



# **SIM LEISURE GROUP LTD**

## **ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

Category	Corporate Governance
Subject	Anti-Bribery and Anti-Corruption Policy
Approved by	Board of Directors
Effective Date	25 February 2025
Reference	CG-2025-1



## 1. PURPOSE OF THE POLICY

1.1 This policy (the “**Policy**”) outlines Sim Leisure Group Limited’s [(“**Sim Leisure’s**” or “**Company’s**”) and with its subsidiaries (“**Group**”)] commitment to conducting business with integrity and upholding high ethical standards to prevent bribery and corruption.

## 2. DEFINITIONS, PRINCIPLES AND SCOPE OF THE POLICY

2.1 Definitions for the Policy:-

- **Bribery:** Offering, promising, giving, accepting, or soliciting anything of value to influence the actions of an individual or entity;
- **Corruption:** Dishonest or fraudulent conduct by those in power, typically involving bribery.

2.2 The Company and the Group adopt a zero-tolerance approach towards bribery and corruption. All forms of bribery and corruption are strictly prohibited.

2.3 This Policy applies to all employees, directors, and third parties representing or doing business with the Company and the Group.

2.4 The Company will demonstrate its commitment through various statements in its corporate website, as detailed in Appendix 1.

## 3. RESPONSIBILITIES

3.1 **Employees:** Must not engage in any form of bribery or corruption and must report any suspected breaches.

3.2 **Directors:** Must ensure compliance with this Policy and lead by example.

3.3 **Third Parties:** Must comply with this Policy and relevant anti-bribery and corruption laws.

## 4. PROHIBITED ACTIVITIES

4.1 Offering or accepting bribes.

4.2 Facilitating or being complicit in bribery or corruption.

4.3 Engaging in any activity that creates the appearance of improper conduct.

## **5. CONSEQUENCES OF VIOLATION**

5.1 Violations of this Policy will result in disciplinary action, which may include termination of employment or contracts.

## **6. REPORTING, TRAINING AND REVIEW AND UPDATE**

6.1 Employees must report any suspected breaches of this Policy to their immediate supervisor or through the Company's whistleblowing channels.

6.2 The Company and the Group will provide regular briefing and/or training sessions. This may include a compliance pledge by new recruits and an annual pledge by employees to ensure understanding and compliance.

6.3 This Policy will be reviewed and updated as necessary to ensure continued compliance with legal and regulatory requirements.

*END OF THE POLICY*

## **INTEGRITY PLEDGE**

Sim Leisure Group is committed to business integrity. Our growth in the last 30 years has been the result of our refusal to give bribes in Malaysia, where we first started our business. The situation forced us to seek a level playing field overseas and resulted in us competing among the world's best in our field in Dubai and brought our company to seek listing in Singapore. Competition on the world stage has made us super-competitive.

Sim Leisure is back operating in Malaysia and continues to speak out and fight the lonely battle against corruption, which is still rampant. We continue to receive backlash from fighting corruption, but for every fight we take on, we make progress and become stronger.

Sim Leisure Group has a zero-tolerance policy towards any form of corruption – including, but not limited to, kickbacks, gifts, entertainment, favours, hospitality and donations.

Sim Leisure Group conducts business in a fair, honest and ethical manner, and undertakes measures to ensure people, companies and entities the Group deals with do not participate in nor condone corrupt practices.

*"People tend to see corruption at its surface and do not fully grasp the magnitude of the damage corruption brings. It is more than just money lost under the table or getting short-changed. It cripples the economy from within, just as cancer grows in the body, if you do not detect it sooner and have it removed, it will spread throughout your body to the deathly stage four"*

***Dato' Sim Choo Kheng, Founder and Executive Chairman, Sim Leisure Group Ltd***

If you need support in your business journey in dealing with corrupt people and practices, you know you have a supporter in us. Feel free to reach out to us at [info@simleisuregroup.com](mailto:info@simleisuregroup.com).

To find out more about Sim Leisure Group's and our Founder and Executive Chairman Dato' Sim Choo Kheng's personal journey of integrity and stance against corruption you can click on the links to the articles below.

[Integrity a 'lonely journey' for Sim Choo Kheng](#)

[Sim Leisure Group's Sim Choo Kheng: Corruption is like 'a cancer' in the body](#)

[How Malaysian businesses can thrive without paying under counter money](#)

[Integrity the Key to Business Success](#)