



**SNS NETWORK TECHNOLOGY BERHAD**  
[201601002835 (1173761-W)]  
(Incorporated in Malaysia)

# ANTI-BRIBERY AND CORRUPTION POLICY

## **ANTI-BRIBERY AND CORRUPTION POLICY**

### **1.0 INTRODUCTION**

SNS Network Technology Berhad (“**SNS**” or “**the Company**”) and its subsidiaries (collectively, “**SNS Group**”), has taken an initiative to implement our Anti Bribery and Corruption Policy (ABC) which shall outline the steps taken to prevent corruption and to ensure that the Group’s efforts meet standards as determined by any external, independent and qualified third parties and business associates that the Group is following the statutory requirements of Subsection (5) of Section 17A under Malaysia Anti-Corruption Commission Act 2009.

This policy shall provide a clear and unambiguous policy statement of the Group’s position regarding bribery and corruption.

### **2.0 PURPOSE**

This Policy is not intended to be exhaustive and should be read in conjunction with all existing applicable laws, rules and regulations imposed by the Malaysian Government as well as the Group’s policies, which include, but are not limited to, the Malaysian Anti-Corruption Commission Act 2009 (including any amendment thereof), Group’s Handbook and Code of Conduct and Ethics. Directors and Employees shall always observe and ensure compliance with all applicable laws, rules and regulations to which they are bound to observe in discharging of their duties. The Policy outline adequate procedures and practice of upholding high levels of personal and professional conduct and values in the Group’s business dealings and decisions and prevent the occurrence of corrupt practices in the Group’s business activities.

### **3.0 SCOPE**

The Policy is applicable to all Directors and Employees (including full time, part-time, probationary, contract and temporary employees) of the Group and should also include consultants, contractors, trainees, seconded employee, volunteers, interns, agents, sponsors, suppliers, customers, any third party and any other person associated with the Group.

#### **4.0 CONSEQUENCES**

Violation of any of the Policy's provisions can result in disciplinary actions, including termination of employment and/or business dealings. In the event any employee requires further clarification on the Policy, he/she may refer his/her immediate superior ("Superior") or Head of Department ("HOD").

#### **5.0 DEFINITION**

Corruption is defined as any abuse of common resources or authority for personal gain. This includes the offering, promising, giving, authorizing or accepting of any undue financial, kick back or other advantage to, by or for any third parties in order to obtain personal advantages in any forms. Each transaction involves minimum 2 parties, that is a supply side (the Briber) and a demand side (the Recipient).

Common resources may consist of funds, stock, facilities, other employee's working time and any other resources that belong to the Group.

Corruption Watch is the detection of any such abuse by anyone at any level of employment in the business/Group.

Corruption Report is the reporting of these activities to the relevant stakeholders.

#### **6.0 BACKGROUND**

This Policy is established in line with Section 17A of the Malaysian Anti-Corruption Commission Act 2009 ("MACC Act"), which was enacted under the Malaysian Anti-Corruption Commission (Amendment) Act 2018.

Section 17A of the MACC Act provides that a commercial organization commits an offence if any person associated with the commercial organization commits a corrupt act in order to obtain or retain business or an advantage in the conduct of business for the Group.

The Guidelines on Adequate Procedures issued by the National Centre for Governance, Integrity and Anti-Corruption (GIACC) under the Prime Minister's Department on 4 December 2018 pursuant to Section 17A(5) of the MACC Act is aimed at assisting commercial organizations to understand the procedures which ought to be implemented to prevent corrupt practices in their business activities.

A person is associated with a commercial organization if he/she is a director or an employee of the commercial organization, or is a person who performs services for or on behalf of the commercial organization, which likely includes agents engaged by the commercial organization.

## **7.0 GUIDANCE ON COMMON FORMS OF BRIBERY AND CORRUPTION**

### **7.1 Gifts, Entertainment, Hospitality and Travel**

The Group strictly prohibits the acceptance and provision of Gifts, Entertainment, Hospitality and Travel (“collectively referred to as the “Benefits”) to influence business decisions and/or to obtain and retain business or secure an unfair advantage in any business transaction. No Benefits shall be offered to or solicited from other stakeholders who deal with the Group in connection with their official duties if this would influence any business decision and/or give rise to the appearance of impropriety or bias that would damage the reputation of the Group.

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

Infrequent and moderate business meals and entertainment with clients and infrequent invitations to attend local social events and celebratory meals with clients shall be permitted provided that they are not excessive and do not create the appearance of impropriety. Directors and Employees must make use of good judgement, discretion and moderation when giving or accepting such courtesies in business settings and must comply with all applicable laws, rules and regulations in countries that the Group operates.

To define further, in the event employees are required to offer meals or entertainment under normal business courtesies, prior Management approval must be obtained. In addition, offering of such meals or entertainment under normal business courtesies should not exceed 3 occasions in a year to the same parties or person from the same entity.

As for offering of gifts on behalf of the Group under normal business courtesies, Application Form is required to be submitted for Management’s prior approval for any gifts of any amount. Provision of gifts are also limited to not more than 2 times in a year presented the same party or person from the same entity subject to preapproval by Management. Employees are not allowed to accept any gifts of any amount under their

personal capacity. In the event the gift could not be declined, Employee are required to declare the gift received by filling in the Form as per Conflict of Interest Module. A register will also be maintained for all the above-mentioned expenses on a yearly basis.

## **7.2 Charitable Donations and Sponsorships**

The Group prohibits Employee from making donations or sponsorships that could be perceived as bribes or payments to gain an improper business advantage and are to ensure that donations or sponsorships are not used as a cover for bribery or used to circumvent or avoid any of the Malaysian law on bribery and corruption.

Instead Group shall only allow donations and sponsorships for legitimate reasons and as permitted by existing laws and regulations. As such, SNS must conduct due diligence to ensure that donations to local or foreign-based charities or beneficiaries are not disguised illegal payments to government officials, and must ensure that the charity does not act as a platform to fund illegal activities in violation of international anti-money laundering, anti-terrorism and other applicable laws. Sponsorships and donations, if any should only be offered to organizations rather than individuals.

Upon receipt of any request of donation and sponsorship, employee shall bring to the attention of Head of Department. The respective Head of Department shall then forward the request to Management for consideration. All donations and sponsorships must be evidenced and supported by relevant documents, including request letter, receipts and / or agreement, if any. All the said document must be kept as records for at least 7 years. On top of that, a register will also be maintained for all the above-mentioned transactions on a yearly basis.

## **7.3 Political Contributions**

As a matter of general policy, the Group does not make contributions to political parties or candidates.

## **7.4 Facilitation Payments to Officer of Public Body**

Facilitation payments are unofficial payments or other benefits made to secure or expedite the performance of a routine action by an officer of the public body. Directors or Employees shall not promise or offer, or agree to give or offer, facilitation payments to an officer of any public body.

## **7.5 Conflicts of Interest**

Directors and Employees must avoid any conflict of interest with the Group and must not use their positions, influence or knowledge gained directly or indirectly in the course of their duties or employment for private or personal advantage.

Should an actual or potential conflict of interest arise, or may arise, the affected Directors and Employees shall make full disclosure to the Board or to the Superior/HOD, where applicable, the nature and extent of such conflict. The affected individuals shall then abstain from making a material decision with respect to any transaction, contract or proposed contract or arrangement in which they are interested, whether directly or indirectly.

## **8.0 PENALTY CODE**

Non-compliance of this Policy shall be considered as a gross misconduct. Once proven, Offender is subject to disciplinary action, up to and not limited to termination in service. The Group will further report the case to the relevant authorities.

Under Section 24 of MACC Act 2009, any person who commits an offence under the relevant sections shall on conviction be liable to:

- Imprisonment for a term not exceeding 20 years; and
- A fine of not less than ten times the sum or value of the gratification or RM 1 million, whichever higher.

## **9.0 RECORD-KEEPING**

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

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as customers, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness.

## 10.0 TRAINING

Human resource Department is responsible to conduct Training and timely refresher and awareness programs with all Employees to ensure they understand the Group's ABC. Training shall also be conducted on a regular basis, in accordance with the level of bribery and corruption risk related to the position. Training should also be provided to individuals who are new to the Group or newly appointed to or currently holding an exposed position.

All employees are also compulsory to attend at least one training on ABC and acknowledge on the requirements of this ABC.

## 11.0 COMMUNICATION

The policy shall be communicated to new recruits for their acknowledgment during the 1st week they are on board. A notice on our ABC policy will also be sent to all our Business Associates together with our first correspondence with them attaching the relevant forms to be completed and returned duly acknowledged.

A copy of the policy is also published at our official website for public viewing.

## 12.0 REPORTING PROCESS

In the event of suspicion or upon detection of any form of corruption taking place, stakeholder may report their concerns or evidence that corruption, fraud, bribery or some other form of misconduct may have occurred or is occurring related to any misuse of the common resources by email to **honesty@sns.com.my** or by mail in sealed envelope addressed to the below address:

**SNS Network Technology Berhad  
No 61 Jalan Sultan Nazrin Shah  
30250 Ipoh, Perak, Malaysia  
For Attention of The Whistle Blowing Committee**

All reports will be treated with highest confidentiality. However, the report must include as much details and evidence as possible to facilitate investigations. Besides that, provision of evidence and witness that will allow the Counsel to verify the matter shall be required.

### **13.0 ADHERENCE TO ANTI-BRIBERY AND CORRUPTION POLICY**

Violation of Malaysian laws on anti-corruption by employees may expose SNS to fines and penalties including imprisonment.

As such, failure to comply with this ABC Policy and other related policies, whether intentional or unintentional, may lead to disciplinary action up to and including termination. For more detailed legal charges that may be imposed pursuant to non-compliance, reference may be made to the MACC Act 2009.

### **14.0 REVIEW OF POLICY**

This Policy shall be reviewed by the Management at least every three (3) years or as required when internal or external events warrant a more frequent review to be undertaken.

### **15.0 DECLARATION**

SNS Network Technology Berhad and its subsidiaries (SNS) are committed to the highest ethical standards and working with Entrepreneurs which aims to build ethical business relations. SNS shall comply with the Law of Malaysia at all times, particularly in the areas of corruption, tax-fraud, terrorism and money-laundering