

Procedure

Anti-Bribery & Anti-Corruption (ABAC) Policy & Guidelines

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Distribution:

Person-associated and Business Associates of ENFRASYS Group of Companies.

Summary of Changes:

- Revision and Additional of New Clauses (Clauses 14, 15 & 16)
- The definition of “Persons Associates” and the Code of Business Conduct have been updated.
- Changes have been made to the definition in Clause 13.1.5 Personal or Private Relationships.

ABAC POLICY & GUIDELINES					
Document No	:	ENFRASYS/P/LC/02	Rev	:	02
Effective Date	:	01 November 2024			

Purpose

The Policy elaborates upon those principles, guiding ENFRASYS’ person-associated and business associates concerning how to deal with improper solicitation, bribery and other corrupt activities and issues that may arise during business.

The Policy is not intended to provide definitive answers to all questions regarding bribery and corruption. Rather, they are intended to provide all person-associated and business associates with a basic introduction to how ENFRASYS always combats bribery and corruption in furtherance of the group’s commitment to lawful and ethical behavior. Some of the guidelines are designed to prevent situations in which bribery and corrupt practices may take root.

Scope

The Policy is generally applicable to ENFRASYS’ person-associated and business associates, as defined in “1.3 Application”, acting on behalf of ENFRASYS, unless otherwise stated in the specific policies referred to in this Policy.

Responsibility

Refer “4.0 Responsibilities.”

Definition

Refer “2.0 Definitions and Abbreviations.”

ABAC POLICY & GUIDELINES					
Document No	:	ENFRASYS/P/LC/02	Rev	:	02
Effective Date	:	01 November 2024			

Attachment

Attachment 1: Integrity Declaration Form for Employees

(ENFRASYS/P/LC/02/F/001/R00)

Attachment 2: Integrity Declaration Form for Business Associates

(ENFRASYS/P/LC/02/F/002/R00)

Attachment 3: Due Diligence Checklist for Business Associates

(ENFRASYS/P/LC/02/C/003/R00)

Attachment 4: Due Diligence Checklist for Employees

(ENFRASYS/P/LC/02/C/004/R00)

Attachment 5: Provision/ Receipt of Gifts/ Hospitality/ Donation/ Sponsorship Form

(ENFRASYS/P/LC/02/F/005/R00)

Attachment 6: Provision/ Receipt of Entertainment

(ENFRASYS/P/LC/02/F/006/R00)

Attachment 7: Gifts, Entertainment, Hospitality, Donation & Sponsorship Register

(ENFRASYS/P/LC/02/F/007/R00)

Attachment 8: Conflict of Interest Declaration Form for Employees

(ENFRASYS/P/LC/02/F/008/R001)

Attachment 9: Conflict of Interest Declaration Form for Business Associates

(ENFRASYS/P/LC/02/F/009/R001)

Associated Documents

- 1. Anti-Bribery and Anti-Corruption Manual - ENFRASYS/M/ABMS/R00
- 2. Whistleblowing Policy - ENFRASYS/P/LC/004

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev
			: 02
Effective Date	:	01 November 2024	

Table of Contents

ENFRASYS GROUP OF COMPANIES	1
1.0 INTRODUCTION	6
1.1 Overview	6
1.2 Objectives	7
1.3 Application	7
2.0 DEFINITIONS AND ABBREVIATIONS	8
3.0 BRIBERY AND CORRUPTION OFFENCES	14
4.0 RESPONSIBILITIES	21
5.0 COMPLIANCE	25
5.1 BUSINESS ETHICS	25
6.0 DUE DILIGENCE	27
6.1 Definition of High Risk	27
6.1.1 High Risk Employees	27
6.1.2 High Risk Business Associates	28
6.1.3 Donations & Sponsorships	28
6.2 Due Diligence Process	29
6.3 Due Diligence Outcome and Findings	29
6.3 Due Diligence Approvals	30
6.4 Documentation	32
7.0 FACILITATION PAYMENT	33
8.0 GIFT, ENTERTAINMENT & HOSPITALITY	34
8.1 Gift, Entertainment and Hospitality Policy	34
8.2 Allowable Gifts	35
8.3 Giving Gifts	36
8.4 Accepting Gifts	36
8.5 Allowable Entertainment	38
8.6 Providing Entertainment	38
8.7 Accepting Entertainment	39
8.8 Allowable Hospitality	39
8.9 Providing Hospitality	40
8.10 Accepting Hospitality	41
8.11 Exception to the Gifts, Entertainment, Hospitality Policy	41
8.12 Reporting and Recording	42
9.0 DONATION & SPONSORSHIP	43

ABAC POLICY & GUIDELINES					
Document No	:	ENFRASYS/P/LC/02	Rev	:	02
Effective Date	:	01 November 2024			

9.1	Donation and Sponsorship Policy	43
9.2	Charitable and Social Donations.....	47
9.3	Political Donations	48
9.4	Sponsorships.....	49
9.5	Reporting and Recording.....	50
10.0	FINANCIAL AND NON-FINANCIAL CONTROLS.....	51
10.1	Financial Controls.....	51
10.2	Non-Financial Controls	52
11.0	COMMUNICATION & TRAINING.....	52
11.1	Internal Stakeholders.....	52
11.2	External Stakeholders	54
12.0	WHISTLEBLOWING	56
13.0	CONFLICT OF INTEREST.....	56
13.1	Types of Conflict.....	56
13.1.1	Other Business Interest	56
13.1.2	Other Employment.....	57
13.1.3	Corporate Directorship.....	57
13.1.4	Trading in “Anything of Value”	58
13.1.5	Personal or Private Relationship.....	59
13.2	Disclosing Conflicts	59
13.3	Remedial Action	60
14.0	RECORD KEEPING.....	60
14.1	Access	60
14.2	Condition.....	61
15.0	CLARIFICATIONS	61
16.0	ACKNOWLEDGEMENT AND ACCEPTANCE.....	61

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

1.0 INTRODUCTION

1.1 Overview

ENFRASYS is committed to conducting its business professionally and ethically with integrity and lawfully in compliance with all applicable laws of Malaysia pertaining to bribery or corruption.

As part of the Anti-Bribery and Corruption Management System, ENFRASYS has designed the ABAC Policy and Guidelines, hereinafter also referred to as “Policy”, which is aligned with requirements of, but not limited to;

- Malaysia Anti-Corruption Commission Act 2009 (Act 694);
- Malaysian Anti-Corruption Commission (Amendment) Act 2018 (Act A1567);
- Prime Minister’s Department Guidelines “T.R.U.S.T” on Adequate Procedures On “Pursuant to Subsection of Section 17A (5) of Malaysia Anti-Corruption Commission Act 2009;
- Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (Act 613);
- Penal Code Act (Act 574);
- Company Act (Act 777);
- Whistleblower Protection Act 2010 (Act 711);
- ENFRASYS’s Anti-Bribery Management System.
- Corporate and relevant stakeholders (if any).

This Policy sets out overall policies, procedures and guidelines of ENFRASYS on all forms of bribery and corruption designed to prevent, detect and respond to bribery and corruption, and comply with applicable anti-bribery and corruption laws.

In case of any ambiguity or inaccurate information in this Policy, kindly consult the Legal and Compliance Department for clarification. Where there is a conflict between this Policy and applicable laws, the law prevails.

This Policy is subject to changes from time to time, is approved by the Board of Directors of ENFRASYS prior to take effect.

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

1.2 Objectives

This Policy aims to protect ENFRASYS’s reputation, and persons associated by providing clear and unambiguous guidance to prevent ENFRASYS or its persons associated from falling into the bribery or corruption trap or being alleged to have committed bribery or corruption.

This policy spells out for persons associated with ENFRASYS the expected and standard behaviors and guidelines when dealing with bribery or corruption issues in day-to-day business operations and activities.

1.3 Application

This Policy is applicable to the following **stakeholders** in the conduct of ENFRASYS’s business operations and activities, unless otherwise stated in the specific policies in this Policy:

- **persons associated** (internal party, i.e., directors, partners or employees of the commercial organization or persons who perform services for or on behalf of the commercial organization);
- **business associates** (external party, i.e., clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, sub-contractors, suppliers, vendors, advisors, agents, distributors, representatives, intermediaries, investors, public officials, party officials, politicians and any person or body which performs services for or on behalf of organization).

ABAC POLICY & GUIDELINES					
Document No	:	ENFRASYS/P/LC/02	Rev	:	02
Effective Date	:	01 November 2024			

2.0 DEFINITIONS AND ABBREVIATIONS

For the purpose of comprehending the contents of this Policy, the definitions and abbreviations are stipulated as follows;

Agent	Shall have the same meaning as defined by MACC Act 2009, i.e.: Any person employed by or acting for another, and includes an officer of a public body or an officer serving in or under any public body, a trustee, an administrator or executor of the estate of a deceased person, a subcontractor, and any person employed by or acting for such trustee, administrator or executor, or subcontractor;
Bribery	<ul style="list-style-type: none"> • Shall have the same meaning as defined by ISO 37001:2016, i.e.: Offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person’s duties. • It may also be defined as the act of corruptly giving, agreeing to give, authorizing, promising, offering, soliciting, receiving, or agreeing to receive any gratification, whether directly or indirectly.
Board of Directors	Refers to a panel of individuals elected by organization’s shareholder(s) to represent their interests.
Business Associate	Refer to an external party with whom the organization has, or plans to establish, some form of business relationship and includes but is not limited to clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, sub-contractors, suppliers, vendors, advisors, agents, distributors, representatives, intermediaries,

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

investors, public officials, party officials, politicians and any person or body which performs services for or on behalf of organization.

Code of Business Conduct	Refers to Enfrasys' Anti-Bribery and Anti-Corruption Policy applicable to all Business Associates of Enfrasys.
Commercial Organization	Refer to a company incorporated under the Companies Act 2016 [Act 777] and carries on a business in Malaysia or elsewhere.
Conflict of Interest	Refers to situation where business, financial, family, political or personal interests could interfere with the judgement of persons carrying out their duties for the organization.
Hospitality	Refer to any entertainment offered or received by organization for its persons associated, business associates and other stakeholders in the manner that complete expenses are borne by the organization.
Corruption	Shall have the same meaning as defined by MACC Act 2009, i.e.: Act of giving or receiving of any gratification or reward in the form of cash or in-kind of high value for performing a task in relation to his/her job description.
Donation	Refers to the gratification given out by organization for charity, humanitarian aid or to support local community welfare, whether in-kind or by way of financial contribution.
Employee	Refers to any person who is in the employment with organization, including but not limited to executives, nonexecutives, full-time, contract, part time, temporary employees or those serving internships.
Entertainment	Refer to entertainment offered or received by organization's employees or directors to/ from third parties with food and drink, or in other forms of entertainment, in the manner that the expenses to be borne by the organization.

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

- Facilitation
Payment
- Shall have the same meaning as defined by ISO 37001:2016 A.2.2.1, i.e.: An illegal or unofficial payment made in return for services that the payer is legally entitled to receive without making such payment. It is normally a relatively minor payment made to a public official or person with a certifying/ approval function in order to secure or expedite the performance of a routine or necessary action.
 - Is a small bribe, also known as “grease payment” or a “speed payment”.
- Gift
- Refers to something is given voluntarily as token of appreciation or respect, without requiring payment in return.
- Governing Body
- Shall have the same meaning as defined by ISO 37001:2016, i.e.: A group or body that has the ultimate responsibility and authority for an organization’s activities, governance and policies and to which top management reports and by which top management is held accountable.
- Gratification
- Shall have the same meaning as defined by MACC Act 2009, i.e.:
 - (a) Money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
 - (b) Any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
 - (c) Any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
 - (d) Any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

- (e) Any forbearance to demand any money or money’s worth or valuable thing;
- (f) Any other service or favor of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and
- (g) Any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).
- Giving and receiving **gratification** with corrupt intent, to induce or reward the improper performance or refrain from performing of recipient’s duties, to obtain or retain business advantage, is considered has committed bribery or corruption offence.

ISO 37001:2016 Is an International Standard established by the ISO specifying generic requirements for establishing, implementing, maintaining, reviewing and continuously improving anti-bribery management system.

Limit of Authority Refers to the approved document(s) stipulating the approving authority and authority limits allowed for the board of directors and top management of the organization.

Person associated/
Associated person with a commercial organization Refer to directors, partners or employees of the commercial organization or persons who perform services for or on behalf of the commercial organization such as (but not limited to) agents, consultants or brokers.

ABAC POLICY & GUIDELINES					
Document No	:	ENFRASYS/P/LC/02	Rev	:	02
Effective Date	:	01 November 2024			

Political Official	Refers to, political officer, a member and person or body which performs services for or on behalf of a political party.
Public Official	Refers to any appointed or elected official, officer, or employee who works at the expense of taxpayers or the government or state owned, controlled or funded companies, or any person working in specific functions or industries who are defined or regulated as a government official by local law.
Sponsorship	Refers to support, either financially or by way of product and/ or services for and event or activity organized by a profit/ non-profit organizations, local communities, government departments or agencies, primarily aimed at raising awareness of organization profile.
Stakeholder	Shall have the same meaning as defined by ISO 37001:2016, i.e.: Person or organization that can affect, be affected by, or perceive themselves to be affected by a decision or activity.
Top Management	Shall have the same meaning as defined by ISO 37001:2016, i.e.: A person or group of people who directs and controls an organization at the highest level. The top management of ENFRASYS is referred to the position of Group Chief Executive Officer, Group Chief Operating Officer, Group Chief Financial Officer, Chief Executive Officer, Chief Financial Officer, and other Head of Departments.
Whistleblower	Refers to a person (internal or external party) raising or reporting concerns of wrongful activities or wrongdoings as defined in organization's Whistleblowing Policy.
ABAC	Anti-bribery and Anti-Corruption.
ISO	International Organization for Standardization, is a worldwide federation of national standards bodies.
MACC	Malaysian Anti-Corruption Commission.

ABAC POLICY & GUIDELINES					
Document No	:	ENFRASYS/P/LC/02	Rev	:	02
Effective Date	:	01 November 2024			

- ENFRASYS ENFRASYS Group of Companies, consisting of
- Enfrasys Consulting Sdn. Bhd.
 - Enfrasys Solutions Sdn. Bhd.
- RMP Royal Malaysia Police.

3.0 BRIBERY AND CORRUPTION OFFENCES

Following are classification of bribery and corruption offences and their applicable penalties as defined by Malaysian Anti-Corruption Commission if a commercial organization or employee is convicted:

Bribery and Corruption Offences	Penalties
<p><u>Sections 16 MACC Act, Offence of accepting gratification (Personal Liability);</u></p> <p>Any person who by himself, or by or in conjunction with any other person—</p> <p>(a) corruptly solicits or receives or agrees to receive for himself or for any other person; or</p> <p>(b) corruptly gives, promises or offers to any person whether for the benefit of that person or of another person, any gratification as an inducement to or a reward for, or otherwise on account of—</p> <p>(A) any person doing or forbearing to do anything in respect of any matter or transaction, actual or proposed or likely to take place; or</p> <p>(B) any officer of a public body doing or forbearing to do anything in respect of any matter or transaction, actual or proposed or likely to take place, in which the public body is concerned, commits an offence.</p>	<p><u>Section 24 (1), MACC Act, Penalty for offences under sections 16, 17, 18, 20, 21, 22 and 23 (Personal Liability):</u></p> <p>Any person who commits an offence under sections 16, 17, 20, 21, 22 and 23 on conviction be liable to;</p> <p>(a) imprisonment for a term not exceeding twenty years; and</p> <p>(b) a fine of not less than five times the sum or value of the gratification which is the subject matter of the offence, where such gratification is capable of being valued or is of a pecuniary nature, or ten thousand ringgits, whichever is the higher.</p>

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

Section 17 MACC Act, Offence of giving or accepting gratification by agent (Personal Liability):

A person commits an offence if—

- (a) being an agent, he corruptly accepts or obtains, or agrees to accept or attempts to obtain, from any person, for himself or for any other person, any gratification as an inducement or a reward for doing or forbearing to do, or for having done or forborne to do, any act in relation to his principal's affairs or business, or for showing or forbearing to show favour or disfavour to any person in relation to his principal's affairs or business; or
- (b) he corruptly gives or agrees to give or offers any gratification to any agent as an inducement or a reward for doing or forbearing to do, or for having done or forborne to do any act in relation to his principal's affairs or business, or for showing or forbearing to show favour or disfavour to any person in relation to his principal's affairs or business.

Section 24 (1), MACC Act, Penalty for offences under sections 16, 17, 18, 20, 21, 22 and 23 (Personal Liability):

Any person who commits an offence under sections 16, 17, 20, 21, 22 and 23 on conviction be liable to;

- (a) imprisonment for a term not exceeding twenty years; and
- (b) a fine of not less than five times the sum or value of the gratification which is the subject matter of the offence, where such gratification is capable of being valued or is of a pecuniary nature, or ten thousand ringgits, whichever is the higher.

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

Section 18 MACC Act, Offence of intending to deceive principal by agent (Personal Liability):

A person commits an offence if he gives to an agent, or being an agent, he uses with intent to deceive his principal, any receipt, account or other document in respect of which the principal is interested, and which he has reason to believe contains any statement which is false or erroneous or defective in any material particular, and is intended to mislead the principal.

Section 24 (2), MACC Act, Penalty for offences under sections 16, 17, 18, 20, 21, 22 and 23 (Personal Liability):

Any person who commits an offence under section 18 shall on conviction be liable to—

- (a) imprisonment for a term not exceeding twenty years; and
- (b) a fine of not less than five times the sum or value of the false or erroneous or defective material particular, where such false or erroneous or defective material particular is capable of being valued, or of a pecuniary nature, or ten thousand ringgit, whichever is the higher.

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

Section 21 MACC Act, Bribery of officer of public body (Personal Liability):

Any person who offers to an officer of any public body, or being an officer of any public body solicits or accepts, any gratification as an inducement or a reward for –

- (a) the officer voting or abstaining from voting at any meeting of the public body in favor of or against any measure, resolution or question submitted to the public body;
- (b) the officer performing or abstaining from performing or aiding in procuring, expediting, delaying, hindering or preventing the performance of, any official act;
- (c) the officer aiding in procuring or preventing the passing of any vote or the granting of any contract or advantage in favor of any person; or
- (d) the officer showing or forbearing to show any favor or disfavor in his capacity as such officer,

commits an offence, notwithstanding that the officer did not have the power, right or opportunity so to do, show or forbear, or accepted the gratification without intending so to do, show or forbear, or did not in fact so do, show or forbear, or that the inducement or reward was not in relation to the affairs of the public body.

Section 24 (1), MACC Act, Penalty for offences under sections 16, 17, 18, 20, 21, 22 and 23 (Personal Liability):

Any person who commits an offence under sections 16, 17, 20, 21, 22 and 23 on conviction be liable to;

- (a) imprisonment for a term not exceeding twenty years; and
- (b) a fine of not less than five times the sum or value of the gratification which is the subject matter of the offence, where such gratification is capable of being valued or is of a pecuniary nature, or ten thousand ringgits, whichever is the higher.

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

Section 25 (1) MACC, Duty to report bribery transactions (Personal Liability):

Any person to whom any gratification is given, promised, or offered, in contravention of any provision of this Act shall report such gift, promise or offer together with the name, if known, of the person who gave, promised or offered such gratification to him to the nearest officer of the Commission or police officer.

Section 25 (3) MACC, Duty to report bribery transactions (Personal Liability):

Any person from whom any gratification has been solicited or obtained, or an attempt has been made to obtain such gratification, in contravention of any provision of this Act shall at the earliest opportunity thereafter report such soliciting or obtaining of, or attempt to obtain, the gratification together with the full and true description and if known, the name of the person who solicited, or obtained, or attempted to obtain, the gratification from him to the nearest officer of the Commission or police officer.

Section 25 (2) MACC, Duty to report bribery transactions (Personal Liability):

Any person who fails to comply with subsection (1) commits an offence and shall on conviction be liable to a fine not exceeding one hundred thousand ringgit or to imprisonment for a term not exceeding ten years or to both.

Section 25 (4) MACC, Duty to report bribery transactions (Personal Liability):

Any person who fails, without reasonable excuse, to comply with subsection (3) commits an offence and shall on conviction be liable to a fine not exceeding ten thousand ringgit or to imprisonment for a term not exceeding two years or to both.

ABAC POLICY & GUIDELINES					
Document No	:	ENFRASYS/P/LC/02	Rev	:	02
Effective Date	:	01 November 2024			

Section 28 (1) MACC, Attempts, preparations, abetments and criminal conspiracies punishable as offence (Personal Liability);

Any person who—

- (a) attempts to commit any offence under this Act;
- (b) does any act preparatory to or in furtherance of the commission of any offence under this Act; or
- (c) abets or is engaged in a criminal conspiracy to commit any offence under this Act.

Section 28 (1) MACC, Attempts, preparations, abetments and criminal conspiracies punishable as offence (Personal Liability);

Any person commits such offence and on conviction be liable to punishment provided for such offence.

Section 28 (2):

Any provision of this Act which contains a reference to an offence under any specific provision of this Act shall be read as including a reference to an offence under subsection (1) in relation to the offence under that specific provision.

Section 28 (3):

Paragraph (1)(a) shall not apply where an attempt to do any act is expressly made an offence under this Act, and paragraph (1)(c) shall not apply to the case of an abetment of an offence as provided for under section 164 of the Penal Code.

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

Section 17A (1) MACC Act, Offence by commercial organization (Corporate Liability);

A commercial organization commits an offence if a person associated with the commercial organization corruptly gives, agrees to give, promises or offers to any person any gratification whether for the benefit of that person or another person with intent –

- (a) to obtain or retain business for the commercial organization; or
- (b) to obtain or retain an advantage in the conduct of business for the commercial organization.

Section 17A (3) MACC Act, Offence by commercial organization (Personal Liability);

When an offence is committed by a commercial organization, a person –

- (a) who is its director, controller, officer or partner; or
- (b) who is concerned in the management of its affairs, at the time of the commission of the offence, is deemed to have committed that offence unless that person proves that the offence was committed without his consent or connivance and that he exercised due diligence to prevent the commission of the offence as he ought to have exercised, having regard to the nature of his function in that capacity and to the circumstances.

Section 17A (2) MACC Act, Offence by commercial organization (Corporate Liability);

Any commercial organization on conviction liable to a fine of not less than ten times the sum or value of the gratification which is the subject matter of the offence, where such gratification is capable of being valued or is of pecuniary nature, or one million ringgits, whichever is the higher, or to imprisonment for a term not exceeding twenty years or to both.

Section 24 (1), MACC Act, Penalty for offences under sections 16, 17, 18, 20, 21, 22 and 23 (Personal Liability);

Any person who commits an offence under sections 16, 17, 20, 21, 22 and 23 on conviction be liable to;

- (a) imprisonment for a term not exceeding twenty years; and
- (b) a fine of not less than five times the sum or value of the gratification, which is the subject matter of the offence, where such gratification is capable of being valued or is of a pecuniary nature, or ten thousand ringgits, whichever is the higher.

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

4.0 RESPONSIBILITIES

All persons associated with ENFRASYS are responsible for the implementation of the Anti-Bribery and Anti-Corruption Management System whereby it is crucial for each individual to understand and apply them within their roles and responsibilities in a compliant and ethical manners.

Roles	Key Responsibilities
Governing Body (Board of Directors)	<ul style="list-style-type: none"> a) Endorses commitment and stances towards prohibition of bribery and corruption practices in the business conduct within ENFRASYS; b) Approves the Anti-Bribery and Corruption Management System including its policy and objectives and ABAC policies and guidelines, and ensures alignment to ENFRASYS’s vision and strategic direction; c) Promotes an organizational culture that cultivates ABAC awareness, always understanding and compliance to the relevant laws and the company’s policies; and d) Maintains oversights on ABAC governance, provision of appropriate resources, implementation of best practices of Anti-Bribery and Anti-Corruption Management System and ABAC policies and guidelines, periodic review and continual improvement to adequately address the effective operation and conformance of ABAC programs.
Top Management (Group Chief Executive Officer, Group Chief Operating Officer, Group Chief Financial Officer, Chief Executive Officer,	<ul style="list-style-type: none"> a) Formulates overall direction on the establishment, implementation, maintenance and periodic review and continually improvement of Anti-Bribery and Anti-Corruption Management System including its policy and objectives, and ABAC policies and guidelines to adequately address the relevant requirements of stakeholders for managing bribery and corruption risks;

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

<p>Chief Financial Officer, and other Head of Departments.)</p>	<ul style="list-style-type: none"> b) Ensures the integration of Anti-Bribery and Anti-Corruption Management System including its policy and objectives, and ABAC policies and guidelines into day-to-day operations of key organization function such as human resource management, purchasing and finance, and enhance the underlying controls of bribery and corruption risks; c) Provide resource allocation and investment in a robust and effective implementation of Anti-Bribery and Anti-Corruption Management System including its policy and objectives, and ABAC policies and guidelines; d) Provide adequate training and awareness for persons associated with ENFRASYS on the importance of effectiveness and conformance of anti-bribery and anti-corruption programs; e) Communicates both internally and externally regularly on the importance of effectiveness and conformance to the Anti-Bribery and Anti-Corruption Management System including its policy and objectives, and ABAC policies and guidelines; f) Promotes appropriate ABAC culture within ENFRASYS including promoting culture of integrity and compliance in managing bribery and corruption risks, directing and supporting personnel to contribute to the effectiveness of Anti-Bribery and Anti-Corruption Management System; g) Encourages persons associated with ENFRASYS and is business associates to raise report of suspected and actual bribery and corruption events through establish whistleblowing channel, ensures their identity is kept confidential, and no retaliation or discrimination or disciplinary action taken on them; and
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ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

	<p>h) Takes firm action against any proven Improper Conduct including internal disciplinary action, termination of employment/service or business arrangements or reporting any actions or activities suspected of being criminal in nature to the MACC, RMP or other relevant authorities.</p>
<p>Legal & Compliance Department</p>	<p>a) Oversees the establishment and implementation of Anti-Bribery and Anti-Corruption Management System including its policy and objectives, and ABAC policies and guidelines conforming to the defined requirements by laws, international management system, corporate and relevant stakeholders;</p> <p>b) Provides advice and guidance to persons associated with ENFRASYS on the issues related to Anti-Bribery and Anti-Corruption Management System including its policy and objectives, and relevant policies and guidelines;</p> <p>c) Ensures establishment and implementation of internal controls are reasonable to manage bribery and corruption risks;</p> <p>d) Coordinates periodic internal audit to assess the adequacy and operating effectiveness of ENFRASYS's anti-bribery and anti-corruption controls and corruption management processes;</p> <p>e) Reports periodically on the performance and effectiveness of the Anti-Bribery and Anti-Corruption Management System to the governing body and top management appropriate; and</p> <p>f) Coordinates a review of ENFRASYS' Corruption Risk Assessment every three (3) years or when deemed necessary, and reports the findings and recommendations to the governing body and top management appropriate;</p>

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

	<p>g) Monitors all ABAC related declarations and reports for potential red flags and recommends preventive measures where appropriate;</p> <p>h) Raises issues or concerns in relation to Anti-Bribery and Anti-Corruption Management System and significant corruption risks to governing body and top management; and</p> <p>i) Functions as the trusted independent department to manage Whistleblowing reports and make recommendations to the governing body and top management appropriate for improvements to the organization's ABMS.</p>
Employee	<p>a) Executes the Anti-Bribery and Anti-Corruption Management System including its policy and objectives, and ABAC policies and guidelines with integrity and compliant manners;</p> <p>b) Integrates the bribery and corruption controls into business activities and processes; and</p> <p>c) Reports on suspected and real bribery or corruption offences through the ENFRASYS whistleblowing channel.</p>

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

5.0 COMPLIANCE

Adherence to this Policy by all “Persons Associated” and “Business Associates” is **mandatory**. Any action which is considered an offence under the Malaysia Anti-Corruption Commission Act 2009 (Act 694) and Malaysian Anti-Corruption Commission (Amendment) Act 2018 (Act A1567) is viewed as serious/gross misconduct, and the Company shall be at liberty to take internal disciplinary action or termination of employment/service or business arrangements without notice forthwith after due inquiry.

The Company further reserves the right to report any actions or activities suspected of being criminal in nature to the MACC, RMP or other relevant authorities.

5.1 BUSINESS ETHICS

All persons associated with ENFRASYS and business associates are expected to be committed in discharging their duties professionally and ethically with integrity and abiding the laws. ENFRASYS has established for reference:

- **Employee Handbook** – Set out ENFRASYS’s vision, mission and values statement, policies, rules, disciplinary and grievance procedures, other information related to employment laws and regulations besides employee perks and benefits.
- **Code of Business Conduct** – Set out ENFRASYS’s principles, standards and the moral ethical expectations that are applicable to persons associated with ENFRASYS and business associates as they interact in ENFRASYS’ business. It is an integral part of anti-bribery and corruption compliance efforts to prevent bribery or corruption offences.

As an assurance of acknowledgement on understanding and agreement on adherence to the Employee Handbook and Code of Business Conduct, all persons associated with ENFRASYS and business associates dealing in ENFRASYS’s business are required to sign:

- **For Employees:** Integrity Declaration Form for Employees (*Attachment 1*).
- **For Business Associates:** Integrity Declaration Form for Business Associates

(Attachment 2).

ABAC POLICY & GUIDELINES					
Document No	:	ENFRASYS/P/LC/02	Rev	:	02
Effective Date	:	01 November 2024			

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

6.0 DUE DILIGENCE

Due diligence related to bribery and corruption is a process carried out on persons associated with ENFRASYS and business associates to assess carefully and fully, any red flags that may indicate a higher risk associated with possible integrity issues or bribery and corruption risks.

6.1 Definition of High Risk

6.1.1 High Risk Employees

This policy is applicable to the **Function/Department** to conduct the due diligence:

Function/Department	Focus Area
Company Secretary	Appointment of Board of Directors
HR & Administration	Recruitment

High Risk Employees are defined as employees who hold positions which potentially expose them to higher corruption risks. For the Company, high risk employees are:

- a. **Appointment of Board of Directors**
- b. **C-Suite Level**
- c. **Head of Department**
- d. **Employees of High-Risk Department:**
 - i. **Business Development**
 - ii. **Finance & Accounts**

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

6.1.2 High Risk Business Associates

This policy is applicable to the following **Departments** to conduct the due diligence:

- a. **Business Development (Sales)**
- b. **Finance & Accounts - Purchasing**

High Risk Business Associates are defined as:

- a. Entities without any prior record of doing business with the Company
- b. **Partners/Vendor/Supplier** where their contribution to the project is valued at **> RM 40,000.00**
- c. **Customers** who are involved in business transactions with the Company valued at **> RM 100,000.00**
- d. External persons who hold positions of influence which can potentially expose the Company to higher corruption risks such as public officials, agents, consultants, brokers or persons who are connected to them; or
- e. Any other stakeholder the Company deems "High Risk".

6.1.3 Donations & Sponsorships

This policy is applicable to the **Marketing Department** to conduct due diligence.

When assessing if donations and sponsorship shall be made, ENFRASYS shall conduct due diligence on the **intended recipient** of donation or sponsorship **valued at > RM 1,000.00**.

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

6.2 Due Diligence Process

The Due Diligence process involves conducting a checklist on the subject which covers their background, ABAC control measures, relationship with interested parties and finances. Responses to these questions will determine the subject's Due Diligence result. The **Due Diligence Checklist for Business Associates (Attachment 3)** and **Due Diligence Checklist for Employees (Attachment 4)**.

High Risk subjects may also be required to additional anti-bribery and corruption controls, including (where appropriate) making statutory declaration, undergoing focused training and sitting for ABAC Policy Awareness tests.

6.3 Due Diligence Outcome and Findings

Any red flag(s) identified during the Due Diligence process must be adequately addressed and mitigated before the business relationship between the Company and the subject can proceed. ENFRASYS shall exercise judgement based on the information and data obtained to determine if it is appropriate to proceed with the intended business relationship.

ENFRASYS has adopted the following policies for any employment, appointment, or engagement in relation to due diligence findings:

- (a) ENFRASYS shall not engage with any person, organization, or entity which has been convicted or undergoing prosecution for a financial or commercial crime, including financial fraud, bribery, money laundering or terrorism financing.
- (b) ENFRASYS shall not be involved in any transactions, arrangements, or contracts which are not compliant with local laws and regulations; and
- (c) ENFRASYS shall not consider having any business relationship with any person, organization, or entity which has, in the due diligence process:
 - knowingly submitted false, inaccurate or misleading information; or
 - knowingly submitted a false or forged document.

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

6.3 Due Diligence Approvals

The outcome and clearance of due diligence checks shall be **conducted as per table below** by submitting the **Due Diligence Checklist for Business Associates (Attachment 3)** and **Due Diligence Checklist for Employees (Attachment 4)**.

Focus Area	Conducted By	Verified By	Approved By
Appointment of Board of Directors	Company Secretary	Legal & Compliance	Board of Directors
Appointment of C-Suite Level	HR & Administration	Legal & Compliance	Board of Directors
Appointment of Head of Department	HR & Administration	Legal & Compliance	GCEO/GCFO
Appointment of Employees for High-Risk Department(s)	HR & Administration	Legal & Compliance	Head of HRA
Project Partners/ Vendor/Supplier	Purchasing	Legal & Compliance	Chief Financial Officer
Customer Business Transaction	Business Development (Sales)	Legal & Compliance	GCOO
Donation & Sponsorship	Marketing	Legal & Compliance	GCEO

In circumstances where the due **diligence checks are on the GCEO or persons connected to the GCEO**, the clearance of the due diligence checks shall be

ABAC POLICY & GUIDELINES					
Document No	:	ENFRASYS/P/LC/02	Rev	:	02
Effective Date	:	01 November 2024			

approved by the **Board of Director (BOD)**.

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

Due diligence performed shall have a **validity of two (2) years** and should there be **any renewal of service/ contract/ appointment within the two (2) years, re-evaluation of due diligence is not required.**

Note: Validity of due diligence evaluation towards appointment of the BOD and employees are subject to their period of service.

Re-evaluation of due diligence is required for **renewal of service/ contract/ appointment after the two (2) year validity period; and**

In the **event updated circumstances or information are made known** to ENFRASYS, ENFRASYS shall **reassess** such situations to determine if additional controls, **including termination of services, need to be implemented.**

6.4 Documentation

Information and data obtained during the conduct of the due diligence checking process, including verbal communication and internet searches, and the consideration made arising from the outcome of the due diligence process shall be documented and retained as records by **Legal & Compliance Department.**

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

7.0 FACILITATION PAYMENT

“Facilitation payments” often referred to as “*Duit Kopi*” in Malaysia is an illegal or unofficial payment or benefit given to secure or expedite the performance of a person performing a routine or administrative duty or function. Facilitation payments are a form of bribery irrespective of the value involved. “Kickbacks” are typically payments made in return for a business favour or advantage.

ENFRASYS **strictly prohibits** facilitation payments and kickbacks of any kind, for or on behalf of the Company, even where such payments may not be expressly prohibited under any laws or local practice/customs.

Any request for a facilitation payment or kickback must be refused and the matter reported immediately to the **HOD / Legal & Compliance department** either verbally or using ENFRASYS Whistleblowing channel.

However, there may be extenuating circumstances when a facilitation payment can be made in order to protect yourself or your family from the threat of injury, loss of life or liberty. In such circumstances, the following steps must be taken:

- a. Keep any amount to the minimum
- b. Ask for a receipt, detailing the amount and reason for the payment
- c. Create a record concerning the payment.
- d. Report the incident immediately to the **HOD / Legal & Compliance department before** any payment is made.

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

8.0 GIFT, ENTERTAINMENT & HOSPITALITY

It is customary in doing business for the giving and accepting of gifts, entertainment or hospitality to maintain good business rapport or as a token of appreciation. However, in some instances, the giving and accepting of lavish gifts, entertainment or hospitality can reasonably be construed as bribery or corruption, especially when it is perceived to improperly influence business decisions.

As a general rule ENFRASYS ~~does not tolerate~~ and prohibits the giving or accepting of gifts, entertainment or hospitality to avoid it being construed as bribery or corruption.

8.1 Gift, Entertainment and Hospitality Policy

In principle, persons associated with ENFRASYS shall avoid from giving and accepting gifts, entertainment or hospitality as it may fall into a situation of conflict or potential conflict of interest which leads to misconstruction as bribery or corruption.

When giving or receiving a gift, entertainment, or hospitality, the following principles shall be adhered to:

- **Genuine:** given clearly as an act of appreciation, with no ill intention to persuade or influence decisions;
- **No obligation:** gifts, entertainment, or hospitality shall be given without any obligation, return of favor, or expectation from the recipient;
- **No undue influence:** not be seen as intended for, or capable of, achieving undue influence over a transaction or decision (either business decision or in relation to decisions by public authorities or regulators) or compromising integrity and objectivity in the performance of one's duties;

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

- **Made openly:** the gift, entertainment, or hospitality is not made in secret and undocumented. The purpose, approvals given, and value shall be documented.
- **Legality:** does not contradict relevant laws governing the giver and the recipient.
- **According to stakeholder perception:** the gift, entertainment, or hospitality given would not be viewed unfavorably by stakeholders were it made known to them.
- **Proportionate:** the value and nature of the gift, entertainment, or hospitality is not disproportionate to the occasion, e.g. gift or meals of a certain value given to the GCEO of an organization may be deemed appropriate but one of the same values given to a junior staff may be deemed excessive.
- **Conforms to the rules governing the giver or the recipient:** gift, entertainment, or hospitality made shall be in line with the rules or code of conduct of the recipient's organization. This means when giving gifts, entertainment, or hospitality, persons associated with ENFRASYS shall understand the counterparty organization's policies on gifts, entertainment, and hospitality; and
- **Infrequent:** gifts, entertainment and hospitality are not given overly frequently.

8.2 Allowable Gifts

ENFRASYS may provide or accept gifts of nominal value (i.e. **below RM500 on each occasion**) which fall under the following categories;

- **Corporate gifts marked with company name and logo** such as thumb drives, table calendars, pens diaries, notepads, t-shirts, or mugs;

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

- **Festive or ceremonial gifts**, for specific occasions, such as hampers, dates, “kuih raya” or mandarin oranges.
- **Tokens of appreciation provided during an official** event such as plaques, ornaments or door gifts; or
- **Perishable items** such as flowers, fruit, or food.

8.3 Giving Gifts

Receiver	Range Limit	Category of Gifts	Approval Level
Public Officials and others	Not more than RM500	Allowable gifts	Group Chief Operating Officer
VIP/ VVIP who are not serving with the Government	More than RM500 up to RM1,000	Allowable gifts	Group Chief Operating Officer
	More than RM1,000	Other than allowable gifts	Group Chief Operating Officer

All requests to provide gifts by persons associated with ENFRASYS shall obtain approval by submitting the **Provision/ Receipt of Gifts/ Hospitality/ Donation/ Sponsorship Form (Attachment 5)** to **Legal & Compliance Department**.

8.4 Accepting Gifts

Recipient needs to notify the **Legal & Compliance Department** to declare the acceptance of gifts **within 5 working days of receipt** by completing and

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

submitting the **Provision/ Receipt of Gifts/ Hospitality/ Donation/ Sponsorship Form (Attachment 5)**.

Category of Gifts	Disposition of Gifts	Approval Level
Allowable gifts with value not more than RM500	<ul style="list-style-type: none"> • Recipient keeps the gifts; or • Share the gifts among recipient's department staff. 	Group Chief Operating Officer
Allowable gifts with value more than RM500	<ul style="list-style-type: none"> • Return the delivered gifts if not offending the giver; or • Share the gifts among department staff; or • Share the gifts among recipient's department staff who are not involved in the business relationship with the giver. 	Group Chief Operating Officer
Gifts other than allowable gifts with any value	<ul style="list-style-type: none"> • Return the delivered gifts if not offending the giver; or • Share the gifts among department staff who are not involved in the business relationship with the giver.; or • Donate the gifts to charity organization if the nominal value is estimated more than RM1,000 per person per occasion. 	Group Chief Operating Officer

When the **Group Chief Operating Officer is offered gifts**, approval shall be acquired from the **Group Chief Executive Officer**.

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

If the **Group Chief Executive Officer is offered gifts**, approval shall be acquired from the **Board of Director**.

8.5 Allowable Entertainment

It is a common practice within the business environment to provide entertainment to foster business rapport with third parties. ENFRASYS recognizes the need to provide and accept reasonable and proportionate entertainment under appropriate circumstances.

Mode of entertainments that are permitted by ENFRASYS are as follows:

- **Business luncheons**
- **Business dinners**
- **Business hi-teas**

The exchange of business courtesies among **Top Management** is recognized as customary and legitimate to create goodwill and strengthen business relationships. Such courtesies are allowed such as **golfing**.

Other modes of entertainment such as **clubbing, spa and karaoke are strictly prohibited**.

8.6 Providing Entertainment

The allowable nominal value limit per person per occasion is subject to their Level of Authority Limit which is based on the nominal value that is legal and reasonable in accordance with their roles and responsibilities.

Category of Employees	Level of Authority Limit	Approval Level	
		Management	Below 10 pax

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

<ul style="list-style-type: none"> Executive and above 	Business meal - Not more than RM100 per person per occasion.	10 pax and above	Group Chief Financial Officer
Top Management <ul style="list-style-type: none"> Head of Departments Top Management 	Business meal - Not more than RM500 per person per occasion.	Group Chief Financial Officer	
	Golfing	Group Chief Financial Officer	

All requests to provide gifts by the persons associated with ENFRASYS shall obtain approval by submitting the **Provision/ Receipt of Entertainment Form (Attachment 6)** to **Legal & Compliance Department**.

8.7 Accepting Entertainment

Persons associated with ENFRASYS shall declare the acceptance of Allowable Entertainment **within 5 working days of receipt** by completing and submitting the **Provision/ Receipt of Entertainment Form (Attachment 6)** to **Legal & Compliance Department**.

8.8 Allowable Hospitality

ENFRASYS recognizes the exchange of business courtesies in relation to hospitality is customary and legitimate to network, create goodwill and strengthen business rapport.

Generally, hospitality is a private function held by organization in the form of entertainment and events paid for and organized by an organization, involving internal parties and external parties with whom a business rapport (whether past,

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

present and prospective) exists and the public at large, for the benefit of the organization.

Corporate events and activities include but are not limited to:

- **Sporting events**
- **Gala dinners**
- **Concerts**
- **Activity-based events such as golf tournament**

8.9 Providing Hospitality

- a) Person-in-charge obtains the list of external parties from respective departments to be invited for the upcoming Hospitality event.
- b) Once the list of invitees or guests has been determined, person-in-charge shall prepare and submit **Provision/ Receipt of Gifts/ Hospitality/ Donation/ Sponsorship Form (Attachment 5)** to **Legal & Compliance Department**.
- c) Approving authority limit for providing Hospitality events is as tabulated below;

Range Limit	Approval Level
Not more than RM500 per person per occasion.	Group Chief Financial Officer

- d) Once approval is obtained, person-in-charge shall proceed with the planning and holding the event for third party organization or issuing the official invitation to attend upcoming planned event.
- e) **No event shall be provided to business associates** which is currently:
 - undergoing any bidding
 - contract negotiation process

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

- work in progress until after three (3) months has elapsed from the official completion.

8.10 Accepting Hospitality

When receiving an invitation from third parties, persons associated with ENFRASYS shall require to obtain approval by completing and submitting the **Provision/ Receipt of Gifts/ Hospitality/ Donation/ Sponsorship Form (Attachment 5)** to **Legal & Compliance Department**.

8.11 Exception to the Gifts, Entertainment, Hospitality Policy

Although generally ENFRASYS practices a Gifts, Entertainment, Hospitality Policy, there are certain exceptions to the general rules whereby the giving and accepting of gifts **are not permitted** in the following situations;

- i. It could or be **perceived as something that influence any business decisions** (e.g. accepting from a supplier who is involved in pending purchasing decision);
- ii. It is in the form of **cash or cash equivalents** of any amount (e.g. gift certificates, gift/ shopping cards, any vouchers which can be converted or traded for cash, money or postal orders, shares of stock, or other forms of marketable instruments or interest);
- iii. It is **not consistent with what is customary and routine** in business;
- iv. It is **excessive in value and frequent**;
- v. It is **inappropriate in nature**;

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

- vi. It is **provided around the time of any pending business decision** (exception exists for standard working meals where appropriate pre-approval is granted); or
- vii. It **violates** any applicable laws

8.12 Reporting and Recording

Records are evidence that the gifts, entertainment and hospitality were not made with a corrupt or unethical intent. All accounts, invoices, documents, and records shall be prepared and maintained with accuracy and completeness.

All records and documentation shall be retained **by the Legal & Compliance Department.**

Documented information includes the following details:

- details of the gift, entertainment and Hospitality;
- the actual or estimated value;
- the purpose and occasion such gift, entertainment and hospitality is made; and
- the giver name and organization providing or receiving the gift, entertainment and Hospitality

Refer **Gifts, Entertainment, Hospitality, Donation & Sponsorship Register (Attachment 7).**

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

9.0 DONATION & SPONSORSHIP

It is a common practice for businesses to give donations and sponsorships which can be made in the form of direct cash and non-cash contributions.

Donations may be part of an organization's corporate philanthropy activities; giving of **gifts for charity, humanitarian aid, or to benefit a cause, given to non-profit** charitable organizations as well as political organizations without return consideration.

Sponsorship is a business deal where an organization commits money or resources for the right to be associated with non-profit organization, event or program. Sponsorships are a form of marketing tool to increase visibility of organization's reputation, brands, products or services.

However, donations and sponsorships may be construed as a bribery or corruption if it is given excessively and improperly, or with improper intention to influence business decisions or outcome, which may bring negative impacts on ENFRASYS such as legal consequences or reputational damage.

9.1 Donation and Sponsorship Policy

a) Sponsorships may be made to individuals or organizations. Donations and sponsorships **shall never be made:**

- where it is not given directly in good faith, or perceived to be able to, influence any business decisions or outcome;
- where there is **conflict of interests**, or any perceived conflict of interests;
- with improper or corrupt purposes;

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

- to, or for the **benefit of, individuals**;
- by **person associates** with ENFRASYS **directly or indirectly** in the course of **his/ her employment** as a way to obtain a **personal advantage** in a commercial transaction;
- in conjunction with, as part of, or in relation to the **negotiation of any bid, tender**, or organizations; or
- to interested parties, except in such situations where the Board of Directors' specific approval is obtained.

b) Donations and sponsorships to be made shall:

- be legal and allowed by applicable laws;
- be duly obtain internal and external authorizations;
- be to adequately structured recipient organizations or entities to guarantee proper administration of funds;
- not be used as a means to cover up and undue payment or bribery; and
- be accurately stated in accounting books and records.

Examples of **red flags** to look out for are, but are not limited to, as follows:

- the proposed recipient organizations have **affiliation with public officials or their relatives** are involved;
- the contributions are **made on behalf of a public officials**;
- there are **risks of a perceived improper advantage to ENFRASYS**; or

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

- The proposed recipient organizations are **based in a high-risk country**, the requests come from a high-risk country, or the activities take place in a high-risk country.
- c) Donations and sponsorships to **foreign-based charities or beneficiaries** shall be ascertained that are **not disguised illegal payments for public officials** and **do not act as a conduit to fund illegal activities** in violation of international anti-money laundering, anti-terrorism and other applicable laws.
- d) When assessing if donations and sponsorships shall be made, ENFRASYS take into account, amongst others, the following considerations:
- **due diligence** on the intended recipient of donation or sponsorship as stipulated in the Due Diligence criteria:
 - **reasonableness** of the **amount, value and objective** of the donation or sponsorship requested; and
 - should the objectives of the donation and sponsorship contradict with ENFRASYS's values.
- e) ENFRASYS requires its persons associated to use good judgement and common sense in assessing the request. When in doubt, persons associated with ENFRASYS shall seek advice from **Legal & Compliance Department** to determine the authenticity of such requests.
- f) Donations and sponsorships are only permissible with prior **approval** by submitting the **Provision/ Receipt of Gifts/ Hospitality/ Donation/ Sponsorship Form (Attachment 5)** and supported with an official letter of request from the requesting external parties.
- g) Once approval is obtained, donations and sponsorships are made, and acknowledgement or proof of receipt are collected and safe kept.

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

- h) No donations or sponsorships shall be made to a single organization more than once annually.

Range Limit	Approval Level
Not more than RM10,000 per occasion	Group Chief Financial Officer
More than RM10,000 per occasion	Group Chief Executive Officer

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

9.2 Charitable and Social Donations

a) Donations made by ENFRASYS to general public which are for social and environmental causes:

- **Disaster relief** – natural disasters such as floods, typhoons or landslides;
- **Education** – promotion of educational activities or aids for advancement of education of disadvantaged or underprivileged pupils;
- **Health** – promotion of health awareness, support of better health of wellbeing or disease outbreaks;
- **Wellbeing of the local community** – Support and elevation of living quality, aids to underprivileged, disabled, poverty stricken or critically ill citizens or promotion national unity through education, sports and culture events particularly among the youth;
- **Environmental** – promotion or support of preservation of the environment; and
- **Development of industries** in which ENFRASYS does business in.

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

9.3 Political Donations

- a) Persons associated with ENFRASYS or business associates are **not permitted**, under any circumstances, to make donations neither in cash nor in kind to political candidates, political officials or political parties on behalf of ENFRASYS. In-kind contributions include participation in a political campaign during paid working hours and/ or the use of administrative support, ENFRASYS's facilities, equipment and supplies.
- b) If any persons associated with ENFRASYS or business associates may have made or may intend to make a political donation, this encounter shall be reported immediately via the **Whistleblowing channel**.
- c) Notwithstanding the above prohibition, persons associated with ENFRASYS and business associates can participate in and donate to political activities strictly under their individual capacity and not as a representative of ENFRASYS. Any decision to do so is entirely personal and voluntary and is a private matter.
- d) Persons associated with ENFRASYS and business associates shall not use their position within ENFRASYS to coerce or pressure other persons associated with ENFRASYS or business associates to make contributions to or support or oppose any political candidates, political officials, or political parties.

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

9.4 Sponsorships

a) ENFRASYS provide sponsorships to individuals or organizations shall have the following commercial justifications, but not limited to:

- generation of revenue directly or indirectly for ENFRASYS;
- perceived improvement of ENFRASYS' corporate image and reputation from the perspective of ENFRASYS' targeted audience, and via positive media relations and coverage of ENFRASYS developments, products and services; or
- strengthening of ENFRASYS' corporate citizenship and/ or promotion of ENFRASYS' corporate social responsibility activities.

b) Upon conducting **due diligence**, if it is discovered that the recipient party is **affiliated with public related offices, public officials, political candidates, political officials, and/ or political parties**:

- such affiliations should be **fully and accurately disclosed** including details relating to public department/ branch or political party;
- the **nature of the affiliate's control and extent of ownership** or the **recipient party**; the key officers and directors of the affiliate and any other relevant information; and
- whether there are **any ongoing or contemplated transaction or applications** for the granting of licenses, permits or approvals with the relevant public office or public official.

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

9.5 Reporting and Recording

a) If a current or prospective business partner, customer, public official, donation and sponsorship recipient, political candidate and party official promises or offers any benefit, or makes any threat, in connection with a donation (whether charitable and social or political) or a sponsorship request, the request should be denied and the incident should be **reported through Whistleblowing channels. Refer to Whistleblowing Policy** for detailed guidance.

b) Records are evidence that the donations and sponsorships were not made with a corrupt or unethical intent. All accounts, invoices, documents, and records shall be prepared and maintained with accuracy and completeness.

All records and documentation shall be retained **by the Legal & Compliance Department.**

Refer **Gifts, Entertainment, Hospitality, Donation & Sponsorship Register (Attachment 7).**

ABAC POLICY & GUIDELINES					
Document No	:	ENFRASYS/P/LC/02	Rev	:	02
Effective Date	:	01 November 2024			

10.0 FINANCIAL AND NON-FINANCIAL CONTROLS

To promote fair business practice and mitigate potential conflicts of interest, ENFRASYS undertakes separation of duties for both financial and non-financial transactions. ENFRASYS will keep detailed and accurate records of all financial and non-financial transactions, and will have appropriate internal controls in place to act as evidence for all payments made.

10.1 Financial Controls

- a) Financial controls manage financial transactions in an accurate, complete and timely manner to prevent the occurrence of bribery and corruption. Tiered levels of authority should be in place for payment approval, with higher levels of approval required for larger transactions.
- b) As cash is a common tool for bribery and corruption, its use in daily operations is restricted unless necessary. Reimbursements for claims are only made based on official receipts, and all financial payments especially cash transactions are accurately recorded with a clear audit trail.
- c) Large or abnormal claim submissions must be monitored and checked to ensure that it is within agreed limits with all supporting documentation and necessary approvals in place.
- d) As stated under Section 3, Intending to Deceive is an offence under Section 18 of MACC Act 2009. ENFRASYS reserves the right to take strong sanctions against any employee found abusing the claims process including termination of employment and reporting to the relevant enforcement agency if deemed necessary.

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

10.2 Non-Financial Controls

- a) Non-financial controls ensure that the procurement, operational, commercial and other non-financial activities are properly managed. As the procurement process potentially has higher corruption risks, ENFRASYS awards contracts through a competitive bidding process which must involve at least 3 bidders. The successful bidder is selected on the basis of the best fit to ENFRASYS' needs.
- b) Separation of duties must be practiced such that wherever practical, the operational staffs requiring goods and services is kept separate from the staff conducting procurement and/or making payment.
- c) Multiple levels of checking must be in place to ensure these controls are adhered to. The responsibilities and threshold limits outlined in the Limit of Authority (LOA) document must be strictly followed at all times. Any breaches observed must be reported immediately to the Legal and Compliance Manager.

11.0 COMMUNICATION & TRAINING

ENFRASYS is committed to create awareness and educate its persons associated and business associates so that they understand the need to comply with ENFRASYS's stances on anti-bribery and corruption and its repercussion when committing bribery and corruption offences to the organization and individual.

11.1 Internal Stakeholders

- a) Internal stakeholders (i.e. persons associated with ENFRASYS) represent ENFRASYS in any business dealings or activities with external stakeholders, and carry ENFRASYS' image and reputation. Appropriate and continuous communication and training pertaining to anti-bribery and corruption for persons associated with ENFRASYS are incorporated throughout the engagement with ENFRASYS including, but not limited to the followings;

Page **52** of **60**

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

- i) Attending interview as candidates as an employee and director for Board of Director;
 - ii) Appointments as employee and director for Board of Director;
 - iii) Open and transparent communication during employment related to anti-bribery and corruption practices;
 - iv) Training and awareness programs on anti-bribery and corruption planned and provided accordingly to roles responsibilities of persons associated, taking into account the corruption risk assessment;
 - v) ABAC Policy Awareness tests for employees defined as “High Risk”;
 - vi) Awareness on securing and sharing company related information, and the implications of breach of confidential information;
 - vii) Annual performance appraisal and recognition in upholding integrity in business dealings and work culture;
 - viii) Disciplinary actions including advising, counseling, reprimand/ warning and termination for breaching the Policy; and
 - ix) Raising concerns by internal stakeholders.
- b) It is the responsibilities of Group Chief Executive Officer to communicate and ensure persons associated understand ENFRASYS's anti-bribery and corruption stances and measures.
- c) The communication and training for internal stakeholders pertaining to ENFRASYS's anti-bribery and corruption stances and measures are evidenced with the following documentation, but not limited to:
- i) Employment appointment letter or contract;
 - ii) ENFRASYS's Employee Handbook;

ABAC POLICY & GUIDELINES					
Document No	:	ENFRASYS/P/LC/02	Rev	:	02
Effective Date	:	01 November 2024			

- iii) ENFRASYS's Code of Business Conduct;
- iv) ENFRASYS's Anti-Bribery Management System;
- v) ENFRASYS's Anti-Bribery and Corruption Policy and Guidelines;
- vi) Background declaration form;
- vii) Reprimand/ warning/ notification Letter;
- viii) Training plan, training attendance form and training certificate; and
- ix) Training course materials

11.2 External Stakeholders

- a) Any persons associated with ENFRASYS who are responsible or assigned to deal in any business dealings or activities with business associates and recipients of donations and sponsorships) are representing ENFRASYS's image, reputation and brand. These interactions may expose ENFRASYS to a higher risk in relation to the corporate liability under Section 17A, MACC Act 2009 (Amendment 2018).
- b) Appropriate and continuous communication and training pertaining to ENFRASYS's Anti-Bribery and Corruption Management System and ABAC Policy and Guidelines for business associates and recipients of donations and sponsorship are incorporated throughout the engagement with ENFRASYS including, but not limited to the followings;
 - i) Assessment of business associates and recipients of donations and sponsorship;

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

- ii) Appointments as approved business associates and recipients of donations and sponsorship;
 - iii) Open and transparent communication during engagement as business associates related to anti-bribery and corruption practices;
 - iv) Training and awareness programs on Anti-Bribery and Corruption Management System and ABAC Policy and Guidelines planned and provided for business associates, taking into account the corruption risk assessment;
 - v) Annual performance appraisal and recognition in upholding integrity in business dealings
 - vi) Disciplinary actions including advising, counseling, reprimand/ warning and termination for breaching the Policy;
 - vii) Raising concerns by business associates.
- c) The communication and training for business associates pertaining to ENFRASYS's anti-bribery and corruption stances and measures are evidenced with the following documentation, but not limited to:
- i) External provider letter of appointment or contract;
 - ii) Code of Business Conduct;
 - iii) ENFRASYS's Anti-Bribery and Corruption Management System;
 - iv) ENFRASYS's Anti-Bribery and Corruption Policy and Guidelines;
 - v) Background declaration form;
 - vi) Reprimand/ warning/ notification letter;

ABAC POLICY & GUIDELINES					
Document No	:	ENFRASYS/P/LC/02	Rev	:	02
Effective Date	:	01 November 2024			

- vii) Training plan, training attendance form and training certificate;
- viii) Emphasise ABAC messaging via ENFRASYS' website, brochures and official emails; and
- ix) Training course materials.

12.0 WHISTLEBLOWING

Any persons, including Directors, Employees, Third Parties and the general public, who knows of or suspects an ongoing or potential violation of this policy, is strongly encouraged to report their concerns using the whistleblowing channel set out in the Company's **Whistleblowing Policy (ENFRASYS/P/LC/04)**.

The Whistleblower will be accorded protection of confidentiality when disclosure is made, provided that it is made in good faith and without any malicious intent.

13.0 CONFLICT OF INTEREST

All Persons Associated with ENFRASYS and its Business Associates should be alert to any business activity that competes or conflicts, or is perceived to compete or conflict, with the interest of the Company.

13.1 Types of Conflict

Conflicts can occur in various circumstances including (but not limited to):

13.1.1 Other Business Interest

- Making personal investments which creates a substantial conflict between the Employee and the Company's interest;
- Not devoting all efforts solely on the Company's business during office hours;

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

- Allowing business activity conducted outside the Company and office hours to affect the Employee’s ability to perform their duties to the best of their ability for the Company;
- Having ownership or involvement (either direct or indirect of a financial or other nature) in entities with which the Company currently or intends to conduct business. This includes (but is not limited to) customers, partners, suppliers, contractors, regulators and government agencies;
- Having ownership or involvement (either direct or indirect of a financial or other nature) in entities in competition with the business of the Company;
- Diverting business away from and causing loss to the Company;
- Interests in other business (either direct or indirect of a financial or other nature) that is undisclosed or not reported to the Company.

13.1.2 Other Employment

- Being gainfully employed or have interest in another Company (either in a secondary, temporary, casual or any other capacity), which is in direct conflict with the employee’s employment, business and the Company without first declaring any possible conflict of interest and receiving prior written approval of the Management;
- Accepting employment of any kind or entering into any contract for their service with any Third Party or engaging in any form of business at any time without first obtaining the written consent and approval from the Management.

13.1.3 Corporate Directorship

- Holding any shares or equity in any company, firm, business and accepting any appointment to membership of the Board of Director or any standing committee without first declaring any possible conflict of interest and receiving prior written approval of the Management;

Note: Exceptions are allowed for directorships in entities which are public service in nature and not-for-business or profit such as charitable, social, cultural,

ABAC POLICY & GUIDELINES					
Document No	:	ENFRASYS/P/LC/02	Rev	:	02
Effective Date	:	01 November 2024			

educational or religious entities provided that the discharge of these responsibilities do not interfere with his duties and responsibilities in the Company.

13.1.4 Trading in “Anything of Value”

- Accepting or soliciting any gift, favour or service that might tend to influence the employee in the discharge of his official duties;
- Offering, requesting, or accepting bribes and other improper financial advantages. Employees may not provide anything of value to obtain or retain business or any advantage, financial or otherwise. “Anything of Value” extends beyond cash to include improper gifts, entertainment, charitable and political contributions, and employment or internships for clients, government officials, or their related persons.
- The prohibition against the provision of “Anything of Value” applies not only to government officials and employees or officials of organisations with government ownership or control, but also includes clients, suppliers, and any person with whom the Company does or anticipates doing business;
- Accepting the following from any person or party who has any form of business or other dealings with the Company:
 - a. Any payment and gift
 - b. Any favours that might be regarded as placing the employee under some obligations to such person or party.

ABAC POLICY & GUIDELINES			
Document No	:	ENFRASYS/P/LC/02	Rev : 02
Effective Date	:	01 November 2024	

13.1.5 Personal or Private Relationship

- Has a **family member** working in ENFRASYS or **third-party entities** either **directly** or **indirectly** (such as clients, customers, or partners of ENFRASYS), or **has ownership** (both **directly** and **indirectly**) in **entities** with which the Company currently **conducts business** or **intends** to conduct business, or which operate in a **similar business environment**;

Note: Family member in this context shall refer to

- a. **Spouse of employees**
- b. **Parents or parents-in-law of employees**
- c. **Children or son/daughter-in-law, or grandchildren**
- d. **Siblings of employees**
- e. **Nephews, nieces, uncles or aunts of employees.**

13.2 Disclosing Conflicts

Whether or not an actual or potential conflict of interest exists depends on the facts of each case. Employees are required to disclose the actual or potential conflict promptly by submitting the completed **Conflict of Interest Declaration Form for Employees (Attachment 8)** to **Legal & Compliance Department**;

Employees who are unsure are advised to seek clarification and guidance from their HOD / Legal & Compliance Department / HR & Administration Department before proceeding, or if the activity has commenced, immediately cease the activity and promptly disclose it.

For Business Associates, the process to disclose Conflicts of Interest is outlined in the **Code of Business Conduct for Business Associates** document.

ABAC POLICY & GUIDELINES					
Document No	:	ENFRASYS/P/LC/02	Rev	:	02
Effective Date	:	01 November 2024			

13.3 Remedial Action

The Company reserves the right to take the appropriate disciplinary action against an Employee who is found to be in breach of the Company's rules and regulations, policies, procedures and accepted practices, whether expressed or implied.

The Company is committed in ensuring that any action taken is in accordance with accepted practices and the relevant laws. These actions can include (but are not limited to):

- a. Recusal or abstaining from the decision-making process;
- b. Not lobbying for the entity in conflict;
- c. Removing the conflict e.g., by selling off interest, re-designating the conflicted person or resigning from the conflicting position;
- d. Reporting the Employee to the relevant enforcement agencies.

14.0 RECORD KEEPING

14.1 Access

- a) All policies and procedures should be stored in a secure location with restricted access to making changes;
- b) Documents classified as highly confidential should have stronger security to limit access;
- c) Audit trails should be in place to monitor historical access of documents; and
- d) The Legal and Compliance Manager has overall responsibility for the document control and record keeping of all anti-bribery and anti-corruption related material, including this Policy and all Associated Documents.

ABAC POLICY & GUIDELINES					
Document No	:	ENFRASYS/P/LC/02	Rev	:	02
Effective Date	:	01 November 2024			

14.2 Condition

- a) The Legal and Compliance Manager shall monitor and check the condition of the documents and records at the filing locations periodically to prevent damage, deterioration or loss;
- b) Records arising from the procedures (e.g., acknowledgements of policies, due diligence checks, conflicts of interest submissions, anti-corruption declarations, anti-bribery training provided, gifts registrar etc.) must be kept in a safe place and backed up regularly;
- c) All records must be controlled to ensure they are adequately protected and readily available when required; and
- d) The respective Heads of Department's from which these records originate are responsible for its safe keeping.

15.0 CLARIFICATIONS

Any questions or feedback regarding this Policy can be directed to the Legal and Compliance Department as follows:

- Name of Department Head;
- Mailing address;
- Email; and
- Phone number.

16.0 ACKNOWLEDGEMENT AND ACCEPTANCE

Employees must acknowledge and accept this ABAC policy by signing the Integrity Declaration Form for Employees (ENFRASYS/P/LC/02/F/001/R00).

ABAC POLICY & GUIDELINES					
Document No	:	ENFRASYS/P/LC/02	Rev	:	02
Effective Date	:	01 November 2024			

END OF DOCUMENT

Name ("I"):	
Designation:	

1. I agree to comply with all applicable laws, regulations and company policies in the conduct of my duties at ENFRASYS Group of Companies (hereinafter referred to as "ENFRASYS").
2. I agree to abide by the terms and conditions of my employment contract with ENFRASYS, with reference to: -
 - any official contracts, letter of offer, letter of appointment, engagement letter, or any official document to the similar effect; and
 - the Employee Code of Conduct and relevant policies and procedures of the company, including the company's Anti-Bribery and Corruption Policy.
3. I agree to conduct my duties in an ethical manner and shall not undertake any bribery and corrupt conduct in my role at ENFRASYS.
4. I understand that if I fail to comply with any part of the above-mentioned items 1 to 3, ENFRASYS reserves the right to review my employment status, which may lead to disciplinary actions, dismissal, and even reporting to the authorities.
5. I declare that:
 - I am not aware of any actual, potential, or perceived conflict of interest situations with ENFRASYS or other stakeholders of the Company's business.
 - apart from the actual, potential, or perceived conflict of interest situations declared in the Conflict of Interest Declaration Form, I am not aware of any other actual, potential, or perceived conflict of interest situations with ENFRASYS or other stakeholders of the Company's business.

(Tick whichever is applicable)

I agree to notify ENFRASYS, as soon as practicable, of any emerging or new actual, potential, or perceived conflict of interest situations which may arise.

6. I declare that:

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

I have been convicted of the following offences, other than traffic offences (if any).

(Tick whichever is applicable)

To provide a brief description of offences convicted (other than traffic offences):

I declare that all information provided in this Form is, to the best of knowledge and belief, true, complete, and accurate.

I understand that if any information is untrue, incomplete, or inaccurate, ENFRASYS reserves the right to review my employment relationship with the Company, which may lead to disciplinary actions, dismissal, cessation of business relationship and even reporting to the authorities.

Name: _____

Identity Card/
Passport Number: _____

Signature: _____

Designation: _____

Organization
Stamp: _____

Date: _____

Name (“I”):	
Name of organisation represented (the “Entity” or “We”):	
Nature of business relationship with ENFRASYS:	

1. The Entity agrees to comply with all applicable laws and regulation in the conduct of business or service in relation to the businesses and operations of ENFRASYS Group of Companies (hereinafter referred to as “ENFRASYS”).
2. The Entity agrees to abide by the terms and conditions governing the business relationship with ENFRASYS, with reference to:-
 - any official contracts, letter of offer, letter of appointment, engagement letter, or any official document to the similar effect; and
 - the company’s Code of Business Conduct and relevant policies and procedures of the company, including the company’s Anti-Bribery and Corruption Policy.
3. The Entity agrees to conduct business in an ethical manner and shall not undertake any bribery and corrupt conduct in doing business with and for ENFRASYS.
4. The Entity understands that if it fails to comply with any part of the above-mentioned items 1 to 3, ENFRASYS reserves the right to review my/ our business relationship, including contracts, employment or appointment, which may lead to disciplinary actions, dismissal, cessation of business relationship, and even reporting to the authorities.
5. The Entity declares that:
 - the Entity is not aware of any actual, potential, or perceived conflict of interest situations with ENFRASYS or other stakeholders of the company’s business.
 - apart from the actual, potential, or perceived conflict of interest situations declared in the Conflict of Interest Disclosure document, the Entity is not aware of any other actual, potential, or perceived conflict of interest situations with ENFRASYS or other stakeholders of the company’s business.

(Tick whichever is applicable)

The Entity agrees to notify ENFRASYS, as soon as practicable, on any emerging or new actual, potential, or perceived conflict of interest situations which may arise.

6. The Entity declares that:

- The Entity has never been convicted of any crime or offences, other than traffic offences (if any).
- The Entity has been convicted of the following offences, other than traffic offences (if any).

(Tick whichever is applicable)

To provide a brief description of offences convicted (other than traffic offences):

I declare, on behalf of the Entity, that all information provided in this Form is, to the best of the knowledge and belief, true, complete, and accurate.

The Entity understands that if any information is untrue, incomplete, or inaccurate, ENFRASYS reserves the right to review our business relationship, including, but not limited to, contracts, appointment, and engagements, which may lead to disciplinary actions, dismissal, cessation of business relationship, and even reporting to the authorities.

Name: _____

Identity Card/
Passport Number: _____

Signature: _____

Designation: _____

Organisation
Stamp: _____

Date: _____

OBJECTIVE

Ascertain if a business partner or staff holding certain portfolio (ENTITY) has potential corruption risks or been involved in or has association with any past bribery or corruption activities.

METHODOLOGY

The Due Diligence exercise involves asking a set of 16 questions on ENTITY which covers the following dimensions:

1. Background

Examines if ENTITY is or has been associated with bribery or corruption activities

2. Controls

Determines the strength of the anti-bribery and anti-corruption systems practiced by ENTITY

3. Relationship

Identifies if ENTITY has any link to persons of interest who may be in conflict with ENFRASYS

4. Finances

Does the ENTITY practise financial behaviour which is not normal and can raise red flags

The responses to these questions will determine the result of ENTITY's Due Diligence.

DUE DILIGENCE ON:

CONDUCTED BY:

Name : _____

Designation : _____

Department : _____

Date : _____

Signature

Instructions:

1. The result and any additional information collected from the Due Diligence exercise must be recorded in the attached Due Diligence Form.
2. Based on the responses, indicate if ENTITY is a potential corruption risk to ENFRASYS.
3. This exercise must be conducted at least once for all business partners with which ENFRASYS has a business relationship.

VERIFIED BY (LEGAL & COMPLIANCE):

Name : _____

Designation : _____

Department : _____

Date : _____

Signature

DIMENSION	NO.	QUESTION	YES / NO
Background	1	Has a recent online search on ENTITY shown any adverse or negative news, reports or articles related to bribery and/or corruption?	
	2	Is ENTITY listed on the current MACC database of convicted corruption offenders?	
	3	Have checks with contacts or companies who may have knowledge or association with ENTITY revealed any adverse or negative news, reports or articles related to bribery and/or corruption?	
	4	Has ENTITY's responses been consistent with official records filed with regulators (e.g. Suruhanjaya Syarikat Malaysia, Bursa Malaysia etc.)?	
	5	Is ENTITY forthcoming in providing all information requested by ENFRASYS?	
Controls	6	Are there internal anti-bribery and anti-corruption policies and controls in place at ENTITY?	
	7	Are these policies and controls sufficiently practiced by both internal staff at ENTITY and extended to external parties who have a business relationship with ENTITY?	
	8	Does ENTITY have its own Due Diligence process and does this process extend to its external parties?	
	9	Has ENTITY had business dealings with third parties who have been involved in bribery and/or corruption?	
Relationship	10	Does ENTITY have any personal/professional relationship with key persons in ENFRASYS who can influence decisions in favour of ENTITY?	
	11	Does ENTITY have any personal/professional relationship with key public officials who may have been or are currently involved in ENFRASYS' business?	
	12	Was ENTITY recommended by or suggested to ENFRASYS by a public official? If yes, identify the public official.	
Finances	13	Does ENTITY have a record of making large cash payments to unidentified parties for unclear reasons?	
	14	Does ENTITY have a record of making cash payments to unidentified parties on a regular basis?	
	15	Are the rates charged by ENTITY much higher than the industry average or exceed the true value of its services?	
	16	Does ENTITY frequently request for payments on an urgent basis or demand high commission rates?	

***To be filled by Authorised Approver**

Decision of Due Diligence exercise on ENTITY (choose only one of the following):

- A. **Passed** – recommend continuing business relationship/appointment.

- B. **Passed with conditions** – recommend conducting periodic Due Diligence and/or company submitting regular declaration on anti-corruption.

- C. **Pending** - on hold while awaiting additional information from ENTITY.

- D. **Failed** – recommend not proceeding with/terminating business relationship/appointment.

Additional Comments (if any - please use additional pages if necessary)

APPROVED BY

Name : _____
Designation : _____
Department : _____
Date : _____

Signature

OBJECTIVE

Ascertain if an EMPLOYEE holding a certain portfolio has potential corruption risks or has been involved in or associated with any past bribery or corruption activities.

METHODOLOGY

The Due Diligence exercise involves asking a set of questions about the EMPLOYEE, covering the following dimensions:

1. Background Check

Verify if the EMPLOYEE has any criminal records, financial irregularities, or negative references.

2. Conflict of Interest

Identify and detail any potential conflicts of interest the EMPLOYEE may have.

3. ABAC Policy Awareness

Confirm if the EMPLOYEE acknowledges the company's ABAC policy.

4. Gifts and Hospitality

Check if the EMPLOYEE has received any gifts or hospitality in the last 12 months and provide details.

5. Third-Party Interactions

Determine if the EMPLOYEE has had any interactions with government officials and describe them.

The responses to these questions will determine the result of EMPLOYEES'S Due Diligence.

DUE DILIGENCE ON:

CONDUCTED BY:

Name : _____

Designation : _____

Department : _____

Date : _____

Signature

Instructions:

1. The result and any additional information collected from the Due Diligence exercise must be recorded in the attached Due Diligence Form.
2. Based on the responses, indicate if EMPLOYEE is a potential corruption risk to ENFRASYS.
3. This exercise must be conducted at least once for all EMPLOYEES holding key positions within ENFRASYS.

VERIFIED BY (LEGAL & COMPLIANCE):

Name : _____

Designation : _____

Department : _____

Date : _____

Signature

Section 1: Background Check

A. Criminal Record Check

Completed Pending Not Applicable

B. Financial Background Check

Completed Pending Not Applicable

C. Reference Check

Completed Pending Not Applicable

Section 2: Conflict of Interest

A. Disclosure of Potential Conflicts

No Yes (If yes, provide details below)

B. Details of Potential Conflicts

Section 3: ABAC Policy Awareness

A. ABAC Policy Awareness Completed

Yes (Date: _____)

No

Section 4: Gifts and Hospitality

A. Gifts Received in the Last 12 Months

Yes (If yes, provide details below)

No

B. Details of Gifts

C. Hospitality Received in the Last 12 Months

Yes (If yes, provide details below)

No

D. Details of Hospitality

Section 5: Third-Party Interactions

A. Interactions with Government Officials

Yes (If yes, provide details below)

No

B. Details of Interactions

Section 6: Declaration

I, _____, hereby declare that the information provided in this form is true and accurate to the best of my knowledge. I understand that any false information may result in disciplinary action.

Full Name: _____

Position: _____

Department: _____

Date of Hire: _____

Report To: _____

***To be filled by Authorised Approver**

Decision of Due Diligence exercise on EMPLOYEE (choose only one of the following):

- D. **Passed** – recommend continuing employment/appointment.
- E. **Passed with conditions** – recommend conducting periodic Due Diligence and/or employee submitting regular declaration on anti-corruption.
- F. **Pending** - on hold while awaiting additional information from EMPLOYEE.
- G. **Failed** – recommend not proceeding with/terminating employment/appointment.

Additional Comments (if any - please use additional pages if necessary)

APPROVED BY

Name : _____
Designation : _____
Department : _____
Date : _____

Signature

PLEASE TICK (✓) THE FOLLOWING RELEVANT CATEGORIES APPLIED:

GIFTS	<input type="checkbox"/>	HOSPITALITY	<input type="checkbox"/>	DONATION	<input type="checkbox"/>	SPONSORSHIP	<input type="checkbox"/>
--------------	--------------------------	--------------------	--------------------------	-----------------	--------------------------	--------------------	--------------------------

DETAILS OF EMPLOYEE GIVING / RECEIVING OF GIFTS / HOSPITALITY / DONATION / SPONSORSHIP

TO BE FILLED IN BY RECEIVER / REQUESTOR			
Employee Name		Department / Business Unit	
Signature		Date	

*GIVING		*RECEIVING / BEING OFFERED	
Public Official	Yes / No	#Value / Estimated Value	
Description of the Gifts / Hospitality / Donation / Sponsorship			
# Details / Remarks			
Name of receivers / givers <i>(Please provide a list should the space provided not sufficient)</i>	Company	Designation	

*Please (✓) where relevant

#Attach supporting documents where applicable.

APPROVAL

TO BE APPROVED BY GROUP CHIEF FINANCIAL OFFICER / GROUP CHIEF EXECUTIVE OFFICER (please refer to approval authority stated in our Anti-Bribery & Anti-Corruption (ABAC) Policy & Guidelines)						
Name						
Decision	<input type="checkbox"/>	Approve & Accept / Acknowledge	<input type="checkbox"/>	Decline & Return	<input type="checkbox"/>	Decline & Charity
Reason						
Signature				Date		

Note: ALL gifts and/or hospitality shall be approved in advance by **Authorised Signatories** as per the approved Policy.

FOR OFFICE USE	SERIAL NO.:	

(The table below is applicable for gifts to be declined / returned to third party or for gifts to be distributed as charitable donation)

TO BE FILLED IN BY MARKETING & CORP.COMM. / EMPLOYEE			
Name of Charity Home /Organisation			
Name		Position	
Signature		Date	

DETAILS OF EMPLOYEE GIVING / RECEIVING OF ENTERTAINMENT

TO BE FILLED IN BY RECEIVER / REQUESTOR			
Employee Name		Department / Business Unit	
Signature		Date	

*GIVING			
Public Official	Yes / No	#Value / Estimated Value	
Type of Entertainment			Approval by
Management • Executive and above		Business Meal <i>Not more than RM100/person/occasion</i>	Head of Department
Top Management • Head of Departments • Top Management		Business Meal <i>Not more than RM500/person/occasion</i>	Group Chief Executive Officer
		Golfing	Group Chief Executive Officer
# Details / Remarks			

*RECEIVING / BEING OFFERED			
Public Official	Yes / No	#Value / Estimated Value	
Description of the Entertainment			
# Details / Remarks			

Name of receivers / givers <i>(Please provide a list should the space provided not sufficient)</i>	Company	Designation

PROVISION/ RECEIPT OF ENTERTAINMENT FORM
(ENFRASYS/P/LC/02/F/006/R00)

APPROVAL

TO BE APPROVED BY HEAD OF DEPT./ GROUP CHIEF EXECUTIVE OFFICER			
Name			
Designation			
Decision	<input type="checkbox"/>	Approve	<input type="checkbox"/>
			Decline
Reason			
Signature		Date	

Note: ALL entertainment shall be approved in advance by **Authorised Signatories** as per the approved Policy.

FOR OFFICE USE	SERIAL NO.:	
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CONFLICT OF INTEREST DECLARATION FORM

This declaration form is in accordance with the Enfrasys Group's Anti-Bribery & Anti-Corruption (ABAC) Policy & Guidelines. Business Associates and/or Employees must declare all the perceived, potential and actual conflict of interest. Where a conflict arises that has not been declared, you are required to make a declaration of such conflict of interest within seven (7) working days from the day the said COI arises. Once the form is filled out, it should be forwarded to the Human Resources & Administrations Department for validation. Following this, the form will be confidentially maintained by the Legal & Compliance Department. It's important to note that the Legal & Compliance Department is tasked with preserving a copy of the validated form for auditing purposes. **Please refer to the ABAC policy and Guidelines for reference of the terms.**

Non-compliance:

1. Failure to disclose a conflict of interest, or refusal to resolve or properly manage a conflict, will be treated as a disciplinary matter. Action will be taken in accordance to the disciplinary processes of the Enfrasys Group of Companies.
2. Depending on the circumstances and the severity of the breach, the action taken may involve reporting to enforcement agencies such as the Malaysian Anti-Corruption Commission, the Royal Malaysian Police, and/or equivalent authorities for further action.

CONFLICT OF INTEREST DISCLOSURE STATEMENT.

PART A: DETAILS OF EMPLOYEE / OFFICER			
Name		Department	
Employee ID		Position	
NRIC		Joined Date	

I hereby declare that I have read and understand the Enfrasys Group's Conflict of Interest Declaration Form and I understand that should any new conflict of interest arise and if there is an important change to an existing conflict of interest, I am required to report this promptly and complete the Conflict of Interest Declaration Form.

(Please tick boxes if applicable)

Num	Types of Conflict	Tick if Applicable
1.	Other Business Interest	
2.	Other Employment	
3.	Corporate Directorship	
4.	Trading in 'Anything of Value'	
5.	Personal or Private Relationship	



**ENFRASYS GROUP OF COMPANIES
CONFLICT OF INTEREST DECLARATION FORM**

(ENFRASYS/P/LC/02/F/008/R001)

ACKNOWLEDGEMENT

To the my best of knowledge, the information provided on this form is complete disclosure of any known or potential Conflicts of Interest that I may have in relation to my position at Enfrasys Group of Companies.

I accept full responsibility if the information provided is found to be false or misleading.

.....

Name:

Date:

CONFLICT OF INTEREST DECLARATION FORM

This declaration form is in accordance with the Enfrasys Group’s Anti-Bribery & Anti-Corruption (ABAC) Policy & Guidelines. Business Associates must declare all the perceived, potential and actual Conflict of Interest (“COI”). Where a conflict arises that has not been declared, you must declare such conflict of interest within seven (7) working days from the day the said COI arises. Once the form is filled out, it should be forwarded to the Business Development / Procurement Department for validation. Following this, the form will be confidentially maintained by the Legal & Compliance Department. It’s important to note that the Legal & Compliance Department is tasked with preserving a copy of the validated form for auditing purposes.

Non-compliance:

1. Failure to disclose a conflict of interest, or refusal to resolve or properly manage a conflict, will be treated as a disciplinary matter. Action will be taken in accordance with the disciplinary processes of the Enfrasys Group of Companies.

2. Depending on the circumstances and the severity of the breach, the action taken may involve reporting to enforcement agencies such as the Malaysian Anti-Corruption Commission, the Royal Malaysian Police, and/or equivalent authorities for further action.

CONFLICT OF INTEREST DISCLOSURE STATEMENT.

PART A: DETAILS OF BUSINESS ASSOCIATES			
Company Name		Business Registration No	
Representative’s Name		Designation	
NRIC / Passport No.		Department	

I hereby declare that I have read and understand the Enfrasys Group’s Conflict of Interest Declaration Form and I understand that should any new conflict of interest arise and if there is an important change to an existing conflict of interest, I am required to report this promptly and complete the Conflict of Interest Declaration Form

(Please tick boxes if applicable)

NO.	CONFLICT OF INTEREST SITUATIONS	TICK IF APPLICABLE
1	Do you or any family members or person associated have any personal or private dealings with Enfrasys Group of Companies?	<input type="checkbox"/>
2	Do you have any financial or personal gain from the transaction or dealing with Enfrasys Group of Companies, or did you receive any financial or personal benefits, such as gifts, salary, fees, loans or guarantees of obligations, free service or discounts?	<input type="checkbox"/>
3	Do you have an opportunity for personal gain through your position or using Enfrasys Group’s facilities, equipment, systems or other properties?	<input type="checkbox"/>

ACKNOWLEDGEMENT

I hereby affirm that the information filled in this form is a disclosure of any real or potential conflicts of interest that could impact my association with Enfrasys Group of Companies. I acknowledge and accept that I will be held accountable if any of the disclosed information is subsequently discovered to be false or misleading.

.....

Representative's Name : _____

Date : _____

Company's Name : _____

Company's Stamp : _____