

Company policy on Customer relation – Dealing with Third Parties

Purpose

Integrity is our value and the foundation of MSP CAT corporate strategy built upon our Code of Conduct. We encourage all employees to follow and live by the code.

Policy

The Company may conduct business with third party agents, buyer or customer representatives, and other business partners as required. In such a case employee concerned needs to identify and evaluate bribery risk in the transaction.

Engaging or conducting business with third parties require final evaluation by either CFO or by the Compliance Department.

Applicability

All Company employees

Procedure

Before engaging with third party, all employees must inform and seek clearance from either the CFO or Compliance Department.

Every employee shall promptly report to his/her superior or to the CEO or to the Board of Directors any violation of this Code, in an event he or she becomes aware of any breach of this policy or any event that could affect the reputation of the Company.

Training to employees

To provide on-going Customer relation – Dealing with Third parties policy compliance training to new employees at the time of orientation and annual refresher training to all employees. Company may select an individual employee or a group of employees to attend that training based on job function and assessed risks.

Governance

Consistent review by Compliance department.

All Government transactions using third parties must reviewed and documented by Compliance Department.

Annual compliance risk assessments to be conducted by Compliance Department.

Date : 25 March 2016

Revise Date : 1 September 2020

Approved by : (1) Chief Executive Officer

