



## **ANTI-BRIBERY & CORRUPTION POLICY STATEMENT**

### **1.0 INTRODUCTION**

Dataprep Group of Companies (collectively referred to as the “Group”) conduct its business in a legal and ethical manner. The Group requires all employees (including full time, probationary, contract and temporary staff) (“Employees”) and Directors of the Group to be committed to acting professionally and with integrity in their business dealings.

The Group will take reasonable and appropriate measures to ensure that its businesses do not participate in corrupt activities for its advantage or benefit. This Anti-Bribery and Corruption Policy (“Policy”) sets out the parameters to prevent the occurrence of bribery and corrupt practices in relation to the businesses of the Group. This Policy is in line with the applicable laws and regulations in Malaysia and intends to fulfil the requirements set forth in The Guidelines on Adequate Procedures issued on 10 December 2018 by the Prime Minister’s Office pursuant to Section 17A (5) of the Malaysian Anti-Corruption Commission Act 2009 (“MACC Act”).

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

#### **2.1 Conflicts of Interest**

A Conflict of Interest may arise in a situation where an individual is in a position to take advantage of his/her role in Group for his/ her personal benefit, including the benefit of his/her family and/or friends and/or company. This would undermine the duties of good faith, fidelity, diligence and integrity as expected by the Group from its Personnel in the performance of the Personnel’s duties and obligations.

All Personnel should avoid situations in which personal interest could conflict with their professional obligations or duties. Personnel must not use their position, official working hours, company’s resources and assets, or information available to them for personal gain or to the company’s disadvantage.

In situations where a conflict does occur, Personnel are required to declare the matter as per the **Staff Manual**.

## **2.2 Gifts, Hospitality and Entertainment**

This Policy does not prohibit normal business or corporate gifts, hospitality and entertainment, as long as it is reasonable, appropriate, modest and bona fide corporate hospitality.

Some examples of acceptable gifts and/or benefits are as follows:-

- a) token gifts offered in business situations or to all participants and attendees for example, work related seminars, conferences, trade and business events;
- b) gifts presented at work-related conferences, seminars and/or business events;
- c) gifts given in gratitude for hosting business events, conferences and/or seminars;
- d) refreshments or meals during meetings or as participants of work-related conferences and/or seminars; and meals for business purposes.
- e) gift, hospitality and entertainment to be done in an open and transparent manner.

When in doubt, Personnel are to consult the Compliance Officer.

As a general principle, the Directors and Employees **should not accept** or give a gift to a third party if it is made with the intention of influencing the third party to obtain or retain business, or in exchange for favors or benefits. In addition, lavish or unreasonable gifts or hospitality should not be accepted as such gifts or hospitality may be perceived or interpreted as attempts by the Directors or Employees to obtain or receive favorable business treatment for personal benefits.

The Directors and Employees should be mindful in giving or receiving gifts or hospitality as it could be perceived as a way of improperly influencing the decision making of the recipient. Hence, the intention behind the gifts or hospitality should always be considered.

## **2.3 Facilitation Payments**

Group adopts a strict policy of disallowing the use of facilitation payments in its business. Facilitation payment is an unofficial payment or other provision made personally to an individual in control of a process or decision. It is given to secure or expedite the performance of a routine or administrative duty or function.

Personnel shall decline to make the payment and report to GMD/CCO immediately when they encounter any requests for a facilitation payment. In addition, if a payment has been made and Personnel are unsure of the nature, the GMD/CCO must be notified immediately, and the payment shall be recorded accordingly. Personnel must not promise or offer, or agree to give or offer, facilitation payments to any other party.

## **2.4 Third Party and Agencies**

All third parties, including agents, suppliers and joint venture partners should be made aware of this Policy and the arrangements with them shall be subject to clear contractual terms, including specific provisions requiring them to comply with minimum standards and procedures relating to bribery and corruption.

## **2.5 Political Contribution**

Subject to any prevailing law that governs political contribution, the Group may make contribution to political parties or candidates. All political contributions require approval from the Head of Division or the GMD/CCO. The records of all political contributions shall be kept by the Group or Divisional Corporate Division.

## **2.6 Charitable Contribution**

Charitable support and donations are acceptable (and indeed are encouraged), whether of in kind services, knowledge, time, or direct financial contributions. However, Directors and Employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. No donation can be offered or made without the prior approval of the Head of Division or GMD/CCO. The records of all charitable contributions shall be kept by the Group or Divisional Corporate Communications Department.

## **3.0 COMPLIANCE WITH THE LAW**

The Group will comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions within which the Group operates. Directors and Employees are expected to understand and comply with the Malaysian Anti-Corruption Commission Act 2009 (including any amendment thereof). Any breaches of this Policy may tantamount to a breach of Section 17A of the MACC Act in which in the event any commercial organisation commits an offence under Section 17A shall, on conviction, be liable to:-

- a) A fine not less than 10 times the sum or value of gratification or RM1million, whichever is higher; OR
- b) Its officers concerned, imprisonment for a term not exceeding 20 years, or BOTH.

The Group reserves the right to report any actions or activities suspected of being criminal in nature to the police or other relevant authorities.

Group shall conduct regular risk assessments to identify the Bribery and Corruption risks affecting the business, set anti-bribery and corruption objectives, and assess the effectiveness of the controls in achieving those objectives.

#### **4.0 TRAINING AND AWARENESS**

The Group shall conduct periodical awareness programmes for all its Personnel on Group's position regarding anti-bribery and corruption, integrity and ethics.

#### **5.0 REPORTING OF VIOLATIONS OF THE POLICY**

Any Employee who knows of, or suspects, a violation of the Policy, is encouraged to whistle blow or report the concerns through the mechanism set out under the Group's **Whistle Blowing Policy & Procedures**. The provision, protection and procedure of the Whistle Blowing Policy & Procedures for reporting of the violations of the Policy are available on the Group website. No individual will be discriminated against or suffer any sort or manner of retaliation for raising genuine concerns or reporting in good faith on violations or suspected violations of the Policy. All reports will be treated confidentially.

**MOHAMAD SABIR MOHAMAD SABRI**

**Group Managing Director**

[1 June 2020]