



ANEKA JARINGAN HOLDINGS BERHAD

(Registration No.: 201801030681 (1292707-D))

ANTI BRIBERY AND CORRUPTION POLICY

This anti bribery and corruption policy statement is for the internal use of Aneka Jaringan Holdings Berhad group of companies. The Company shall review and update this document from time to time.

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ANEKA JARINGAN HOLDINGS BERHAD

POLICY STATEMENT ON ANTI-BRIBERY AND CORRUPTION

The Management in Aneka Jaringan Holdings Berhad and its subsidiaries (“the Group”) applied the most stringent standards of ethical conduct, integrity and accountability in the conduct of all our business activities and operations in complying with all the rules, regulations and laws pertaining to anti-bribery and corruption.

The Management will not tolerate any staff or workers in the Group who are caught indulging in such activities in any form. All employees and workers are forbidden in soliciting whether directly or indirectly, accepting or offering any gratification in any manner or form whilst in the employment of the Group. Any staff and workers caught breaching this policy shall be terminated immediately without recourse as well as subject to the penalties of the local laws and regulations pertaining to such acts.

The Board and Management are committed to implementing and enforcing stringent processes to prevent, eliminate and monitor to ensure that such activities do not happen. Aneka Jaringan Group shall provide all the employees and workers the necessary avenue to make any reports on any improper conduct as governed by our whistle blowing policy and have direct access to the Board and Management pertaining to any anti bribery and corruption issues.

1.0 INTRODUCTION

1.1 Purpose

Aneka Jaringan Holdings Berhad and its subsidiaries (“the Group”) are committed to conduct all business dealings with upmost ethics and integrity as one of its core values. The Group has adopted a **ZERO TOLERANCE** approach to any incidents of bribery or corruption in any forms.

This policy sets out the Group’s position on all matters regarding bribery and corruption in any form that the Group might face in its daily business operations. It also provides the guidelines for the staff on what to do in the event that they are face with such acts of inducements or temptations in the course of the execution of their duties.

Under the Malaysian Anti-Corruption Act 2009 (Revised 2018), bribery and corruption are criminal offences and the penalties include a fine of unlimited amount and/or twenty years imprisonment. The Directors and Management are liable in the event that any staff or worker of the Company commits such act of bribery or corruption.

1.2 Scope

This policy shall apply to all Directors, Management, staff and workers in the Group.

1.3 Definitions

Bribery / Corruption	any action of giving or receiving gratification which would be considered as an offence under MACC act “abuse of entrusted power for personal gain” (Transparency International). Include the action of bribery and as well acts of extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud and money laundering.
Inducement	Offer of incentive, gifts, payment on behalf, position of employment, entertainment, services
Gifts	any item of monetary value such as money, jewelleries and others given by one individual to another with the intention of creating or enhancing a relationship.
Donations/Sponsorship	payment or gratification in kind to a body, organisation
Gratification	means i. Money, donation, gifts, loan, fee, reward, property, financial benefits or other similar items of value ii. Offer of office or employment whether for self or family members, iii. Any value consideration of any kind, discount, commission, rebate, bonus, deductions iv. Services or favour of any description, payment of behalf v. Offer or undertaking whether conditional or unconditional of any future gratifications vi. Entertainment or hospitality of any kind

2.0 ACT OF BRIBERY AND CORRUPTION

An act of bribery or corruption occurs when any of the director, management, staff or workers offer money or other monetary inducements to a customer or receiving gratifications from suppliers with the intention to secure, expedite or circumvent processes and restrictions for projects, permits, procurements of materials or services or influence decision making processes.

3.0 DIFFERENT FORMS OF BRIBERY AND CORRUPTION

3.1 Gifts

The Group has a no gift policy in terms of receiving gifts from any parties other than corporate gifts with corporate logo which are deemed as of minimal value. In the same token, the Group can provide corporate gifts such as table calendars, pens, diaries which are of minimal value to customers & suppliers as souvenir for special events or traditional year end gifts.

All such gifts shall be received or provided under no obligation or expectation from all parties involved and shall be made openly to avoid any impression of ulterior motive behind the gifts giving or receiving.

3.2 Entertainment

The Group understands that it is common practice for staff to entertain or be entertained by customers and suppliers as part of the business relationship, especially during festive seasons. The Group's staff may be allowed to entertain on such occasion but the extent of such entertainment shall be within reasonable limit and within the extent that is legal.

In providing such entertainment, the staff has to ensure that it is made in good faith to promote goodwill and it should not be on an excessive basis or where it will be construed as with ulterior motive or bad intentions such as in exchange of favours or advantages.

In receiving of entertainment, the staff shall observe the same principles where such entertainments are within reasonable limits and are not excessive. Staff shall conduct themselves in such manner that they are not exposed to an environment where such entertainments can be construed as an exchange for favours or advantages.

3.3 Travel

There are occasions where due to the corporate events, projects and feasibilities studies, the staff may need to travel with customers or suppliers where certain expenses are paid or being paid for; in such circumstances the staff has to refer to the Head of Department where the purpose of the travel and itinerary has to be assessed such that there is no hidden agenda, motives or obligations. Under no condition shall any family members be allowed to be part of the group in the travel.

3.4 Facilitation Payments

Facilitation payments refers to unofficial payments made personally to an individual/corporate to secure or expedite performance of a process by an officer of a public body such as issuing of licenses, permits. Such payments are illegal and consider as corruption and the Group will not tolerate such action by any staff or senior management.

3.5 Sponsorships & Donations

The Group forbids any sponsorships or donations of any kind to any individual, corporate bodies, clubs or political parties. However, the Group can sponsor or donate to charitable bodies, local communities, educational bodies for the welfare of the public as part of its corporate social responsibilities program.

Such bodies has to be screened to ensure it is not part of a scheme to conceal corruption practices or to influence business decision. All such donations or sponsorships has to be done without any motive or intention of securing an advantage of any kind or to influence the outcome of a business process.

4.0 BUSINESS ASSOCIATES / PARTNERS

The Group is committed to ensure that any business partner/s that it intends to do business with shall comply with the Group's standard operating procedures and are thoroughly vetted. The Group expects all business partners on behalf of the Group to refrain from any form bribery or corruption and to adhere to this policy strictly.

Should any suspicion in the course of the business relationship arise, the Group will perform the necessary due diligence on the business partners and if proven, the Group shall seek an alternative provider of the good or services. Such due diligence shall include a risk assessment of potential bribery and checking of the partner's relationships with public officials and the reason why the partner is chosen. All business partners will be required to fill a verification and declaration form.

5.0 EMPLOYEES RESPONSIBILITIES

All employees are required to understand and comply to this policy and their responsibilities shall include:

- To ensure that they are familiar with the requirements and directives of this policy
- To raise any suspicious transactions to their immediate superiors
- To report any violations immediately to the appropriate channel

6.0 CONFLICT OF INTEREST

There are situations where a conflict of interest might arise due to personal interest that can interfere with the objective decision making of the business of the Group. All personnel shall refrain from making any decision if such situation arises and are strictly forbidden to use their position to make or influence any of the processes. If a staff shall find himself/herself in such situation, he/she shall report to their immediate superior and refrain himself/herself.

7.0 WHISTLEBLOWING

If any personnel suspect that this policy had been breached, they have a duty to inform their immediate superior or the Head of department of their concerns or raise their concerns via the channel as stated in the Group's whistleblowing policy.

8.0 MONITORING AND REVIEW OF POLICY

This policy shall be subject to regular monitoring and review so that it can be updated to ensure its relevance as part of the Group's continuous commitment to anti bribery and anticorruption effort.