



YPJ HOLDINGS SDN. BHD.

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

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INTRODUCTION

The Company has adopted a zero-tolerance policy against all forms of bribery and corruption.

Anti-Bribery & Anti-Corruption Policy (hereinafter referred to as the "ABAC Policy") provides guidance to employees concerning how to deal with improper solicitation, bribery and other corrupt activities and issues that may arise in the course of business.

It is also intended to apply to every director except as otherwise stated in this ABAC Policy.

Joint venture companies in which the Company is a non-controlling co-venture and associated companies are encouraged to adopt-similar principles and standards.

Therefore, the Company shall make it clear to all contractors, subcontractors, consultants, agents, representatives and others performing work or services for or on behalf of the Company will comply with the relevant parts of the ABAC Policy when performing such work or services.

The ABAC Policy is not intended to provide definitive answers to all questions regarding bribery and corruption.

Rather, they are intended to provide employees with a basic introduction to how the Company combats bribery and corruption in furtherance of the Company commitment to adherence of law and ethical behavior at all times.

Some of the guidelines are designed to prevent situations in which bribery and corrupt practices may take root.

If you have any doubt about the scope of applicable laws or the application of the Company policies concerning the fight against bribery and corruption, you should contact the Integrity and Governance Department immediately.

"ALWAYS ASK WHENEVER IN DOUBT"

Engaging in bribery and corrupt practices can have severe consequences for you and for the Company.

You may face dismissal, fines and imprisonment, and the Company may face damage to reputation, financial loss and disbarment from business and other negative consequences.

1. APPLICATION & DEFINITIONS

A. APPLICATION

This ABAC Policy is intended to apply to every employee of every Company.

It is also intended to apply to every director for those companies, except as otherwise stated in this Policy.

Joint venture companies in which the Company is a non-controlling co-venture and associated companies are encouraged to adopt this ABAC Policy or similar principles and standards.

Although the ABAC Policy is specifically written for the employees and directors, the Company expects that contractors, sub-contractors, consultants, agents, representatives and others performing work or services for or on behalf of the companies will comply with the relevant parts of this ABAC Policy when performing such work or services.

If a law conflicts with principles as set out in this ABAC Policy, you should comply with the law.

If you perceive that a provision in this Policy conflicts with the law in your jurisdiction, you should consult with your Head of Department or Human Resource Department, rather than disregard the Policy without consultation.

However, if a local custom conflict with this Policy, you are to comply with this ABAC Policy.

B. DEFINITIONS

References to "you" in this ABAC Policy refer to any person to whom this ABAC Policy applies.

Where more specific references are used (such as "employee"), the more specific reference is intended.

For purposes of this ABAC Policy, the term "family/household" includes your spouse(s), children (including step-children and adopted children), parents, step-parents, siblings, step-siblings, grandparents, grandchildren, in-laws, uncles, aunts, nieces, nephews, and first cousins, as well as other persons who are members of your household.

For purposes of this ABAC Policy, the term "employee" means any person who is in the employment of the Company including but not limited to executives, non-executives, secretaries, seconders and individuals on direct hire.

The companies in which the Company has direct or indirect shareholding are distinct legal entities.

2. GIFT, ENTERTAINMENT AND CORPORATE HOSPITALITY

A. "NO GIFT" POLICY

The Company has adopted a "No Gift" Policy whereby, subject only to certain narrow exceptions, the employees and directors, family members or agents acting for or on behalf of the employees, directors or their family members are prohibited from, directly or indirectly, receiving or providing gifts.

The Company requires employees and directors to abide by this policy to avoid conflict of interest or party in on-going or potential business dealing between the Company and external parties as a gift can be seen as a bribe that may tarnish the Company reputation or be in violation of anti-bribery and corruption laws.

A conflict of interest arises in a situation in which an individual is in a position to take advantage of his or her role in the Company for his or her personal benefit, including the benefit of his or her family/household and friends.

This would undermine the duties of good faith, fidelity, diligence and integrity as expected by the Company from its employees and directors in the performance of their duties and obligations.

It is the responsibility of employees and directors to inform external parties involved in any business dealings with the Company that the Company practices a "No Gift Policy" and to request the external party's understanding for and adherence with this policy.

i. Receiving Gifts

The Company is very much aware that the exchange of gifts can be a very delicate matter where, in certain cultures or situations, gift giving is a central part of business etiquette.

Despite acknowledging the Company "No Gift Policy", some external parties may still insist in providing gifts to the employees, directors and/or their family members in certain situations which do not fall within the general exceptions.

Although the general principle is to immediately refuse or return such gifts, accepting a gift on behalf of the Company is allowed only in very limited circumstances, whereby refusing the gift is likely to seriously offend and may sever the business relationship with the Third Party.

However, in no circumstances may an employee, director or his/her family/household members accept gifts in the form of cash or cash equivalent.

In these limited circumstances, employees are expected to immediately record the gift in the Gift Activity Reporting Form (Refer **Appendix 1**) or any other form as provided by your Human Resource Department for submission to your Head of Department who will then decide whether to approve the acceptance of the gift or require it to be returned.

Directors should inform the Company Secretary, as soon as reasonably practicable, to seek his/her advice when faced with a similar situation.

Even if it may appear disrespectful to refuse a gift from an external party, nevertheless, if there is a conflict-of-interest situation (e.g., bidding is in progress and the Company that gave the gift is one of the bidders) then clearly the Head of Department cannot approve the acceptance of said gift (in the case of directors, the Company Secretary would advise the same).

In this situation, the gift must be politely returned with a note of explanation about the "No Gift" policy.

In the event the Head of Department approves the acceptance of the gift, he/she must also determine the treatment of the gift whether to:

- Donate the gift to charity; or
- Hold it for departmental display; or
- Share with other employees in the department; or
- Permit it to be retained by the employee.

In the determine the above, Head of Department are expected to exercise proper care and judgment in each case, taking into account pertinent circumstances including the character of the gift, its purpose, the position/ seniority of the person(s) providing the gift, the business context, reciprocity, applicable laws and cultural norms.

ii. Providing Gifts

Generally, employees are not allowed to provide gifts to third parties with the exception of the Chairman & CEO, Senior General Manager and any other officers identified in the gift and entertainment policy of the respective jurisdictions.

iii. Exceptions to the "No Gift" Policy

Although generally the Company practices a "No Gift" Policy, there are certain exceptions to the general rule whereby the receiving and provision of gifts are permitted in the following situations: -

- Exchange of gifts at the company-to-company level (e.g. gifts exchanged between companies as part of an official the Company visit/courtesy call and thereafter said gift is treated as the Company property);
- Gifts from the Company to external institutions or individuals in relation to the Company official functions, events and celebrations (e.g., commemorative gifts or door gifts offered to all guests attending the event

- Gifts from the Company to employees and directors and/or their family members in relation to an internal or externally recognized the Company function, event and celebration (e.g., in recognition of an employee's/director's service to the Company);
- Token gifts of nominal value normally bearing the Company logo or (e.g. t-shirts, pens, diaries, calendars and other small promotional items) that are given out equally to members of the public, delegates, customers, partners and key stakeholders attending events such as conferences, exhibitions, training, trade shows etc. and deemed as part of the Company brand building or promotional activities; and
- Gifts to external parties who have no business dealings with the Company (e.g. monetary gifts or gifts in-kind to charitable organizations).

Even in the above exceptional circumstances, employees and directors are expected to exercise proper judgment in handling gift activities and behave in a manner consistent with the Company general principles as per below:

- Conscientiously maintain the highest degree of integrity;
- Always exercise proper care and judgment;
- Avoid conflicts of interest;
- Refrain from taking advantage of your position or exercising your authority to further your own personal interest at the expense of the Company, and;
- Comply with applicable laws, regulations and the Company policies and procedures.

iv. The Company 'No Gift' Policy

As a general principle, the employees and directors are prohibited from, directly or indirectly, giving or receiving gifts to avoid conflict of interest or the appearance of conflict of interest.

THE GENERAL RULE

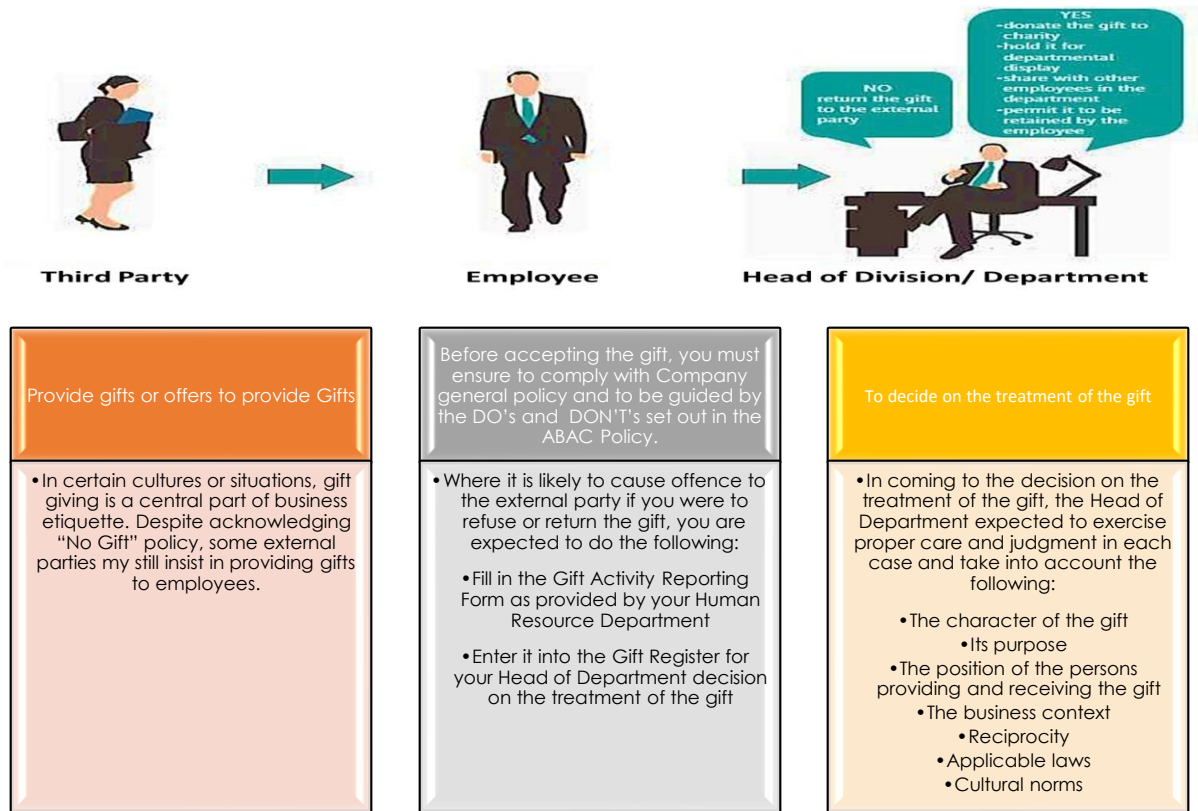


v. Gift Activity Reporting & Approval Process

The below depicts the process flow for reporting a gift accepted on behalf of COMPANY (only allowed in very limited circumstances) whereby refusing the gift is likely to seriously offend and may sever the business relationship with the Third Party.

EXCEPTIONAL CASES

(IN VERY LIMITED CIRCUMSTANCES AND SUBJECT TO APPROVAL)



Refer to the DO's and DON'Ts below:

DO's	DON'Ts
<ul style="list-style-type: none"> ✓ The employees and directors must inform third parties involved in business dealings with the Company that the Company practices a "No Gift Policy" and to request the aforementioned parties to respect and adhere with the policy. ✓ The employees and directors are prohibited from accepting or providing gifts to third parties unless it falls under the general exceptions. ✓ Heads of Department must exercise proper care and judgment when handling gift activities and apply the general principles in determining the appropriateness of the gift, in particular when dealing with public officials and public agencies/bodies as strict rules apply. ✓ Employees are required to submit the Gift Activity Reporting Form to his/her Head of Department who will then decide whether to approve the acceptance of the gift or require the gift to be returned. 	<p>There are certain types of gifts which are never permissible and the employees and directors should immediately refuse if it involves the following: -</p> <ul style="list-style-type: none"> ✗ Any gift of cash or cash equivalent. Cash equivalent could be in the form of vouchers, discounts, coupons, shares and commission etc. ✗ Any gifts involving parties engaged in a tender or competitive bidding exercise. ✗ Any gifts that come with a direct/indirect suggestion, hint, understanding or implication that in return for the gift, some expected or desirable outcome is required ("quid pro quo"). ✗ Any gift that would be illegal or in breach of local or foreign anti-bribery and anti-corruption laws. ✗ Any gift which is lavish or excessive e.g. valued above the maximum threshold permitted by the Company or may adversely affect the reputation of the Company. <p>You must immediately return or decline any gift that falls within the above-mentioned categories.</p>

B. ENTERTAINMENT

i. Providing Entertainment

The Company recognizes that providing modest entertainment is a legitimate way of building business relationships and as such a common practice within the business environment to foster good business relationship with external clients. As such, eligible employees are allowed to entertain external clients through a reasonable act of hospitality as part of business networking as well as a measure of goodwill towards the recipients.

In some countries, the act of hospitality through entertainment is a central part of business etiquette. However, this may not necessarily be the case in every country or in all circumstances as it may create a negative perception if observed or known by others despite selfless motives behind the entertainment provided.

Employees and directors should always bear in mind that this is an area where perception is often regarded as more important than facts and therefore you should always exercise proper care and judgment when-providing entertainment to third

parties especially when it involves public officials to ensure compliance with local anti-bribery and anti-corruption laws.

Employees and directors are strictly prohibited from providing or offering to provide entertainment with a view to improperly cause undue influence on any party in exchange for some future benefit or result. Any acts of this nature, whether provided directly or indirectly through an intermediary, may be construed as an act of bribery and contrary to the Company general values and principles.

You are required to comply with the policies and procedures of your Integrity and Governance Department, and maintain expenses within the limits of your entitlement, when carrying out entertainment activities.

Any entertainment activities that would involve public officials shall require the prior approval of the Head of Department in consultation with Integrity and Governance Department.

ii. Receiving Entertainment

The Company recognizes that the occasional acceptance of a reasonable and modest level of entertainment provided by third parties in the normal course of business is a legitimate way to network and build good business relationships.

However, it is important for employees and directors to exercise proper care and judgment before accepting entertainment offered or provided by a third party.

This is not only to safeguard the Company reputation, but also to protect employees and directors from allegations of impropriety or undue influence.

You are required to comply with the policies and procedures of your Human Resource Department in relation to receiving entertainment from third parties.

In no event, however, may you or any of your family/household members accept entertainment in exchange for an exercise of non-exercise of your Company authority or otherwise to the detriment of the Company.

Refer to the DO's and DON'Ts below:

DO's	DON'Ts
<ul style="list-style-type: none"> ✓ The employees and directors must ensure that the entertainment offered is legitimate, modest and not lavish or excessive or extraordinary. ✓ The employees and directors are prohibited from offering or providing entertainment with a view to improperly creating undue influence or any party in exchange for some future benefit or result. Any acts of this nature, whether directly or indirectly, may be construed as an act of bribery. That is contrary to the general principles of the Company. ✓ You must be aware and educate yourself on local anti-bribery and anti-corruption laws when dealing with public officials as in some countries providing entertainment to public officials has the potential to be regarded as bribery. ✓ Eligible employees are required to comply with the policies and procedures of their Human Resource Department, and maintain expenses within the limits of their entitlement, when carrying out entertainment activities. ✓ Any entertainment activities that would involve public officials shall require the prior approval from the respective Head of Department in consultation with Integrity and Governance Department. 	<p>There are certain types of entertainment activities which are never permissible and you should immediately refuse if it involves the following:</p> <ul style="list-style-type: none"> ✗ Any entertainment that comes with a direct/indirect suggestion, hint, understanding or implication that in return for the entertainment provided some expected or desirable outcome is required ("quid pro quo"). ✗ Any entertainment activities that would be illegal or in breach of local or foreign bribery laws. ✗ Any entertainment activities that would be perceived as extravagant, lavish or excessive or may adversely affect the reputation of the Company. ✗ Any entertainment activity that is sexually oriented or may otherwise tarnish the reputation of the Company. <p>You must immediately return or decline any entertainment that falls within the above-mentioned categories.</p>

C. CORPORATE HOSPITALITY

i. Corporate Hospitality

Corporate hospitality is generally defined as “corporate events or activities organized by an organization which involves the entertainment of employees and third parties for the benefit of the organization”. Third parties may include customers, potential customers, contractors, external companies and any other stakeholders with whom a business relationship, whether current, prospective or historic exists.

Corporate events and activities include but are not limited to sporting events, gala dinners, concert or activity based every such as golf tournaments.

Corporate hospitality is recognized as a legitimate way to network and build goodwill in business relationships. However, there is a fine line between what is considered to be legitimate vs. illegitimate forms of corporate hospitality. The question is whether there is any intention to influence or be perceived to influence the improper outcome of a business decision by providing the corporate hospitality.

Corporate hospitality would be illegitimate in the following situations: -

- If it provides an advantage to another person if offered; or
- If it is given with the intention of inducing the person to perform a relevant function improperly; or
- If there is knowledge that acceptance of the advantage would in itself be improper performance.

Transparency International has advocated corporate hospitality arrangements/activities should conform to the following basic principles:

Transparency, in that all corporate hospitality is reported and written approval is obtained, all records of which are properly kept;

- Proportionality i.e. the corporate hospitality must not be too excessive. In addition, the corporate hospitality must commensurate with the recipient's official capacity and not provided in his/her personal capacity;
- Reasonableness in ensuring that the corporate hospitality is not lavish; and
- Bona fide, where the intention to offer and/or provide the corporate hospitality is done with good and legal intentions.

ii. Providing Corporate Hospitality

The Company recognizes that providing corporate hospitality to its stakeholders be it through corporate events, sporting events or other public events, is a legitimate way to network and build goodwill in business relationships.

It is customary for the Company to issue complimentary invitations in the form of passes, tickets or invitations to third parties for events organized or sponsored by the Company as well as events organized or sponsored by external organizations.

While providing corporate hospitality is a reflection of the Company courtesy and goodwill, the respective Heads of Department must exercise proper care to protect the Company reputation against any allegations of impropriety or the perception of bribery especially when the arrangements could influence or be perceived to influence the outcome of a business decision and are not reasonable and bona fide expenditures.

There should also be explicit, clear and internally transparent criteria to determine the selection of guests to be invited to the Company corporate hospitality event.

Reasonable due diligence should be exercised, particularly when the arrangements involve public officials.

There are various local and international anti-bribery and anti-corruption laws that impose strict restrictions on the value and level of entertainment and corporate

hospitality to be accorded to third parties, particularly when it is offered to government or public officials.

The Company is committed to comply with applicable laws governing the provision of corporate hospitality to third parties, especially when it involves public officials, and therefore expect employees to undertake the following:

- To publicize and make clear of the Company policy on providing and receiving corporate hospitality;
- To obtain all necessary approvals for the issuance of complimentary tickets or passes to corporate hospitality events in accordance with the Company Limits of Authority;
- To expressly notify the recipients in writing that all complimentary tickets or passes are NON- TRANSFERABLE (e.g. the terms and conditions for use to be printed on the tickets, passes or invitations). In the event that the recipients are unable to attend, he/she is expected to return the tickets or passes to the Company.

The unauthorized transfer of tickets or passes to persons other than the named recipient may signify to others that the invitation was extended to the recipient in his/her personal capacity. All expenses incurred to provide the corporate hospitality must be properly documented, receipted and recorded in the Company records.

iii. Receiving Corporate Hospitality

As a general principle, the Company strictly prohibits employees and directors from soliciting corporate hospitality nor are they allowed to accept hospitality that is excessive, inappropriate, illegal or given in response to, in anticipation of, or to influence a favorable business decision, particularly from parties engaged in a tender or competitive bidding exercise (e.g. Contractors, vendors, suppliers etc.).

Notwithstanding the above, the Company recognizes that the occasional acceptance of an appropriate level of hospitality given in the normal course of business is usually a legitimate contribution to building good business relationships. However, it is important for employees and directors to exercise proper care and judgment before accepting the hospitality. This is not only to safeguard the Company reputation, but also to protect employees and directors from allegations of impropriety or undue influence.

If you have any doubts on the appropriateness of a corporate hospitality offered by an external party for e.g., a contractor or supplier, you should either decline the offer or consult your Head of Department. In the case of directors, you should seek the advice of your respective Company Secretary.

Refer to the DO's and DON'Ts below:

DO's	DON'Ts
<ul style="list-style-type: none"> ✓ You must ensure that the corporate hospitality accepted from an external party is legitimate, modest and not lavish or excessive or extraordinary in nature. ✓ You must exercise proper care and judgment before offering or providing corporate hospitality to third parties to ensure compliance with applicable laws and regulations, in particular when it involves public officials. ✓ Any corporate hospitality activities that would involve public officials shall require the prior approval of the respective Head of Department. ✓ If you have any doubts whether the corporate hospitality offered by an external party for e.g. A contractor or supplier is appropriate or reasonable in nature, you should either decline the offer or consult your Head of Department. 	<p>There are certain types of corporate hospitality activities which are never permissible and you should immediately refuse if it involves the following: -</p> <ul style="list-style-type: none"> ✗ Corporate hospitality offered by parties currently engaged in the tender or competitive bidding exercise. ✗ Corporate hospitality offered that comes with a direct/indirect suggestion, hint, understanding or implication that in return for the corporate hospitality provided some expected or desirable outcome is required ("quid pro quo"). ✗ Any corporate hospitality activities that would be illegal or in breach of local or foreign bribery laws. Corporate hospitality which is lavish or excessive or may adversely affect the reputation of the Company. ✗ Any corporate hospitality activities that are sexually oriented or may otherwise tarnish the reputation of the Company. <p>You must immediately decline any offers of corporate hospitality that falls within the above categories.</p>

3. DEALING WITH PUBLIC OFFICIALS

i. Dealing with Public Officials

A 'public or government official' is defined which includes, without limitation, as a candidate for public office, officials of any political party, and officials of state-owned enterprises other than the Company.

Providing gift, entertainment or corporate hospitality to public officials or their family/household members is generally considered a 'red flag' situation in most jurisdictions.

You are prohibited from paying for non-business travel and hospitality for any government official or his/her family/household members without permission from your Head of Department in consultation with your Human Resource Department. Other policies and procedures on gift, entertainment and corporate hospitality must also be abided by, copies of which can be obtained from your Integrity and Governance Department.

If approval is obtained for you to provide gift, entertainment or corporate hospitality to public officials, you must ensure that the gift, entertainment or corporate hospitality is not excessive and lavish, and must commensurate with the official designation of the public official and not his personal capacity. You must also be aware of local laws governing the activity and to ensure compliance. You should seek guidance from your Human Resource Department prior to providing any gift, entertainment or corporate hospitality to public officials.

ii. The Employees

To prevent violations of law and underscore our commitment to ethical behavior worldwide, you should always abide by the Company policies and provisions in relation to gifts (including the "No Gift" Policy), entertainment and corporate hospitality, copies of which are available from your Human Resource Department. In this regard, you are strictly prohibited from accepting gifts, entertainment or corporate hospitality that is excessive, lavish, inappropriate, illegal, or given to influence a business decision or with an understanding that, in return, some desirable outcome may be expected.

If you have any queries on this matter, you should always consult and seek further advice from your respective Head of Department or Integrity and Governance Department.

Refer to the DO's and DON'Ts below:

DO's	DON'Ts
<ul style="list-style-type: none"> ✓ Do ensure that to provide or to offer to provide entertainment to public officials is lawful under local laws, as it might be deemed as bribery in certain countries or companies. If it is unlawful or if certain requirements must be met, you must ensure to fully comply with the law. ✓ Do ensure that proper care and judgment is exercised to confirm that there is no conflict of interest. It is unethical to offer or provide entertainment in exchange for some future benefit or result. ✓ Do ensure that any 'red flag' is resolved before giving out gift or entertainment. ✓ Do ensure that all documentation (including invoices and receipts) are properly recorded and kept. 	<ul style="list-style-type: none"> ✗ Do not try to circumvent any laws or policies with regards to gifts and entertainment, even if it means that the Company might lose out on business opportunities as a result. ✗ Do not offer to provide gifts, entertainment or hospitality that is illegal or unduly dangerous, indecent, sexually oriented or disrespectful. ✗ Do not exceed the monetary threshold as specified in the Entertainment Expenses Policy. ✗ Do not act on your own accord when providing entertainment to public officials. Always consult your Head of Department or Integrity and Governance Department. ✗ Do not conceal, alter, destroy or otherwise modify any documentation that relates to entertainment or corporate hospitality accorded to public officials.

4. CSR, SPONSORSHIPS AND DONATIONS

As a responsible corporate citizen, the Company is committed to contributing to the well-being of the people and nation in countries where it operates. It is however important that all Corporate Social Responsibility ("CSR"), sponsorships and donations are made in accordance with the Company policies and receive prior authorization by the Company Management or the Board of Directors ("Board").

A. Corporate Social Responsibility ("CSR")

Given the nature of our business, the Company is often asked by governments to contribute to Social Investment activities in the country.

As part of our commitment to corporate social responsibility and sustainable development, as a general matter, the Company provides such assistance in appropriate circumstances and in an appropriate manner. However, such requests must be carefully examined for legitimacy and not be made to improperly influence a business outcome.

Any red flags must be resolved before committing any funds to the program. Even requests determined to be legitimate must be carefully structured to ensure that the benefits reach their intended recipients. If you are in any doubt as to whether a charitable contribution or social benefit is appropriate, consult your Head of Department for assistance.

B. Sponsorships & Donations

Employees must ensure that all sponsorships and donations are not used as a subterfuge for bribery or used to circumvent or avoid any of the Company policy in prohibition on bribery.

The Company needs to be certain that donations to foreign-based charities or beneficiaries are not disguised illegal payments to government officials, and must ensure that the charity does not act as a conduct to fund illegal activities in violation of international anti-money laundering, anti-terrorism and other applicable laws.

In accordance with the Company commitment to contribute to the community coupled with its values of integrity and transparency, all sponsorships and donations must comply with the following:

- Ensure such contributions are allowed by applicable laws
- Obtain all the necessary internal and external authorizations
- Be made to well established entities having an adequate organizational structure to guarantee proper administration of the funds;
- Be accurately stated in the Company accounting books and records;
- Not to be used as a means to cover up an undue payment or bribery.

The Company requires employees to use good judgement and common sense in assessing the requests. When in doubt, employees should seek further advice from their Head of Department or escalate the matter to Integrity and Governance Department.

i. Due Diligence Checklist

Before making a commitment to a CSR activity, sponsorship or donation requested by external stakeholders, you must first conduct proper due diligence to ensure that the requests are legitimate and that any red flags raised are resolved prior to committing the funds.

The request is evaluated against the Company Guidelines on CSR, Sponsorships and Donations and meets the following criteria;

- The request does not fall under the list of activities which the Company does not support or contribute to;
- There is no risk of a perceived improper advantage for the Company
- The proposed recipient is a legitimate organization and proper due diligence are made/background checks

If the request meets the above requirements and it is reasonably ascertained to be legitimate in nature you can proceed to prepare a recommendation/memorandum seeking Management's approval as per the Limits of Authority (LOA) Policy.

If the request comes from or the proposed recipient is Government owned or if a Government Official or their relative is involved and it is reasonably expected that the Company may have business that could be influenced by that Government Official or the Government Official's agency, ministry or department, a memorandum must be sent to Integrity and Governance Department for review as to whether or not the proposed investment/ sponsorship or donation should proceed and if deemed necessary, the Integrity and Governance Department should be consulted to ensure compliance with anti-bribery and anti-corruption laws.

Refer to the DO's and DON'Ts Below:

DO's	DON'Ts
<ul style="list-style-type: none"> ✓ Ensure that the activity is in line with the Company policy and guidelines on CSR, sponsorships and donations and does not fall under the list of CSR activities which the Company does not support or contribute to. In case of any doubts. ✓ Ensure that the request has been carefully examined for legitimacy and that an appropriate level of due diligence has been conducted on the requesting party. ✓ Ensure that the proposed recipient is a legitimate organization and the funding of the CSR activity is in compliance with the applicable laws and not made to improperly influence a business outcome or perceived to provide an improper advantage to the Company. ✓ If the request comes or the proposed recipient is Government owned or involves a Government Official or their relatives, the request must undergo a more stringent due diligence process to determine whether there are any red flags raised. ✓ Any red flags must be resolved before committing any funds to the program. 	<ul style="list-style-type: none"> ✗ Do not commit any funds without first undergoing the proper processes and procedures to evaluate the legitimacy of the request. ✗ Do not try to circumvent any guidelines, rules or procedures put in place by making charitable contributions as a subterfuge for illegal payments. ✗ Do not conceal, alter, destroy or otherwise modify any relevant information, which in the normal course of business, may raise potential red flags that would require additional investigation particularly if it involves public officials. If you are unsure or have any concerns, please consult your Head of Department or Integrity and Governance Department. If the matter is still unresolved, you must ensure to escalate the matter further to Integrity and Governance Department.

C. Education Sponsorship

The Company has a sponsorship programme with the objective to provide educational opportunities to deserving students to enable them to realize their potential and to contribute to the growth of the Company and the nation.

The awarding of scholarships should be based on strict guidelines and due diligence to ensure that only the most qualified and deserving students receive the scholarship award.

This is crucial to ensure that no element of corruption is involved in the giving out of scholarships.

The selection of sponsorship recipients should be based on approved criteria such as academic qualifications and assessment results. The process of selection should be transparent and the reasons for selection should be properly recorded.

Refer to the DO's and DON'Ts below:

DO's	DON'Ts
<ul style="list-style-type: none"> ✓ Do ensure that proper care and judgment is exercised in awarding scholarships or loans. This is to avoid any allegations of bribery and corruption. ✓ Do ensure that due diligence is carried out to confirm that the candidate is the appropriate person based on eligibility criteria and/or other prerequisites, rules and guidelines. ✓ Do ensure that, if the scholarship or loan candidate has a family/household relationship to staff or director, it is properly recorded and is being made transparent. ✓ Do ensure that the amount of scholarship/loan is reasonable in value ✓ Do ensure that any 'red flag' is resolved before giving out scholarships or loans. For example, if the candidate is a relative of a government official, you must ensure that it is not against the laws of the relevant country and is consistent with the policies. ✓ Do ensure that all documentations (including invoices and receipts) are properly recorded and kept. 	<ul style="list-style-type: none"> ✗ Do not award scholarships or loans without undergoing the proper process and procedures set by the Company to ensure that there is no bribery or corruption or perception thereof. ✗ Do not try to circumvent guidelines, rules or procedures when selecting candidates for scholarship as it might put you and the Company in trouble in the event of any bribery allegation. ✗ Do not try to conceal any information where you think that there might be conflict of interest. If you are unsure please consult your Head of Department or Integrity and Governance Department. ✗ Do not arbitrarily award scholarships or loans. The amount of scholarships and loans must be based on the guidelines prepared by the Company. ✗ Do not ignore any laws, guideline policies when awarding scholars or loans, particularly if a public official is in some way involved, as some countries might impose certain requirements. Always consult Head of Department or Integrity and Governance Department. ✗ Do not conceal, alter, destroy or otherwise modify any relevant documentation.

5. POLITICAL CONTRIBUTIONS

As a matter of general policy, the Company does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office.

The Company may, in very limited circumstances, make political contributions in countries where such contributions are permitted under the law. The authority to approve such political contributions is with the Director / CEO or the respective Board.

If any contribution is made, it must be permissible under applicable laws and must not be made with any promise or expectation of favorable treatment in return and must be accurately reflected in the Company books and records.

Good faith payments to a government entity such as payments to the host country's federal treasury required by contract or law, are not prohibited, so long as they are made with due care to the government entity and not to any individual official.

The Company encourages employees to participate in the political election process by voting. Employees may choose to make personal political contributions as appropriate within the limits established by law.

Under no circumstances, however, will any employee be compensated or reimbursed in any way by the Company for a personal political contribution.

Employees are prohibited from acting on the below without first obtaining approval from their respective Head of Department: -

- Using their position with the Company to try to influence any other person (whether or not employed by the Company) to make political contributions or to support politicians or their parties in any country
- Make any contribution or incur expenditure using the Company resources to benefit any political campaign, party or politician in any country
- The use of the Company facilities equipment and resources for any political campaign or party functions

Furthermore, charitable donations may not be used as a subterfuge for prohibited political payments.

Notwithstanding the foregoing, it is the Company policy to engage and communicate its views and position on issues of public interest that have an important impact on the Company.

Employees must comply with local laws concerning lobbying in the jurisdiction; which the Company engages in lobbying must conduct themselves in a manner which is in accordance with local laws consistent with the values and principle of the Company.

Refer to the DO's and DON'Ts below:

DO's	DON'Ts
<ul style="list-style-type: none"> ✓ Be aware and educate yourself with all applicable laws and regulations in your jurisdiction that may prohibit or restrict companies from getting involved in political activities, make political contributions or engage in lobbying activities. ✓ In countries where political contributions are allowed under the law, any such contribution shall require the prior approval of the respective Heads of Department. ✓ Ensure that your political views are your own when engaging in personal political activity and it does not reflect the views of the Company. ✓ If you plan to seek or accept a public office, you will need to comply with the policies and procedures of the Integrity and Governance Department in your jurisdiction. 	<ul style="list-style-type: none"> ✗ You are prohibited from using your position with the Company to try to influence any other person (whether or not employed by the Company) to make political contributions or to support politicians or their parties, without the prior approval of your Head of Department. ✗ You are prohibited from making any contribution or incurring an expenditure using the Company resources to benefit any political campaign, party or politician in any country without the prior approval of your Head of Department. ✗ The Company facilities, equipment and resources may not be used for the furtherance of any political campaign or party functions without the prior approval of the respective Head of Department. ✗ Charitable donations may not be used as a subterfuge for prohibited political payments.

6. FACILITATION PAYMENT

A. Making Facilitation Payment

"Facilitation payment" is defined as payments made to secure or expedite the performance by a person performing a routine or administrative duty or function. Offering, promising or requesting facilitation payments is just as prohibited as actually paying or receiving facilitation payments. Facilitation payments need not involve cash or other financial asset; it can be any sort of advantage with the intention to influence them in their duties.

The Company prohibits accepting or obtaining, either directly or indirectly, facilitation payments from any person for the benefit of the employee himself or for any other person who is subject to the Company. The reason underlying this prohibition is that facilitation payment is seen as a form of bribery and corruption.

All persons subject to the Company must not offer, promise, give, request, accept or receive anything which might reasonably be regarded as a facilitation payment. If you receive a request or if you are offered facilitation payments, you must report it to your Head of Department.

B. Exception to Making Facilitation Payment

However, there are certain situations or circumstances where you are faced with having to make facilitation payments in order to protect your life, limb or liberty. In dangerous situations like this, you are allowed to make payments but you must immediately report to your Head of Department. Making facilitation payment in such a situation is the only exception which can be used as a defense when faced with allegations of bribery and corruption.

7. MONEY LAUNDERING

Money laundering is defined as occurring when the criminal origin or nature of money or assets is hidden in legitimate business dealings or when legitimate funds are used to support criminal activities, including financing terrorism.

The Company strongly objects to practices related to money laundering, including dealing in the proceeds of criminal activities.

Money laundering is a very serious crime and the laws governing this type of crime can have extra territorial effect, i.e. the application of the law is extended beyond local borders. The penalties for breaching anti-money laundering legislation are severe and can include extradition and incarceration in foreign jurisdictions.

To avoid violating anti-money laundering laws, employees are expected to always conduct counterparty due diligence to understand the business and background of the Company prospective business counterparties and to determine the origin and destination of money, property and services.

Counterparty means any party that the Company is currently in relationship with or intends to do business with in the future, either on a regular or once-off basis. Counterparties include but are not limited to customers, contractors, suppliers, consultants, agents, JV partners and any other business partners.

A number of initiatives can be taken to strengthen anti-money laundering governance. They include the following: -

- Adequate training and compliance programs should be conducted to ensure understanding and strict compliance to any internal anti money laundering policies.
- Employees frequently involved in decision making process concerning counterparties particularly in matters on financial transactions should be properly acquainted with the applicable laws and regulations related to money laundering.
- Employees should be attentive to and report suspicious behavior by customers, consultants and business partners using proper reporting channels, in-house experts on anti-money laundering should always be consulted.
- Convoluting payment arrangements such as payment in cash, payment to a third party or to accounts in other countries or requests for upfront payment for expenses or other fees
- Periodic audits should be conducted and a process should be developed to follow all available accounting, record-keeping and financial reporting requirements applicable to cash and payments in connection with other transactions and contracts.

8. DEALING WITH THIRD PARTIES

A. Dealing with Third Parties

The Company dealings with third parties, which include contractors, suppliers, agents, consultants, joint venture partners, introducers/government intermediaries etc., must be carried out in compliance with all relevant laws and consistent with the values and principles of the Company. As part of this commitment, all forms of bribery and corruption are unacceptable and will not be tolerated.

The Company expects that all third parties acting for or on its behalf to share the Company values and ethical standards as their actions can implicate the Company legally and tarnish the Company reputation.

Therefore, where we engage third parties, such as contractors, agents, intermediaries or joint venture partners, we are obligated to conduct appropriate counterparty due diligence (Refer **Appendix 2**) to understand the business and background of the Company prospective business counterparties before entering into any arrangements with them to ensure that we are dealing with counterparties that subscribe to acceptable standard of integrity in the conduct of their business.

To help ensure that we only do business with third parties that share the Company standards of integrity, we must do the following:

- Conduct due diligence to assess the integrity of the Company prospective business counter parties. Do not enter into any business dealings with any third party reasonably suspected of engaging in bribery and improper business practices unless those suspicions are investigated and resolved.
- All third parties are made aware of the ABAC Policy and our expectations of them
- Continue to be aware of and to periodically monitor third party performance and business practices to ensure ongoing compliance.

If at any point during the due diligence exercise or in the dealings with a third party, there are conflicts of interest or "red flags" are raised, these warrant further investigation and must be sufficiently addressed before the engagement of the third party can progress.

Examples of common "red flags" involving third parties include:

- The transaction involves a country known for a high incidence of corrupt payments.
- Family, business or other "special" ties with government or public officials.
- A reference check reveals a flawed background or a reputation for getting "things done" regardless of the circumstances or suggests that for a certain amount of money, he can fix the problem.
- Objection to anti-bribery representations and warranties in commercial agreements or negative response when told of such requirements.

- Convoluted payment arrangements such as payment in cash, payment to a third party or to accounts in other countries or requests for upfront payment for expenses or other fees.
- The third party requires that his/her identity not be disclosed as part of the business transaction
- Inadequate credentials for the nature of the engagement or lack of an office or an established place of business.

B. Dealing with Contractors and Suppliers

i. Dealing with Contractors and Suppliers

The Company is committed to uphold the highest standard of ethics and integrity in all aspects of its procurement activities.

The Company should avoid dealing with any contractors or suppliers known or reasonably suspected of corrupt practices or known or reasonably suspected to pay bribes.

The Company must ensure that all procurement activities are in line with the procurement policies and procedures that are applicable in your jurisdiction, which include:

- Due diligence of contractors and suppliers are undertaken before they are registered/licensed with the Company.
- Contractors and Suppliers are made aware of and understand the Company Code of Conduct and Business Ethics and that they will comply accordingly.
- All commercial contracts and invitations to bid (ITBs) incorporate the provisions relating to business conduct, conflict of interest and fighting corruption and unethical practices.
- In Malaysia, the General Terms and Conditions of License for contractors incorporate the provisions relating to business conduct, conflict of interest and fighting corruption and unethical practices.
- All commercial contracts with major contractors and suppliers to incorporate a provision where the Company retains the right to audit third party compliance with the ABAC policy.

The Company must conduct due diligence on prospective contractors and suppliers to confirm whether or not these external parties have in place anti-bribery programmes and that they will not engage in any improper practices.

Screening should be conducted to the Company, its directors and top management and this can be done through the due diligence process and procedures as

established in your jurisdiction. The scope and extent of the due diligence required will vary depending upon the circumstances of each proposed transaction.

The Company should also monitor significant contractors and suppliers as part of their regular review of the performance of the third party. The Company has the right to terminate their services in the event that these third party pay bribes or act in a manner which is inconsistent with the ABAC Policy.

If any red flags are raised, these issues must be resolved.

If it is not possible then the company must be barred from being on the list of registered or licensed contractors /suppliers and/or disqualified from participating in any tender exercise.

For further guidance on the implementation of the ABAC Policy and the due diligence checklist for contractors and suppliers, employees should consult their respective Head of Department or Human Resource Department.

ii. Due Diligence Checklist for Contractors and Suppliers

The Company, in particular, the procurement function must follow the following procedures when dealing with Contractors and Suppliers: -

- Perform a risk assessment using a risk-based approach;
- Undertake due diligence on the third party depending on the level established by the risk analysis;
- Preparing and maintaining appropriate written documentation of the due diligence and risk assessment performed;

C. Mergers, Acquisitions & Investments

The Company must undertake due diligence in evaluating Mergers and Acquisition transactions and investments to ensure compliance with anti-bribery and anti-corruption laws.

Transparency International has provided a guide (<http://www.transparency.or.uk/our-work/publications/227-anti-bribery-due-diligence-for-transactions>) for companies on undertaking anti- bribery and anti-corruption due diligence in the course of mergers, acquisitions and investments which is as follows:

i. Due Diligence – Pre-Acquisition

- Anti-bribery due diligence is considered on a proportionate basis for all investments but on a risk-based approach, with the level of due diligence being proportionate to the investment and the perceived likelihood of risk of bribery.
- The level of anti-bribery due diligence for the transaction is commensurate with the bribery risks.

- Anti-bribery due diligence starts sufficiently early in the due diligence process to allow for adequate due diligence to be carried out and for the findings to influence the outcome of the negotiations or stimulate further review if necessary.
 - The partners or board provide commitment and oversight to the due diligence reviews.
 - Information gained during the anti-bribery due diligence is passed on efficiently and effectively to the management once the investment has been made
- ii. Due Diligence – Post Acquisition
- To conduct due diligence on a proportionate basis immediately after purchase to determine if there is any current bribery and if so, takes immediate remedial action.
 - To ensure that the target has or adopts an adequate anti-bribery and anti-corruption programme equivalent to its own.
 - Bribery detected through due diligence is reported to the authorities.
- iii. What to look for in Anti-Bribery Due Diligence
- Has bribery taken place historically?
 - Is it possible or likely that bribery is currently taking place?
 - If so, how widespread is it likely to be?
 - What is the commitment of the board and top management of the target to countering bribery?
 - Does the target have in place an adequate anti-bribery programme to prevent bribery?
 - What would the likely impact be if bribery, historical or current, were discovered after the transaction had completed?

D. Joint Venture Partners

In view of the possibility that Company may be held responsible for the illegal activities of its co-venturers, we need to ensure that Joint Ventures in which the Company has a controlling interest adopt this ABAC Policy.

Where the Company neither controls nor operates the Joint Venture ("JV") or where the Company holds a minority interest, we should:

- Make reasonable efforts to influence the JV Partner to adopt the ABAC Policy (or substantially equivalent standards and principles) and to comply with all applicable anti-bribery and anti-corruption laws and to establish controls substantially similar to the Company standards to prevent bribery;

- Be alert to warning signs which may arise in the conduct of the business. Any such warning signs must be reported to the Integrity and Governance Department and appropriate action to be taken; and
- Require (or where this right does not formally exist, request) that the majority partner or JV entity to provide written representation of anti-bribery compliance on an annual basis.

9. RECRUITMENT OF EMPLOYEES

The Company, being a diversified entity, provides equal opportunity for any qualified and competent individual to be employed from various multicultural and multiracial background, sourced from both the Company sponsorship program and externally, local and internationally.

The recruitment of employees should be based on approved selection criteria to ensure that only the most qualified and suitable individuals are employed. This is crucial to ensure that no element of corruption is involved in the hiring of employees:

In line with this, proper background checks should be conducted in order to ensure that the potential employee has not been convicted in any bribery or corruption cases nationally or internationally. More detailed background checks should be taken when hiring employees that would be responsible in management positions, as they would be tasked with decision-making obligations.

If you find or suspect that another person subject to this policy has violated or about to violate this policy or applicable law, whether deliberately or inadvertently, you must forthwith report the same, in writing, to your Head of Department or Integrity and Governance Department.

DO's	DON'Ts
<ul style="list-style-type: none"> ✓ Do ensure that the due process and procedure are carried out based on the approved selection criteria when recruiting new employees, to avoid any allegations of bribery and corruption. ✓ Do ensure that due diligence is carried out to confirm that the candidate is the suitable person based on eligibility criteria and/or other prerequisites, rules and guidelines. ✓ Do ensure that relevant approvals are obtained from the respective Approving Authority prior to issuance of an offer letter. ✓ Do ensure that if the candidate to be employed has family/household relationship to a staff or director, it is properly recorded and is being made transparent. ✓ Do ensure that all right, entitlements and benefits given to the candidate are reasonable in value. ✓ Do ensure that any 'red flag' is resolved before recruiting. For example, if the candidate is a relative of a government official, you must ensure that it is not against the laws of the relevant country. ✓ Do ensure that all documentations (including invoices and receipts) are properly recorded and kept. 	<ul style="list-style-type: none"> ✗ Do not recruit an employee without undergoing the proper process and procedures set by the Company to ensure that there is no perception of bribery or corruption. ✗ Do not try to circumvent any guidelines, rules or procedures when selecting new employees as it might put you and the Company in trouble in the event of any bribery allegation. ✗ Do not try to conceal any information where you think that there might be a conflict of interest. If you are unsure, please consult your Head of Department or Human Resource Department. ✗ Do not arbitrarily award rights entitlements and benefits. The value and types of rights, entitlements and benefits must be based on the guidelines prepared by the Company. ✗ Do not fail to give particular attention to any laws, guidelines of policies when a public official is involved, as some countries might impose particular requirements. Always consult your Head of Department or Integrity and Governance Department. ✗ Do not conceal, alter, destroy or otherwise modify any documentation

10. WHISTLEBLOWING POLICY

The Company encourages openness and transparency in its commitment to the highest standard of integrity and accountability.

If you make a report or disclosure about any actual or perceived bribery or corruption in good faith, belief, without malicious intent, that a breach or violation as aforesaid may have occurred or may about to occur, you will be accorded protection of confidentiality, to the extent reasonably practicable, notwithstanding that, after investigation, it is shown that you were mistaken. In addition, employees who whistle blow internally will be also are protected against detrimental action for having made the disclosure, to the extent reasonably practicable.

PROCEDURAL MATTERS CONSEQUENCES OF A BREACH

Adherence to this Policy and Guidelines is critical to the smooth running of its business or enterprise and is for the common good of the Company and its employees.

Any conduct which is not in accordance with the principles set out in this Policy and Guidelines will be dealt according to the Company policies and other applicable local laws.

HOW TO MAKE A REPORT ON ANY BREACH

Any alleged or suspected improper conduct must be disclosed using the procedures provided for in the Company Whistleblowing Policy as adopted for your jurisdiction, a copy of which is available from your Integrity and Governance Department.

FURTHER CLARIFICATIONS

Should you require further clarification with regards to this Policy and Guidelines, depending on the subject concerned, you should consult your Integrity and Governance or Head of Department.

REGISTERING ANY CONFLICTS OF INTERESTS, GIFTS AND CORPORATE HOSPITALITY

All conflicts of interests (potential or real) and matters related to giving or receiving gifts / entertainment / corporate hospitality will be registered according to the policies and procedures of the Human Resource Department. Please liaise with your Integrity and Governance personnel for further information on the procedures for registration.

'COMPANY reserves the right to amend this Anti-Bribery and Anti-Corruption Policy and Guidelines as whenever it deems fit'

APPENDIX 1: GIFT ACTIVITY REPORTING FORM

All employees must declare & report all gifts (which is valued at **RM100 or more**), entertainment and corporate hospitality within **three (3) working days** upon receiving the same, to Integrity and Governance Department.

Similarly, any meal treats (any value) accepted must also be declared in this form.

The **physical gifts** valued at RM100 or more must be deposited to Integrity and Governance Department within **three (3) working days** upon receipt of the same.

Integrity and Governance Department will seek the CEO's direction on best way to dispose the gift.

For gifts worth less than RM100, employee could accept the same with no declaration & report is required.

As for **hampers** (any value), no declaration & report is required **but** the employee **must** share the hampers amongst colleagues/ placed at pantry or common areas.

Employee Name	:	
Position	:	
Department	:	
Date		

ITEM RECEIVED/MEAL DATE	DESCRIPTION OF ITEM /MEAL (FOR MEALS, PLEASE INCLUDE VENUE)	ESTIMATED /ACTUAL VALUE RM	GIVEN BY (GIVER NAME AND ORGANIZATION)
1			
2			

ADMINISTRATIVE			
HOD's Remarks:	:		Name: Signature: Date:
I&G's Remarks	:		Name: Signature: Date:
CEO's Remarks	:		Name: Signature: Date:

APPENDIX 2: DUE DILIGENCE CHECKLIST WITH THIRD PARTIES

DECLARATION FORM BY THIRD PARTIES

1. We are the contractors / vendors / suppliers / solicitors / agents / consultants / joint venture partners / introducers / government intermediaries of the Company.
2. We hereby declare that we will comply with:
 - i. All applicable laws and regulations relating to the Anti- Bribery Anti-Corruption Policy and Whistleblowing Policy.
 - ii. The following anti-corruption principles:
 - a. Committing to promote values of integrity, transparency, accountability and good corporate governance.
 - b. Prevention of corruption and fighting any form of corrupt practice.
 - c. Supporting anti-corruption initiatives led by the government and the authorities.

(hereinafter collectively referred to as "the requirements")
3. We have not been convicted nor are we subject to any investigation, inquiry or enforcement proceedings by the relevant authorities of any actual or suspected breach and will report any actual or suspected breach as soon as reasonably practicable and to the extent permitted by the law, to the Company.
4. We undertake to promptly inform the Company of any breach and/ or alleged/ suspected breach of the requirements and cooperate with the Company in any investigation of such breach involving the staff.
5. We acknowledge that the provisions set out in this declaration form shall form part of the terms and conditions of our appointment and/ or contract of service.
6. We further acknowledge that the Company has the right to suspend or terminate the contract/ agreement/ job and disqualify us from tendering for future contracts/ jobs if we were found to have breached the requirements or any other terms and conditions implemented by the Company pursuant to the contract/ agreement/ job.

Signature of Authorized Person : _____

Name of Company's Authorized Person : _____

Company's Name : _____

Company's Stamp : _____

Date : _____

DUE DILIGENCE CHECKLIST ON THIRD PARTIES

Tick (√) whether **YES** or **NO** on the Due Diligence Checklist below.

If you have answered **YES** to any of the statements, you have to be satisfied that the relevant information/ explanation/ justification is available/ procured/ documented prior to your engagement with the third parties.

NO.	DUE DILIGENCE CHECKLIST	YES	NO
RELATIONSHIP WITH THIRD PARTY			
1	There has been difficulty in obtaining the required information from the third party		
2	There are concerns or evidence of corruption (convictions) in respect of the third party		
3	There are allegations of corruption activity against the third party or any of its employees		
4	The third party does not have its own anti-corruption/ code of conduct/ anti-fraud/ compliance programme		
5	The third party does not have its own due diligence procedure in place for the sourcing of customers and procurement of vendors, subcontractors etc.		
6	The value of the contract secured by the third party is unreasonable		
7	There is evidence of adverse news related to the third party		
8	The third party does not have the necessary skills and experience to provide the services for which they will be contracted		
9	The third party is not charging a fair market price for their services <i>(a company paying bribes may often charge more for its services in order to create a slush fund to pay bribes)</i>		
10	The third party is being associated with disreputable suppliers/ subcontractors etc.		
11	The third party is not readily and efficiently able to deal with the due diligence requirements of the Company or larger companies		
12	The third party ever requested urgent payments or unusually high commissions		

Tick (√) whether **YES** or **NO** on the Due Diligence Checklist below.

For any third party with positive public officials trace i.e. with **YES** answer any of the following due diligence set, and the department has decided to commence the relationship with whereby the interests are also not prohibited by the Company Code of Conduct Policy, the disclosure in the financing requisition/ RFP etc. is a mandatory.

NO.	DUE DILIGENCE CHECKLIST	YES	NO
THIRD PARTY AS A PUBLIC OFFICIAL			
1	The third party is a public official (as defined in the IACSOP)		
2	The owners, directors, shareholders, officers or any employees of the third party being current or former public officials		
THIRD PARTY'S DEALING WITH PUBLIC OFFICIAL			
3	The third party is recommended by a public official		
4	The third party will be interacting/ has any affiliations with public officials in order to perform the contract		
5	The owners, directors, shareholders, officers or any employees of the third party have personal, familial or any associations with public officials		
6	The third party has connections with public officials or government agencies		
7	The third party's employees (including immediate family members of the employees) have connections with public officials		

Tick (√) whether **YES** or **NO** on the Due Diligence Checklist below. In the event the answer to any of the checklist below is **YES** then the respective department have to be satisfied that all of the red flags are sufficiently mitigated.

NO.	DUE DILIGENCE CHECKLIST	YES	NO
FINANCIAL BACKGROUND			
1	Any identified issue on repeated payments made to an unidentified third party, or an identified third party but for unclear reasons?		
2	Any identified issue on significant payment to an unidentified third party, or an identified third party but for unclear reasons?		
3	Are there any payments with non-transparent recipient or reason for payment (for instance, consulting expenses)?		
4	Is there any unusual frequency of payments made by the customer to its suppliers/ vendors/ contractors etc. or made by the customer's customer to the customer?		
5	Is there any unusual value of payments made by the customer to its suppliers/ vendors/ contractors or made by the customer's customer to the customer?		
6	Is there any excessive expenses which could be an indication of bribes?		