

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY	Ref No	SOP/ABC/21/2
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ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

反贿赂和反贪污政策

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CONTENTS

1.	INTRODUCTION & PURPOSE	4
2.	POLICY STATEMENT	5
3.	SCOPE AND APPLICABILITY	6
4.	BACKGROUND	7
5.	GUIDANCE ON COMMON FORMS OF BRIBERY AND CORRUPTION.....	8
	5.1 GIFTS, ENTERTAINMENT, AND CORPORATE HOSPITALITY	8
	5.1.1 NO-GIFT POLICY.....	9
	5.1.2 RECEIVING GIFTS	10
	5.1.3 RECEIVING CORPORATE HOSPITALITY AND ENTERTAINMENT	12
	5.1.4 PROVIDING GIFTS.....	13
	5.1.5 PROVIDING CORPORATE HOSPITALITY AND ENTERTAINMENT	15
	5.1.6 DEALING WITH PUBLIC OFFICIALS	16
	5.2 CORPORATE SOCIAL RESPONSIBILITY (CSR), DONATION AND SPONSORSHIPS	18
	5.2.1 POLITICAL CONTRIBUTIONS.....	19
	5.3 FACILITATION PAYMENT.....	20
	5.4 PURCHASING AND PROCUREMENT PRACTICES	21
	5.5 RECRUITMENT OF EMPLOYEES.....	22
	5.6 MONEY LAUNDERING	22
6.	DEALING WITH THIRD PARTIES.....	23
	6.1 DUE DILIGENCE PROCESS.....	27
7.	EMPLOYEE RESPONSIBILITY	29
8.	REPORTING VIOLATIONS OF THE POLICY	30
9.	PROTECTION	30
10.	RECORD KEEPING	31
11.	TRAINING AND COMMUNICATION.....	31
12.	WAIVER.....	32
13.	REVIEW AND MONITORING	32
14.	APPENDIX	

1. INTRODUCTION & PURPOSE 简介与目的

We, MOG GROUP OF COMPANIES and our subsidiaries (collectively referred to as “MOG”, “Group”, “we”, “us” or “our”) are committed to conduct our business with integrity, trustworthiness and accountability. Our Management continually promotes a culture of integrity within the MOG Group and stresses the importance of a zero-tolerance approach towards bribery and corruption in our actions and decisions, both internally and externally.

The purpose of this Anti-Bribery & Anti-Corruption Policy (hereinafter referred to as “Policy”) is to provide guidance to Directors and Employees (including full time, part-time, probationary, contract and temporary staffs) of the Group (hereinafter referred to as “Directors” and “Employees”) as to how they should be dealing with bribery, corruption and any other related issues that may arise in the course of business. It reiterates MOG’s commitment to ensure full compliance by our Directors and Employees with the Malaysian Anti-Corruption Commission (MACC) Act 2009 (“hereinafter referred to as “MACC Act”), the MACC (Amendment) Act 2018 and any other local anti-bribery or anti-corruption laws that may be applicable.

This Policy sets out the practise of upholding high levels of personal and professional conduct while endorsing the values in the Group’s business dealings and decisions. However, this Policy is not intended to be exhaustive and should be read in conjunction with all existing laws, rules and regulations imposed by the Malaysian Government, as well as our Group’s policies.

我们，MOG 集团的公司及子公司（统称为“MOG”，“集团”，“本集团”，“我们”，或“我们的”）致力于以诚信，可信赖和负责任的态度开展我们的业务。我们的管理层不断促进 MOG 集团内部的诚信文化，并强调在内部和外部的行为和决策中对贿赂和贪污采取零容忍态度的重要性。

本《反贿赂和反贪污政策》（以下简称“政策”）的目的是为集团的董事及雇员，包括“全职”，“兼职”，“试用”，“合同”和“临时”员工（以下简称“董事”及“雇员”），提供指导以了解他们应如何处理贿赂，贪污以及在业务过程中可能出现的任何其他相关问题。它重申了 MOG 的承诺，即确保董事及雇员完全遵守 2009 年《马来西亚反贪会法令》（以下简称“MACC 法令”），2018 年 MACC（修订）法令以及任何相关的反贿赂或反贪污法令。

此政策规定了在维持集团个人业务和决策价值的同时，坚持高水平的个人和专业行为的规范。尽管如此，此政策非详尽无遗，应与马来西亚政府强加的所有现有法律，法规和条例以及本集团的政策一起阅读。

2. POLICY STATEMENT 政策声明

Our Group has adopted a zero-tolerance policy against all forms of bribery and corruption. We are committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices. It is our Group's policy to conduct all the business activities with honesty, integrity and the highest possible ethical standards and vigorously enforce our good business practices.

“Bribery” – Bribery is defined as any action which would be considered as an offence of giving or receiving ‘gratification’ under the MACC Act. In practice, this means offering, promising, giving, solicitation or the receipt or agreement to receive any financial or other advantage, or any other inducement, or “gratification” (as defined and interpreted under Section 3 of the MACC Act) from any person or company, (wherever they are situated and whether they are a public official or body, or a private person or company) by an individual employee, agent or other person or body acting on another's behalf. Bribery can take a variety of forms, whether in cash or in kind, can be given or received directly or indirectly through intermediaries, when someone improperly influence or attempts to improperly influence one's decision or performance of duties.

“Corruption” – Corruption is broadly defined as the abuse of entrusted power for private gain.

This Policy is intended provide the principles and guidelines on how to deal with instances of activities which may constitute bribery and corruption practices.

本集团对所有形式的贿赂及贪污行为实施“零容忍”政策，这意味着绝不允许存在任何贿赂及贪污行为。我们致力于预防，威慑和检测欺诈，贿赂和所有其他贪污的商业行为；以诚实，正直和最高的道德标准开展所有业务活动，并持续推行我们的良好商业惯例。

“贿赂” – 根据反贪会法令，贿赂的定义为提供，承诺，给予，接受或征求利益，以诱使他人采取非法，不道德或违反信任的行为或不做为。实践上，这包含任何员工，代理人，第三方，或其他代表行事的个人或团体 —— 提供，许诺，给予，邀请或接受，答应任何人或任何公司（无论他们身在何处，无论是公职人员还是团体，还是私人或公司）的任何财务或其他好处的协议，或任何其他诱因或“利益”（根据反贪会法令第 3 节的定义和解释）。贿赂可以有各种形式，无论是现金还是实物，可以通过中介，直接或间接地收受，以试图不当影响某人的决定或履行其职责。

“贪污” – 贪污的广义定义是滥用委托权力谋取私利。

此政策旨在帮助识别、避免及提供有关如何处理贪污与贿赂行为的准则及规范。

3. SCOPE AND APPLICABILITY 范围和应用性

This Policy applies to all Directors and Employees of the Group.

This Policy should also apply to agents, business associates, consultants, contractor, customers, distributors, joint venture partners, sponsors, suppliers, volunteers, the government, public bodies, any third-party and any other person associated with our Group. Any arrangements our Group makes with a third party is subjected to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures that is set out in this Policy.

Each Director of Employee as well as persons associated with our Group must read and understand the Policy. Violation of any of the Policy's provisions may lead to disciplinary actions, including termination of employment and / or business dealings. Further legal action may also be taken in the event that the Group's interests have been compromised.

此政策应用于集团的所有董事及雇员。

此政策也应用于代理商，业务伙伴，顾问，承包商，客户，分销商，合资伙伴，资助人，供应商，志愿者，政府，公共机构，任何第三方以及与本集团有关联的任何其他人。本集团与第三方进行的任何安排均应遵守明确的合同条款，包括要求第三方遵守此政策规定的最低标准和程序的具体规定。

每位董事及雇员以及与本集团有联系的人员必须阅读并理解此政策。违反此政策的任何规定可能会导致纪律处分，包括终止雇用和/或业务往来。若集团的利益受到损害，将保留采取进一步的法律行动。

4. BACKGROUND 背景

This Policy has been established in line with Section 17A of the MACC (Amendment) Act 2018 which provides that a commercial organisation commits an offence if a person associated with the commercial organisation (such as its directors or employees) commits a corrupt act (corruptly gives, agrees to give, promises or offers to any person any gratification) whether for the benefits of that person or another person with intent to obtain or retain business or an advantage in the conduct of business for the commercial organisation.

The penalty for an offence under Section 17A (1) of the MACC Act is a fine of not less than 10 times the sum or value of the gratification or One Million Ringgit (RM 1,000,000.00) whichever is higher, or imprisonment for a term not exceeding 20 years or both.

If a commercial organisation is charged with an offence under Section 17A (1) of the MACC Act, it is a defence to such corporate liability offence if the commercial organisation can show that it had adequate procedures in place to prevent persons associated with the commercial organisation from carrying out the corrupt act.

Thus, Directors, Employees and any other person or persons associated with our Group (including third parties) have a duty to: -

- Read and understand this Policy in order to be familiar with the applicable requirements and directives as per this Policy; and
- Raise and report suspicious transactions, violations or suspected violations of this Policy to their immediate superior or HOD. If notifying the immediate superior or HOD is not possible or inappropriate for any reason or is not in the best interest of the Group, the Directors and Employees can raise their concerns via MOG's Whistleblowing Policy.

此政策是根据《2018年反贪会（修订）法》第17A条制定的。这条文阐明若一家商业组织之关联人士为了获得或保留企业的业务或营商利益，或是为了获得或保留企业在经商营运方面的优势，而给予、同意给予、承诺或提供任何一方报酬或贿赂，该商业组织将被推定为犯罪。

根据《反贪会法令》第17A(1)条文，若罪名成立，将处以以下重罚：(i) 不低于贿赂价值10倍的罚款或100万令吉（以较高者为准）；(ii) 20年以内的监禁；或(iii) 两者兼施。

可用于第17A条下罪行的唯一抗辩是商业组织必须证明有适当的程序旨在防止与商业组织相关的人员从事贪污行为。

因此，董事及雇员和与本集团有关联的任何其他人士（包括第三方）有义务：-

- 阅读并理解此政策，以便熟悉此政策中应用的要求和指示；及
- 提出任何可疑交易，违反或怀疑违反此政策的人员及行为，并向其直接上级或部门主管检举。若基于任何原因无法或不适合通知直接上级或部门主管，或不符合本集团的最大利益，则董事及雇员可以通过MOG的举报政策提出疑虑。

5. GUIDANCE ON COMMON FORMS OF BRIBERY AND CORRUPTION

关于贿赂和贪污常见形式的指导

5.1 GIFTS, ENTERTAINMENT, AND CORPORATE HOSPITALITY 赠礼、娱乐和款待政策

Our Group prohibits both the acceptance and provision of Gifts, Entertainment and Corporate Hospitality (collectively referred to as the “Benefits”) to influence business decisions and / or to obtain retail business or secure an unfair advantage in any business transaction.

No Benefits shall be offered to or solicited from other stakeholders who deal with the Group in connection with their official duties if this would influence any business decision and / or give rise to the appearance of impropriety or bias that would damage the reputation of the Group.

For the avoidance of doubt, this Policy does not prohibit normal business courtesies such as meals and entertainment, occasional token gifts and customary gifts during festivals, special occasions or social events, as long as they are reasonable, appropriate, modest and bona fide corporate courtesies.

Infrequent and moderate business meals and entertainment with clients and infrequent invitations to attend local social events and celebratory meals with clients can be appropriate aspects of promoting good business relationships, provided that they are not excessive and do not create the appearance of impropriety.

Directors and Employees must make use of good judgement, discretion and moderation when giving or accepting such courtesies in business settings and must comply with all applicable laws, rules and regulations in countries that the Group operates.

本集团禁止接受和提供赠礼，娱乐和商务款待（统称为“好处”）以影响业务决策和/或获得零售业务或在任何业务交易中获得不公平的利益。

本集团全体人员不得向任何利益相关者提供，或征求任何利益，从而影响任何业务决策和/或导致不恰当行为而影响集团声誉。

为避免疑义，兹明确规定，此政策并无禁止正常的商务礼节，例如一般用餐和娱乐，在节日，特殊场合或社交活动中的偶尔象征性赠礼或节庆赠礼，只要在合理，合适，不张扬，且真实的商务礼节即可。

在不过分且无不恰当行为的前提下，与客户进行非频密及适度的商务用餐和娱乐活动，非频密邀请客户参加当地社交活动，或与客户进行庆祝性用餐，将有助于适当促进良好业务关系。

在业务往来中，董事及雇员须时刻保持良好的判断力，酌处权及节制力，以给予或接受此类商务礼遇，且须遵守集团运营所在国家/地区的所有适用法律，法规和规章。

5.1.1 NO-GIFT POLICY 无赠礼政策

- a. Our Group adopts a “No-Gift Policy” whereby all Directors and Employees shall not solicit or accept any gifts from any third party who may have direct or indirect business interest with our Group.

本集团采用“无赠礼政策”，所有董事及雇员均不得从与本集团有直接或间接商业利益的任何第三方索要或接受任何赠礼。

- b. Our Group requires all Directors and Employees to abide by this Policy in order to avoid conflict of interests between MOG and the external parties as a gift can be seen as a bribe that may tarnish the Group’s reputation or be in violation of anti-bribery and corruption laws. 基于赠礼可被视为贿赂，本集团要求所有董事及雇员需遵守此政策，以避免 MOG 与外部各方之间的利益冲突，从而损害本集团的声誉或违反反贿赂和贪污条例。

- c. The exception to the above would be fruits, flowers, token gifts or promotional items (such as diaries, pens, umbrellas, shirts, etc.) with an approximate or actual value of less than One Hundred and Fifty Ringgit (RM150) (the recipient must properly estimate the value of such gift). Hampers of any value may be shared amongst team members or be placed in the common area or pantry for Employees’ consumption. In such a case, the staff could choose to accept the item without having to make a declaration under the “Gifts, Entertainment and Corporate Hospitality Declaration” Form (please refer to Appendix A).

上述例外为，水果，鲜花，象征性赠礼或促销品（例如日记，笔，雨伞，衬衫等），其近似值或实际值小于一百五十令吉（RM150）（收件人必须正确估计此类赠礼的价值）。任何价值的礼篮则可与团队成员之间共享，也可以放在公共区域或厨房中供雇员消费。唯此情况下，雇员方可选择接受该物品，而不必填写“赠礼，娱乐和款待声明”表格(请参阅附录 A)进行声明。

- d. Any gifts that violate the “No-Gift Policy” must be declined or returned with an explanation note from the Directors or Employees thanking the third party for the gift and the Group’s “No-Gift Policy” shall be politely brought to the attention of the sender.

任何触犯或违反“无赠礼政策”的赠礼必须予以拒绝或退回，并附上董事或雇员的解释性说明，且感谢第三方的赠礼。本集团的“无赠礼政策”需礼貌性地传达给赠礼人。

5.1.2 RECEIVING GIFTS 接受赠礼

- a. Our Group is very much aware that in certain culture or situations, gifts are given as a form of business etiquette. Despite acknowledging our “No-Gift Policy”, some external parties may insist to provide gifts to our Directors or Employees.

本集团了解，某些文化或特定情况下，赠礼是商务礼仪的一种形式。尽管意识到本集团的“无赠礼政策”，一些外部团体仍可能坚持向董事或雇员赠礼。

- b. In the event where Directors or Employees are unable to decline or return a gift with an approximate or actual value of One Hundred and Fifty Ringgit (RM150) and more, the Directors or Employees must declare it via the “Gifts, Entertainment and Corporate Hospitality Declaration” Form, and surrender such gift to our Management. Subject to due considerations by the Management, the Management will have the right to decide on the following:

若董事或雇员无法拒绝或退还大约或实际价值一百五十令吉（RM150）或更多的赠礼，则董事或雇员必须通过“赠礼，娱乐和款待声明”表格予以声明，并交出赠礼与管理层。管理层在适当考虑的前提下，有权决定以下事项：

- I. To donate the gift to charity; or
将赠礼捐赠给慈善机构；或
- II. To register it as a company property to be used publicly by all Employees; or
将其注册为公司所有雇员的公用财产；或
- III. To designate it as a display item; or
将其列为展示品；或
- IV. To share it with other Employees; or
与其他雇员分享；或
- V. To retain all the gifts and consume later as lucky draw items during the company’s event; or
保留所有赠礼并在日后的公司活动作为幸运抽奖品；或
- VI. To permit it to be retained by the Directors or Employees.
允许由董事或雇员保留。

- c. The exception to the above is for meals provided or paid for by a third party. In such cases, the Directors or Employees could accept the meal provided or paid for by a third party regardless of value but they must declare it via the “Gifts, Entertainment and Corporate Hospitality Declaration” Form.

上述例外为，由第三方提供或支付的餐费。在此情况下，董事或雇员可以接受由第三方所提供或支付的餐点，而不论其价值如何，但须通过“赠礼，娱乐及款待声明”表格进行声明。

d. All declarations must be submitted (with the Employee’s and superior’s signature) to the Corporate Affairs Department as follows: -

所有声明（须附上雇员和上级的签名）必须提交给公司事务部，方法如下： -

- **with** gift, including entertainment and corporate hospitality : **IMMEDIATELY.**
- **without** gift, including entertainment and corporate hospitality : **HALF YEARLY.**

若有收到任何赠礼，娱乐和商务款待：即刻上报表格进行声明

若无收到任何赠礼，娱乐和商务款待：半年上报表格进行声明

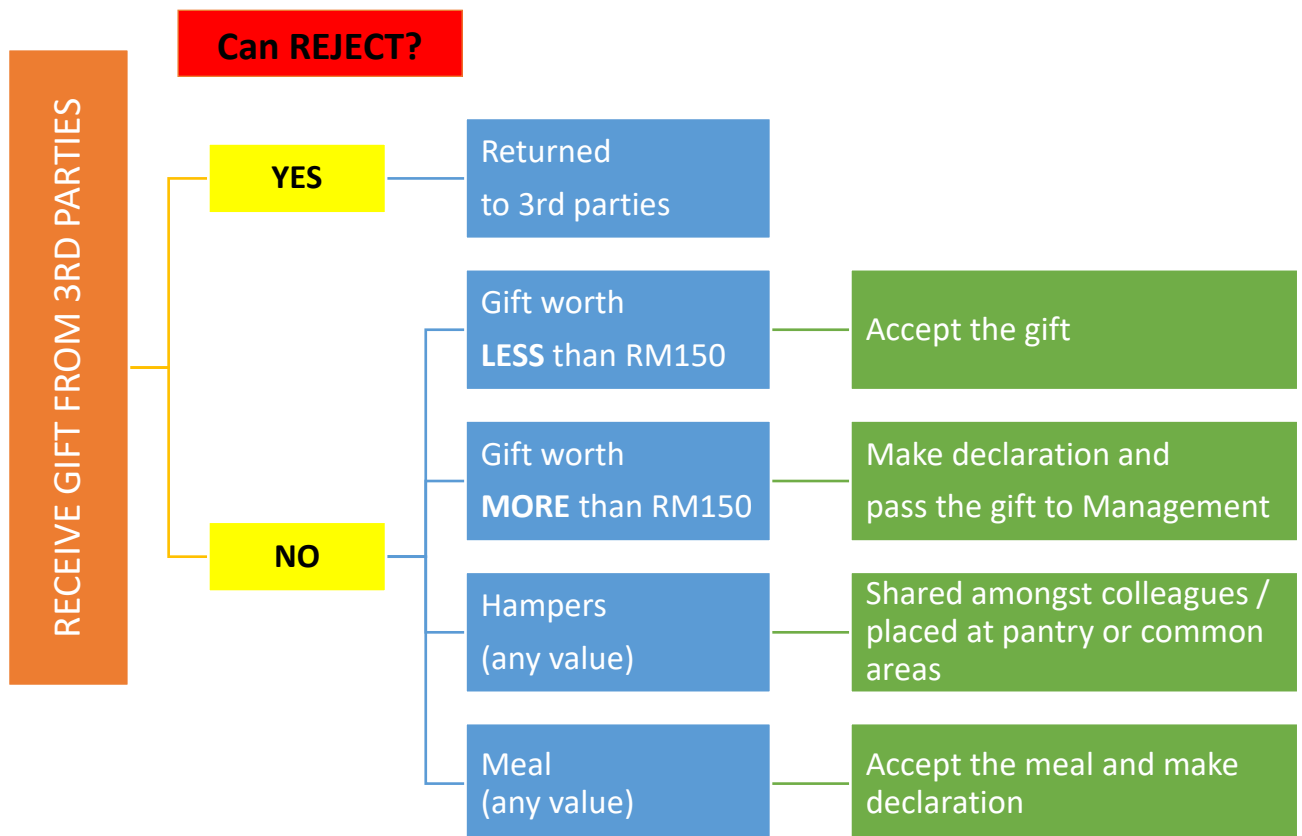
Note: Directors or Employees who Benefits during business trips will have to submit the “Gifts, Entertainment and Corporate Hospitality Declaration” Form upon their return to office.

注意：在商务旅行中受益的董事或雇员，则需在返回岗位后即刻提交“赠礼，娱乐及款待声明”表格。

e. Should any dispute pertaining to this policy arise, the matter shall be referred to and resolved by the Management. The subsequent decision made by the Management will be final.

若发生与此政策的任何争议，则需就此事向管理层提出并由管理层解决。管理层的决定将视为最终决定。

QUICK SUMMARY



5.1.3 RECEIVING CORPORATE HOSPITALITY AND ENTERTAINMENT 接受商务款待及娱乐

- a. Our Group strictly prohibits Directors and Employees from soliciting corporate hospitality and entertainment. They are also not allowed to accept any corporate hospitality and entertainment that is excessive, inappropriate, illegal or given in response to, in anticipation of, or to influence a favourable business decision, particularly from third parties engaged in a tender or competitive bidding exercise.

本集团严格禁止董事和雇员索取商务款待及娱乐活动。他们也不得接受任何过度，不当，违法或，因回应，预期或能影响有利的商业决策而给予的商务款待及娱乐活动，特别是来自从事招标或竞争性投标活动的第三方的招待。

- b. Although the general principle is to immediately refuse or return such gifts, accepting a gift on behalf of our Group is allowed only in very limited circumstances namely when refusing such gift is likely to seriously offend or sever the business relationship with the third party. However, in no circumstances may a Director or Employee or his or her family or household members accept gifts in the form of cash or cash equivalent.

尽管一般原则是立即拒绝或退回此类赠礼，但仅在非常有限的情况下（即拒绝此类赠礼可能严重冒犯或切断与第三方的业务关系时），才能代表本集团接受赠礼。但是，在任何情况下，董事或雇员或其家人或家庭成员均不得接受现金或现金等价物形式的馈赠。

- c. Our Group recognises that the occasional acceptance of an appropriate level of corporate hospitality and entertainment given in the normal course of business will assist the Group in building good business relationships. However, it is important for Directors and Employees to exercise proper care and judgement before accepting any corporate hospitality and entertainment. This is not only to safeguard the Group's reputation, but also to protect our Directors or Employees from allegations of impropriety or undue influence.

本集团认知在日常业务过程中，难免需接受适当程度的商务款待和娱乐活动，以有助于本集团建立良好的业务关系。然而，对于董事和雇员而言，在商务款待和娱乐活动之前，务必谨慎对待及判断。不仅是为了维护集团的声誉，亦为了确保董事或雇员免受不当或将带来不当影响的指控。

- d. If the Directors or Employees have any doubts on the appropriateness of a corporate hospitality and entertainment offered by an external party, they should either decline the offer or consult the Management.

如果董事或雇员对外部人士提供的商务款待和娱乐活动的适当性有任何疑问，则应拒绝该提议或咨询管理层。

5.1.4 PROVIDING GIFTS 提供赠礼

- a. Generally, Directors and Employees are not allowed to provide gifts to third parties unless expressly permitted by the Management or any other personnel authorised by the Management. Gifts distributed are generally corporate gifts given as common business courtesy or during corporate events.

一般情况下，除非获得管理层或管理层授权的其他人员的明确许可，否则董事和雇员不得向第三方提供赠礼。而分发的赠礼通常是作为普通商务礼节或在公司活动期间提供的公司赠品。

- b. All gifts' expenses incurred must be properly kept, documented and recorded by the respective department for audit purposes.

所有相关的赠礼支出必须由相关部门妥善保存和记录，以备审核之用。

- c. There are situations whereby receiving and provision of gifts are permitted. The situations are as follows: - 在下列情况下，可允许接受和提供赠礼：

- I. Exchange of gifts at a company-to-company level (e.g. gifts exchanged between companies as part of an official company visit/courtesy call and thereafter said gift is treated as company property);

公司与公司之间交换赠礼（例如，公司正式访问或礼节性拜访，此赠礼被视为公司财产）

- II. Gifts from company to external institutions or individuals in relation to the company's official functions, events and celebrations (e.g. commemorative gifts or door gifts offered to all guests attending the event);

送给与公司的官方项目，活动，和庆典有关的外部机构或个人的赠礼（例如，提供所有参加活动的客人纪念礼物或上门礼物）

- III. Gift from our Group to Directors and Employees and / or their family members in relation to an internal or externally recognised company functions, event and celebration (e.g. in recognition of a staff's/director's service to the company);

本集团就内部或外部认可的公司项目，活动和庆典，赠送与董事及雇员或其家人的赠礼（例如，表彰董事及雇员对公司的服务）

- IV. Token gifts of nominal value normally bearing our Group's logo (e.g. t-shirts, pens, diaries, calendars or other small promotional items) or gifts that are given out equally to members of the public, delegates, customers, partners and key stakeholders attending events (such as conferences, exhibitions, training, trade shows and is deemed to be a part of the Group's brand building or promotional activities); and

具有本集团徽标的象征性名义价值的赠礼（例如恤衫，钢笔，日记，日历或其他小型促销品）或均等地赠送给参加活动的公众，代表，客户，合作伙伴和主要利益相关者的赠礼（例如会议，展览，培训，商业展览，并被视为本集团品牌建设或促销活动的一部分）；和

V. Gifts to external parties who have no business dealings with our Group (e.g. monetary gifts or gifts in-kind to charitable organisations).

给与本集团没有业务往来的外部人士的赠礼（例如，金钱馈赠或实物赠礼与慈善组织。）

5.1.5 PROVIDING CORPORATE HOSPITALITY AND ENTERTAINMENT 提供商务款待及娱乐

- a. Our Group recognises that providing modest corporate hospitality and entertainment is a legitimate way of building business relationships and a common practise within the business environment to foster good business relationships with third parties. As such, eligible Directors and Employees are allowed to provide corporate hospitality and entertainment to third parties as part of the Group's plan to network as well as a measure of goodwill towards the recipients.

本集团认知，在业务往来中，提供适度的商务款待及娱乐是合法且普通行为，有助于与第三方建立良好业务关系。因此，符合资格的董事及雇员允许向第三方提供商务款待及娱乐活动，以建立在集团的人脉及商誉。

- b. Directors and Employees should always bear in mind that this is an area where perception is often regarded as more important than facts and therefore, they should always exercise proper care and judgment when providing corporate hospitality and entertainment to third parties especially when it involves public officials to ensure compliance with anti-bribery and anti-corruption laws.

董事及雇员应谨记，感知往往比事实更重要。因此，在向第三方提供商务款待及娱乐活动时，尤其是在涉及公职人员的情况下，需保持谨慎对待及良好判断，以确保遵守反贿赂和反贪污法令。

- c. Directors and Employees are strictly prohibited from providing or offering to provide corporate hospitality and entertainment with a view to improperly cause undue influence on any party in exchange for future benefits. Any acts of this nature, whether provided directly or indirectly or through an intermediary, may be construed as an act of bribery.

严格禁止董事及雇员提供或提议提供商务款待及娱乐活动，以期不当地对任何一方造成不正当影响，以换取未来利益。任何这种性质的行为，无论是直接或间接提供，还是通过中介提供，都可被视为贿赂行为。

- d. Directors and Employees are required to comply with the Group's policies and procedures, while maintaining expenses within the entitlement limits when providing corporate hospitality and entertainment. The Management's approval prior to the event must be obtained if entitlement limits is expected to exceed the limit set by the Group.

董事及雇员必须遵守集团的政策和程序，同时在提供商务款待及娱乐活动时，将支出保持在应享的限额之内。如果预计的权利限制将超出集团设定的限制，则必须在事前获得管理层的批准。

- e. All expenses incurred when providing corporate hospitality and entertainment must be properly kept, documented and recorded for audit purposes.

提供商务款待及娱乐活动时发生的所有费用必须妥善保存及记录，以备审核之用。

5.1.6 DEALING WITH PUBLIC OFFICIALS

- a. Public officials are individuals exercising public functions or is acting in a public capacity, and shall include any of the following:

公职人员是指行使公共职能或以官方身份行事的人员:

- I. Yang Di-Pertuan Agong, Yang Dipertua Negeri, Sultan, Raja Muda, and Tengku Mahkota;
- II. An official or employee of any government, or any agency, statutory body, ministry or department of the government (of any level);
任何政府或政府的任何机构，法定机构，部门，体系（任何级别）的官员或雇员；
- III. Police, military and judicial official (of any level);
警察，军事和司法官员（任何级别）；
- IV. Member of Dewan Undangan Negeri and Dewan Negara;
- V. Senator; 参议员
- VI. Member of Parliament; 议会成员
- VII. Any individual acting in an official capacity for a government (of any level);
任何代表官方身份担任政府职务的个人（任何级别）
- VIII. Official or employee of a company/an enterprise wholly or partially state-owned (of any level); 国有公司或企业（全部或部分国有）的官方代表或雇员（任何级别）
- IX. A political party or official of a political party (of any level); and
政党或政党官员（任何级别）；及
- X. A candidate for political office. 政治职务候选人

- b. Public officials include immediate family members, close associates and companies related to such individuals in their capacity as directors, members of management or beneficial owners.
公职人员包括其直系家庭成员，亲密联系人以及与其个人相关的公司，包括董事，管理层成员或实益拥有人。

- c. Family members are individuals who are related to a public official either directly (consanguinity) or through marriage. A family member of public officials includes his/ her parents, siblings, spouse, children, and spouse's parents (biologically and non-biologically).
家庭成员是指与公职人员有直接或间接关系的个人（近亲）或姻亲关系。公职人员的家庭成员包括其父母，兄弟姐妹，配偶，子女和配偶的父母（在生物学和非生物学上）。

- d. A close associate is any individual closely connected to a public official, either socially or professionally.

亲密关联是指在社会上或职业上与公职人员紧密联系的任何人员。

- e. An individual who is closely connected to a public official may include the public official's:
与公职人员有密切关系的个人可以包括该公职人员的:
- I. extended family members, such as relatives (biological and non-biological relationship); 衍生家庭成员, 例如亲戚 (生物学和非生物学关系);
 - II. financially dependent individuals (i.e. persons salaried by the public official such as drivers, bodyguards, secretaries); 财务上有依赖性的人 (即由公职人员发薪的人, 例如司机, 保镖, 秘书);
 - III. business partners or associates; 商业伙伴或合伙人;
 - IV. prominent members of the same organisation as the public official; 与公职人员同组织的杰出成员;
 - V. individuals working closely with the public official (i.e. work colleagues); or 与公职人员紧密合作的个人 (工作同事); 或
 - VI. close friends. 密切往来的朋友
- f. Any business relationship with the Group involving interests of a public official who otherwise has a direct relationship with our Group, and which interests are not prohibited by the Group policies, requires disclosure.
若本集团的任何业务关系涉及公职人员的利益, 而该公职人员的利益与本集团有直接关系, 且本集团政策未禁止其利益, 则需要披露。
- g. In addition, management's specific approval for establishing business relationships with such customers must be obtained at the appropriate committee level.
此外, 与此类公职人员建立业务关系必须提前获得最高管理层的特定批准。
- h. Directors and Employees are prohibited from paying for non-business travel, entertainment and hospitality for any public officials or his or her family members without permission from the Board of Directors.
未经董事会许可, 禁止董事及雇员为任何公职人员或其家庭成员支付非商务旅行, 娱乐和款待。
- i. If approval is obtained to provide Benefits to public officials, the Directors or Employees must ensure that the gift (only corporate gift is allowed), entertainment or corporate hospitality is not excessive and lavish, and must commensurate with the official designation of the public official and not the personal capacity.
若已获得批准向公职人员提供福利, 则董事或雇员必须确保礼品 (仅允许公司礼品), 娱乐活动或公司招待不过度和豪华, 并且必须与公职人员的职位相称, 而并非个人能力。

5.2 CORPORATE SOCIAL RESPONSIBILITY (CSR), DONATION AND SPONSORSHIPS

企业社会责任，捐赠及赞助

- a. The Group encourages and supports charitable donations and sponsorships, whether of in-kind services, knowledge, time, or direct financial contributions, to individuals, organisations, communities and societies who require special help and care.
本集团鼓励并支持对有需要特殊帮助和关怀的个人，组织，社区和社会的慈善捐赠和赞助，无论是实物服务，知识，时间还是直接的财务捐助。
- b. As bribes can be concealed in the form of charitable, sponsorships or donations, all CSR, sponsorships and donations shall be done in good faith and are not aimed to gain any business or other advantage in return, whether for the Group or self-enrich, that may be considered improper.
由于可以通过慈善，赞助或捐赠的形式掩盖贿赂，因此，所有企业社会责任，赞助和捐赠均应真诚地进行，而非为了获得任何可能被认为是不适当的业务或其他利益，无论是对集团或个人。
- c. Any CSR, donations and sponsorship activities conducted must not be used as a conduit to circumvent, avoid, or evade the laws or regulatory requirements. More importantly, it shall not be used to facilitate corruption, illegal and money laundering activities.
进行的任何企业社会责任，捐赠和赞助活动均不得用作规避，避免或逃避法律或法规要求的渠道。更重要的是，不得将其用于促进贪污，非法和洗钱活动。
- d. All CSR, donations and sponsorship requests must be carefully examined for legitimacy and not be made to improperly influence a business outcome.
必须仔细检查所有企业社会责任，捐赠和赞助请求的合法性，并且不得对业务成果产生不当影响。
- e. The proposed recipient must be a legitimate organisation and appropriate due diligence must be conducted in order to ensure that the benefits will reach the intended recipients whilst the programmes meet the intended objectives.
拟议的接受者必须是一个合法的组织，并且必须进行适当的尽职调查，以确保利益可以到达既定的接受者，且计划可以达到预期的目标。
- f. Must not be made to individuals or in cash; or be made at the request of a public official as an inducement to or reward for acting improperly.
不可授予个人或给予现金；或应公职人员的请求而给予赞助或捐赠，以诱使或奖励不当行为。

- g. All CSR, donations and sponsorship shall be made in accordance with the approval budget and must obtain approval from the Management; all the relevant document or record shall be kept by the Group.
所有企业社会责任，捐赠和赞助均应按照批准预算进行，并且必须获得管理层的批准；所有相关文件或记录应由集团保存。
- h. Any charitable donations and sponsorships made in a private capacity of a Director or Employee should never be in exchange for any improper purposes that may affect the business of the Group.
以董事或雇员的私人身份进行的任何慈善捐赠和赞助，绝不能以任何可能影响本集团业务的不正当目的作为交换。

5.2.1 POLITICAL CONTRIBUTIONS 政治捐献

- a. As a matter of general policy, the Group does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office.
一般情况，本集团不向政党，政党官员或政治职位候选人提供任何形式的政治捐献。
- b. In very limited circumstances, if any contribution is to be made, it must be approved by our Management, permissible under applicable laws and must not be made with any promise or expectation of favourable treatment in return.
在非常有限的情况下，若非得要作出任何贡献，则必须得到管理层的批准，在适用法律许可之下，并且不得有任何优惠待遇作为回报的任何承诺或期望。
- c. Records of such contributions shall be properly maintained and kept by the Group.
此类捐款的记录需妥善记录并保存。

5.3 FACILITATION PAYMENT 疏通费

- a. Facilitation payments are unofficial payments or other benefits made to secure or expedite the performance of a routine or administrative function.

疏通费是向某个有控制或决策权的人所付出的款项以确保或加速履行其职务。

- b. It need not involve cash or other financial asset as it can be any sort of advantage with the intention to influence them in their duties.

它未必涉及现金或其他金融资产，可以是任何形式的好处，以影响对方的职责。

- c. Our Group prohibits accepting or obtaining, either directly or indirectly, facilitation payments from any person for the benefit of the Employee himself or for any other person. The reason underlying this prohibition is that facilitation payment is seen as a form of bribery and corruption.

本集团禁止任何雇员直接或间接接受或获得任何人的疏通费以取得自身或他人利益。疏通费被视为贿赂和贪污的一种形式。

- d. Directors or Employees must not offer, promise, give, request accept or receive anything which might reasonably be regarded as a facilitation payment. If facilitation payments are requested or offered, a report must be made to the relevant superior, the Management or via the Group's Whistleblowing channel.

董事或雇员不得提供，承诺，给予，要求接受或接受任何可能被视为疏通费的款项。如被要求或提供疏通费，则必须向相关上级，管理层或通过本集团的举报渠道进行举报。

- e. However, there are certain situations or circumstances where Employees will have to make facilitation payments in order to protect a staff's life, limb or liberty. In dangerous situations like this, staffs are allowed to make payments but is required to immediately report to the Group. Making facilitation payment in such situation is the only exception which can be used as a defence when faced with allegations of bribery and corruptions.

然而，在某些情况下，雇员为了保护生命，肢体或自由，被迫必须支付疏通费。在此类危险状况下，雇员允许付疏通费，但必须立即向集团报告，以记录事件的详细信息。唯有在危险情况下支付的疏通费，是当面对贿赂和贪污指控时，唯一可用作辩护的例外。

5.4 PURCHASING AND PROCUREMENT PRACTICES 采购和采购惯例

- a. Directors and Employees are responsible to ensure the Group's purchase of required materials, supplies, equipment, or sub-contract services are procured at the most favourable and competitive terms.

董事及雇员有责任确保以最优惠和最具竞争力的条件采购本集团所需的材料，用品，设备或分包服务。

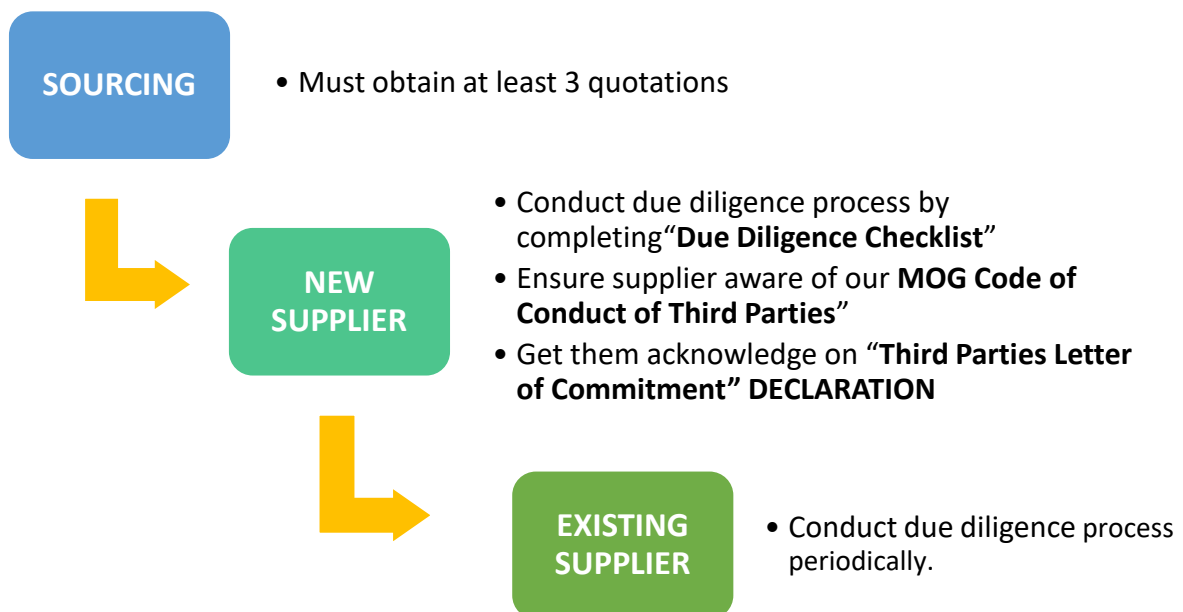
- b. All new procurement or services will have to obtain at least three quotations for Management's approval, and all quotations shall be properly kept by the relevant departments.

所有新的采购或服务都必须至少获得三份报价单，以供管理层批准，所有报价单均应由相关部门妥善保存。

- c. Directors and Employees must avoid soliciting illegal purchases and procurement practises and be cautious of involvement in any bribery or corrupt act.

董事和员工必须避免进行非法采购，并加倍谨慎任何有可能涉及贿赂或贪污的行为。

QUICK SUMMARY



5.5 RECRUITMENT OF EMPLOYEES 员工招聘

- a. The recruitment of Directors and Employees will be based on approved selection criteria to ensure that only the most qualified and suitable individuals based on qualifications, performance, skills and experience are employed. This is crucial to ensure that no element of corruption is involved in the hiring process.
董事及雇员的招募将基于批准的慎选标准，仅聘用基于资格，绩效，技能和经验的最合格和最合适的人员，以确保招聘过程中不涉及任何贪污要素。
- b. Family members of Directors and Employees may be hired as employees of MOG only if the appointment is based on qualifications, performance, skills and experience. There should be no direct reporting relationship between the Director or Employee and his or her family member. Approval from Board of Directors is required if any family member of the Director is being appointed into the Board of Directors. The Director has a duty to disclose the relationship between himself and his family member.
只有根据资格，绩效，技能和经验任命的董事及雇员的家庭成员才能被聘为 MOG 的雇员。董事或雇员与其家庭成员之间不应有直接报告关系。任何董事的家庭成员欲进入董事会，都需获得董事会的批准。董事有责任披露自己及其家人之间的关系。
- c. In line with this, proper background checks should be conducted in order to ensure that the potential employee has not been convicted for any bribery or corruption cases. More detailed background checks should be carried out when hiring employees in the management level, as they would be tasked with decision-making obligations.
因此，需进行适当的背景调查，以确保准雇员没有因任何贿赂或贪污案件而被定罪。管理层级别的员工应工作将承担决策责任，因此需进行更详细的背景调查。

5.6 MONEY LAUNDERING 洗钱

- a. Our Group strongly objects practises relating to money laundering which include dealing with proceeds of criminal activities. All Directors and Employees must avoid violating anti-money laundering laws in the country, at all cost.
本集团强烈反对任何与洗钱有关的活动，包括处理犯罪活动的收益。所有董事及雇员必须尽最大责任，避免触犯反洗钱法律。
- b. Directors and Employees are expected to conduct reasonable due diligence on third parties to understand their business background and to determine the origin and destination of money and services.
董事及雇员应对第三方进行合理的尽职调查，以了解其业务背景并确定金钱和服务的来源和目的地。

6. DEALING WITH THIRD PARTIES

- a. Our Group dealing with third parties, which include but not limited to agents, consultant or advisors, contractors or subcontractors, business contacts, joint venture partners, vendors or parties supplying good and services and customers must be carried out in compliance with the relevant laws and must be consistent with the values and principles of the Group's policies. As part of the Group's commitment, all forms of bribery and corruptions are unacceptable and will not be tolerated.

本集团与第三方的往来，包括但不限于代理商，顾问，承包商或分包商，业务联系人，合资伙伴，供应商或客人 — 必须遵守相关法律并与本集团政策保持一致的价值观和原则。作为集团承诺的一部分，本集团不接受且不容忍任何形式的贿赂和贪污行为。

- b. For the purpose of this policy, the third parties shall include all legitimate business entities ranging from public limited companies and private limited companies to partnerships and sole proprietorships.

就此政策而言，第三方应包括任何合法的商业实体，从公共有限公司和私人有限公司至合伙企业和独资企业。

- c. Our Group expects all third parties acting for or on its behalf to approach any issues of bribery and corruptions in a manner that is consistent with the principles set out in this Policy. Our Group requires all these parties to cooperate and ensure compliance with these standards in order to maintain the business relationship.

本集团期望所有代表或代为行事的第三方，能以符合此政策所规定的原则，处理所面对的任何贿赂和贪污问题；并要求各方合作，严格遵守此政策中所体现的标准，以维持业务关系。

- d. To ensure that our Group only conduct businesses with third parties who share our standards of integrity, Directors and Employees must exercise the following:

为确保本集团仅与符合我们诚信标准的第三方拓展业务，董事及雇员必须执行以下事项：

- I. Conduct proper due diligence to assess the integrity of prospective business counterparties.

进行适当的尽职调查，以评估潜在业务对手的完整性。

- II. Not to enter into any business dealings with any third party who can reasonably be suspected to engage in bribery or improper business practices unless those suspicions are investigated and resolved.

除非经过调查和得到解决，否则勿与任何合理怀疑涉嫌贿赂及贪污或任何不正当商业行为的第三方进行任何业务往来。

III. Inform relevant third party of the Group's Code of Business Conduct for Third Parties, Whistleblowing channel and its other relevant policies.

通知相关的第三方有关本集团的第三方商业行为守则，举报渠道及其他相关政策。

e. All third parties must sign the "Third Party Letter of Commitment and Declaration" Form (refer to Appendix B) which states that:

所有第三方都必须签署“第三方承诺和声明书” (请参阅附录 B)，其中指出：

I. They understand and will comply with all applicable laws and regulations. Besides, they are also ready to commit to anti-corruption principles which includes promoting values of integrity, transparency, accountability, good corporate governance, prevention of corruption, fighting any form of corrupt practice, as well as supporting anti-corruption initiatives led by the government and the local authorities (hereinafter collectively referred to as "the requirements").

他们了解并遵守所有适用的法律和条规。此外，他们将遵守反贪污原则，包括促进廉正，透明，问责制，良好的公司治理，预防贪污，打击任何形式的贪污行为，以及支持由政府 and 地方当局所领导的反贪污举措（以下统称为“要求”）。

II. They have not been convicted nor subjected to any investigation, inquiry or enforcement proceedings by the relevant authorities of any actual or suspected breach and will report any actual or suspected breach as soon as reasonably practicable and to the extent permitted by the law, to our Group.

他们并未因任何实际或疑似违规而被定罪，也未受到有关当局任何调查，询问或执行程序。若出现任何实际或疑似违规行为，在合理范围及法律允许下，须尽快向本集团报告。

III. They undertake to promptly inform our Group of any breach and / or alleged / suspected breach of the requirements and cooperate with our investigations of such breach involving our Directors and Employees.

他们须承诺，若有任何违反和/或涉嫌/怀疑违反此政策的情况，需立即通知本集团，并配合我们对涉及董事及雇员的违规行为进行调查。

IV. They acknowledge that the provisions set out in the declaration form shall form part of the terms and conditions of their appointment and / or contract of service. Meanwhile, they are liable to indemnify our Group's from and against any and all judgements, losses, liabilities, penalties, damages (including loss of profit), costs, expenses, claims, demands and causes of action of every kind, resulting from such breach and termination.

他们须确认，第三方申报表中所规定的条款应构成其任命和/或服务合同的条款和条件的一部分。同时，若因违规而导致终止合约，他们有责任对本集团负起因违规而引起的任何判断，损失，负债，处罚，损害赔偿（包括利润损失），成本，费用，索赔，要求和各种诉讼因由，进行赔偿。

- V. They further acknowledge that our Group has the right to suspend or terminate their contract or agreement or job and disqualify them from tendering for future contracts or jobs if they are found to have breached the requirements or any other terms and conditions which have been implemented by our Group pursuant to the contract or agreement or job.

他们进一步确认，若发现他们违反了要求或任何其他条款和条件，本集团有权中止或终止其合同或协议或工作，并有权取消他们对未来合同或工作的投标资格。

- f. Our Group will continue to be aware and will periodically monitor third parties performances and business practices to ensure ongoing compliance.

本集团将继续提高意识，并定期监测第三方的表现和业务实践，以确保持续合规。

- g. At some instances, our Group may also engage with online vendors or service providers such as for the purchase of air flight tickets, travel insurance etc. Such vendors are excluded from the requirement to sign the declaration form. Nevertheless, the staff is still required to ensure reasonable due care is exercised to protect the Group's interest at all times.

在某些情况下，本集团可能与在线供应商或服务提供商合作，例如购买机票，旅行保险等。此类供应商无需签署声明表格。尽管如此，仍需雇员提高警惕以保护集团的利益。

- h. If at any point during the due diligence exercise or during the dealings with a third party, there are conflicts of interest or "red flags", it warrants further investigation and such matter must be sufficiently addressed before the engagement of the third party can proceed.

若再尽职调查过程中或与第三方打交道期间，存在利益冲突或“危险信号”，则有必要进行进一步调查，并且必须充分解决该问题，然后才能进行第三方的聘用。

- i. Examples of common "red flags" involving third parties include:

涉及第三方的常见“危险信号”包括：

- I. The transaction involves a country known for a high incidence of corrupt payments.
交易涉及贪污率很高的国家。
- II. Family, business or other "special" ties with government or public officials.
家庭，企业或其他“特殊”背景与政府或公职人员有关联。
- III. A reference check reveals a flawed background or reputation of the third parties.
背景调查显示了第三方的背景或声誉存在缺陷。
- IV. Objection to anti-bribery representations and warranties in commercial agreements or negative response when told of such requirements.
反对商业协议中的反贿赂陈述和保证，或在被告知此类要求时给予负面回应。

- V. **Convolutd payment arrangements such as payment in cash, payment to a third party or requests for upfront payment for expenses or other fees.**
复杂的付款安排，例如现金付款，向第三方付款或要求预支费用或其他费用。
- VI. **The third party requires that his or her identity not to be disclosed as part of the business transaction.**
第三方要求在业务交易中不要披露其身份。
- VII. **Inadequate credentials for the nature of the engagement or lack of an office or an established place of business.**
参与性质的凭证不足或缺少办公室或既定营业地点。
- j. **Our Group requires our Directors and Employees to use good judgement and common sense at all times when assessing the integrity and ethical business practices of third parties.**
本集团要董事及雇员在评估第三方的诚信和道德商业惯例时始终保持良好的判断力和常识。
- k. **The detailed due diligence checklist on third parties can be referred to in our “Due Diligence Checklist on Third Parties” (Appendix C). Directors and Employees should take note that the due diligence checklist is non-exhaustive and are strongly encouraged to add their own measures into the checklist for a meaningful and thorough assessment on the third party.**
有关第三方的详细尽职调查清单，请参阅我们的“第三方尽职调查清单”（附录 C）。董事及雇员应注意，尽职调查清单并不详尽，因此强烈建议将自己的措施添加到清单中，以对第三方进行有意义且全面的评估。

6.1 DUE DILIGENCE PROCESS 尽职调查程序

- a. The purpose of due diligence is to provide a guide to Directors and Employees who have to decide whether or not to continue the relationship with the relevant third party. Any unsatisfactory answer to the non-exhaustive due diligence checklist shall be treated as a red flag by the Directors and Employees.
尽职调查的目的是为必须决定是否继续与相关第三方建立关系的董事及雇员提供指南。对于非详尽的尽职调查清单若存在任何不满意的回答，董事及雇员均应将其视为危险信号。
- b. If all identified red flags are sufficiently mitigated, then the Directors and Employees could proceed with the relationship. Similarly, if no red flags have been identified, then the Employee can proceed with the engagement (to satisfy that reasonable steps had been taken to address the corruption risk of the third party).
若所有识别出的危险信号得到充分缓解，则董事和员工可以继续与合作。同样，若未发现危险信号，则雇员可以进行下一步业务往来（此举为确保已采取合理步骤解决第三方的贪污风险）。
- c. If red flags have been identified but are not sufficiently mitigated, then it is critical that further inquiry is undertaken prior to entering into any contract or relationship. All red flags will need to be resolved or mitigated.
若已识别危险信号，但未得到充分缓解，在订立任何合同或业务关系之前进行进一步的询问至关重要。所有危险信号都必须解决或缓解。
- d. The most common or direct way of resolving a red flag will be to contact the third party directly. In particular, the third party should be asked what measures they have taken to resolve the corruption issue which had taken place in their company.
解决危险信号的最常见或直接的方法是直接联系第三方。尤其应询问第三方，他们采取了什么措施来解决公司中正发生的贪污问题。
- e. Our Group does not in any way limit the methods or mechanisms used by the Directors and Employees to conduct the third party's due diligence so long as the same is permitted by law.
在法律允许内，本集团不会以任何方式限制董事及雇员进行第三方尽职调查的方法或机制。
- f. If the red flags relate to a historic investigation in corrupt activity where there were no convictions, then the red flag can be considered mitigated (though it is prudent to seek further information or background of the circumstances).
若危险信号涉及的背景调查是未被定罪的贪污活动，则可认为危险信号已减轻（仍需谨慎寻求进一步的信息或背景情况）。

- g. In some circumstances, the red flags are unsubstantiated rumours which have not been formally investigated by the authorities or law enforcement agencies or proven in a court, tribunal or equivalent. Under this scenario, the Directors and Employees may proceed with the contract. Nevertheless, it is advisable for the Directors and Employees to continuously monitor the situation and immediately highlight to the Management if they notice any adverse findings.

在某些情况下，危险信号是未经证实的谣言，未经当局或执法机构的正式调查，也未在法院，法庭或同等机构中得到证实。在此情况下，董事及雇员可以继续执行合同。尽管如此，建议董事及雇员仍需不断监测形势，并在发现任何不利状况时立即向管理层汇报。

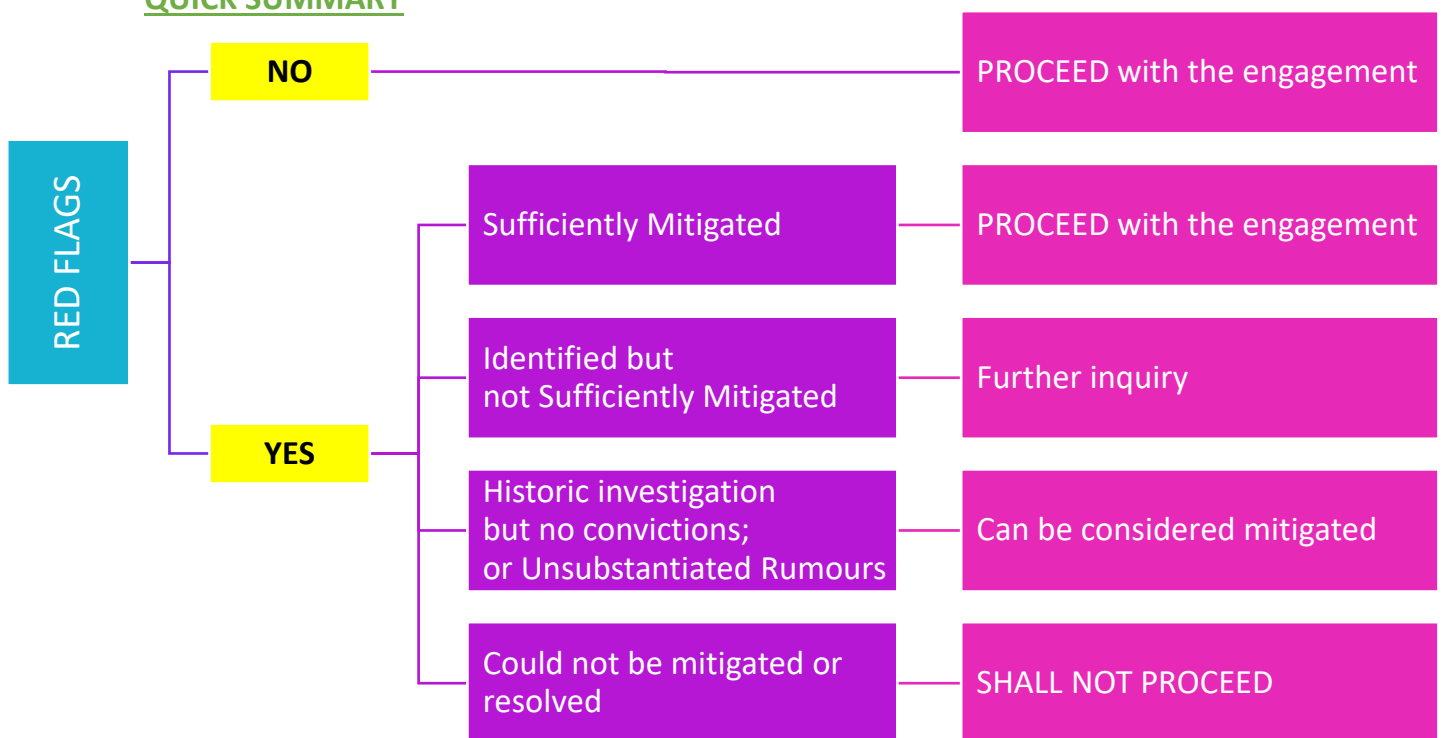
- h. When the Directors and Employees find that the red flags could not be mitigated or resolved despite all of the non-exhaustive measures, the Directors and Employees shall not proceed with the relationship with the third party.

当董事及雇员发现尽管采取了所有非详尽的措施仍无法缓解或解决危险信号时，董事及雇员不得继续与第三方建立业务关系。

- i. For any third party with positive public officials’ trace, and the Directors and Employees have decided to commence the relationship whereby the interests are also not prohibited by our Group’s policies, the disclosure in the financing requisition or request for proposal etc. is mandatory.

对于任何与公职人员有密切往来的第三方，在与本集团未有利益冲突下，而董事及雇员已决定与其建立业务关系，则必须在融资申请书或计划书中披露此类信息。

QUICK SUMMARY



7. EMPLOYEE RESPONSIBILITY 雇员责任

- a. As an Employee of the Group, we must ensure that we have read, understand and comply with the information contained within this policy, and with any training or other anti-bribery and anti-corruption information given. All employees have to sign "Employee Declaration" (refer to Appendix D).

作为集团的雇员，必须确保已阅读，理解并遵守此政策中所包含的信息，以及所提供的任何培训或其他反贿赂和反贪污信息。全体雇员必须签署一份“雇员声明”（请参阅附录 D）。

- b. All Employees of the Group should comply with the following:

集团全体雇员应遵守以下规定：

- I. Cannot give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage;
不允许给予，承诺给予或提供款项，赠礼或款待来获得或期望获得商业优势；
- II. Cannot give, promise to give, or offer payment to any third party to "facilitate" or expedite a procedure;
不允许向任何第三方给予，承诺给予或提供款项以“促进”或加快既有的程序；
- III. Cannot accept payment from any third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
不允许接受来自自己确定或怀疑想获得商业优势的第三方的任何款项；
- IV. Cannot accept a gift or hospitality from any third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided in return;
不允许接受来自自己确定或怀疑想获得商业优势的第三方的任何礼品或款待；
- V. Cannot threaten or retaliate against another employee who refuses to commit a bribery offence or who has raised concerns under this policy.
不允许威胁或报复任何因拒绝贿赂或根据此政策提出疑虑的雇员。

- c. All Employees are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption.

所有雇员有同等责任共同防止，检测和举报贿赂或任何形式的贪污行为。

8. REPORTING VIOLATIONS OF THE POLICY 举报违反政策的行为

- a. Any employee who knows of, or suspects, a violation of the Policy, is encouraged to report their concerns through the Group's Whistleblowing Channel. The provisions and procedure of the Whistleblowing Policy is available on the Group's website at mog.com.my.
任何雇员若得悉或怀疑他人存在违反公司政策等违规行为，可以通过集团的举报渠道举报疑虑。《举报政策》的规定和程序可在集团网站 mog.com.my 上寻获。
- b. 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.
任何人都不会因真诚地提出真实疑虑，或真诚地举报违反或怀疑违反此政策的行为，而受到歧视或遭受任何形式的报复。所有举报将被保密处理。
- c. However, malicious false allegations will be viewed seriously and treated as a gross misconduct and if proven, may lead to dismissal. Making a false report may result in the reporting individual being held personally liable for damages by anyone who may have been affected by the false disclosure.
反之，恶意的虚假指控将被认真对待，并被视为严重的不当行为；一经证实，将导致解雇。做出虚假举报者，需独立承担任何因虚假举报所带来的影响。

9. PROTECTION 保护

- a. If the Director or Employee encounters any form of bribery or corruption, he or she has a duty to disclose or report such acts to the Group.
如任何董事或雇员面对任何形式的贿赂或贪污行为，皆有义务向集团披露或举报。
- b. The Group will protect the Director or Employee against detrimental action i.e. against retaliation, punishment and / or unfair treatment (including intimidation, harassment, discrimination, demotion and termination of employment) from his / her superior or any other employees as a result of refusing to accept or offer a bribe to other corrupt activities or because report a concern relating to bribery or corruption.
任何不愿接受或提供贿赂，或因为举报与贿赂或贪污有关的问题的董事或雇员，将受本集团保护免遭其上级或任何其他雇员的惩罚和/或不公平待遇，包括恐吓，骚扰，歧视，降职和解雇。

10. RECORD KEEPING 保持记录

- a. Our Group shall control and maintain proper financial records of all payments made to third parties to serve as evidence that such payments are bona fide and not linked to corrupt and / or unethical conduct.

本集团应管制并保存所有支付给第三方的款项的正确财务记录，以作为此类款项是善意的且与贪污和/或不道德行为无关的证据。

- b. All departments and outlets shall keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We shall declare and keep a written record of the amount and reason for hospitality or gifts accepted or given and understand that gifts are subjected to Management's review and approval.

各部门或分店需保留详细而准确的财务记录，并具有适当的内部控制措施，以作为所有已付款项的证据。我们必须申报任何接受或给予的款待或赠礼的金额和原因并保持书面记录，并了解任何赠礼都需获得管理层的审查和批准。

- c. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as customers, suppliers and business contacts, should be prepared and maintain with strict accuracy and completeness. Records should be retained for a significant period of time in order to comply with the local law as well as the Group's policies.

与第三方交易有关的所有帐目，发票，备忘录和其他文件和记录都应准备并严格和完整地维护。记录应保留一段时间，以符合当地法律和集团的政策。

11. TRAINING AND COMMUNICATION 培训与沟通

- a. Our Group shall conduct a timely refresher and awareness programme to all Directors and Employees to ensure sufficient understanding our Group's anti-corruption position.

本集团将对所有董事及雇员进行及时的复习和提高意识培训，以确保充分了解本集团的反贪污立场。

- b. Training shall be provided to individuals who are new to the Group or newly appointed to or currently holding an exposed position. Training shall also be conducted on a regular basis, in accordance with the level of bribery and corruption risk related to the position.

本集团将向新成员或新任命或目前就职的雇员提供培训，并根据与其职位有关的贿赂和贪污风险级别，定期向董事及雇员提供培训。

- c. Employee will be asked to formally accept to comply with this Policy.

将要求员工以正式行式接受并遵守此政策。

12. WAIVER 豁免

- a. Any deviation or waiver from this Policy must be approved by the Board of the Group.
对此政策的任何偏差或豁免必须得到集团董事会的批准。
- b. In the unlikely situation where an exception or modification to the principles set out in this Policy be required, the request for exception must be made in good faith and submitted in writing to the Board of the Group.
在极少数情况下，若需对此政策中规定的原则进行豁免或修改，则必须以书面形式将例外请求提交与集团董事会。

13. REVIEW AND MONITORING 审查和监测

- a. Corporate Affairs Department is responsible for monitoring the effectiveness of this Policy and will review the implementation of it on a regular basis. We will assess the suitability, adequacy, and effectiveness of this Policy.
公司事务部负责监督此政策的有效性，并将定期审查其实施情况。我们将评估此政策的适用性，充分性和有效性。
- b. Any need for improvements will be applied as soon as possible. Directors, Employees and persons associated with MOG (including third parties) are encouraged to offer the feedback on this Policy if there are suggestions as to how it can be improved. Feedback of this nature must be addressed to the Corporate Affairs Department and Management.
任何改进的需求将尽快得到应用。我们鼓励与 MOG 相关的董事，雇员和个人（包括第三方）对此政策提供反馈。任何有关于如何改进此政策的建议，必须发送给公司事务部和管理层。

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GIFTS, ENTERTAINMENT AND CORPORATE HOSPITALITY DECLARATION	Ref	CA/GECHD/20/0
	Rev	0
	Last Updated	1 June 2020

1. This declaration form is in accordance with the Group’s “**No-Gift Policy**”.
2. All Directors and Employees must declare all gifts (which is valued at RM150 or more), entertainment and corporate hospitality **IMMEDIATELY** upon receiving the same to the Management. The physical gifts valued at RM150 or more must be deposited to the Management IMMEDIATELY upon receipt of the same.
3. Similarly, any meal treats (of any value) accepted must also be declared in this form.
4. For gifts worth less than RM150, Directors and Employees could accept the same with no declaration required.
5. As for hampers (of any value), no declaration is required but the Directors and Employees may share the hampers amongst team members or place them in the common area for Employee’s consumption.
6. All declarations must be submitted (with the Employee’s and superior’s signatures) to Corporate Affairs Department as follow:
 - **with** gift, including entertainment and corporate hospitality : **IMMEDIATELY.**
 - **without** gift, including entertainment and corporate hospitality: **HALF YEARLY.**

Note: Directors and Employees who have accepted any gift, including entertainment and corporate hospitality during business trips will have to submit the Gifts, Entertainment and Corporate Hospitality Declaration Form upon their return to office.

Director / Employee Name	:			
Position	:			
Outlet / Department	:			
Declaration Period (“√” the relevant box)	:	<input type="checkbox"/> 1 st half	<input type="checkbox"/> 2 nd half	of year _____

A. WITHOUT any gifts, meal, entertainment and corporate hospitality to declare.

<p>I confirm that to the best of my knowledge, there are no gifts, meals, entertainment and / or corporate hospitality items which I need to declare for this duration.</p>	<p>Signature:</p> <p>Date:</p>
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THIRD PARTIES LETTER OF COMMITMENT AND DECLARATION	Ref	CA/TPD/20/0
	Rev	0
	Last Updated	1 June 2020

1. We _____ (Company Name) are the contractors / vendors / suppliers / solicitors / agents / consultants / joint venture partners / introducers / government intermediaries / others _____ of MOG Group of Companies (“MOG”).
2. We hereby declare that:
 - a. We understand and will comply with all applicable laws and regulations, MOG Group’s Code of Business Conduct for Third Parties and other relevant policies.
 - b. We are ready to commit to the following anti-corruption principles, which includes:
 - I. Promoting values of integrity, transparency, accountability and good corporate governance;
 - II. Prevention of corruption and any form of corrupt practice;
 - III. Supporting anti-corruption initiatives led by the government and the local authorities. (hereinafter collectively referred to as “the requirements”).
3. We have not been convicted nor are we subject to any investigation, inquiry or enforcement proceedings by the relevant authorities of any actual or suspected breach and will report any actual or suspected breach as soon as reasonably practicable and to the extent permitted by the law to MOG.
4. We undertake to promptly inform MOG of any breach and / or alleged / suspected breach of the requirements and cooperate with MOG in any investigation of such breach involving MOG’s Directors and Employees.
5. We acknowledge that the provisions set out in this declaration form shall form part of the terms and conditions of our appointment and / or contract of service. Meanwhile, we are liable to indemnify MOG from and against any and all judgements, losses, liabilities, penalties, damages (including loss of profit), costs, expenses, claims, demands and causes of action of every kind, resulting from such breach and termination.
6. We further acknowledge that MOG has the right to suspend or terminate the contract / agreement / job and disqualify us from tendering for future contracts / jobs if we were found to have breached the requirements or any other terms and conditions implemented by MOG pursuant to the contract / agreement / job.

Signature of Authorised Person	:	
Name of Company’s Authorised Person	:	
Company’s Name	:	
Company’s Stamp	:	
Date	:	

DUE DILIGENCE CHECKLIST ON THIRD PARTIES	Ref	CA/DDCTP/20/0
	Rev	0
	Last Updated	1 June 2020

Tick (v) whether YES or NO on the Due Diligence Checklist below.

If you have answered YES to any of the statements below, you have to be satisfied that the relevant information / explanation / justification is available / procured / documented prior to your engagement with the third parties.

PART A: RELATIONSHIP WITH THE THIRD PARTY

NO	DUE DILIGENCE CHECKLIST	YES	NO
1	There has been difficulty in obtaining the required information from the third party.		
2	There are concerns or evidence of corruption (convictions) in respect of the third party.		
3	There are allegations of corruption activity against the third party or any of its employees.		
4	The third party does not have its own anti-corruption / code of conduct / anti-fraud / compliance policy.		
5	The third party does not have its own due diligence procedure in place for the sourcing of customers and procurement of vendors, subcontractors etc.		
6	The value of the contract secured by the third party is unreasonable.		
7	There is evidence of adverse news related to the third party.		
8	The third party does not have the necessary skills and experience to provide the services for which they will be contracted.		
9	The third party is not charging a fair market price for their services (a company paying bribes may often charge more for its services in order to create a slush fund to pay bribes).		
10	The third party is being associated with disreputable suppliers / subcontractors etc.		
11	The third party is not readily and efficiently able to deal with the due diligence requirements of MOG or larger companies.		
12	The third party requested for urgent payments or unusually high commissions.		

DUE DILIGENCE CHECKLIST ON THIRD PARTIES	Ref	CA/DDCTP/20/0
	Rev	0
	Last Updated	1 June 2020

Tick (v) whether YES or NO on the Due Diligence Checklist below.

For any third party with positive public officials trace i.e. with YES answer any of the following due diligence set, and the outlet / department has decided to commence the relationship with the third party whereby the interests are also not prohibited by MOG's Policies, the disclosure in the financing requisition / request for proposal etc. is mandatory.

PART B: THIRD PARTY AS A PUBLIC OFFICIAL

NO	DUE DILIGENCE CHECKLIST	YES	NO
13	The third party is a public official.		
14	The owners, directors, shareholders, officers or any employees of the third party being current or former public officials.		

PART C: THIRD PARTY'S DEALING WITH PUBLIC OFFICIAL

NO	DUE DILIGENCE CHECKLIST	YES	NO
15	The third party is recommended by a public official.		
16	The third party will be interacting / has any affiliations with public officials in order to perform the contract.		
17	The owners, directors, shareholders, officers or any employees of the third party have personal, familial or any associations with public officials.		
18	The third party has connections with public officials or government agencies.		
19	The third party's employees (including immediate family members of the employees) have connections with public officials.		

DUE DILIGENCE CHECKLIST ON THIRD PARTIES	Ref	CA/DDCTP/20/0
	Rev	0
	Last Updated	1 June 2020

Tick (v) whether YES or NO on the Due Diligence Checklist below.

In the event the answer to any of the checklist below is YES then the respective divisions have to be satisfied that all of the red flags are sufficiently mitigated.

PART D: FINANCIAL BACKGROUND

NO	DUE DILIGENCE CHECKLIST	YES	NO
20	Any identified issue on repeated payments made to an unidentified third party, or an identified third party but for unclear reasons?		
21	Any identified issue on significant payment to an unidentified third party, or an identified third party but for unclear reasons?		
22	Are there any payments with non-transparent recipient or reason for payment (for instance, consulting expenses)?		
23	Is there any unusual frequency of payments made by the customer to its suppliers / vendors / contractors etc. or made by the customer's customer to the customer?		
24	Is there any unusual value of payments made by the customer to its suppliers / vendors / contractors or made by the customer's customer to the customer?		
25	Is there any excessive expense which could be an indication of bribes?		

ASSURANCE DECLARATION:

I herewith confirm the following:

- a. I have conducted the above due diligence to carefully evaluated _____
(Company Name) _____ (Company No.); and
- b. I will continuously monitor the activities and undertakings through the duration of the Group's cooperation with the third party.

Assurance by the Personnel

Verified by HOD

Name :
Date :

Name :
Date :

EMPLOYEE DECLARATION	Ref	CA/ED/20/0
	Rev	0
	Last Updated	1 June 2020

1. I hereby declare that I have read and understood the Anti-Bribery and Anti-Corruption Policy of MOG Group of Companies and the duties and responsibilities required of me in relation to the said Policy.
2. I confirm that in the course of my employment with the Group, I will: -
 - a. act in an ethical manner and will not give/accept any forms of bribery while I carry out my duties and responsibilities for the Group.
 - b. not engage in any activity, practice, or conduct which shall constitute an offence under the Malaysian Anti-Corruption Commission Act 2009 ('Act') or equivalent laws.
3. I understand if I fail to comply with this Declaration Form, the Group reserves the right to undertake a review of my appointment or employment with the Group, which may lead to possible disciplinary actions, dismissal or the reporting of any instances of bribery and corruption to the relevant authorities.
4. I declare, in the best of my knowledge and belief, that I am not aware of any actual, potential, or perceived conflict of interest within the Group or other stakeholders of the Group.
5. I agree to notify the Group, as soon as practicable, on any new actual, potential, or perceived conflict of interest.

6. I further declare that (tick whichever is applicable)

I have never been convicted of crime or offences, other than traffic offences (if any).

I have been convicted of the following crime or offences.

To provide a brief description of financial or commercial crime convicted, if any:

7. I declare that all information provided in this Declaration Form is to the best of my knowledge and belief and are true, complete, and accurate.
8. I understand that if any information provided in this Declaration Form is untrue, incomplete or inaccurate, the Group reserves the right to undertake a review of my appointment or employment with the Group, which may lead to disciplinary actions, dismissal or the reporting of any instances of bribery and corruption to the relevant authorities.

Signature

Full Name as per IC:
 IC Number :
 Outlet :
 Date :