gift-giving tradition, belong to the entire employees even if addressed to a single employee. Under no circumstances an employee may take a food gift home; food gifts must be shared with and distributed to all employees.

If any employee has questions about and / or needs clarification of any aspect of this No Gift Policy, the employee should check with his / her supervisor. If the supervisor is uncertain, Human Resources is the arbiter of the No Gift Policy to ensure consistent treatment across Reach Energy.

Any exceptions to the No Gift Policy may be made only with the permission of the Chief Executive Officer of Reach Energy.