

NO GIFT POLICY

GDEX Berhad (formerly known as GD Express Carrier Bhd) (“GDEX” or “the Company”) and its subsidiaries (collectively referred to as “the Group”) require that all employees demonstrate the highest standards of ethics and business conduct in all matters when dealing with:-

- All vendors and suppliers, both existing and potential
- The customers and clients, both existing and potential
- Employees and potential employees
- Independent contractors, agents and other representatives dealing with government officials on the Group’s behalf
- Consultants
- Any individual or organisation with whom they come into contact

As one effort to demonstrate the Group’s commitment to these standards and behaviour, all employees must abide by the following no-gift policy requirements. Any exceptions to the gift policy may be made only with the permission of the CEO.

The purpose of this No Gift Policy (“the Policy”) is to provide guidance to the following persons:

- (a) the Director (executive and non-executive), the Management (all level) and the employee of the Group, except as otherwise stated in the Policy; and
- (b) the contractors, subcontractors, consultants, business associates, joint venture partners, agents, vendors, suppliers, representatives and others performing work or services for or on behalf of the Group.

The Group does not allow its employees to solicit, accept or provide any gifts, offers, entertainment (including travel-related expenses), corporate hospitality and anything of monetary value from/to any party (ies) who have direct or indirect business dealings with the GDEX Group with the intention of obtaining or retaining any advantage or benefits in the decisions of those dealings.

No gifts of any kind, that are offered by vendors, suppliers, customers, potential employees, potential vendors, and suppliers, or any other individual or organisation - no matter the value - will be accepted by any employee, at any time, on or off the work premises.

“Gift” - means any item of value, monetary or non-monetary including but not limited to gift items, discount on products / services, travel and accommodation, use of vehicles, prizes, equipment, gift vouchers, securities, club or facility membership, ticket or entry to events, any form of commission, hampers, jewellery, decorative items and any item of high value.

A. Providing Gift

“Corporate gifts” normally bears the Company’s name and logo and are of nominal/ appropriate value such as diaries, table calendars, pens, notepads and plaques.

“Festive gifts” are traditional treats or gifts customary to the occasion such as red packets (without cash or cash equivalent), hampers, oranges and dates.

Corporate gifts or festive gifts may be given to our Business Partners, shareholders or other parties provided they are made for the right reason, no obligation, no expectation, made openly, of reasonable value, legal and documented.

B. Accepting Gift

The Group recognises that exchange of gifts is a very delicate matter where, in certain cultures or situations gift giving is customary, a tradition or central part of business etiquette.

EXCEPTIONS

Our personnel are expected to decline with the Exceptions being:-

- a) gifts such as t-shirts, pens, mugs, trade show bags and all other souvenirs that employees obtain, **as members of the public**, at events such as business meetings, conferences, training events, seminars, and trade shows, that are offered equally to all members of the public attending the event;
- b) Cards, thank you notes, certificates, or other written forms of thanks and recognition;
- c) Food, flowers, beverages, and moderately priced meals or tickets to local events that are supplied by and also attended by current customers, partners, and vendors or suppliers in the interest of building positive business relationships; and
- d) Donations to/from corporates, individuals, private organisations whether local or foreign which are considered and accepted as welfare and humanitarian assistance.

(i) Gifts of less than RM300

The Group allows the giving and receiving of business gifts of less than RM300 that are customary business courtesies and are reasonable in value and frequency. It may be customary for gifts to be given on a personal basis during holidays, special events or festivals.

Employee is required to ensure there is a clear distinction between the gifts given on a personal basis and those given on behalf of the Group.

Under no circumstance is employee to misrepresent personal gifts and/or use such customs to circumvent the Group's gifts policy.

(ii) Gifts greater than RM300

CEO's approval shall be obtained for any gift greater than RM300 to be made by an employee to a person or commercial organization in the interest of building positive business relationship.

An employee should refuse an offered gift that is greater than RM300. However, if offence may be caused or return is impractical then it must be discussed with the CEO. If return is not practical, the Group may elect to donate it to charity or make some other appropriate disposal of the gift to charity.

(iii) Gifts involving government officials

CEO's approval shall be obtained for any gift is made to or received from a government official in the interest of building positive business relationship.

Recording gifts

A log of gifts greater than RM300 given or accepted will be kept and recorded of the gift's nature and value, the names of the giver and the recipient, the reason or occasion for the gift, and the fact of the approval of the giving or retention of the gift. Such logs must be filed and maintained for review by the ABC Committee.

INFORMATION OF NO GIFT POLICY

Employees are required to professionally inform vendors, potential vendors and others of this no-gift policy, and the reasons the Group has adopted the policy. Employees will request that vendors respect the Group's no gift policy and not purchase and deliver any gift for the employees, at any time, for any reason.

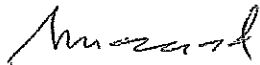
SUPPLEMENTAL NATURE OF POLICY

This policy is supplemental to the Group's Code of Ethics and Conduct, standards, values, and policies in the Employee Handbook and in the Groups' documents.

If any employee has questions about or needs clarification of any aspect of this policy, the employee should check with their supervisor. If the supervisor is uncertain, ABC Committee should be referred to ensure consistent treatment across the Group.

All employees must acknowledge that they have received and understood the Group's No Gift Policy.

The Group will review and update this policy on a regular basis.



Muhammad bin Ibrahim
Chairman