



**A-RANK BERHAD**

(200301031200 [633621-X])  
(Incorporated in Malaysia)

# **ANTI-BRIBERY AND CORRUPTION POLICY**

(Effective from 9 December 2020)

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**DOCUMENT REVISION HISTORY**

<b>Version No</b>	<b>Effective Date</b>	<b>Section Reference</b>	<b>Summary of Changes</b>
1	09.12.2020	All	Original Document

## ANTI-BRIBERY AND CORRUPTION COMMITMENT

*A-Rank Berhad (“A-Rank”) and its subsidiaries (collectively referred to as “A-Rank Group” or “the Group”) always strive to uphold integrity in all we do and adopts a zero-tolerance approach against all forms of bribery and corruption.*

### 1.0 INTRODUCTION

#### 1.1 Purpose

A-Rank Group has developed this Anti-Bribery and Corruption Policy (“this Policy” or “ABC Policy”) as part of the Anti-Bribery Management System of the Group to help prevent, detect and address bribery and corruption. This is critical to sustain the Group success and reputation.

The objectives of this Policy are as follows:

- (a) To set out A-Rank Group’s position on bribery in all its forms, and matters of corruption that may be faced in the course of its operations;
- (b) To provide information and guidance on how to recognise and deal with potential acts of bribery and corruption; and
- (c) To educate the Group’s Personnel and Third Parties that integrity is the foundation of our business success. Refusal to engage in bribery, refusal to participate in acts of corruption, actively raising concerns, or the reporting of possible wrongdoing, will not be penalised even if such actions may result in A-Rank Group losing business, not meeting its targets or suffering disadvantage.

This Policy is not intended to be exhaustive. It is incumbent upon the reader to seek immediate guidance from A-Rank’s Compliance Officer (“CO”), in the event that any person subject to this Policy finds themselves in a scenario not dealt with in this Policy, or has any doubt about the scope of applicable laws, or the application of this Policy.

#### 1.2 Applicability

This Policy applies to:

- (a) A-Rank Personnel, i.e., employees and directors of the Group; and
- (b) Any Third Party performing works or services for or on behalf of A-Rank Group, including but not limited to agents, representatives, intermediaries, joint venture partners, consultants, advisers, contractors, subcontractors, vendors, distributors and service providers.

Joint-venture, co-ventures and associated companies, in which A-Rank Group is a non-controlling stakeholder, are encouraged to read this Policy and adopt these or similar practices.

This Policy extends across all of A-Rank Group’s business dealings in all countries in which the Group operates. All persons covered by this Policy, in discharging their duties for or on behalf of A-Rank Group, are required to comply with not only the Malaysian laws and regulations but also the laws and regulations applicable in the location of the business activities, and in particular with respect to anti-bribery and corruption laws, rules and regulations. In jurisdictions where local laws and regulations set stricter rules than those set out in this Policy, the stricter rules must always prevail.

### 1.3 Related Documents

This Policy shall be read as a whole, together with:

- (a) Code of Conduct and Ethics for Directors and Employees;
- (b) Whistleblowing Policy;
- (c) Limit of Financial Authority (“LOA”);
- (d) All relevant policies and procedures of A-Rank Group; and
- (e) All applicable laws and regulations.

### 1.4 Applicable Laws and Regulations

A-Rank Group is committed to upholding the highest level of ethics and integrity in conducting its business and to complying with all applicable laws and regulations in the countries where it does business. These laws include but are not limited to:

- (a) Malaysian Penal Code 1936 and its amendments;
- (b) Malaysian Anti-Corruption Commission (“MACC”) Act 2009 and its amendments;
- (c) Malaysian Anti-Money Laundering Act 2011 (“AMLA”); and
- (d) Malaysian Companies Act 2016.

In the event where there is a conflict between mandatory laws and the provisions contained in this and other policies, the law shall prevail. However, the provisions in this Policy are to be adhered to in the event of any conflict or inconsistencies with a local custom or practice.

## 2.0 DEFINITIONS

“**Bribery**” or “**Corruption**” means any act considered as an offence of giving or receiving ‘gratification’ under the MACC Act 2009. This includes offering, promising, giving, accepting or soliciting any ‘gratification’, directly or indirectly, and irrespective of location(s), to illicitly influence the decisions or actions of a person who is in a position of trust within an organisation or a function, or to obtain or retain commercial advantage.

“**Compliance Officer**” or “**CO**” refers to a competent person who is appointed by the Board of Directors of A-Rank to oversee all anti-bribery and corruption related matters, as specified in Section 7.1 of this Policy. The CO shall be assisted by all Head of Department within A-Rank Group with regard to all anti-bribery and corruption compliance matters.

“**Gratification**” is defined by the MACC Act 2009 as:

- (a) Money, donation, gift, loan, fee, reward, valuable security, property or interest in 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;
- (c) Any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole 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).

“**Gifts and Hospitality**” means anything of value that the person subject to this Policy give or receive, either directly or indirectly, including (but not limited to):

- (a) Goods or services;
- (b) Discounts or rebates;
- (c) Meals or refreshments;
- (d) Organisation of corporate events or activities;
- (e) Entertainment (tickets to events, recreational activities, etc.); and
- (f) Travel and accommodation expenses.

“**Personnel**” refers to all employees and directors of A-Rank Group, either full-time, probationary, contract or temporary staff.

“**Public Official**” refers to any person who holds a public office or exercises a public function for a country, including (but not limited to) a member, an officer, or an employee to the federal or state government, local authority, public international organisation, wholly or partially state-owned enterprise, political party or political candidate. See the full definition of “foreign public official”, “official of a public body” and “public body” at [Section 3](#) of the MACC Act 2009.

“**Third Party**” refers to any external individual or organisation with whom A-Rank Group has, or plans to establish, some form of business relationship. This includes (but not limited to) existing or prospective agents, representatives, intermediaries, joint venture partners, consultants, advisers, contractors, subcontractors, vendors, distributors, service providers and customers.

### 3.0 CORE AREAS OF ANTI-BRIBERY AND CORRUPTION

#### 3.1 Gifts and Hospitality

The giving and receiving of modest gifts and reasonable acts of hospitality are **allowed** by A-Rank Group **only** as a legitimate means of building goodwill in business relationships.

Under no circumstances shall A-Rank Personnel be soliciting any gift or hospitality from any Third Party that has or may have business interest with the Group. Nonetheless, any provision or receipt of gifts and event of hospitality must be in accordance with the Group’s LOA and relevant policies, whilst fulfilling the following conditions:

- (a) They must be made in good faith without any corrupt intent;
- (b) They must be reasonable in cost, quantity and frequency;
- (c) They must be ordinary and customary in the context of industry’s general practices;
- (d) They must be appropriate to the official designation of the person offering or receiving the gifts and hospitality;
- (e) They must be carried out in an open and transparent manner, and lawful under the circumstances;
- (f) They must not create a conflict of interest or compromise the integrity of anyone;
- (g) They must not create any obligation or expectation on the recipient;
- (h) They must not be seen as intended for, or capable of, achieving undue influence in relation to a business transaction or public policy engagement; and
- (i) They must be properly recorded and substantiated to support the above, and retained in accordance with [Section 3.10](#) of this Policy.

Examples of gifts and events of hospitality that are generally allowable:

- (a) 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 treated as company property.
- (b) Token gifts and/or hospitality of nominal value that are given out equally to all guests attending the events, e.g. conferences, exhibitions, training, trade shows, etc.
- (c) Customary gifts during cultural rituals/festivities or ceremonies of births, weddings, funerals, etc.
- (d) Sponsorship for A-Rank Group's/ its Third Parties' official function, event or celebration, e.g. lucky draw gifts for annual dinner.
- (e) Gifts given as part of the Group's Corporate Social Responsibility programme.
- (f) Meals and/or refreshments provided to / received from Third Parties that are consistent with generally accepted business practices and must not be extravagant.

Examples of gifts and events of hospitality that are generally prohibited, unless deemed necessary and permitted by law, subject to the approval of the CO and/or a higher authority:

- (a) Delivery or provision of gifts off-site (e.g. to personal address of the recipient) to/ from Third Parties;
- (b) Provision of gifts and hospitality, either directly or indirectly, to Public Officials in the course of the conduct of business for or on behalf of A-Rank Group (see also **Section 3.6** below);
- (c) Entertainment to any participant of business meetings, congresses, site visits or comparable events, unless such entertainment is appropriate and incidental part of such events. Giving and receiving of any side or extended entertainment such as sight-seeing trips is strictly prohibited; and
- (d) Travel, accommodation and entertainment of any person who accompanies the participant to a business meeting, congresses, site visits or comparable event.

### 3.2 Charitable Donations and Sponsorships

A-Rank Group prohibits the use and receipt of donations and sponsorships as a subterfuge for bribery to influence a business outcome or favourable decision.

Charitable donations and sponsorships, in addition to conditions and circumstances set forth in **Section 3.1** above, **may be allowed** subject to approval as prescribed in the Group's LOA and the conditions below:

- (a) Good judgement and due care are exercised in selecting the charitable or sponsored organisation, including verifying that the recipients are bona fide and have no records of criminal, bribery or corruption cases;
- (b) They must be aligned with the Group's corporate responsibility and values;
- (c) They must comply with all applicable laws, regulations and other relevant policies and procedures of A-Rank Group; and
- (d) They must be properly recorded in the books and records, and retained in accordance with **Section 3.10** of this Policy.

### 3.3 Political Contributions

A-Rank Group's funds or resources must not be used to make any direct or indirect political contribution without prior written approval from the Board of Directors establishing that it is in the best interest of A-Rank Group to do so, and then upon satisfying itself that A-Rank Group is acting responsibly in accordance with all applicable local laws and requirements for public disclosure. No such political contributions may be used as a subterfuge for bribery.

### 3.4 Payments

All payments made by A-Rank Group must be warranted, transparent and proper. No payments shall be made as a subterfuge for bribery or any acts of corruption.

A-Rank Group does not condone the making and receiving of corrupt payments, including facilitation payments, in its business. Facilitation payment means unofficial payment or other provision made to or received by an individual in control of a process or decision to secure or expedite the performance of a routine or administrative duty or function, and is seen as a form of bribery and corruption.

All payments made by the Group must conform to the following:

- (a) Any payment made to any person, such as an agent, representative or intermediary, represents no more than an appropriate remuneration for legitimate goods or services rendered by such person;
- (b) No part of any such payment is permitted to be passed on by the agent, representative or intermediary as bribe;
- (c) All payments must be supported with proper and adequate supporting documents to evidence the validity, accuracy, and legitimacy of payments made;
- (d) All payments must be reviewed and approved in accordance with A-Rank Group's LOA and requirements stipulated in this Policy and other relevant policies and procedures, before making the payment; and
- (e) All payments must be accurately recorded in the financial records of the respective entities under the Group, and retained in accordance with **Section 3.10** of this Policy.

A-Rank Group however recognises that there may be situations where a person is coerced into making payments/ bribes by real or perceived threats to health, safety or liberty. In such situations, the prior approval of the CO is required or, in an emergency, retroactively as soon as possible after the payment. The CO shall maintain records of the circumstances of the threat and the payment.

### 3.5 Dealings with Third Parties

A-Rank Group's dealings with Third Parties must be carried out in compliance with all relevant laws and regulations, and consistent with its policies and procedures and the General Principles of its Code of Ethics.

To ensure that the Group is dealing with Third Parties that share the same value and ethical standards, the following actions must be observed:

- (a) Where practical and relevant, conduct due diligence to assess the integrity of the prospective Third Party. Such due diligence may include searches through relevant databases, checking for relationships with public officials, and documenting the reasons for choosing one particular Third Party over another;
- (b) Communicating this Policy and the Group's stance in countering bribery and corruption to the Third Party; and
- (c) Where deemed necessary by the management of A-Rank Group, binding the Third Party to adhere to this Policy and the right for A-Rank Group to terminate the contract or business relationship in which an act of bribery or corruption has been observed or proven to have occurred, through provisions in the contracts/ legal documents or acknowledgement of the **Third Party Declaration Form**.



### 3.6 Dealings with Public Officials

A-Rank Group shall always abide by the General Principles of its Code of Ethics when dealing with Public Officials, without any appearance of impropriety.

Caution must be exercised when dealing with Public Officials. Any offering of gift, hospitality or other benefits, whether directly or indirectly, to Public Officials, is prohibited, unless deemed necessary and permitted by law, subject to the approval of the CO and/or a higher authority.

### 3.7 Mergers, Acquisitions and Investments

A-Rank Group must undertake anti-bribery due diligence alongside other due diligence (e.g. legal and financial) in evaluating merger and acquisition transactions to ensure compliance with anti-bribery and corruption laws.

Such assessment shall be conducted as follows:

(a) Pre-acquisition

The Group shall evaluate the bribery and corruption risk exposures and the corresponding mitigating controls of the target company, to assure that the business to be acquired is sound and not distorted by bribery. The result of the assessment shall be presented to the management and the Board of Directors for deliberation, as part of the decision-making process. Upon approval, the contract for the acquisition should incorporate provision requiring adherence to this and the relevant policies and procedures of A-Rank Group.

(b) Post-acquisition

Besides integrating or aligning the newly acquired target's Anti-Bribery Management System with that of A-Rank Group, a comprehensive anti-bribery due diligence/ risk assessment shall be performed to identify any further risks and/or incidents of bribery and corruption. The result of the assessment shall be presented to the management and the Board of Directors for deliberation, and acted upon.

### 3.8 Conflict of Interest

Conflict of interest arises when a Personnel is in a position to derive personal benefit from actions or decisions made in their official or professional capacity, including the benefit of his/her family, relatives and/or company.

Any Personnel discharging their duties and obligations on behalf of A-Rank Group must avoid situations that could create or appear to create conflicts of interest. All A-Rank Personnel must not use their position, the Group's resources and assets, or information available to them for their personal gain or to the Group's disadvantage.

In situation where there is a real or apparent conflict, it is incumbent for the Personnel to declare and make full disclosure of the conflict, through the **Potential Conflict of Interest Declaration Form**, to the CO and/or a higher authority immediately, for appropriate actions to be taken.

### 3.9 Recruitment of Personnel

A-Rank Group's recruitment, performance evaluation, remuneration, recognition and promotion for employees and directors shall be objective and show no favour.

Appropriate due diligence shall be conducted on prospective employees and directors, in proportion to the risk profile of the position. The assessment shall include background checks to ensure the prospective employee or director has not been convicted in any bribery or corruption case(s).

A-Rank Group will not offer employment to prospective employees or directors in return for previous favour or in exchange for improper favour, such as awarding of contracts. A-Rank Group shall award contracts and employee positions based on merit. Support/referral letters in all forms shall not be recognised as part of the decision-making process.

### 3.10 Record Keeping

A-Rank Group shall keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to Third Parties, for a period of time subject to prevailing laws and regulations on record keeping.

All gifts, hospitality, donations, sponsorships, facilitation, extortion or other benefits accepted from or offered to Third Parties, in discharging duties for or on behalf of A-Rank Group, must be declared and properly recorded in a register maintained by Account Department who will be reporting to the CO. A summary of declarations and red flags noted shall be tabled to the Audit Committee half-yearly, or at its discretion, at a shorter interval.

All accounts, invoices, memoranda, due diligence forms and other documents and records relating to dealings with Third Parties should be maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

## 4.0 STAFF DECLARATION

All Personnel of A-Rank Group shall certify in writing that they have read, understood and will abide by this Policy via the **Staff Declaration Form** as appended in **Appendix 2** of this Policy. A copy of this declaration shall be documented and retained by the Administration Department (for employees) or the Company Secretary (for directors).

A-Rank Group reserves the right to request any information, including on employees' assets, in the event that the person is implicated in any bribery and corruption-related accusation or incident.

## 5.0 COMMUNICATION, TRAINING AND AWARENESS

This Policy is published on A-Rank's website at [www.arank.com.my](http://www.arank.com.my). All persons subject to this Policy must be informed whenever significant changes are made to this Policy.

Training and awareness programme on this Policy shall form part of the induction process for all new employees and directors. Training for existing employees and directors shall be provided from time to time, in accordance with the level of bribery and corruption risk related to the position.

The Administration Department shall maintain records of all training and awareness programmes, including details and attendance of participants.

## 6.0 RAISING CONCERNS

Any person subject to this Policy who learns of any attempted, suspected or actual bribery or corruption activities that violations of this Policy and/or the related documents, or applicable laws, is responsible to report promptly through the Group's whistleblowing channels as prescribed under **Section 3** of its Whistleblowing Policy.

Reports made in good faith, either anonymously or otherwise, shall be addressed in a timely manner and without incurring fear of reprisal regardless of the outcome of any investigation, as provided by A-Rank Group's Whistleblowing Policy.

## 7.0 GOVERNANCE, MONITORING AND COMPLIANCE

### 7.1 Responsibility for this Policy

The Board of Directors of A-Rank shall oversee the setting of commitment towards prohibition of bribery and corruption in the business conduct of A-Rank Group, including approval of this Policy, and ensuring this Policy complies with the Group's legal and ethical obligations.

The Audit Committee of A-Rank shall assist its Board of Directors to oversee the compliance of this Policy, and ensure the effectiveness of the risk assessment and management framework as well as the internal control system in combating bribery and corruption.

The Risk Management Committee of A-Rank shall keep abreast of any emerging bribery and corruption risk within the Group, and ensure periodic update and effective management of the identified risks.

The Management of A-Rank Group including Heads of Departments or personnel of supervisory role shall provide the overall direction on the establishment, implementation and periodic review of this Policy, and ensuring adequate resources for effective implementation and monitoring. The Management is also responsible for continuous monitoring of the performance of all Personnel and the Third Parties to ensure ongoing compliance to this Policy.

The CO shall monitor the implementation, compliance, and effectiveness of this Policy through periodic reviews and assessments, and report any non-compliance issues or concerns to the Audit Committee and/or Board of Directors. The CO also acts as the point of contact for matters pertaining to this Policy, and anti-bribery and corruption.

### 7.2 Audits and Compliance

The internal control systems and procedures of A-Rank Group will be subject to audits to provide assurance that they are effective in countering bribery and corruption. Audit documentation should include performance improvement action plans, and any deficiencies identified must be rectified as soon as possible.

Such audits shall be conducted by the Outsourced Internal Auditor of A-Rank Group and/or other independent external party at least once every year. The outcome of the audits shall be reported to the Audit Committee, and acted upon.

**7.3 Infringement of this Policy**

Any infringement of this Policy, including any acts of bribery and misconduct, shall constitute serious misconduct or offences warranting disciplinary action against the offenders, including termination of employment or business relationship.

Non-compliance/ infringement issues identified by audits, whistleblowing or other means shall be reported to the Audit Committee and/or Board of Directors, in accordance with the level of risk identified, for deliberation and action.

**8.0 CONTINUOUS IMPROVEMENT**

A-Rank Group is committed to continuously improving, and review at least once every three (3) years, its policies and procedures relating to anti-bribery and corruption.

A-Rank Group shall monitor the legal and regulatory requirements, wherever it operates, and any changes in the Group's business environment and risks, to identify improvement opportunities to this Policy and overall management of bribery and corruption risks within the Group.

The risk assessment in relation to bribery and corruption risks shall be integrated into the Group's annual risk assessment. The results of the risk assessment shall be presented to the Audit Committee and the Board of Directors for review and approval, and incorporated into the Group's risk profile and risk registers.

In the event that the current management system is found to be inadequate, necessary revision and improvement shall be made to this Policy and the relevant policies and procedures. Any changes to this Policy shall be approved by the Board of Directors.

**This Policy was reviewed and approved by the Board on 9 December 2020.**

### Third Party Declaration Form

Our company, \_\_\_\_\_, which includes its directors, officers and employees who intend to conduct business transaction(s) with A-Rank Berhad and/or its subsidiaries (“A-Rank Group”) hereby to confirm that:

1. We shall observe and comply with A-Rank Group’s Anti-Bribery and Corruption (“ABC”) Policy, and all applicable laws and regulations relating to anti-bribery and corruption including but not limited to the Malaysian Anti-Corruption Commission Act 2009 and its amendment or any law amending or replacing such Act.
2. We have not been convicted nor are we subject to any investigation or inquiry of any actual or suspected breach of any applicable anti-bribery and corruption laws.
3. We undertake to promptly inform A-Rank Group of any breach and/or alleged/ suspected breach of A-Rank Group’s ABC Policy and/or anti-bribery and corruption legislations as may be imposed by the relevant authorities.
4. We acknowledge that A-Rank Group may suspend any commercial agreement or transaction entered into by and between A-Rank Group and us if A-Rank Group determines, or suspects, any violation of the obligations assumed by it hereunder, and A-Rank Group shall have the right to terminate the commercial agreement or transaction with immediate effect and without any liability whatsoever on the part of A-Rank Group to us. This is without prejudice to any other rights or remedies that A-Rank Group may have or any other appropriate action which A-Rank Group may seek under the terms of the applicable commercial agreement or the applicable rules and regulations.
5. We shall fully indemnify A-Rank Group against any claims, fines, losses, expenses (including legal costs) and/or damages arising from and out of our breach herein.
6. We acknowledge that the provisions set out in this declaration form shall form part of the terms and conditions of our appointment and/or contract of service.

Signature of Authorised Person:

X

Name and Position of the  
Company’s Authorised Signatory:

Company Name (and stamp):

Date:

## Staff Declaration Form

*Borang Deklarasi Kakitangan*

I, the undersigned, hereby declare that I have read and understood A-Rank Group's Anti-Bribery and Corruption ("ABC") Policy, and the responsibilities required of me in relation to the ABC Policy. I will abide by the requirements and provisions set out in the ABC Policy.

I also understand that A-Rank Group reserves the right to take appropriate disciplinary and/or legal actions against me if A-Rank Group determines, or suspects, any violation of the obligations assumed by me hereunder, without any liability whatsoever on the part of A-Rank Group to me.

*Saya, yang bertandatangan di bawah ini, dengan ini mengakui bahawa saya telah membaca dan memahami Polisi Anti-Rasuah dan Korupsi ("Polisi ABC") Kumpulan A-Rank dan segala tanggungjawab yang dikehendaki ke atas saya berkaitan Polisi ini. Saya akan mematuhi segala syarat dan peruntukan yang ditetapkan dalam Polisi ABC.*

*Saya juga memahami bahawa A-Rank Group berhak untuk mengambil sebarang tindakan disiplin dan/atau tindakan undang-undang yang sewajarnya ke atas saya sekiranya Kumpulan A-Rank mendapati, atau mengesyaki, sebarang pelanggaran obligasi oleh saya, tanpa sebarang liabiliti dikenakan ke atas Kumpulan A-Rank.*

X

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Name:

NRIC/Passport No.:

Staff No:

Position:

Company:

Date:

## POTENTIAL CONFLICT OF INTEREST DECLARATION FORM

### 1. EMPLOYEE DETAILS

Name : \_\_\_\_\_  
Employee No. / Staff ID : \_\_\_\_\_  
Entity : \_\_\_\_\_  
Position/ Title : \_\_\_\_\_  
Business Unit/ Department : \_\_\_\_\_

### 2. NATURE OF CONFLICT (Please tick “√” where relevant)

- Dealing with Suppliers, Customers, Agents or Competitors  
 Investment Activities  
 Secondary Employment and/or Other Activities  
 Family Members and Close Personal Relationship  
 Board Membership  
 Others (please specify): \_\_\_\_\_

### 3. DETAILS OF THE CONFLICT

Description of conflict : \_\_\_\_\_  
Actual and/or suspected date or duration of conflict arising : \_\_\_\_\_  
Impact/ potential impact of conflict (to quantify the impact, if possible and relevant) : \_\_\_\_\_

### 4. PROPOSED REMEDIAL ACTION TO MANAGE THE CONFLICT

I hereby propose:-

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A-RANK GROUP  
ANTI-BRIBERY AND CORRUPTION POLICY

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5. **DECLARATION**

All information that I have furnished here is true and accurate to the best of my knowledge as at the date of this Declaration Form. I undertake to update A-Rank if there are any changes to the information that I have provided here and upon becoming aware of undisclosed Potential Conflict of Interests. If I have provided any false or misleading information or suppressed any material facts, I understand that I will be subject to disciplinary action.

X

\_\_\_\_\_  
Name:

Staff No:

Position:

Date:

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<b>REVIEW AND APPROVAL</b> Review by Head of Department	
Remarks:	Signature: Name: Designation: Date:
<b>Approval by Compliance Officer and/or a higher authority</b>	
Remarks:	Signature: Name: Designation: Date:



## GIFTS, HOSPITALITY, DONATIONS AND SPONSORSHIP REQUISITION / DECLARATION FORM

**IMPORTANT:**

Accepting or offering anything of value such as gifts, meals, entertainment, rewards or hospitality from or to any Public Official or Commercial Party that is considered excessive or disproportionate may be perceived as an acceptance of a bribe. Employees should thus exercise sound judgment when offering or accepting anything of value and conduct themselves with integrity, impartiality, transparency and honesty at all times. If you have received/offered anything of value from/to a Public Official or Commercial Party, you must submit this Declaration Form for your Head of Department's acknowledgement before reporting to the Compliance Officer of A-Rank Group, in accordance with Table A (at the end of this form) and the Group's Anti-Bribery and Corruption Policy.

**1. EMPLOYEE DETAILS**

Name : \_\_\_\_\_  
 Employee No. / Staff ID : \_\_\_\_\_  
 Entity : \_\_\_\_\_  
 Position/ Title : \_\_\_\_\_  
 Business Unit/ Department : \_\_\_\_\_

**2. NATURE OF BENEFIT** (Please tick ✓ where relevant)

	OFFER / PROVISION	RECEIPT / ACCEPTANCE
Gift	<input type="checkbox"/>	<input type="checkbox"/>
Hospitality	<input type="checkbox"/>	<input type="checkbox"/>
Donation	<input type="checkbox"/>	<input type="checkbox"/>
Sponsorship	<input type="checkbox"/>	<input type="checkbox"/>
Others (please specify):	_____	_____

**3. DETAILS OF BENEFIT<sup>1</sup>**

Date of Offer / Receipt : \_\_\_\_\_  
 Description of Offer / Benefit : \_\_\_\_\_  
 \_\_\_\_\_  
 Estimated/ Actual Value (RM) : \_\_\_\_\_  
 Estimated/ Actual Value per person (RM) : \_\_\_\_\_  
 Reason for Offering/ Accepting Benefit : \_\_\_\_\_  
 \_\_\_\_\_

<sup>1</sup> Please attach relevant supporting documents as deemed necessary, e.g. invoice, proof of request, receipt, email correspondences, meeting invites, etc.

**4. DETAILS OF RECIPIENT/OFFEROR**

Is the Recipient/Offeror a public official? Yes  No

If Recipient/Offeror is an organisation

Name of Organisation : \_\_\_\_\_

If Recipient/Offeror is an individual

No.	Full Name	Position/ Title	Organisation	Relationship <sup>2</sup>

<sup>2</sup> Relationship with Recipient/Offeror, e.g. business referral, existing/ potential client, vendor, etc. (Please add additional pages if the space above is insufficient).

**A-RANK GROUP  
ANTI-BRIBERY AND CORRUPTION POLICY**

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**5. ADDITIONAL DETAILS**

- i. For due diligence conducted on the recipient of donation/ sponsorship:
  - (a) Is the recipient a legitimate organisation? Yes  No
  - (b) Does the recipient have any history or reputation of corruption or inappropriate activity? Yes  No
  - (c) Is the potential contribution a disguise for bribe? Yes  No
  - (d) Is the recipient a political party, public official or related to one? Yes  No
  
- ii. Would offering/ accepting the benefit:
  - (a) Create an actual, potential or perceived conflict of interest? Yes  No
  - (b) Contingent upon receiving/ offering business or other benefits? Yes  No
  - (c) Bring the applicant, A-Rank Group or the Board into disrepute? Yes  No

iii. Additional Remarks (if any): \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

<b>Requested/Declared by</b>	<b>Reviewed by</b>	<b>Approved by</b>
<b>Name:</b>	<b>Name:</b>	<b>Name:</b>
<b>Position:</b>	<b>Position:</b>	<b>Position:</b>
<b>Date:</b>	<b>Date:</b>	<b>Date:</b>

FOR DOCUMENTATION PURPOSES BY COMPLIANCE OFFICER	
<b>The Benefit is</b>	Accepted <input type="checkbox"/> Declined <input type="checkbox"/>
<b>Comments/ Remarks:</b>	_____
	_____
	_____
<b>Concurred/ Processed by</b>	
Name:	
Date:	