



TPPT SDN BHD

ANTI-CORRUPTION AND BRIBERY POLICY

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TPPT SDN BHD ANTI-CORRUPTION AND BRIBERY POLICY

1. INTRODUCTION

TPPT Sdn Bhd (“TPPT” or the “Company”) has established and adopted this Anti-Corruption and Bribery Policy (“Policy”). TPPT is committed to conducting the business ethically and with integrity. This means avoiding practices of bribery and corruption of all forms in the Company’s daily operations.

This Policy provides principles, guidelines and requirements on how to deal with bribery and corrupt practices that may arise in the course of daily business and operation activities within, as well as complying with all applicable laws, which include compliance with the Malaysian Anti-Corruption Commission Act 2009 and the Malaysian Anti-Corruption Commission (Amendment) Act 2018 and any of its amendments or re-enactments that may be made by the relevant authority from time to time.

2. OBJECTIVE

The objective for the establishment of this Policy is to:

- 2.1 set out responsibilities to comply with laws against bribery and corruption;
and
- 2.2 provide information and guidance to those working for the Company on how to recognize and deal with corruption and bribery issues.

3. SCOPE AND APPLICATION

This Policy applies to all individuals working for TPPT at all levels, positions and grades (collectively the “Employees”) and the Board of Directors (the “Board”) whether permanent, full time, part-time, contract or temporary and any third parties associated with the Company. The associated third parties shall refer to any individual or organization that an associate may come into contact during the course of his/her engagement with TPPT, which may include but not limited to suppliers, contractors, agents, consultants, advocate & solicitors, joint-venture partners, outsourced personnel, distributors, advisers, government and public bodies including their advisors, representatives and officials.. These associates’ third parties in which TPPT is non-controlling are encouraged to adopt these or similar principles.

4. DEFINITIONS

The following definitions are included in this policy.

Benefits	Any form of advantages or profits gained by the Board, the Employees, and the Associated Third Parties
Bribery	Offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to that person’s duties, action or decision.
Corruption	The provision or receipt of monetary or non-monetary bribe or reward of high value for performing in relation to the Board, the Employees’ and the Associated Third Parties’ duties. This includes misuse of a public office or power for private gain or the misuse of private power in relation to business outside the realm of government.

Entertainment	The provision of recreation or accommodation or travel in connection with or for the purpose of facilitating entertainment of the kind mentioned above, with or without consideration paid whether in cash or in kind, in promoting or in connection with a trade or business activities and/or transactions
Facilitation Payments	A payment or other provision made personally to an individual in control of a process or decision. It is given to secure or expedite a routine or administrative duty or function.
Kickbacks	Any forms of payment intended as compensation for favorable treatment or other improper services. This includes the return of a sum already paid or due as a reward for awarding of furthering business.
Gifts	Any form of monetary or non-monetary such as goods, services, cash or cash equivalents, fees, rewards, facilities, or benefits given to or received by the Board, the Employees, and the Associated Third Parties, his or her spouses or any other person on his or her behalf, without any or insufficient consideration known to the Board, the Employees, and the Associated Third Parties.
Associated Third Parties	External parties with whom the Company has, or plans to establish, some form of business relationship. This may include Counterparties and Business Associates i.e. clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, solicitors, surveyors, suppliers, vendors, entrepreneurs, tenants, advisers, agents, distributors, representatives, intermediaries and investors.

5. ANTI-BRIBERY AND CORRUPTION POLICY

- 5.1 All forms of bribery and corruption are prohibited. The Company upholds a zero tolerance approach. In addition to bribery, Employees must not participate in any corrupt activity, such as extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.
- 5.2 The Company upholds all laws relevant to countering corruption and bribery. TPPT remain bound by the laws of Malaysia, including the Malaysian Anti-Corruption Commission Act 2009 and the Malaysian Anti-Corruption Commission (Amendment) Act 2018 and any of its amendments or re-enactments that may be made by the relevant authority from time to time in respect of our conduct both at home and abroad.
- 5.3 This Policy applies equally to its business dealings with commercial ('private sector') and government ('public sector') entities, and includes interactions with their directors, Employees, agents and other appointed representatives at all levels. Even the perception of bribery or corruption is to be avoided, in particular when dealing with Government officials.
- 5.4 No Employee will suffer demotion, penalty or other adverse consequences for refusing to pay or receive bribes or other illicit behaviour, even if such refusal may result in the company losing business or experiencing a delay in business operations.
- 5.5 The following steps are to be taken to address these risks:
- a) Implement this Policy;
 - b) Perform regular corruption risk assessment on operations and review findings;
 - c) Take steps to implement training programs for all individuals operating in areas of the Company that are identified as high risk; and

- d) Regular review and update to this Policy.

6. CORRUPTION, GIFTS, BENEFITS AND ENTERTAINMENT

- 6.1 All persons who are subject to this Policy shall NOT:
 - a) offer, give, or promise to give a bribe or anything which may be viewed as a bribe to secure or award an improper business advantage;
 - b) offer, give, or promise to give a bribe or anything which may be viewed as a bribe to a government official, agent or representative to facilitate, expedite, or reward any action or procedure;
 - c) request or receive a bribe or anything which may be viewed as a bribe from a third party knowing or suspecting it is offered with the expectation that it will obtain a business advantage for them; or
 - d) engage in any activity that might lead to a breach of this Policy.

- 6.2 All persons who are subject to this Policy are dissuade from accepting or receiving Gifts, Benefits and/or Entertainment from a third party or stakeholder of the Company that might create a sense of obligation and compromise their professional judgement or create appearance of doing so.

- 6.3 All persons who are subject to this Policy shall not accept or receive any Gift, Benefits and/or Entertainment from a third party or stakeholder of the Company except if it is made from gestures that are construed to be legitimate contribution and provided that the Gifts, Benefits and/or Entertainment are presented in good faith, which may be directly or indirectly offered as a result of or in anticipation of the Board's, Employee's and Associated Third Party's position or performance of duties with the Company or for cultivating good business relationship.

- 6.4 All persons who are subject to this Policy shall exercise proper care and judgement in respect of giving or receiving any Gifts, Benefits and/or Entertainment on a case-to-case basis.
- 6.5 All persons who are subject to this Policy shall take into consideration the impact of their actions with regards to how their actions are perceived (ie. Influencing their decision) and its impact towards the business operations of the Company prior to giving or accepting any Gifts, Benefits and/or Entertainment.
- 6.6 The use of good judgement is encouraged when giving or accepting the Gifts, Benefits and Entertainment. All the Benefits including Gifts and Entertainment must be :-
- a) reasonable in value;
 - b) infrequent in nature;
 - c) transparent and open;
 - d) not given to influence or obtain an unfair advantage; and
 - e) respectful and customary.

7. FACILITATION PAYMENT AND KICKBACKS

- 7.1 The Company adopts a strict stance that disallows Facilitation Payments or Kickbacks of any kind. All associates must avoid any activity that might lead to Facilitation Payments or Kickbacks being made or accepted.
- 7.2 Employees are expected to notify their immediate superior when encountered with any requests for a facilitation payment. In addition, if a payment has been made and Employees are unsure of the nature, their immediate superior must be immediately notified and consulted. They must also ensure that the payment has been recorded transparently.

8. ASSOCIATED THIRD PARTIES AND PROCUREMENT PROCESS

- 8.1 As part of the Company's commitment to comply with laws against bribery and corruption, TPPT expects all Associated Third Parties to refrain from bribery and corruption.
- 8.2 TPPT have processes and adheres to the system of internal controls on Associated Third Parties selection which should never be based on receipt of the Gifts, Benefits or Entertainment.
- 8.3 Selection of Associated Third Parties shall subject to clear adherence to this Policy and compliance with the available TPPT's Policies, Guidelines and Procedures.
- 8.4 Tender, bidding and procurement process is open to all qualified associates and no parties having the unfair advantage of separate, prior, close-door negotiations for a contract.
- 8.5 Appropriate assessment shall be conducted to individuals or third parties to ensure the business and background of the potential business associates are free from bribery elements or conflict of interest prior to procurement process.

9. GIFTS, DONATIONS AND SPONSORSHIPS

- 9.1 Employees are prohibited from directly, or indirectly, receiving or asking for (soliciting) gifts in the form of cash or cash equivalent, including gift certificates, loans, commissions, coupons, discounts or any other related forms from external parties. It is the responsibility of the Employees to inform external parties involved in any business dealings that TPPT practices a "No-Gift" policy.

- 9.2 The only form of gift-giving allowed to external parties is a corporate gift. Any gift-giving or event of hospitality is subject to approval according to Limits of Authority and must fulfil the following conditions:
- a) They are limited, customary and lawful under the circumstances;
 - b) They do not have or are perceived to have (by either the giver or the receiver), any effect on actions or decisions.
 - c) There must be no expectation of any specific favour or improper advantages from the intended recipients;
 - d) The independent business judgment of the intended recipients must not be affected;
 - e) There must not be any corrupt / criminal intent involved; and
 - f) The giving out of the gift and hospitality must be done in an open and transparent manner.
- 9.3 Donations and sponsorships in the form of charity may be permissible depending on the circumstance but should be made directly to an official entity and be able to be disclosed publicly when required to.
- 9.4 Contributions made by TPPT to community projects or charities need to be made in good faith and in compliance with this Policy and all relevant TPPT's policies and procedures.
- 9.5 The Company does not make charitable donations or contributions to political parties. Whilst our Employees and the Associated Third Parties acting in their personal capacity as citizens are not restricted to make any personal political donations, TPPT will not make any reimbursement for these personal political contributions back to its Employees or the Associated Third Parties.

- 9.6 TPPT's properties, facilities, services or employee time cannot be used for or contributed to any political party or candidate for public office without approval by the Chairman/Board of Directors.

10. RESPONSIBILITIES

- 10.1 The Board has oversight of this Policy. All employees are responsible for ensuring the compliance and required to be familiar with this Policy. Any violation of this Policy will be regarded as serious matter and will result in disciplinary action, including dismissal and termination in accordance with local law.
- 10.2 Any individual and employee with any suspicious, concerns or believes regarding a violation with this Policy has occurred or may occur in future, should raise up, notify and shall make report to the Company via the appropriate channel.
- 10.3 An employee will be accountable individually whether he/she pays a bribe himself/herself or whether he/she authorizes, assists or conspires with someone else to violate this Policy and/or an anti-corruption or anti-bribery. Punishment for violating the law are against him/her as an individual and may include imprisonment, probation, mandated community service and monetary fines and others which will not be paid by TPPT.

11. RECORD KEEPING

- 11.1 All financial records must be kept and have appropriate internal controls in place which will evidence, substantiate and justify that business reason for making payments to, and receiving payments from, third parties.

- 11.2 Ensure all expenses claims relating to gifts or entertainment made to third parties are submitted in accordance with the Company's reimbursement procedures and/or applicable policy and specifically record the reason for such expenditure. All the parties shall further ensure that all expense claims shall comply with the terms and conditions of this Policy.
- 11.3 All documents, accounts and records relating to dealings with third parties, such as customers, suppliers and business contracts, should be prepared and maintained with strict accuracy and completeness. No accounts should be kept "off-book" to facilitate or conceal improper payments.

12. COMMUNICATION AND TRAINING

- 12.1 TPPT will on a continuing basis provide specific and regular training on this Policy, and on anti-corruption and bribery laws and on how to implement and comply with this Policy, for all new and existing Employees.
- 12.2 Administration Section shall maintain all records to identify employees who have received training, and produce, communicate and update the training schedule.
- 12.2 The zero-tolerance approach to corruption and bribery must be communicated to all the Associated Third Parties in respect of the business relationship. Wherever possible, all the Associated Third Parties should be sent a copy of this Policy.

13. REPORTING OF POLICY VIOLATIONS

- 13.1 All the Employees and the Associated Third Parties are responsible for the success of this Policy and should ensure adherence to this Policy and use it to disclose any suspected danger or wrongdoing.

13.2 Each Employee has a responsibility to ensure that suspected-bribery and corruption incidents are reported promptly. Employees who encounter actual or suspected violations of this Policy are required to report their concerns using the reporting Whistleblowing channels at :

aduan@tppt.com.my

13.3 Reports made in good faith, either anonymously or otherwise, shall be addressed in a timely manner and without incurring fear of reprisal regardless of the outcome of any investigation.

14. MONITORING AND COMPLIANCE

14.1 Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering corruption and bribery.

14.2 Such audits may be conducted internally by TPPT or by an external party. Audit documentation should include performance improvement action plans.

15. WAIVER

Any deviation or waiver from this policy must be approved by TPPT's Audit Committee and Board of Directors.