



**DGB ASIA BERHAD**  
**200601001857**  
**(721605-K)**

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**ANTI-BRIBERY AND CORRUPTION POLICY**  
**(“ABC Policy”)**

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**Document Revision History**

VERSION	DATE	SUMMARY OF CHANGES
1	29.05.2020	
2	29.05.2024	Added information on the revised anti-bribery and corruption statement, flowcharts, declaration and reporting forms.

*\*This ABC Policy shall be reviewed at least once every three (3) years pursuant to Paragraph 15.28(1)(b) of the amended ACE Market Listing Requirement.*

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## **1. INTRODUCTION**

DGB Asia Berhad all its subsidiaries, joint venture companies and associate companies (“the Group”) are committed to ethical, transparent and responsible business practices as well as complying with all applicable laws, which include compliance with the Malaysian Anti-Corruption Commission Act 2009 (“MACC Act 2009”) and the Malaysian Anti- Corruption Commission (Amendment) Act 2018 and any of its amendments or re-enactments that may be made by the relevant authority from time to time.

This Anti-Bribery and Corruption Policy (“ABC Policy”) sets out the parameters to prevent the occurrence of bribery and corrupt practices in relation to the businesses of the Group.

This ABC Policy is supplemental to and shall be read in conjunction with the Group’s Code of Ethics and Conduct of the Group as annexed herewith, Whistle Blowing Policy, the MACC Act 2009 and the Malaysian Anti-Corruption Commission (Amendment) Act 2018.

## **2. OBJECTIVE**

This ABC Policy sets out the Group’s position on matters pertaining to bribery and corruption that may be encountered by the Directors and Employees of the Group in the course of business for the purpose of providing guidance in dealing with and preventing acts of bribery and corruption. The Group will take reasonable and appropriate measures to ensure that its businesses do not participate in corrupt activities for its advantage or benefit.

## **3. SCOPE**

This ABC Policy applies to all Directors (both executive and non-executive), employees, and/or any third-party affiliates (collectively, “the Parties”). The Parties include, but are not limited to, current or prospective customers, business partners, contractors, suppliers, consultants, agents, associates, and others who performing work or services on behalf of the Group.

#### 4. DEFINITIONS

For the purpose of this Policy: -

- (a) **Bribery**, means the act of giving or receiving something of value in exchange for some kind of influence or action in return, that the recipient would otherwise not offer.
- (b) **Corruption**, means the act of soliciting, giving, accepting, or receiving gratification, directly or indirectly, to/from a person in authority either in the form of money, services or valuable goods as an inducement or reward to or not to do an act in relation to the person's principal affairs – in short, corruption is essentially an abuse of entrusted power or position to obtain a personal gain or benefit.
- (c) **Gratification**, defined under the MACC Act, includes money, donation, gift, loan, fee, reward, valuable security, property or interest in property, employment, appointment, release, forbearance, undertaking, promise, rebate, discount, services employment or contract of employment or services and agreement to give employment or render services in any capacity. The provision or receipt of gratification is not an offence unless it is done corruptly.
- (d) **Director(s)**, refers to the Board of Directors of the Group which includes Executive and Non-Executive Director(s), as well as Independent Directors.
- (e) **Employee(s)**, refers to a person who works for the Group on a temporary, fixed term, probationary or permanent employment.
- (f) **Third Party Affiliate (“the Parties”)**, refers to person who performing work or services for and/or on behalf of the Group, include but not limited to agents, partners, contractors, sub-contractors, vendors, suppliers, service providers, consultants, representatives and/or any other.
- (g) **Public Official(s)**, refers to government and public bodies including their advisors, representatives, and officials.
- (h) **Gifts**, means any form of goods or services provided or received without payment including but not limited to items such as money, securities, business opportunities, goods, services, entertainment, sponsored events, food and beverages, vacations, and others.
- (i) **Entertainment**, means any form of lavish gifts, perks, or experiences provided to individuals in positions of power or influence with the intention of influencing their decisions or actions in favour of the giver.
- (j) **Hospitality**, means any form of amenity, travelling or accommodation or invitation provided or received.
- (k) **Donation and Sponsorship (“D&S”)**, means charitable contributions or sponsorship payments made to support the community. For example, sponsorships of educational events, supporting non-governmental organisations (“NGOs”), and other social causes.
- (l) **Facilitation payment**, means the payment made to authoritative personnel as an incentive/encouragement to complete some process or work speedily and efficiently.

## 5. ANTI-BRIBERY AND CORRUPTION STATEMENT

The Group has adopted a zero-tolerance policy against all forms of bribery and corruption. The Group acknowledges and is committed to conducting all our business with honesty, ethics, professionalism, fairness, and integrity in accordance with our Code of Ethics and Conduct. Every Employee, Director, and parties involved with the Group is responsible for complying with this ABC Policy.

Failing to report or participating in any act of giving, promising, soliciting, accepting bribes, or engaging in corrupt practices constitutes an offence. You may face disciplinary action as well as potential criminal investigation and prosecution and the Group may face damage to its reputation, financial losses, business disbarment and other negative consequences.

In the event of an investigation into corruption involving the Group, we shall ensure our full co-operation with the enforcement agencies and other competent authorities.

In the event of suspicious behaviour, allegations and/or investigations relating to bribery or corruption, the Group Human Resources reserves the right to request the relevant Employee to declare information regarding the assets owned by them as deemed necessary.

### 5.1 GIFTS, ENTERTAINMENT AND HOSPITALITY (“GEH”)

The Group has adopted a “**No Gifts, Entertainment and Hospitality**” policy (“**No-GEH Policy**”) with limited exception. The Group acknowledges that in certain cultures or situations, GEH offering or receiving is a common business etiquette that conveys friendliness and respect. Despite acknowledging the Group No-GEH Policy, certain third parties may still insist on offering GEH (whether to the Employees, Directors and/or their family members and other associated persons) and rejection will be constructed as insensible or culturally deemed offensive.

(a) In principle, all GEH shall be prohibited in offering and receiving, especially in the following circumstances, and if offered or received, it must be returned: -

- GEH in the form of cash or cash equivalent. Cash equivalent could be in the form of vouchers, discounts, coupons, shares, and commission etc;
- GEH offered or received during sensitive periods, such as tender or bidding exercise and related situations;
- GEH offered or received with the intention of causing undue influence on decision makers or appearance of the same;
- GEH offered or received with the expectation of gaining a return personal/corporate favour from the recipient;
- GEH offered or received secretly or through third parties such as family members/friends of directors or employees;
- GEH that would be illegal or in breach of local or foreign bribery and corruption laws; and/or
- GEH, which is lavish or excessive e.g. valued above the maximum threshold permitted by the Company or may adversely affect the reputation of DGB.

## 5.1 GIFTS, ENTERTAINMENT AND HOSPITALITY (Cont'd)

(b) The following circumstances are the exceptions to the No-GEH policy where provision or acceptance of Gifts and/or Hospitality are permissible (“the Exceptions”): -

- Exchange of gifts at the company-to-company level (e.g. gifts exchanged between companies as part of an official company visit/courtesy call and thereafter said gift is treated as company property);
- Gifts from company to external institutions or individuals in relation to the company’s official functions, events and celebrations (e.g. commemorative gifts or door gifts offered to all guests attending the event);
- Gifts from DGB to Employees and Directors and/or their family members in relation to an internal or externally recognised Company function, event and celebration (e.g. in recognition of an Employee’s/director’s service to the Company);
- Token gifts of nominal value normally bearing the DGB or Company’s logo or (e.g. t-shirts, pens, diaries, calendars and other small promotional items) that are given out equally to members of the public, delegates, customers, partners and key stakeholders attending events such as conferences, exhibitions, training, trade shows etc. and deemed as part of the company’s brand building or promotional activities; and
- Gifts to external parties who have no business dealings with DGB (e.g. monetary gifts or gifts in-kind to charitable organisations).

(c) The aforesaid Exceptions are nevertheless subject to the following conditions/limitations: -

- the GEH are offered or received for the right reason i.e. as an act of appreciation or common courtesy associated with festive seasons or other ceremonial occasions;
- the GEH are offered or received without obligation i.e. it must not be used to cause or induce the receiver to improperly or illegally influence any business action or inaction;
- the act of offering or receiving must be open and transparent;
- the GEH are of nominal or reasonable value i.e. the type of GEH and its value must commensurate with the occasion and be in accordance with general business practice;
- the act of giving or receiving must not be unlawful i.e. not in contravention of applicable laws;
- the giving of such GEH must be documented i.e. the expense must be approved in accordance with and comply with DGB’s standard operating procedures;
- the GEH are given or received with no expectations i.e. without any expectations of a favour or improper advantages from the receiver.

## 5.1 GIFTS, ENTERTAINMENT AND HOSPITALITY (Cont'd)

(d) The approval requirements for offered GEH: -

- (i) The Employee must obtain approval through the standard operating procedures of supplier payments or expense reimbursements.
- (ii) The approval levels based on the approximate value of GEH are as follows:

GEH Approximate Value (RM)	Authorised Approval
RM 5,000 and below	Chief Officer
RM5,001 and above	Directors

- (iii) The Audit Committee will review all approved GEH on a quarterly basis to ensure compliance and accountability.

(e) The approval requirements for received GEH: -

- (i) Valued more than RM 1,000, the employees or directors should **NOT** accept. In this situation, the GEH must be politely returned with a note of explanation about the Company's No-GEH Policy. However, in the circumstances whereby the Chief Officer or Director is unable to decline/return the said GEH, the declaration must be made.
  - (ii) Valued less than RM 1,000, the employees or directors may accept the GEH.
  - (iii) The Audit Committee will review all approved GEH on a quarterly basis to ensure compliance and accountability.
- (f) In the event the value of the GEH offered or received exceeds the threshold set by DGB, you are required to disclose the details in the Company's Gifts and Hospitality Declaration Form ("**Appendix 1**"). Notwithstanding the foregoing, as a matter of good practice, you are encouraged to declare any and all GEH that you offered and received regardless of the threshold value so as to avoid allegations of corruption.
- (g) In the event the Chief Officer or Director approves the acceptance of the gift, he/she must also determine the treatment of the gift whether: -
- donate the gift to charity; or
  - register it as a company property to be used publicly by all employees; or
  - designate it as a display item; or
  - share it with other employees; or
  - retain all the gifts and consume later as lucky draw items during company's event etc
  - permit it to be retained by the employee.
- (h) In determining the above, Chief Officer or Director are expected to exercise proper care and judgement in each case, taking into account pertinent circumstances including the character of the gift, its purpose, the position/ seniority of the person(s) providing the gift, the business context, reciprocity, applicable laws and cultural norms.

## 5.2 DONATIONS AND SPONSORSHIPS

- (a) As part of our commitment to corporate social responsibility and sustainable development, the Group provides assistance in appropriate circumstances and manners. Donations and sponsorship may be permissible depending on the circumstances.
- (b) In principle, all donations and sponsorship may be permissible depending on the circumstances and must adhere to the following but not limited to the guidelines:
  - must be permitted by the applicable laws;
  - must be made directly to the official entity and be capable of being publicly disclosed;
  - must be accurately reflected in the Group’s accounting books and records;
  - must not be made to influence business decisions or to cover up undue payments or bribery; and
  - must obtain written approval from Chief Officer or Director and made within the authorised budget or limit.

## 5.3 POLITICAL CONTRIBUTIONS

- (a) The Group will not make any political contribution whether in the form of cash/cash equivalent, services and/or goods to any political parties for campaigns and routine activities.
- (b) In any event that any gift/sponsorship/donation is made to any political parties (who are our Customers) pursuant to Clause 5.1 and Clause 5.2, it shall not be construed/implied as an indication of the Group’s support to that political party’s ideology and/or an attempt to obtain any business/personal benefits.

## 5.4 FACILITATION PAYMENTS

- (a) The Group has adopted a strict “**No Facilitation Payment**” policy. Employees, Directors, and Parties dealing with the Group shall not accept or obtain or attempt to accept or obtain, solicit, offer, promise, or give facilitation payments to secure or expedite the performance of their duty.
- (b) Facilitation payment is only permissible in extreme circumstances where the Group’s employees’ safety is at stake and such payment is mandatory to ensure the safety of our employees. Upon occurrence of such an incident, the prior approval of the Director is required or, in an emergency, retroactively, as soon as possible after the payment.
- (c) The facilitation payment made must be recorded in accordance with the Group internal guidelines.



## **5.5 CONFLICT OF INTEREST**

- (a) Employees are prohibited from using their official position, the Group's confidential information, assets and other resources for their personal gain or the advantage of their family and associates.
- (b) In principle, to prevent conflict of interests all employee must adhere to the following guidelines, but not limited to: -
- avoid any situation or activity that compromises, or may compromise your judgement or ability to act in the best interest of the Group;
  - avoid being in a position where your personal interests are in conflict or may be in conflict with the interests or business of the Group;
  - avoid any activities that will bring direct or indirect profit, commercial or business advantages to the Group's competitors;
  - always identify and promptly disclose any actual or potential conflict of interests' situation to your Head of Department or the Human Resources Department in compliance with DGB's policies.

## **5.6 RECRUITMENT PROCESS**

- (a) The Group provides equal opportunity for any qualified and competent individuals to be recruited based on the approved selection criteria to ensure that only the most qualified and suitable individuals are employed/appointed as Employees. This is crucial to ensure that no element of Corruption is involved in the recruitment process.
- (b) In principle, all relevant employees must adhere to the following guidelines, but not limited to: -
- where applicable, conduct proper background checks to ensure that potential candidates have not been convicted of an act of Bribery or Corruption nationally or internationally;
  - avoid offering employment/appointment in exchange for or to reward any benefit received by the Group;
  - avoid offering employment/appointment, procuring, or creating a position opening in the Group in exchange for a personal benefit or seek an unfair advantage in any business negotiations or as an inducement for future business
  - always require potential candidates to disclose any actual or potential conflict of interests to the Group and conduct necessary checks to verify the same;
  - always ensure that if the candidate to be employed/appointed has a family/household relationship with any of the Group's personnel, it is properly disclosed and recorded;
  - always ensure that all rights, entitlements, and benefits given to the candidate are reasonable value.

## **5.7 DEALING WITH THE PARTIES**

The Group's dealings with the Parties, which include contractors, suppliers, agents, consultants, joint venture partners, introducers/government intermediaries etc., must be carried out in compliance with all applicable laws and the Group's policies. As part of this commitment, all forms of bribery and corruption are strictly prohibited and unacceptable.

- (a) The Group expects all third parties acting for or on behalf of the Group to adhere to ethical business practices, the ABC Policy and other applicable policies and laws and to avoid corrupt practices, including bribery.
- (b) Acknowledging that the actions of third parties can have legal implications and impact the Group's reputation, an appropriate assessment must be conducted to ensure the business and background of the potential business partners are free from bribery or conflict of interest before engaging with any third party.
- (c) The Parties are required to complete a declaration form that they undertake to abide by the provisions of the ABC Policy directly or indirectly applicable to them.
- (d) Continue to monitor the performance and business practices of the parties to ensure ongoing compliance. If suspicions of bribery and corruption arise in their dealings with the Group, the Group reserves the right to exercise legal remedies and terminate their services.

## **5.8 DEALINGS WITH PUBLIC OFFICIALS**

- (a) All Employees must always exercise due care and diligence when dealing with public officials or their associated persons.
- (b) All employees must adhere to the following guidelines when dealing with public officials, but not limited to: -
  - never offer GEH to public officials for reasons in any way connected directly or indirectly with his/her official duties;
  - never attempt to exert any improper or illegal influence on public officials, directly or indirectly, to obtain any unfair favours or advantages;
  - never offer or receive any facilitation payments to/from public officials, directly or indirectly.
  - obtain written approval from Chief Officer or Director for offering or receiving GEH to/from public official, ensuring that the value does not exceed one fourth of their monthly remuneration or RM500, whichever is lower;
  - If approval is obtained to offer GEH to the public officials, ensure that it is not excessive and lavish, commensurate with the official designation of the public official and not his personal capacity and in compliance with the applicable local laws.

## 5.9 POTENTIAL RISK SCENARIOS - “RED FLAGS”

- (a) The following is a non-exhaustive list of possible red flags (for illustrative purposes only) that may arise and which may raise concerns under various anti-corruption laws.
- (b) If the Employees and the Parties come across any of these red flags or believe it may occur potentially while working with the Group, he / she must make report promptly in accordance with the procedures as set out in our Whistle blowing Policy.
- Become aware that a third party engages in, or has been accused of engaging in improper business practices, improper conduct or has a reputation for paying bribes or requiring bribes;
  - A third party demands gifts, benefits, commission or fees before committing or continue to sign up a contract;
  - A third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
  - A third party refuses to provide or provide insufficient, false, or inconsistent information in response to due diligence questions;
  - A third party requests the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us, or a shell entity serves as a middleman especially when domiciled in secrecy haven;
  - There are signs that the third party is not acting on his own behalf, but is trying to conceal the true beneficial owner’s identity;
  - A third party has a reputation of having a “special relationship” with a government, political party or other public official or has been specifically requested by a public official;
  - A third party refuses to sign a commission or fee agreement or insists on the use of a side-letter relating to the payment of funds;
  - A third party requests an unusually large or inappropriate commission, retainer, bonus or other fee or an unexpected additional fee or commission to “facilitate” a service;
  - A third party requests payment in cash or cash equivalent such a money order; refuses to provide an invoice or receipt;
  - A third party refuses to provide an invoice or receipt for a payment, or you receive an invoice or receipt that appears to be non-standard or customized;
  - A third party requests that a transaction is structured to evade normal record-keeping or reporting requirements;
  - A third party refuses to abide by this ABC Policy or does not demonstrate that it has adequate internal anti-corruption policies and procedures in place; and
  - Been offered an unusually generous gift or lavish benefits or entertainment by a third party.

## **6. RECORDS-KEEPING**

- (a) It is important that proper and complete records be maintained of all payments made to third parties in the usual course of business as these would serve as evidence that such payments were bona fide, and not linked to corrupt and/or unethical conduct. All accounts, invoices, documents and records relating to dealings with the Parties are maintained and recorded with accuracy and completeness.
- (b) All expenses claims relating to gifts or entertainment made to third parties must be submitted in accordance with the Group's reimbursement procedures and/or applicable policy and specifically recorded the reasons for such expenditure.
- (c) All documents, accounts and records relating to dealings with third parties, such as customers, suppliers and business contracts, should be prepared and maintained with strict accuracy and completeness. No accounts should be kept "off-book" to facilitate or conceal improper payments.
- (d) The Group will also maintain records the relevant declaration submitted by the Employees and the Parties to ensure that all persons subject to this ABC Policy comply with the requirements.

## **7. MONITORING AND REVIEW**

- (a) This ABC Policy will be reviewed at least once every three (3) years to ensure its effectiveness and consistency with the governing legislation and regulatory requirements, or more frequently should there be material changes to the said legislation and regulations or circumstance of the business, if any.
- (b) The Company will conduct regular risk assessments to identify the bribery and corruption risks facing the business, set anti-bribery and corruption objectives and assess the effectiveness of existing controls in achieving those objectives.
- (c) Internal control systems and procedures of the Group will be subject to regular audits to provide assurance that they are effective in countering corruption and bribery.

## **8. COMMUNICATION AND TRAINING**

- (a) The Group will on a continuing basis provide specific and regular training in relation to anti-corruption and bribery laws and compliance with this ABC Policy, for all new and existing Employees.
- (b) This ABC Policy is published on the Company's website and awareness is reinforced through emails, newsletters, and the Employee's Handbook.
- (c) All Employees are required to sign a declaration that they have read and understood and will abide by the ABC Policy. The current Employees are required to sign the declaration as soon as practicable. It is envisaged that the declaration may be submitted electronically in the future.

## **9. REPORTING PROCEDURE**

- (a) Any individual who knows of, or suspects, a violation of this Policy, is encouraged to whistle blow or report the concerns through the mechanism set out under the Group's Whistle Blowing Policy. The provision, protection and procedures of the Whistle Blowing Policy for reporting of the violations of this Policy are available on the Company's website.
- (b) Any concerns, questions or reports should be addressed to firstly, their immediate supervisor or Head of Department, or where that is not possible, to other functions such as the Human Resource Department, Chief Officer or Directors.
- (c) Any reports made for violation of the ABC Policy will be treated very seriously and accordingly, employees are responsible to ensure that:-
  - They exercise sound judgement that it is a genuine threat and violation of the ABC Policy;
  - They have evidence to support their allegations of any violations of the ABC Policy;
  - They are available to provide evidence in any inquiry of such violations; and
  - They are not frivolous reports with the motive to scandalise.
- (d) No individual will be discriminated against or suffer any sort or manner of retaliation for raising genuine concerns or reporting in good faith on violations or suspected violations of this ABC Policy. All reports will be treated confidentially.

## **10. CONSEQUENCE OF VIOLATIONS**

- (a) Engaging in Bribery or Corruption practices is not only a violation of this ABC Policy but also a criminal offence in Malaysia. Under the following section of MACC Act but not limited to: -
  - (i) Section 24 of the MACC Act 2009, a person who commits Bribery or Corruption, if found guilty, may be subject to imprisonment up to twenty (20) years and a fine of not less than five (5) times the sum or value of the relevant Gratification, or RM10,000.00, whichever is higher.
  - (ii) Section 17A (1) of the MACC Act 2009, a company may be held liable if its employees or person who performs services for or on behalf of the company corruptly provides Gratification to any person in return for an advantage and, if found guilty, may be subject to imprisonment up to twenty (20) years and/or a fine of not less than ten (10) times the sum or value of the relevant Gratification or RM1,000,000.00, whichever is higher, or to both. A director or a member of the senior management of a company may be deemed to have committed an offence where an offence is committed by a company under section 17A (3) of the MACC Act 2009.
  - (iii) Section 25 (1) and (2) of the MACC Act 2009, any person who knows and fails to report an act of giving and offering of Bribes commits an offence and if found guilty, he or she shall be liable to a fine not exceeding RM100,000.00 or to imprisonment for a term not exceeding ten (10) years, or to both.
  - (iv) Section 25(3) and (4) of the MACC Act 2009, any person who knows and fails to report an act of soliciting and obtaining Bribes commits an offence and if found guilty, he or she shall be liable to a fine not exceeding RM10,000.00 or to imprisonment for a term not exceeding two (2) years, or to both.

## **10. CONSEQUENCE OF VIOLATIONS (Cont'd)**

- (b) The employees who violate this ABC Policy will be subject to disciplinary action up to and including termination of employment. In addition, employees may be held personally liable for engaging in bribery or for violating the ABC laws. The Group may refer suspected violations to the appropriate law enforcement or regulatory authorities, which could lead to penalties, fines, and/or imprisonment for the employees found liable for violating the law.
- (c) If the Group determines that a Business Partner has not complied with the provisions of this ABC Policy, the Group will take appropriate action, which may include termination of the Business Partner's contract, initiating proper legal action, and/or notifying the proper authorities regarding the violation.
- (d) The Group will also face reputational damage, significant costs associated to investigations into allegations of corrupt activities, potential debarred from government contracting, as well as be exposed to civil suits by shareholders, customers, and competitors due to the corrupt activities.

## **11. BOARD APPROVAL**

This ABC Policy (version 2) was reviewed and approved by the Board of Directors of the Company on 29 May 2024.

**Appendix 1: Gifts, Entertainment and Hospitality Declaration Form**  
**DGB Asia Berhad and all its Subsidiaries (“DGB”)**  
**- Gift, Entertainment and Hospitality Declaration Form**



**Details of GEH Received or Offered:**

No	Details of GEH									Recipient/Provider		
	Date	Mode	Type	Description	Purpose	Location	Currency	Value	Action on GEH Received	Name of Person & Designation	Organisation	Relationship
		[Offered/ Received]	[Gifts, Entertainment , Hospitality]	[e.g., Gift, Meal, Event Tickets, etc]	[Provide reason/ occasion for GEH]			[Specify the estimated or known monetary value of the GEH]				

**Declared by:**

I hereby declare that I have offered and/or received the above-mentioned gift, entertainment or hospitality, and I understand and acknowledge the ABC policies and guidelines set forth by DGB Asia Berhad regarding the offering and receiving of gifts, entertainment and hospitality. I confirm that this declaration is accurate to the best of my knowledge.

\_\_\_\_\_  
Signature

Name

Department & Position

Date

**Approved by:**

I have reviewed the information provided above, and I approve of the acceptance of the gift, entertainment or hospitality in accordance with DGB’s ABC policies.

\_\_\_\_\_  
Authorised Signature

Name:

Position:

Date:

\_\_\_\_\_  
Authorised Signature

Name:

Position:

Date:

## Appendix 2 : Anti-Bribery and Corruption Policy Acknowledgement Form

**DGB Asia Berhad and all its Subsidiaries (“DGB”)  
- Anti-Bribery and Corruption Policy Acknowledgment Form – Employee**



In commitment to fostering ethical conduct within our organisation, all employees are required to thoroughly read and comprehend DGB’s Anti-Bribery and Corruption (“ABC”) Policy. Your acknowledgment of understanding and commitment to compliance with anti-bribery and corruption requirements is paramount.

If you have any uncertainties regarding the ABC Policy or any applicable anti-bribery and anti-corruption laws, please consult with your respective Head of Department or the Human Resource Department.

**By acknowledging this form, you affirm the following commitments:**

- (i) I acknowledge that I have read and understood the Anti-Bribery and Corruption (“ABC”) Policy.
- (ii) I confirm that I shall comply with ABC Policy throughout my employment.
- (iii) I confirm that I shall report any known or suspected violations of ABC Policy or anti-corruption laws to any designated representative of DGB or through the established whistleblowing policy.
- (iv) I confirm that I understand that a violation of the ABC Policy would constitute a disciplinary offence that could result in disciplinary measures up to and including termination.

**Acknowledgment:**

I, the undersigned, hereby acknowledge my acceptance and adherence to the DGB’s Anti-Bribery and Corruption Policy and commit to upholding the ethical standards outlined therein.

---

Signature  
Name :  
Designation :  
NRIC No. :  
Date :

---

**For official use:**

Received and acknowledged by:

---

Signature  
Name :  
Designation :  
Date :



## Appendix 2 : Anti-Bribery and Corruption Policy Acknowledgement Form

### DGB Asia Berhad and all its Subsidiaries (“DGB”) - Anti-Bribery and Corruption Policy Acknowledgment Form – Third Party



I/We \_\_\_\_\_ (Name or Company Name) with \_\_\_\_\_ (NRIC No. and Company Registration No.), hereinafter referred to as the “Vendor”, including its directors, officers and employees who intend to conduct business transactions with DGB Asia Berhad and its subsidiaries, hereinafter referred to as “DGB”, hereby:

1. PLEDGES AND UNDERTAKES THAT:

- 1.1. I/We have read and understood, and comply with:
  - i. DGB’s Code of Ethics and Conduct (“Code”), DGB’s Anti-Bribery and Corruption Policy (“ABC Policy”), and other applicable DGB ‘s Policies;
  - ii. All applicable laws and regulations relating to anti-bribery and corruption; and
  - iii. The following anti-bribery and corruption principles:
    - a. To advance DGB’s zero tolerance towards bribery and corruption in all aspects of our business, especially in acting for or on behalf of DGB;
    - b. To implement adequate procedures to prevent bribery and corruption;
    - c. To support corruption prevention initiatives by the Malaysian Government and local authorities wherever I / We operate;
    - d. To commit to promoting values of integrity, transparency, accountability and good corporate governance;
    - e. To implement adequate procedures to comply with other Malaysian laws and government regulations wherever we operate to the best of our knowledge (collectively, “Requirements”).
- 1.2. I / We will ensure our subsidiaries, affiliates and all other parties that we appoint to conduct work for the DGB also comply with the Requirements.
- 1.3. I / We have not been convicted, nor are we subject to any investigations, inquiries or enforcement proceedings by the relevant authorities of any actual or suspected breach to the Requirements and will report any actual or suspected breach of the Requirements as soon as reasonably practicable and to the extent permitted by the law to DGB.

2. AGREE THAT:

- 2.1. In the event that, I / We are in breach of any above sections, DGB may immediately revoke the contract award, or terminate the contract of business transactions without any liability whatsoever on the part of the DGB to the Vendor. This is without prejudice to any other rights or remedies that the DGB may have or any other appropriate action which DGB may seek under the terms of the applicable tender/contract or applicable laws and regulations.
- 2.2. Should any person attempt to solicit any bribe or improper advantage/benefit (whether financial or otherwise) from the Vendor or any other person connected to the Vendor either as an inducement or incentive to be selected or as a reward, gift, or bonus for being selected in the business transactions, or where the Vendor has reasonable grounds to suspect any breach of the obligations in this form or the Code, the Vendor will report such act to the DGB as reasonably practicable.

For and on behalf of the Vendor,  
Yours sincerely,

\_\_\_\_\_  
Authorised Signature and Company Stamp

Name :  
Designation :  
NRIC No. :  
Date :

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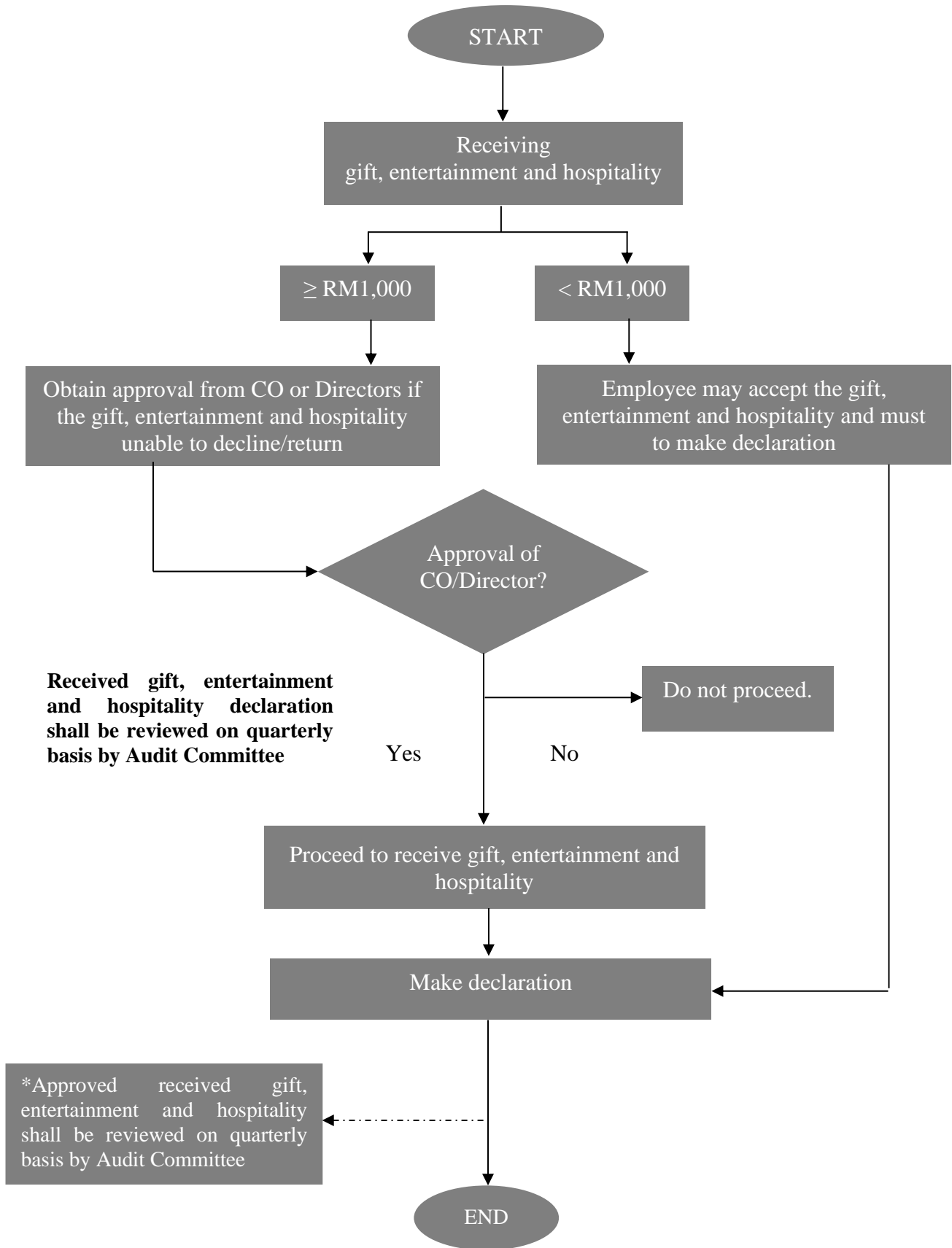
**For official use:**

Received and acknowledged by:

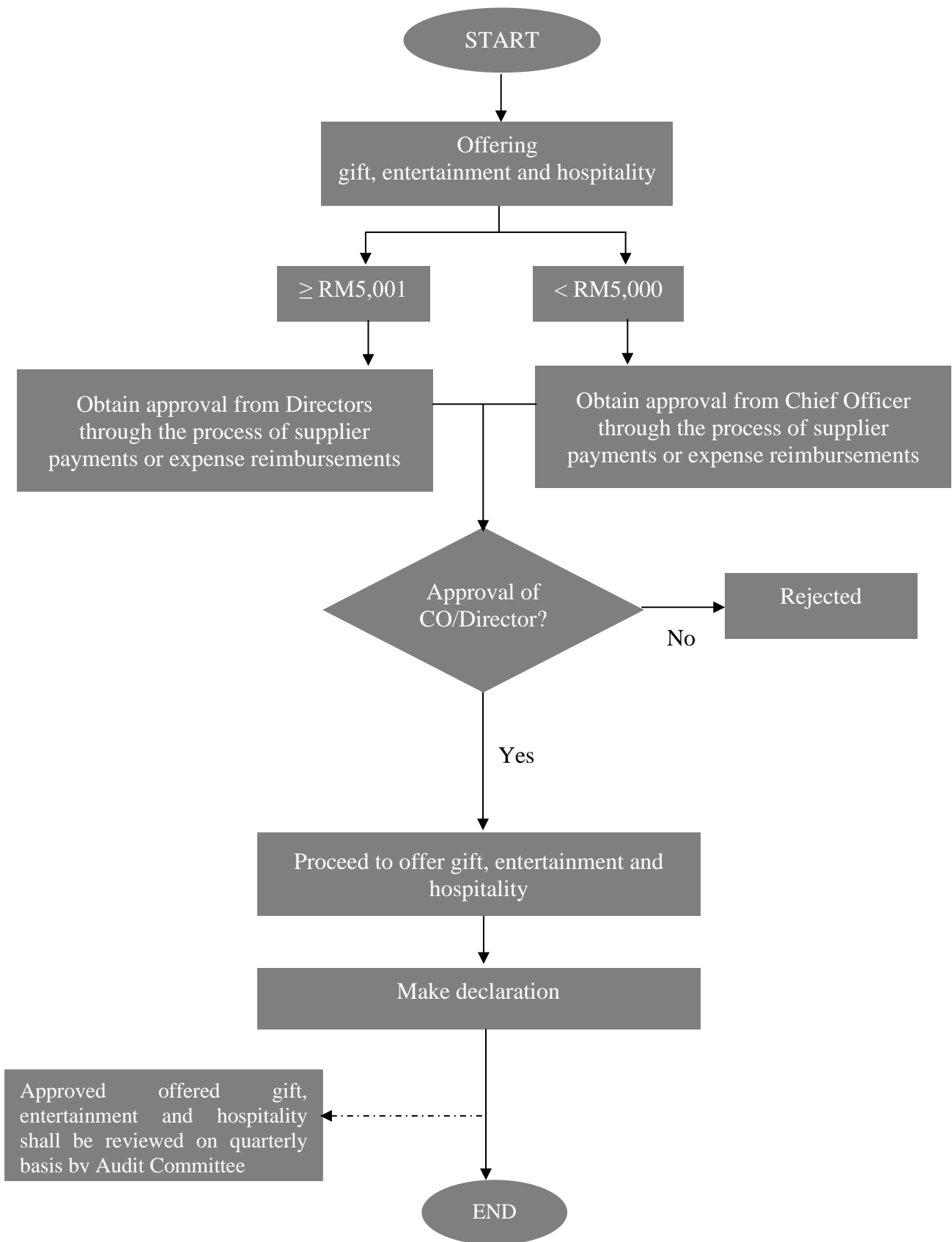
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Signature

Name :  
Designation :  
Date :

**Appendix 3: Process for Receiving Gift, Entertainment and Hospitality (GEH)**



**Appendix 4: Process for Offering Gift, Entertainment and Hospitality**



**Appendix 5 : Reporting Form**



**DGB Asia Berhad and all its Subsidiaries (“DGB”)  
- COMPLAINT/CONCERN FORMS**

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**DETAILS**

Name of Person Lodging :  
Form :  
Email Address :  
Contact No. :  
Date :

**COMPLAINT/CONCERN DETAILS**

Date of Event/Incident :  
Time of Event/Incident :  
Location of Event/Incident :  
Who/What is the Subject of Your :  
Complaints/Concerns :

Summary of Complaints/Concerns:

**WITNESS DETAILS (IF APPLICABLE)**

Name :  
Email Address :  
Contact No. :  
Address :

**OFFICE ADMINSTRATIVE USE:**

Received by :  
Date of Received :  
Actioned by :  
Date of Action :

## **CODE OF ETHICS AND CONDUCT**

All Directors and employees of the Group in exercising and/or discharging their powers or duties shall comply with all applicable laws, rules and regulations including the constitution of the Group. The core areas of conduct include the following: -

- (a) Compliance at all times with the Code of Ethics and Conduct.
- (b) Observe high standards of business, professional and ethical conduct, and to refrain themselves from offering, giving or receiving any gifts and any other form of benefits (in kind, cash, advantages and/or favour and etc) from persons or entities who deal with the Company where the gift would reasonably be expected to influence the performance of the Employees' duties in any aspect.
- (c) Adhere to the principles of selflessness, integrity, objectivity, accountability, openness, honesty and leadership, including fair dealing and the ethical handling of conflicts of interest.
- (d) Not misuse information gained in the course of duties for personal gain or for political purposes.
- (e) Uphold accountability and act in good faith and in the best interests of the Group corporate opportunities, assets and confidential information.
- (f) Ensure the protection of the Group's legitimate business interests, including corporate opportunities, assets and confidential information.
- (g) Ensure full, fair, accurate, timely and understandable disclosure.
- (h) Declaration of any personal, professional or business interests that may conflict with responsibilities.

## **ENFORCEMENT OF THE CODE OF ETHICS AND CONDUCT**

In the event of any violation of this Code of Ethics and Conduct by any Director or employees of the Group, the Board of Directors of the Company shall determine appropriate actions to be taken after considering all relevant information and circumstances.

## **REVIEW OF THE CODE OF ETHICS AND CONDUCT**

The Board of Directors of the Company will review this Code of Ethics and Conduct from time to time to ensure that it continues to remain relevant and appropriate.