


ventureTECH	VentureTECH Sdn. Bhd.	
	(Registration No. Company No. 200401016536/ 655039-U)	
	INTEGRITY AND GOVERNANCE UNIT	
	DOCUMENT NO: 1	VERSION: 1.0
ANTI-BRIBERY AND CORRUPTION POLICY		

ANTI-BRIBERY AND CORRUPTION POLICY

Reference No.:		Revision No.:	
Effective Date:		Revision Date:	

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1. Introduction

- 1.1 VentureTECH adopts a zero-tolerance policy against all forms of bribery and corruption. This Anti-Bribery and Corruption Policy (“**ABC Policy**”) has been established to enshrine such principles, providing guidance to Employees (as defined herein) on dealing with improper solicitation, bribery and other corrupt activities that may arise in the course of executing or undertaking their professional duties, obligations and responsibilities.
- 1.2 Bribery and corruption are criminal offences and defined as “Gratification” in the MACC Act, and of which both convicted individual and the company he/she worked for shall be liable for punishment under the law for the offence. Engaging in bribery or corrupt practices may result in dire and severe consequences for VentureTECH and Employees engaged in such illegal and undesired practices. Any Employee involved in bribery or corrupt practices of any kind: -
- (a) exposes VentureTECH to damage to or loss of reputation, financial losses, legal liability, including criminal proceedings and sanctions; and
 - (b) shall be liable for dismissal from employment, legal proceedings, and where charged and found liable by authorities, applicable fines and imprisonment.
- 1.3 This ABC Policy is not a comprehensive guide on anti-bribery and corruption practices, but is intended to provide Employees with basic guidelines on combating Bribery and Corruption (as defined hereafter) and should be read in conjunction with various policies, standard operating procedures, guidelines and Code of Business Conduct (as defined herein). If multiple documents speak on the same subject, then the more stringent provision always applies.


2. Anti-Bribery and Corruption Commitment

- 2.1 VentureTECH conducts all its business in an honest and ethical manner, and VentureTECH commits to act professionally, fairly and with integrity in its relationships and business dealings with its business partners wherever it operates and VentureTECH shall put in place control and enforcement mechanisms with regard to this ABC Policy.
- 2.2 VentureTECH upholds all laws relevant to this ABC Policy particularly the Malaysian Anti-Corruption Commission Act 2009 (hereinafter referred to as “**MACC Act**”), in respect to its conduct both in Malaysia and abroad. If the law conflict with this ABC Policy, VentureTECH should comply with the law.

3. Objective

This ABC Policy: -

- (a) sets out the responsibilities of Directors (as defined herein), Employees and Business Associates (as defined herein) in complying with and upholding VentureTECH’s position against Bribery and Corruption; and

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- (b) provides guidelines and information to Directors, Employees and Business Associates on refraining from and where applicable, dealing with acts of Bribery and Corruption.

4. Scope

4.1 This ABC Policy shall include, but not limited to, individuals employed, engaged and/or directed by VentureTECH in any manner to represent the business of VentureTECH which shall include, but not limited to, the following: -

- (a) Directors and Employees of VentureTECH (whether full-time, part-time, contract or temporary);
- (b) Business Associates and other parties providing goods and services to or on behalf of VentureTECH;
- (c) any other person associated with VentureTECH and/or representing VentureTECH or involved with VentureTECH in any transaction.

4.2 VentureTECH shall exercise its best endeavours to ensure that jointly controlled and associate companies in Malaysia and elsewhere adopt this ABC Policy.


5. Definitions

“Board” : means the board of directors of VentureTECH;

“Bribery and Corruption” : means any action which would be considered as an offence of giving or receiving ‘Gratification’ under the MACC Act, which in practice means offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person who is in a position of trust within an organization, and may either be: -


- (a) ‘outbound’, where someone acting on behalf of VentureTECH attempts to influence the actions of a party, including government officials or decision makers, or
- (b) ‘inbound’, where an external party is attempting to influence the Employee such as a senior decision-maker or any Employee with access to confidential information;

“Business Associates” means an external party with which or whom VentureTECH has, or intends to establish a

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business relationship, which shall include, but not limited to, advisors, agents, contractors, sub-contractors, consultants, senior associates, consortium partners, joint venture partners, investees, representatives, service providers, suppliers, vendors and any associations, bodies or entities formed by law, wherever located;

- Code of Business Conduct** : means the Code of Business Conduct of VentureTECH, as may be amended from time to time;
- Corporate Hospitality** : means corporate events or activities organized by VentureTECH which involves the entertainment of the Employees and Business Associates for the benefit of VentureTECH such as sporting events or other public events;
- Directors** : means any and all directors in VentureTECH, including independent, non-independent, executive, non-executive and alternate directors;
- Employees** : Employees shall encompass all personnel including Senior Management (as defined herein), managers, supervisors, executives and non-executives under the employment of VentureTECH. This also covers temporary staff and interns;
- Facilitation Payment** : means payments made to secure or expedite the performance by a person performing a duty, function or responsibility of any kind, and include cash, payments in kind and financial and non-financial advantages with the intention of influencing them in the performance of their duty, function or responsibility;
- Gratification** : is defined in the MACC Act to mean the following: -
- (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;

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- (c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether wholly or in part;
- (d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- (e) any forbearance to demand any money or money's worth or valuable thing;
- (f) any other service or favour 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).

- Hospitality** : means the considerate care of Business Associates, which may include food and beverages, refreshments, accommodation, transportation/ travel and entertainment at restaurants, hotels, clubs, resorts and other similar facilities, including leisure, sporting and healthcare activities or services of any kind;
- Kickback** A kickback is a form of negotiated bribery in which a commission is paid to the bribe-taker in exchange for services rendered;
- MD/CEO** : means the Managing Director or Chief Executive Officer of VentureTECH; and
- Senior Management** : means the Senior Management of VentureTECH comprising of MD/CEO, Senior Vice Presidents, Vice Presidents and Assistance Vice Presidents.

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6. Gifts, Entertainment and Hospitality

6.1 “No Gift” Policy

VentureTECH adheres strictly to “No Gift” Policy and Directors and Employees are, subject to exceptions provided in paragraph 6.2 herein, prohibited from receiving, seeking or soliciting gifts, entertainment, or favours of any kind from the Business Associates that could be interpreted as compromising his/her ability to make fair and rational business decision. Further details are set out in the Code of Business Conduct.


VentureTECH requires Directors and Employees to abide by this ABC Policy to avoid conflict of interest or the appearance of conflict of interest for either party in on-going or potential business dealings between VentureTECH and Business Associates as a gift can be seen as a bribe that may tarnish VentureTECH's reputation or be in violation of the MACC Act.

It is the responsibility of Directors and Employees to inform the Business Associates involved in any business dealings with VentureTECH that the company practices a “No Gift” Policy and to request the Business Associates’ understanding for and adherence with this ABC Policy.

6.2 Exceptions to the “No Gift” Policy

The following are the exceptions on accepting or giving gifts with regard to this ABC Policy: -

- (a) Exchange of gifts at, or during, official visit/courtesy call and thereafter the said gift shall be regarded as VentureTECH's property;
- (b) Gifts from VentureTECH to external institutions or individuals in relation to any of VentureTECH's official functions, events and celebrations (e.g. commemorative gifts or door gifts given to all guests attending the event);
- (c) Gifts from VentureTECH to its Employees which shall include any gifts exchanged between VentureTECH, Directors, senior associates, associates, trainees, interns, project researchers, volunteers or their family members in relation to an internal or externally recognised VentureTECH function, event and celebration (e.g. in recognition of any services to VentureTECH);
- (d) Token gifts of nominal value bearing VentureTECH's logo that are given out to members of the public, delegates, customers, partners and key stakeholders attending events such as conferences, exhibitions, training, trade shows and the like and deemed as part of VentureTECH's branding or business development activities; and
- (e) Gifts to external parties who have no business dealings with VentureTECH which include any charitable or sponsorships that are within VentureTECH's policies and procedures.

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6.3 Gifts

(a) Receiving Gifts

Although the general principle is to immediately refuse or return such gifts, accepting a gift on behalf of VentureTECH is allowed only in a very limited circumstances, whereby refusing the gift is likely to seriously offend and may sever VentureTECH's business relationship with the Business Associates. In this limited circumstances, Employees are expected to record the gift in the Gift Report Form as provided in Appendix 1 for submission to the Head of Department/Division or any other higher authority, who will then decide whether to approve the acceptance of the gift or require it to be returned. Directors should inform the company secretary, as soon reasonably practicable, to seek his/her advice when faced with similar situation.

In the event the Head of Department/Division or any other higher authority approves the acceptance of the gift, he/she must also determine the treatment of the gift after consultation with the MD/CEO whether to: -

- (i) donate the gift to charity; or
- (ii) hold it for departmental display; or
- (iii) share with other employees in the department; or
- (iv) permit it to be retained by the Employees.

Any gift received that does not comply with this ABC Policy must be brought to the attention of the Senior Management.

(b) Providing Gifts


Giving of gifts to the Business Associates are only allowed for the Senior Management and any other officer as identified or granted permission to provide entertainment and such gift is to be given within reasonable judgement as approved by MD/CEO and all gifts given should be in accordance with VentureTECH's policy and procedures.

6.4 Entertainment

(a) Providing Entertainment

To safeguard VentureTECH's reputation, and also protect from any allegations of impropriety or undue influence in relation to Bribery and Corruption, the policies and procedures on entertainment should be complied in relation to providing entertainment to Business Associates.

VentureTECH has allocation for eligible employees in providing entertainment under the Staff Benefit, as may be amended from time to time. Any eligible Employee who is allowed to entertain must conduct such act of entertaining

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clients of VentureTECH in a reasonable manner and within the policy and procedure of VentureTECH. This act is to be seen as a goodwill towards the recipient and not as an act of exerting influence in order to obtain Gratification. Any entertainment activity shall require prior approval of the higher authority of the applicants.

(b) Receiving Entertainment

VentureTECH acknowledges the occasional acceptance of a reasonable and modest level of entertainment provided by Business Associates in the ordinary course of business. It is important for all Employees to exercise proper care and judgment before accepting any entertainment offered or provided by the Business Associates. Any receipt of entertainment must be notified to the higher authority of the recipients.

6.5 Corporate Hospitality

(a) Providing Corporate Hospitality

Although Corporate Hospitality is recognized as a legitimate way to network and build goodwill in business relationship, there exists a fine line between what is considered to be legitimate against illegitimate forms of corporate hospitality, with the question being whether there is any intention to influence or be perceived to influence the improper outcome of a business decision by providing such hospitality.

Hospitality is illegitimate under the following circumstances: -

- (i) if it is provided with the intention of inducing the recipient to perform a function improperly; or
- (ii) if there is knowledge that acceptance of such hospitality would in itself be improper performance.

Any hospitality provided must be: -

- (i) transparent, in that all Corporate Hospitality is reported and written approval is obtained, all records of which are properly kept;
- (ii) proportionate, being that Corporate Hospitality commensurate with the recipient's professional capacity and must not be excessive;
- (iii) reasonable, in that the Corporate Hospitality is not lavish; and
- (iv) bona fide, where the intention to offer and/or provide such Corporate Hospitality is done without any improper or illegal intentions.

(b) Receiving Corporate Hospitality

As a general principle, there must not be any soliciting of Corporate Hospitality

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nor acceptance of Corporate Hospitality that is excessive or suspiciously inappropriate in any anticipation of or to influence a favourable decision, in particular from the Business Associates that are engaged in any tendering exercises in VentureTECH. However, occasional acceptance of appropriate level of Corporate Hospitality given in the normal course of business is accepted as a legitimate contribution to building good business relationships. Proper care and judgement are to be exercised before accepting the Corporate Hospitality.

However, in the event, the recipient/provider is unsure of the reasonableness or modesty of the Corporate Hospitality received/provided, he/she shall consult his/her immediate superior for direction.

In the event that the Senior Management, excluding the MD/CEO, are the recipients or providers, approval is to be sought from the MD/CEO; and for the MD/CEO, approval is to be sought from the Chairman.

6.6 In the situations mentioned in paragraph 6.3, 6.4 and 6.5 above, any gifts, entertainment and/or hospitality given or received must be in accordance within the spirit and intent of this ABC Policy and in exercising proper care and good judgement, the following considerations must be practiced:-

- (a) Reasonable in value;
- (b) Infrequent in nature;
- (c) Not given to influence or obtain an unfair advantage of exercising the position or authority for own personal interest;
- (d) Does not damage reputation, image or the integrity of VentureTECH;
- (e) Avoid any conflict of interest; and
- (f) Comply with applicable laws, regulations and VentureTECH's policies and procedures.


7. Facilitation Payment

7.1 VentureTECH prohibits making or accepting, either directly or indirectly, Facilitation Payment of any kind with the intention to influence other party in his/her duties.

7.2 All person must not offer, promise, give, request, accept or receive anything which might reasonably be regarded as Facilitation Payment. If any person receive a request or offered Facilitation Payment, he/she shall report it to their immediate superior. Such occurrence has to be recorded in a register for audit purposes.

7.3 Exception to Making Facilitation Payment

In view that VentureTECH prioritises the safety of its Employees, a Facilitation Payment may be permitted under exceptional circumstances where: -

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- (a) an Employee's safety is at stake and the immediate available recourse to protect or secure the safety of such Employee is to make the Facilitation Payment; and
- (b) prior written approval of the MD/CEO to make such Facilitation Payment has been obtained.

8. Kickback

- 8.1 VentureTECH does not make or accept, kickback payments of any kind. Kickback may be money, a gift, credit, or anything of value.
- 8.2 All person must not offer, promise, give, request, accept or receive anything which might reasonably be regarded as Kickback. If any person receive a request or offered the Kickback, he/she shall report it to their immediate superior. Such occurrence has to be recorded in a register for audit purposes.

9. Political Contributions


- 9.1 VentureTECH does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office .
- 9.2 VentureTECH encourages employees to participate in the political election process by voting. Employees may choose to make personal political contributions as appropriate within the limits established by law. Under no circumstances, however, will any employee be compensated or reimbursed in any way by VentureTECH for a personal political contribution.

10. Procurement Process

- 10.1 In line with the general principles of the Code of Business Conduct and in accordance with the Discretionary Authority Limits of VentureTECH, VentureTECH is committed to uphold the highest standard of ethics and integrity in all aspects of its procurement activities.
- 10.2 VentureTECH should avoid dealing with any Business Associates known or reasonably suspected of corrupt practices or known or reasonably suspected to pay bribes.

11. Record-keeping

- 11.1 VentureTECH shall keep complete business and financial records and have effective internal controls in place which complies with accepted standards of record-keeping and auditing requirements.
- 11.2 All expenses claim relating to gifts, entertainment or hospitalities incurred to third parties

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are to be submitted in accordance with VentureTECH's policies and procedures.

12. Recruitment, Evaluation, Promotion and Support of Employees

12.1 VentureTECH's recruitment, training, performance evaluation, remuneration, recognition and promotion of Employees shall be conducted in accordance with VentureTECH's policies, procedures, be transparent and carried out with integrity.

13. Conflicts of Interest

13.1 Conflicts of interest arise in a situation where there is personal interest involved which may interfere with one's performance of duties or exercising of judgment objectively on behalf of VentureTECH. All employees shall avoid situations in which personal interest could conflict with their professional obligations or duties. Employees must not use their position, official working hours, VentureTECH's resources and assets or information available to them for personal gain or to VentureTECH's disadvantage.


13.2 In situations where a conflict of interest does occur, the employee concerned is required to declare the conflict to his/her immediate superior. Such occurrence has to be recorded in a register for audit purposes.

14. Red Flags of Bribery and Corruption

The following is a list of possible red flags that may arise for an individual while working for VentureTECH and which may raise concerns under various anti-bribery and corruption laws. The list is not intended to be exhaustive and is for illustration purposes only.

If an employee encounters any of these red flags while being engaged with VentureTECH, he/she must report them promptly to his/her immediate supervisor who will assess the situation and bring up the matter to the Integrity and Governance Unit: -

- (a) Become aware that any employee/third-party engages in, or has been accused of engaging in, improper business practices;
- (b) Learn that any employee/third party has a reputation for paying bribes, or requiring that bribes are paid to him/her, or has a reputation for having a "special relationship" with VentureTECH officials;
- (c) Any third-party insists on receiving a commission or fee payment before committing to sign up a contract with VentureTECH, or carrying out a function or process for us;
- (d) An employee/ third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- (e) An employee/third-party requests an unexpected additional fee or commission

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to “facilitate” a service;

- (f) An employee/third-party demands entertainment or gift before commencing or continuing contractual negotiations or provision of services;
- (g) An employee/third-party receives an invoice from a third-party that appears to be non-standard or customised;
- (h) A third-party insists on the use of side letters or refuses to put terms agreed upon in writing;
- (i) A third party or an employee requests or gives a promise of a certain sum of money to another person in expectation a favour for the assurance of getting a position or being employed in VentureTECH;
- (j) An employee/ third party requests for or gives any sum of money or promise of gift or service to the individual or any party with intention to receive a favour that will benefit them directly.

15. Declarations on Integrity Pledge & Conflict of Interest

- 15.1 All Employees and any other person that in any manner represent the business of VentureTECH, shall acknowledge and certify in writing that they have read, understood and will abide by this ABC policy. A copy of this declaration shall be documented and retained by the Human Resource Department for the duration of the Employee’s employment. A sample declaration may be found in the **Appendix 2** of this ABC policy.
- 15.2 The Company reserves the right to request information regarding any of the above-mentioned person’s assets in the event that the person is implicated in any bribery or corruption-related accusation or incident which directly or indirectly implicates VentureTECH.


16. Whistleblower Protection

- 16.1. Any person who has knowledge of or has reasonable belief that any Employee of VentureTECH is involved in bribery or corruption may report such Employee at <https://whistleblowing.venturetech.my/>
- 16.2. VentureTECH encourages openness and shall support anyone who raises genuine concerns in good faith under this ABC Policy. These initiatives will be governed under the Code of Business Conduct and Whistleblowing Policy of VentureTECH.

17 Training and Communication

17.1 Training

VentureTECH will provide its Directors and Employees with adequate training to ensure

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their thorough understanding of this ABC Policy, and to continuously promulgate ethical conduct and integrity.

17.2 Communication

This ABC Policy is made available to public at VentureTECH's website and will be appropriately communicated to all Employees, Directors and Business Associates of VentureTECH.


18 **Monitoring and Review**

18.1 Senior Management shall ensure that regular reviews are conducted to assess the performance, efficiency and effectiveness of the anti-bribery and corruption programme, and ensure the programme is enforced. Such reviews may take the form of an internal audit or an audit carried out by an external party.

18.2 The review should form the basis of any efforts to improve the existing anti-bribery and corruption controls in place in VentureTECH.

19 **Amendments**

19.1 VentureTECH reserves the right to amend, modify or discontinue this ABC Policy at any time, for any reason, subject to the Board's endorsement.

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Appendix 1
Gift Record Form

Declaration


This declaration form supports VentureTECH's Anti-Bribery and Corruption Policy ("ABC Policy"). Employees must declare all gifts and hospitality as outlined in the ABC Policy and seek written approval from their immediate superior and the completed form is to be submitted to the Integrity and Governance Unit of VentureTECH. Details below should be completed in the best knowledge:-

Individual to complete	
Declaration Date	
Name	
Designation	
Department	
Details of gift, benefit or hospitality	
Date offered	
Description of the gift, benefit or hospitality offered	
Estimated or actual value	
Offered by (Name/Position/Organization)	
Reason for accepting the offer (sufficient detail required) and the relationship with the provider. Is the offer a festive gift? Provide details if so.	
Would accepting the offer: - a) Create an actual potential or perceived conflict of interest exist. (Y/N); or b) Bring you, VentureTECH or the Board into disrepute? (Y/N) (If either is answered YES, then the offer must be declined)	
Decision regarding offer: - <input type="checkbox"/> Declined or <input type="checkbox"/> Retained or <input type="checkbox"/> Transferred to VentureTECH's ownership	
Comments:	
Signature of recipient:	Date:
Approval from Immediate Superior: Approved/Not Approved	

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<p>Comments:</p> <p>Signature:</p> <p>Date:</p>
<p>Acknowledgement from IGU</p> <p>Comments</p> <p>Signature:</p> <p>Date:</p>

Note: This form is a sample of declaration to be made and can be amended as deemed necessary.

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Appendix 2
Declaration on Integrity Pledge & Conflict of Interest

I hereby agree that I have read and understood the Anti-Bribery and Corruption Policy ("ABC Policy") of VentureTECH and make the following declaration:-

- (i) That I conduct all transactions or business of VentureTECH in an honest, ethical and professional manner and shall not succumb to bribery and corrupt practices;
- (ii) That I shall deal fairly and with integrity in all my dealings in all relationships and business deals of VentureTECH;
- (iii) That I understand the criminal offences under corruption and bribery practices shall be punishable under the relevant laws within or outside of Malaysia and could also face disciplinary action and charges should my action and/or omission create any damage to the reputation of VentureTECH or any employee of VentureTECH;
- (iv) That I shall immediately notify VentureTECH as soon as possible if I have knowledge of a possible conflict with this ABC Policy or if I am aware that it has occurred or may occur in future, either by myself or any persons engaged in VentureTECH;
- (v) That I shall avoid and make my declaration on any Conflicts of Interest should it arise in situations where there is personal interest that could be considered to have potential interference with my performing duties or exercising judgment objectively on behalf of VentureTECH;
- (vi) That I shall not use my position, official working hours, VentureTECH's resources and assets, or information available for any personal gain or to VentureTECH's disadvantage or in sharing any confidential matters of VentureTECH that are required to be kept confidential under the Official Secrets Act 1972 or under VentureTECH's policy and/or agreement; and
- (vii) That should I resign or leave VentureTECH for whatever reasons, I understand that I shall be bound by this declaration and that VentureTECH may take appropriate action against me, should I be found guilty of any offences within this ABC policy or under the MACC Act.

Signed by:

Name :

Date:

Note: This form is a sample of declaration to be made and can be amended as deemed necessary.