
DONATIONS AND SPONSORSHIPS POLICY

1. INTRODUCTION

All Donations and Sponsorships provided by LBS Bina Group Berhad (“**LBGB**”) and its subsidiaries (collectively “**LBGB Group**” or “**Group**”) must be ethical and legal under applicable laws and not with intention to influence any business decisions or cause other to perceive it as such.

2. SCOPE

This Policy is applicable to the Personnel of LBGB Group and Business Associates acting on behalf of LBGB Group. Joint-venture companies and associated companies are encouraged to adopt these or similar principles. This Policy should be read in conjunction with the Anti-Bribery and Corruption Policy and the Whistleblowing Policy of LBGB Group.

3. DEFINITIONS

“**Business Associate**” means an external party with whom LBGB 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 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 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 request 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 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, a business deal or decision;
 - ii) be given direct 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 made in writing to the Group in reasonable period of time before the anticipated commencement of the relevant event/action.

The Executive Director shall approve the proposal upon being satisfied with result of the due diligence conducted on the recipient in accordance with the guideline of the Group.

6. POLICY VIOLATION

The procedure of reporting any violations of this Policy shall be referred reporting mechanism contained in the Whistleblowing Policy.

7. POLICY REVIEW

This Policy has been approved by the Board of Directors and shall be made available on the Group’s corporate website and internal computer networking system. All Heads of Department are responsible to inform their staff and clearly explain to them the contents of this Policy.

This Policy shall be reviewed by the Board of Directors and updated whenever necessary to ensure its effective implementation. Any subsequent amendments to this Policy should be approved by the Board of Directors.
