DUOPHARMA BIOTECH BERHAD

SPONSORSHIP POLICY

DOCUMENT NO: DBB/GRMI/POL/007-04

REVISION NO: 04

EFFECTIVE DATE : 30 AUGUST 2019
REVISION DATE : 14 MAY 2026

A. REVISION HISTORY RECORD

Revision Date	Change Description	Revision No.	Revised by
30 August 2019	New	01	Rama Sockalingam
12 August 2020	Included signatories of GMD and AIC Chairman	02	Zarinah Japar
8 November 2023	Revision in the policy due to restructuring and inclusion of Indonesian's Corruption law and Malaysian Anti-Corruption Commission ("MACC") (Amendment) Act 2018 (Act 1567)	03	John Tan Hong Tat
14 May 2026	Insert the role of Group Chief Executive Officer to align with the current organisational structure	04	Zarinah Japar

Not to be reproduced or disseminated without the prior approval from the Head of Group Risk Management & Integrity

DUOPHARMA

SPONSORSHIP POLICY

1. INTRODUCTION

Duopharma Biotech Berhad ("Duopharma Biotech" or the "Company") is committed to achieving the highest standards of ethical conduct and complying with all applicable laws in the countries where it conducts business. The objective of this guideline is to ensure that sponsorships received from customers, suppliers, other commercial business associates and Government Officials comply with Duopharma Biotech's values, Company's policies and all applicable laws.

Certain suppliers and sub-contractors have been known to offer, or have been approached to sponsor sporting events, annual dinners, advertising, paying for parties, and the like. Sponsorship authorisation shall be dealt with in line with the policy on gifts.

2. PROCESS FOR DECLARATION & APPROVAL

Sponsorships which are accepted directly by the Company/Duopharma Biotech's Sports Club ("KSDBB") personnel must be monitored for compliance by the Group Risk Management and Integrity ("GRMI") or the Integrity Champions at the respective regional offices, and must be receipted and reported in accordance with procedures outlined below:

- Written approval **must** be obtained from the highest approving authority in the Company prior to submitting the request for sponsorship to customers, suppliers, sub-contractors and other commercial business associates. Details of the event/program must be attached to support the request made.

- Sponsorship in cash form can only be received via direct bank-in into the Company's Account or Duopharma Biotech's Sports Club registered bank account.

- The receipts of all sponsored items (and the name of the sponsors) must be documented and a copy of the listing must be given to the GRMI.

- All sponsored items are to be given out in a lucky draw. **Only staff of Grade JG15 and below (***Manager I and Below***) are entitled to the lucky draw.** A register of the lucky draw winner and the item won must also be maintained and submitted to the GRMI for records and monitoring purposes.

Not to be reproduced or disseminated without the prior approval from the Head of Group Risk Management & Integrity

3. PROHIBITED SPONSORSHIP

- The sponsorships are in contravention of applicable Federal or State laws or Company policies. These laws include the the Malaysian Anti-Corruption Commission Act 2009 (Act 694) and MACC (Amendment) Act 2018 (Act 1567), Section 595 of the Malaysian Companies Act 2016, Prevention of Corruption Act (Chapter 241) Singapore, Republic Act No.3019 of the Philippines, U.S. Foreign Corrupt Practices Act, U.K. Bribery Act, UU RI No.31/1999 Eradication of the Criminal Act and UU RI No. 20/2001 Amendment to Law no.31/1999 on Corruption Eradication (Indonesia) and local anti-bribery laws.

- The purpose of the sponsorship is to obtain an Improper Benefit (i.e. to improperly obtain or retain business or to obtain an advantage in the conduct of business; to induce the recipient to perform some function improperly).

- Receipt of cash (or a cash-equivalent) sponsorship by an employee or representative of the Company.

- The sponsorships would obligate the Company or its personnel to undertake duties, financial or otherwise, which it may not be fully capable of meeting for a period required by the terms and conditions of sponsorships.

- The sponsorship constitutes a request to the Company to operate a commercial endeavor for the sole benefit of the donor or a related person or entity.

- The Group Managing Director (“GMD”) / Group Chief Executive Officer (“GCEO”) holds the right to reject any sponsorships that are not in the best interest of the Company.

All employees shall, if in doubt as to the nature or purpose of the sponsorship consult the Head of Group Risk Management & Integrity (“HGRMI”) who shall decide, either in consultation with the GMD/ GCEO and/or Risk Management Committee (“RMC”) Chairman or through his own accord, the course of action in respect of such sponsorships.

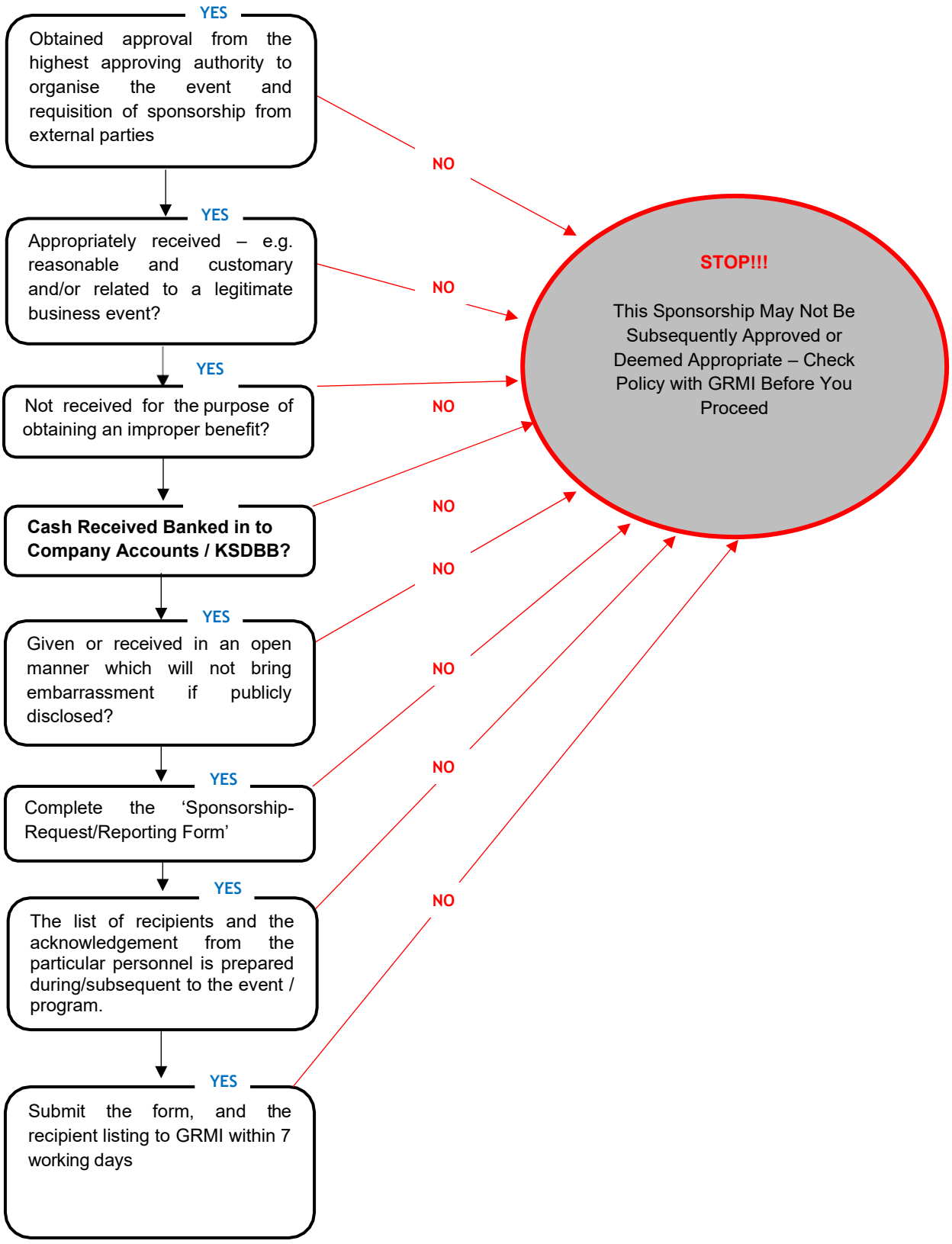
4. REQUIRED DOCUMENTATION & AUDIT VERIFICATION

The following documents are to be submitted to the Integrity Manager in the GRMI:

i. Approval by the highest approving authority GMD/GCEO /Patron of Duopharma Sports Club) on the request for sponsorship;
ii. Sponsorship request/reporting form
iii. List of items sponsored by the third parties;
iv. List of cash banked-in by the third parties;
v. List of items purchased using the cash received from third parties; and
vi. List of recipients of the sponsored items

Not to be reproduced or disseminated without the prior approval from the Head of Group Risk Management & Integrity

5. SPONSORSHIP PROCESS MAP



Not to be reproduced or disseminated without the prior approval from the Head of Group Risk Management & Integrity