



## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

### INTRODUCTION

This Anti-Bribery and Anti-Corruption Policy (the "Policy") applies to all our subsidiary companies, associated companies and joint venture companies under the Dscaff Group of Companies (hereinafter referred to as "Dscaff" or the "Group").

It is the policy of Dscaff to conduct all of its businesses in an honest and ethical manner. Dscaff has zero tolerance approach towards bribery and corruption and is committed to acting professionally and with integrity as well as in conformity with all applicable laws, which include compliance with the Malaysian Anti-Corruption Commission Act 2009, 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.

To ensure the enforcement of anti-bribery and anti-corruption practices, the Group has taken the following steps:

- I. implementation of this Policy;
- II. conduct of comprehensive bribery and corruption risk assessment and where appropriate, to mitigate such risks by implementing adequate procedures and controls;
- III. training programs for employees in areas which are at risk of exposure to corrupt practices; and
- IV. periodic review and update this Policy in line with the latest developments of anti-corruption laws in Malaysia.

### PURPOSE

The purpose of this Policy is to outline the responsibilities of the Group and the employees in observing and upholding the Group's position on bribery and corruption and to provide information and guidance on how to deal with issues on bribery and corruption.

### DEFINITIONS

**Client** means a person or an organisation who wants service or products from Dscaff.

**Employee(s)** means all employees and individuals working for the Group whether full time, part-time, contract, temporary and including individuals engaged by the Group as consultant and/or marketing agent;

**Facilitation Payments** means unofficial payments made in order to expedite, favour or ensure routine activities of public officers and/or Client.

**Management Board** means the senior management of the Group consisting of the Directors, Chief Financial Officer and the Head of Departments.

**Vendor(s)** means any supplier of products and/or services to the Group including sub-contractors.



## **SCOPE**

This Policy applies to all Employees.

## **GIFTS AND ENTERTAINMENT**

To avoid conflicts of interest, all Employees are prohibited from receiving gifts with value above Ringgit Malaysia One Hundred (RM100.00) and/or entertainment of any value from any Vendor.

Employees are not allowed to provide gifts and/or entertainment to Client unless it is in relation to actual business purposes, reasonable and in good faith and complies with the Company's applicable rules and procedures, including the relevant authorisation process.

All expenses relating to any gifts or entertainment made to Client shall undergo rigorous screening process in accordance with Group's internal reimbursement procedures in order to minimise the risk of financial outflow in contravention of anti-corruption or anti-bribery laws.

## **FACILITATION PAYMENT**

Employees shall not make, and shall not accept any form of Facilitation Payments. Any individual with information relating to Facilitation Payment being made shall immediately report the matter to the Management Board.

## **POLITICAL AND CHARITABLE CONTRIBUTIONS**

No contributions (directly or indirectly) to political parties or movements, or their representatives shall be made on behalf of Dscuff.

All charitable contributions or donations made on behalf of Dscuff to any community projects or charities require the approval from the Management Board and need to be made in good faith (in compliance with the Group's Code of Business Conduct and Ethics and this Policy).

## **VENDOR**

In order to minimise and mitigate the potential bribery and corruption risks between Employees and Vendor, Dscuff has implemented the following:

- a) Procurement and selection process shall be conducted in a transparent manner and open to all qualified Vendor;
- b) Due diligence to be conducted on the Vendor to ascertain the existence of sound business practice and the absence of any risk relating to bribery and corruption activities.



## **ROLE AND RESPONSIBILITIES**

The Management Board is responsible for ensuring the due compliance by all Employees and Vendor towards the Policy.

## **CONFIDENTIALITY AND REPORTING**

No individual shall be subject to any form of mistreatment by virtue of his/ or her initiative to report any form of bribery and corruption by any of the Employees and/or Vendor.

All reports made regarding contravention of this Policy including the details of the person who made such reports shall be kept confidential.

## **HIRING OF EMPLOYEES**

The process of hiring of Employees shall include assessment of reputational and conflicts of interest risks. In this regard, Dscuff provides strengthened anti-corruption controls in particular:

- a) conflicts of interest assessment, actual or potential situations;
- b) self-declaration on compliance with the Code of Business Conduct and Ethics, this Policy and anti-corruption / anti-bribery laws;
- c) specific training activities and programmes; and
- d) proper background checks including past convictions and misdemeanours in previous employment relating to any corrupt and bribery practices.

## **MONITORING AND REVIEW**

All Employees and Third Parties are responsible for the success of this Policy. All internal controls shall undergo periodic reviews and audits to ensure the continued effectiveness in preventing corrupt and bribery practices.

– End of document –