

TNG DIGITAL ANTI-BRIBERY AND CORRUPTION POLICY

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1. ANTI-BRIBERY AND CORRUPTION POLICY

Policy Statement

Business activities and operations are to be conducted in an honest and ethical manner. TNG Digital Sdn Bhd (TNGD) takes a zero-tolerance approach towards bribery and corruption and is committed to acting professionally, fairly and with integrity in all business dealings and relationships in all jurisdictions in which it operated. TNGD committed to implementing and enforcing effective measures to counter bribery and corruption which are punishable offences in accordance to the anti-bribery and corruption laws.

Due Diligence

Proper due diligence must be conducted on any relevant parties or personnel (such as Board members, employees, agents, vendors, contractors, suppliers, consultants and senior public officials) prior to entering into any formalised relationships. Methods may include background checks on the person or entity, a document verification process, or conducting interviews with the person to be appointed to a key role where corruption risk has been identified.

2. GIFTS, HOSPITALITY AND PROMOTIONAL OR OTHER ITEMS OF BUSINESS EXPENDITURE

TNGD does not prohibit reasonable, proportionate and bona fide hospitality and promotional or other business expenditure which seeks to improve the image of TNGD, to better present TNGD's products and services or to establish cordial relations which are recognized as an established and important part of doing business.

However, the general rule of TNGD in receipt of gifts is to refuse or return the gifts and explanations are provided to the giver on the non-acceptance of gifts.

i. Giving of gifts

The following exceptions to this rule may be allowed under the following circumstances:

- a) Gifts during festivals to selected valued clients;
- b) Exchange of gifts during official events, signing ceremony or company visits to a group of employees;



- c) Promotional items;
- d) Gifts of nominal value with company logo;
- e) Gifts to external parties with no business dealings, e.g. charitable organizations

Notwithstanding the above, the following shall not be allowed:

- a) Giving of cash or cash equivalent (such as traveler's cheques, coupons, gift certificates or cash vouchers).
- b) Where a conflict of interest situation may arise, e.g. given whilst a bidding is in progress, expectation of quid pro quo and breach of any law.

ii. Entertainment

As a general rule, a reasonable amount of entertainment is allowed for purpose of business networking, fostering relationships with external parties or showing hospitality. This includes both receiving and giving of entertainment.

However, it shall not be allowed if a conflict of interest situation may arise, e.g. given whilst a bidding is in progress, expectation of quid pro quo and breach of any law.

3. FACILITATION PAYMENTS AND KICKBACKS

TNGD does not make, and will not accept facilitation payments or “kickbacks” of any kind by any of its employees and associated persons. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official.

4. DONATIONS

TNGD only makes charitable donations that are appropriate, legal and ethical under local laws and practices.



5. RECORD KEEPING

TNGD must keep financial records (together with relevant supporting documents) and have appropriate internal controls in place, which will evidence the business reason for making or accepting payments or gifts to or third parties.

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

No accounts must be kept “off-book” or considered “off-record” to facilitate or conceal improper payments.

6. HOW TO RAISE A CONCERN

Everyone is encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage or if he believes or suspects that a conflict with this Policy has occurred, or may occur in the future. Concerns should be reported by following the procedures set out in the Whistleblowing Policy. Any employee or stakeholder may raise concern via email to whistleblowing@tngdigital.com.my.