

# Anti-Bribery and Corruption Policy ("ABC Policy")

Ver. August 2024



## **Introduction**

MACP adopts a zero-tolerance approach and condemns against all forms of bribery and corruption.

This ABC Policy sets out the roles and responsibilities, minimum control requirements on dealing with improper solicitation, bribery and corruption activities, as well as measures to preventing, detecting, handling and responding to such issues.

## **Application**

This ABC Policy shall apply to all MACP Personnels i.e. Employees and Associated Persons. It is also expected that all parties engaged by MACP or performing work or services for or on behalf of MACP will comply with it when performing such work or services.

## **Compliance with Laws**

MACP is committed to complying with all applicable anti-bribery and corruption laws and regulations, including but not limited to the Malaysian Anti-Corruption Commission Act 2009.

## **Definition, Interpretation & Construction**

“Associated Persons”	A person is considered as an associated person of MACP if he is a director, partner or an employee of MACP or he is a person who performs services for or on behalf of MACP.
“Conflict of Interest”	When a person’s own interests either influence, have the potential to influence, or are perceived to influence their decision making of the Group.
“Employee(s)”	Partners, employees, directors and associates of MACP, including temporary, contract staff, agents or interns

“Personnel(s)”            The Employee(s) and Associated Person(s) of MACP.

## **Key Principles**

All MACP businesses shall be conducted in accordance with the following key principles: -

- (a) without intent to bribe or corrupt;
- (b) reasonably and transparently;
- (c) proportionate to the professional relationship;
- (d) appropriately documented with business rationale; and
- (e) authorised at an appropriate level of seniority.

## **Prohibited Conduct**

All Personnels are strictly not allowed to:

- (a) offer, give, receive, or solicit bribes or gratifications;
- (b) make facilitation payments or kickbacks;
- (c) engage in any form of corruption, blackmail, extortion, inducements, secret commissions;
- (d) create or maintain any off-the-books accounts or secret accounts; and
- (e) abuse of official position, either
  - i    in order to obtain business;
  - ii   to induce any illegal, improper and unethical actions of another party or violation of any rules; or
  - iii  to gain any illegal and unlawful advantage, to benefit MACP or personally, whether or not monetarily.

## **Gifts, Hospitality and Entertainment**

MACP recognizes that the giving and receiving of gifts, hospitality and sponsored travel are common business practices. Invitations in respect of industry awards and events and musical concerts and/or festival are presumed to be acceptable within reason. However, these must be reasonable, proportionate, consistent with reasonable business practices and must not be intended to influence or perceived to influence business decisions.

All Personnels must exercise good judgment and obtain prior approval from your superior or MACP before giving or receiving gifts or hospitality.

All receipts of such Gifts, Hospitality and Entertainment must be transparently reported as soon as practically possible to your superior or to MACP. For directors, receipts of the same shall be declared at a meeting of the Board of Directors.

### **Charitable Donations and Sponsorships**

Sponsorships and donations of any kind may be permissible depending on the circumstances and subject to due diligence and management approval.

### **Conflict of Interest**

All Personnels shall comply with MACP's Conflict of Interest policy and avoid at all cost any actual, potential or perceived conflict of interest.

### **Reporting and Whistleblowing**

MACP Personnels has the responsibility and are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. Any suspected or actual breach of this ABC Policy must be reported immediately to MACP's management or through the [complaints@macp.com.my](mailto:complaints@macp.com.my) and shall be addressed in a timely manner.

MACP will protect whistleblowers from any form of retaliation or fear of reprisal for reporting of any violation of this ABC Policy in good faith.

### **Training and Awareness**

MACP will provide regular training and awareness programs to ensure that all Personnels are aware of their obligations under this ABC Policy.

### **Oversight, Monitoring and Review**

MACP's management shall have the oversight of the implementation related to this ABC Policy and shall regularly monitor and review the effectiveness of this ABC Policy and make improvements as necessary. Regular risk assessment shall also be conducted to identify any potential bribery and corruption risks.

## **Conclusion**

MACP is committed to preventing bribery and corruption in its operations and expects all Personnels to adhere to this ABC Policy at all times. Any breach of this ABC Policy will be subject to disciplinary action, up to and including termination of employment or service.

## Personnel's Declaration Form

I hereby acknowledge that I have read and understood, and agree to MACP's Anti-Bribery and Corruption policy ("ABC Policy"), and the responsibilities required of me in relation to the said policy.

I will abide by the requirements and provisions set out in the ABC Policy which shall be read together and forms part of my employment contract with MACP.

I understand that if I am found to be a party to any breach of the ABC Policy during the term of my employment, I shall be subject to disciplinary action including the termination of my employment/ agency arrangement.

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Name :  
NRIC :  
Designation :  
Date :