



Anti-Bribery and Corruption Policy

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PART I: INTRODUCTION

1.0 TP TEC GROUP'S ANTI-BRIBERY AND CORRUPTION POLICY

- 1.1. Ethics, honesty and integrity are cornerstones of our approach to doing business.
- 1.2. TP TEC Holding Sdn Bhd and its subsidiaries (“**TP TEC Group**” or “**Group**”) supports the national anti-bribery and corruption effort by continuing to promote high standards of integrity and good governance, emphasising integrity and ethics in our business conduct, and ensuring compliance with all applicable laws and regulations in the countries where we operate.
- 1.3. Bribery and corruption is strictly prohibited. We take a zero-tolerance approach to all forms of bribery and corruption both within our organisation and in respect of the actions of our agents, business partners, contractors, service providers and other third parties and associated persons.
- 1.4. We are committed to upholding the highest ethical standards in our workplace and in all our business dealings and relationships wherever we operate.
- 1.5. We will conduct our business operations and activities in full compliance with the Malaysian Anti-Corruption Commission Act 2009 (“MACC Act 2009”), and also the applicable anti-bribery and corruption laws of all countries in which we conduct our business.
- 1.6. The purpose of this Policy is to:
 - 1.6.1 set out our responsibilities and the responsibilities of those working for us for observing and upholding our stance against bribery and corruption; and
 - 1.6.2 provide information and guidance to those working for us on how to recognize bribery and corruption issues and the procedures for dealing with such issues.
- 1.7. This Policy should be read in conjunction with TP TEC group's Code of Conduct and Business Ethics and the relevant standard operating procedures referred to in this Policy.
- 1.8. This Policy cannot provide definitive answers to every bribery related question. Instead, this Policy aims to provide you with the tools to identify potential bribery and corruption issues. When these issues arise, immediately contact the Director for further guidance.

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2. DEFINED TERMS

- 2.1 **Director** means a Managing Director of TP TEC group's.
- 2.2 **Employee** means any individual working at any level or grade, including staff, trainees, volunteers and interns of TP TEC group's r, whether full-time, part-time, permanent, fixed-term or temporary.
- 2.3 **Gifts** are anything of value (such as money or cash equivalent vouchers, goods, services, loans, tickets and prizes) given to any person or organisation without any expectation of anything in return or without any intention to influence someone to act improperly.
- 2.4 **Head** means, in relation to an Employee, the head of a business unit, head of a support unit, head of a Department, Director, within the Employee's reporting line.
- 2.5 **Hospitality** includes the following advantages that may be given to any person or organisation including their family members and business partners:
- 2.5.1 entertainment (such as golf activities, tickets to sporting events etc.);
- 2.5.2 meals and drinks; and
- 2.5.3 travel and/or accommodation (whether or not packaged with conferences, seminars, study trip or other benefits).
- 2.6 **Public Official** means an individual who: (i) holds a legislative, administrative or judicial position of any kind; or (ii) who performs public duties or exercises a public function for or on behalf of a country or territory (or subdivision thereof) or for any public agency or enterprise (including government linked companies and enterprises, and state-owned or state-controlled companies and enterprises); or (iii) is an official or an agent of a public international organisation (such as the United Nations or similar body).
- 2.7 **TP TEC Group** means TP TP TEC Holding Sdn Bhd and its subsidiaries ("**TP TEC Group**" or "**Group**") and any business entity which is directly or indirectly (i) wholly or majority owned; or (ii) controlled; or (iii) managed by TP TEC Holding Sdn. Bhd.
- 2.8 **Third Party / Third Parties** includes anyone who at any time performs (or who is intended to perform) services for or on behalf of any entity in TP TEC Group, including anyone who is engaged (by contract or otherwise) or paid to represent any entity in TP TEC Group such as suppliers, distributors, business contacts, agents, representatives, intermediaries, middlemen, introducers, sponsors, consultants, contractors, advisers, and potentially Public Officials.

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3. WHO IS COVERED BY THE POLICY?

- 3.1 This Policy applies to all Employees, Directors and Third Parties wherever located.
- 3.2 Employees and Directors are expected, as part of their normal duties, to do the following:
- 3.2.1 familiarize themselves with the Policy and related policies;
 - 3.2.2 participate in any anti-corruption training provided by TP TEC Group;
 - 3.2.3 familiarize themselves with and comply with any policy and procedures which apply to their jobs; and
 - 3.2.4 immediately report any actual or suspected bribe, allegation of bribery made or offered by a third party, an Employee or a Director, or breaches of policies and procedures which come to their attention.
- 3.3 In this Policy, any reference to “you” or “your” means any person subject to this Policy

4. WHO IS RESPONSIBLE FOR THE POLICY?

- 4.1 The Director continues to lead TP TEC Group 's anti-bribery and corruption efforts and has overall responsibility for ensuring this Policy complies with TP TEC Group’s legal and ethical obligations.
- 4.2 The Director has primary and day-to-day responsibility for implementing and overseeing this Policy, and for monitoring its use and effectiveness.
- 4.3 The Director is responsible for reviewing the adequacy of this Policy and regularly reporting on its implementation and matters arising, taking into account relevant developments and evolving international laws and industry standards.
- 4.4 Every Employee of TP TEC Group, Director and any Third Party acting on behalf of TP TEC Group are responsible for understanding the Policy.
- 4.5 Management at all levels are responsible for ensuring that those reporting to them are made aware of and understand this Policy and are given adequate and regular training on it. The nature and frequency of the training will vary depending on the role of the individual and the likelihood that such person or entity will be exposed to corruption issues. All Employees must ensure that

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they complete any anti-corruption training that they are required to undertake as directed by TP TEC Group's Director and management, from time to time.

5. WHAT IS BRIBERY?

- 5.1 Bribery is the direct or indirect giving, promising, offering, receiving, agreeing to receive, requesting or accepting of any advantage or thing of value to or from any person in order to influence them corruptly or improperly in the exercise of their duty or to be so influenced, or to retain, secure or reward an improper benefit (**Bribery**). The advantage may include loans, gifts, entertainment, charitable contributions, offers of employment, airline tickets, vouchers, sponsorship or favours.
- 5.2 Employees, Directors and Third Parties must not engage in Bribery in any form and must avoid any conduct that creates even the appearance of Bribery occurring.
- 5.3 An example of giving a bribe would be you offering the representative of a potential customer or a Public Official tickets to a prestigious golf tournament, in return for providing business or for granting a government project to TP TEC Group. In this example you would be committing an offence as you are making the offer to gain a commercial and contractual advantage. TP TEC Group may also be found to have committed an offence because the offer has been made to obtain business for TP TEC Group (whether or not TP TEC Group are aware of the bribe). It may also be an offence for the representative of the potential customer or Public Official to accept your offer.
- 5.4 Please remember that the recipient of the bribe need not be the person who has agreed to help the person paying the bribe.
- 5.5 Particular care should be exercised when dealing with Public Officials, especially in countries where Bribery is a known problem.

6. PENALTIES FOR BRIBERY

- 6.1 In most countries, Bribery is a serious offence under local law. For instance, in Malaysia, Bribery is punishable by heavy fines and individuals may face imprisonment. Any conviction for Bribery in Malaysia or another country will also cause serious reputational damage to TP TEC Group and may severely damage TP TEC Group's business.
- 6.2 Bribes given or offered by any person carrying out services for TP TEC Group in order to retain business (or an advantage in the conduct of business) for TP TEC Group may result in TP TEC Group being convicted of an offence of

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failing to prevent that bribery, whether or not TP TEC Group knew of the existence of the bribe.

- 6.3 Non-compliance with this Policy may result in severe criminal or civil penalties which will vary according to the offence and which could include imprisonment. Anyone acting in contravention of this Policy may also face immediate disciplinary action up to and including termination for cause.
- 6.4 TP TEC Group will also inform and work with the relevant local authorities in relation to any case of Bribery committed by an Employee, Director or Third Party.

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PART II: RISK AREAS

7. RISK AREAS AND TP TEC GROUP'S RESPONSE

- 7.1. TP TEC Group has conducted a risk assessment of TP TEC Group 's exposure to bribery risks and TP TEC Group has a Code of Conduct and Business Ethics, standard operating procedures and staff training programmes to manage those risks.
- 7.2. The potential risk areas for TP TEC Group include:
- 7.2.1 Engagement of Third Parties;
 - 7.2.2 Interaction with Public Officials;
 - 7.2.3 Sponsorship and donations;
 - 7.2.4 Gifts and hospitality;
 - 7.2.5 Facilitation payments and kickbacks;
 - 7.2.6 Financial books and records, and internal controls; and
 - 7.2.7 Recruitment.
- 7.3 We summarise TP TEC Group 's policy in respect of the potential risks highlighted above in the following section.

8. THIRD PARTIES

- 8.1 All dealings with Third Parties shall be carried out with the highest ethical standards and shall comply with all relevant laws and regulations in Malaysia or in the relevant country. Employees and Directors must not circumvent TP TEC Group's policies and procedures by using a Third Party to do what TP TEC Group may not do itself.
- 8.2 Payments to a Third Party, when it is known or believed that there will be a resulting bribe to a Public Official, an individual, or any entity, are prohibited.
- 8.3 We must ensure that we know all Third Parties whom we engage and that adequate due diligence checks have been carried out on these Third Parties.
- 8.4 Prior to TP TEC Group retaining or entering into a transaction that involves a Third Party or involves other circumstances where there may be a concern

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about compliance with Malaysian or applicable local anti-bribery laws, TP TEC Group shall conduct an appropriate "risk-based due diligence" review to assure TP TEC Group that the Third Party is a legitimate and trustworthy individual, company or enterprise that will comply with anti-bribery laws and this Policy and that other potential corrupt practices concerns are properly reviewed.

8.5 We expect that all Third Parties share our values and ethical standards and, in particular, comply with this Policy. Relationships with Third Parties must be appropriately documented using approved terms and conditions that may include obligations to comply with and a right to terminate for breach of anti-corruption laws and/or this Policy, prohibitions against making or receiving any bribes on TP TEC Group's behalf, anti-corruption related representations and warranties, requirements to keep proper books and records and the right to conduct audits of the books and records.

8.6 In particular, TP TEC Group will take measures reasonably within its power to ensure that:

8.6.1 Any payment made to a Third Party represents no more than the amount outlined in the written agreement with the Third Party and is an appropriate remuneration for legitimate services rendered by such Third Party;

8.6.2 No part of any such payment is passed on by the Third Party as a bribe or is otherwise in contravention of applicable laws or this Policy;

8.6.3 It maintains a record of the names and contract terms for all Third Parties who are retained by it in connection with transactions with Public Officials; and

9. INTERACTION WITH PUBLIC OFFICIALS

9.1 In the normal course of TP TEC Group 's business, meetings may be arranged with Public Officials (in Malaysia or in other countries).

9.2 All meetings with Public Officials must be held in an open and transparent manner so as to avoid any perception of corrupt behaviour being created. All meetings with Public Officials must be properly minuted and the meeting minutes filed appropriately.

9.3 As a general rule, Public Officials shall not be engaged by TP TEC Group to provide TP TEC Group with services where such Public Officials, by their appointment or nature of their duties, have influence over any transaction

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and/or development undertaken by TP TEC Group or is in a position of conflict of interest.

- 9.4 Payment of reasonable and *bona fide* business expenditures to Public Officials is permitted in certain circumstances. These expenditures must be for a *bona fide* and legitimate business purpose and directly relate to the promotion, demonstration or explanation of TP TEC Group's business products or services, or the execution or performance of a contract with a foreign government or agency. Such payments must be reasonable and appropriate under the circumstances, incurred in good faith, based on industry norms, in compliance with applicable laws and regulations and transparent.

10. SPONSORSHIPS & DONATIONS

- 10.1 TP TEC Group may make charitable donations. However those donations must be ethical and legal under Malaysian law and/or the relevant local laws (where applicable).

11. GIFTS AND HOSPITALITY

- 11.1 Excessively lavish or otherwise inappropriate gifts and/or hospitality may constitute Bribery.

11.2 GIFTS

As a general rule, all Employees, Directors and Third Parties are prohibited from giving and receiving any form of Gifts unless they are permitted under section A of Schedule 2 of this Policy. This prohibition of giving and receiving Gifts extends to family members, representatives and/or business partners of Employees, Directors and Third Parties.

11.3 HOSPITALITY

As a general rule, all Employees, Directors and Third Parties are prohibited from giving and receiving any form of Hospitality unless they are permitted under section B of Schedule 2 of this Policy. This prohibition of giving and receiving Hospitality extends to family members, representatives and/or business partners of Employees, Directors and Third Parties.

12. FACILITATION PAYMENTS & "KICKBACKS"

- 12.1 **Facilitation payments** are typically small, unofficial payments made to secure or expedite a routine task or service by a Public Official or other

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person to which an individual or company is otherwise legally entitled (such as speeding up the processing of a visa application).

- 12.2 **"Kickbacks"** are typically payments made in return for a business favour or advantage.
- 12.3 Facilitation payments and "kickbacks" are corrupt payments and it is TP TEC Group's policy that they shall not be made or accepted.
- 12.4 You must avoid any activity that might lead to, or any activity that may suggest, that a facilitation payment or kickback will be made or accepted by TP TEC Group.

13. FINANCIAL BOOKS AND RECORDS, AND INTERNAL CONTROLS

- 13.1 TP TEC Group maintains detailed and accurate books and records and maintains a system of internal controls that ensures accountability for all of TP TEC Group 's funds and assets. TP TEC Group will maintain and make available for inspection accurate books and records, in reasonable detail, that accurately and fairly document all financial transactions, risk assessments and due diligence.
- 13.2 Books and records include: accounts, correspondence, invoices, memoranda, tapes, discs, papers, books and other documents or transcribed information of any type.
- 13.3 All transactions must be truthfully reported pursuant to the relevant regulations, policies and/or standard operating procedures, as the case may be.
- 13.4 No payments may be made without correct supporting documentation and in particular any "off-the books" payments or other fraudulent practices: such as falsifying books and records to disguise or cover up payments, payment of false or fraudulent invoices, miscoding of the general ledger or falsifying expenses reports (particularly to hide improper payments) are contrary to this Policy and are prohibited.
- 13.5 Please refer to the relevant standard operating procedures for more detailed guidance on the limited scenarios where cash is permitted to make payments which are small in value.

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14. RECRUITMENT PROCEDURES

- 14.1 While there is no absolute prohibition on hiring persons recommended by others, hiring decisions ought not be based on TP TEC Group's business transactions. Offers of employment should not be given in exchange for any benefit to be received by TP TEC Group, and Employees or Directors should not offer employment in order to seek any advantage in any business activity.
- 14.2 In accordance with that procedure, all new recruits must be subject to the prescribed pre-employment screening procedures.
- 14.3 The Head responsible for recruitment must ensure that all pre-employment screening procedures have been concluded satisfactorily before any offer of employment is made.
- 14.4 All existing employees and Directors of TP TEC Group (at the date of this Policy) should be subject to appropriate due diligence checks as part of TP TEC Group's risk assessment.

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PART III: YOUR RESPONSIBILITIES

15. YOUR RESPONSIBILITIES

- 15.1 You must ensure that you read, understand and comply with this Policy and the relevant standard operating procedures.
- 15.2 You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- 15.3 You must notify your Head as soon as possible if you genuinely believe or suspect that a breach of this Policy has occurred, or may occur in the future.
- 15.4 You should be vigilant of the warning signs of Bribery (referred to here as "red flags"), set out in Schedule 1 to this Policy.
- 15.5 The prevention, detection and reporting of Bribery are the responsibility of all those working for TP TEC Group or under TP TEC Group's control.
- 15.6 It is a disciplinary offence for you to not comply with the terms of this Policy.

16. HOW TO RAISE A CONCERN

- 16.1 You should raise concerns about any occurrence or genuine suspicion of misconduct or violation of this Policy at the earliest possible stage by reporting any occurrence or suspicion immediately to the Director.
- 16.2 If you are unsure whether a particular act constitutes Bribery, or if you have any other queries, these should be raised with your Head or the Director.
- 16.3 Once you have reported a suspicion or concern the matter should not be discussed with any person other than those responsible for investigating it until otherwise notified or the information is made public.

17. PROHIBITION AGAINST RETALIATION — PROTECTION FOR THOSE REPORTING BRIBERY

- 17.1 We understand that persons who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions.



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- 17.2 All reports of wrongdoing or improper conduct will be treated in confidence and only informed to persons on a need-to-know basis to safeguard the interests of TP TEC Group and also to ensure that any processes undertaken will not be compromised.
- 17.3 TP TEC Group provides assurance that there will be no retaliation, victimisation or repercussions on the employee for making genuine reports on violation of this Policy even if further investigation reveals that the employee is mistaken regarding the facts, rules and procedures involved.

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PART IV: GOING FORWARD

18. TRAINING AND COMMUNICATION

- 18.1 It is everyone's personal responsibility to understand this Policy and the relevant standard operating procedures and your role in following the Policy and procedures.
- 18.2 TP TEC Group is designing a training programme which expands on all of the points raised in this Policy. That training will be designed for Employees, Directors and Third Parties.
- 18.3 Completion of anti-bribery and corruption training is compulsory for all Employees.
- 18.4 Training on this Policy forms part of the induction process for all new Employees.
- 18.5 All existing Employees and Directors will receive regular, relevant training on how to implement and adhere to this Policy.
- 18.6 Training will be also provided to Third Parties, as appropriate. It shall be compulsory for Third Parties to attend such training when invited or requested to attend by TP TEC Group.

19. MONITORING AND REVIEW

- 19.1 All persons covered by this Policy are responsible for the success of this Policy and should ensure they use it to disclose any suspected danger, wrongdoing or improper conduct.
- 19.2 This Policy may be amended from time to time, and it is responsibility of each Employee and Director to keep himself/herself updated.

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SCHEDULE 1

POTENTIAL RISK SCENARIOS: "RED FLAGS"

The following are a list of possible red flags that may arise during the course of you working for TP TEC Group and which may raise concerns under various anti-bribery and corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for TP TEC Group, you must promptly inform your Head:

I THIRD PARTIES

- a) You become aware that a Third Party engages in, or has been accused of engaging in, improper business practices.
- b) You learn that a Third Party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with Public Officials that may involve it making an unofficial payment to that Public Official.
- c) A Third Party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us.
- d) A Third Party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.
- e) A Third Party requests that payment is made to a country or geographic location different from where the Third Party resides or conducts business.
- f) A Third Party requests an unexpected additional fee or commission to "facilitate" a service.
- g) A Third Party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services.
- h) A Third Party requests that a payment is made to "overlook" potential legal violations.
- i) You receive an invoice from a Third Party that appears to be non-standard or customised.
- j) A Third Party refuses to comply with an audit request on the tendering or contracting process.
- k) A Third Party insists on the use of side letters or refuses to put terms agreed in writing.
- l) You notice that TP TEC Group has been invoiced for a commission or fee payment that appears large given the service(s) stated to have been provided.

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- m) A Third Party pressurises you to urgently make payments or make payments ahead of schedule for no apparent reason.
- n) Normal tendering procedures are bypassed and/or a specific contractor is favoured for a project for no apparent reason.

II INTERACTION WITH PUBLIC OFFICIALS

- a) You are asked to pay a fee (whether apparently legitimate or not) to an individual Public Official personally and not to the relevant government department.
- b) You are asked to pay a fee (whether apparently legitimate or not) in cash or in a cash equivalent and no official receipt is provided.
- c) You are asked to approve the travel expenses or entertainment expenses of a Public Official, but you can find no evidence of proper authorisation by TP TEC Group (under the relevant standard operating procedure) for that expense.

III SPONSORSHIPS & DONATIONS

- a) You are asked to make a donation to a political party in order to show appreciation for TP TEC Group winning a public contract.
- b) You are asked if TP TEC Group can contribute a lump sum for "charity" or for a "development project" in the local area, however further details are not given, even on request.

IV GIFTS AND HOSPITALITY

- a) You are given a gift of cash or a cash equivalent such as vouchers that may be exchanged for goods such as electronics, air miles, gold, silver or bearer bonds.
- b) You are given a very high value gift.
- c) You are asked to authorise or pay travel or entertainment expenses for a Public Official for no apparent business reason.
- d) You are asked to pay for entertainment at night clubs or for provision of sexual favours.
- e) You are offered lavish or high-value travel/trips, entertainment other benefits (i) before commencing or continuing contractual negotiations or (ii) prior to or in the midst of an award of a contract to a Third Party.

V FACILITATION PAYMENTS & "KICKBACKS"

- a) You are expected to make a payment (sometimes referred to as "coffee money" or a gratuity) to a Public Official in order to expedite/approve on an application.
- b) An agent assisting you in a land purchase asks for a lump sum amount to ensure the sale goes through without specifying what the money is for.
- c) A Public Official asks for a special administrative fee to allow you to submit an application and there is no official record of that fee being payable.

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VI FINANCIAL BOOKS AND RECORDS, AND INTERNAL CONTROLS

- a) You notice that unusual paying arrangements have been proposed for a particular transaction (such as upfront payments for services or payments in cash to a Third Party's bank account in an overseas country).
- b) An invoice received from a recognised Third Party business partner appears to be unusual, for example it has a different type face, the payee details are different to usual, and/or the invoice number appears to be unusual.
- c) An invoice for a large amount is received without any supporting documentation, despite the sender having been informed that supporting documentation is required.
- d) The amounts indicated on an invoice that you have received are far more than you would have expected for the service(s) provided.
- e) You notice that the description given on the invoice is false or inaccurate.

VII RECRUITMENT

- a) You find out that a prospective employee has been the subject of bribery or corruption investigations in the past.
- b) A prospective employee refuses to provide information on whether they have been subject to a bribery or corruption investigation before.
- c) A pre-employment check on a prospective employee identifies that they have been convicted of a criminal offence relating to bribery or corruption, or that check reveals that the prospective employee has not been truthful when declaring whether they have been subject to investigations on or convicted of bribery or corruption.

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SCHEDULE 2

SECTION A - PERMITTED GIFTS

1. Corporate branded stationery or mementos such as plaques, pens, photo frames and calendars, bouquet of flowers, box of chocolates, fruit basket, commemorative books or other appropriate reading materials given or received as a token of appreciation. For example:
 - (a) in relation to hosting or organising corporate or industry related events such as conferences, seminars, trade shows, presentations, talks or other events;
 - (b) as an invited speaker or panellist at a corporate or industry related events such as conferences, seminars, trade shows, presentations, talks or other events.
2. Promotional gifts such as t-shirts, pens, bags and other articles that are handed out by the hosts or organisers to all invitees or participants at corporate or industry related events such as conferences, seminars, trade shows, presentations, talks or other events.
3. Gifts which are appropriate to the circumstances such as festive occasions, cultural tradition or local custom, and are considered reasonable within the local business community and permitted by local laws. Such Gifts shall not exceed, in any case, RM500 (or its equivalent in value), approved in advance by the relevant Head.

SECTION B - PERMITTED HOSPITALITY

1. Occasional dining and entertainment such as refreshments or meals offered or received in the course of business meetings or to foster good business relationships which is considered reasonable within the local business community. Such dining and entertainment must be within general ethical boundaries, not extravagant or unjustifiably expensive or overly frequent. It is advised that RM500 be used as a general guide.