

T. L. GIAM ADJUSTERS SDN. BHD.

(Company No.: 94485-U) (AJUSTER BERLESEN)

ANTI-BRIBERY AND CORRUPTION POLICY

1. INTRODUCTION

The Board of Directors of TL Giam Adjusters Sdn Bhd Berhad (TLGA or Company) has established and adopted this Anti-Bribery and Corruption Policy (Policy). This Policy is established to set out the principles and provide guidance on dealing with improper solicitation, bribery and other corrupt activities that may arise in the executing or undertaking of professional duties, obligations and responsibilities.

This Policy should be read in conjunction with the Adjusters Code of Ethics and Whistle Blowing Policy.

2. POLICY STATEMENT

TLGA is committed to conducting business dealings in an honest and ethical manner. The Company adopts a zero-tolerance approach against all forms of bribery and corruption and is committed to acting professionally, fairly and with integrity in all our relationships and business dealings.

TLGA will uphold all laws relevant to countering bribery and corruption. We remain bound by the laws of Malaysia, including 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 any relevant authority from time to time in respect of our conduct.

3. OBJECTIVES

This Policy:

- a) sets out the parameters to prevent the occurrence of bribery and corrupt practices in relation to the businesses of TLGA and
- b) to provide information and guidance on how to recognise and deal with bribery and corruption issues.

4. SCOPE

This Policy applies to all employees (including full time, probationary, contract and temporary staff) ("Employees") and Directors of TLGA.

5. DEFINITIONS

“Bribery and Corruption”	Any action of giving or receiving Gratification which would be considered an offence under the MACC Act 2009. In practice, this means offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person who is in a position of trust within an organisation.
“Facilitation Payments”	Payments made to secure or expedite the performance of a person performing a duty, function or responsibility of any kind, and include cash, payments in kind and financial and nonfinancial advantages.
“Gratification”	Gratification as defined in MACC Act 2009 are as follows:- <ol style="list-style-type: none">Money, donation, gift, loan, fee, reward, valuable security, property or interest in property, whether movable or immovable, financial benefits;Office, dignity, employment, contract of employment/services and agreement to give employment/render services in any capacity;Payment, release, discharge/liquidation of loan, obligation or other liability;Valuable consideration of any kind, discount, commission, rebate, bonus, deduction or percentage;Any forbearance to demand any money or money’s worth or valuable thing;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, whether or not already instituted, and including the exercise or the forbearance from exercise of any right or any official power or duty; and 3 g) Any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of (a) to (f).
“Gifts”	Any forms of monetary or non-monetary provisions such as goods, services, cash or cash equivalents, fees, rewards, facilities, or benefits given.
“Hospitality”	Considerate care of guests, which may include food and beverages, refreshments, accommodation, transportation/ travel and entertainment at restaurants, hotels, clubs, resorts and other similar facilities, including leisure, sporting and healthcare activities or services of any kind.
“Kickbacks”	Any forms of payment intended as compensation for favourable treatment or other improper services. This includes the return of a sum already paid or due as a reward for awarding of furthering business

6. GIFTS AND HOSPITALITY

All Employees are prohibited from soliciting gifts from external parties. Nevertheless, this Policy does not prohibit normal and appropriate hospitality (given or received) to or from third parties and the giving or receipt of the gifts or event of hospitality must fulfill the following conditions:

- a) It must not involve any corrupt or criminal intent of any kind;
- b) It is not made with the intention of influencing decision-making or obtaining an unfair advantage;
- c) It is given in a transparent and open manner;
- d) It is reasonable in value; and
- e) The gift is respectful and customary e.g. it is customary for small gifts to be given during festival and wedding.

As a general principle, all persons subject to this Policy should not accept or give a gift to a third party if it might create a sense of obligation to compromise their professional judgement in exchange for favours or benefits.

7. DONATIONS, SPONSORSHIPS AND CONTRIBUTION TO CHARITY OR SOCIAL PROJECTS

TLGA recognises the importance of corporate social responsibilities and shall provide such assistance in appropriate circumstances and in an appropriate manner. However, such requests must be carefully examined for legitimacy and decisions must not be made to influence a business outcome.

8. RESPONSIBILITIES

All Directors and Employees are required to read, understand and comply with the Policy. The prevention, detection and reporting of Bribery and Corruption shall be the responsibility of all Directors and Employees, all of whom are required to avoid and refrain from any activity of any kind that may lead to or suggest or result in a breach of this Policy.

9. CONSEQUENCES FOR VIOLATION OF POLICY

Any Director or Employee who violates this Policy shall be subject to disciplinary proceedings. If found to have committed an act in violation of this Policy, TLGA reserves its right to terminate the directorship or employment with the Company.

10. HOW TO RAISE A CONCERN

Any individual or employee with any suspicion or concerns that a violation of this Policy has occurred or may occur in future should raise this issue by notifying the Company and making a report via the channel outlined in our Whistle Blowing Policy.

11. REVIEW OF THE POLICY

The Board will monitor compliance of the Policy and review the Policy regularly to ensure that it continues to remain relevant and appropriate.