



PERFEC DOT SDN BHD

ANTI-CORRUPTION & ANTI-BRIBERY POLICY (hereinafter as "Policy")

1. INTRODUCTION

- 1.1. Perfected Sdn Bhd together with its subsidiaries, affiliates, related and associated companies (hereinafter as "**Company**", "**we**", "**us**", or "**our**") adopts zero-tolerance approach to corruption and bribery. This Policy is created in compliant with the Section 17A of the Malaysian Anti-Corruption Commission (MACC) Act 2009 (Amendment 2018) (hereinafter as "**the Act**"), which was enforced on 1st June 2020 to encourage business activities to be conducted with integrity and to promote good governance practices in organisations, and not solely for the purpose of punishing commercial organisations.
- 1.2. We are committed to conduct our business with integrity, probity and honesty in an ethical and professional manner by uploading all laws pertaining to countering bribery and corruption. This effort requires mutual understanding, support and co-operation from various parties that collaborate with the Company in all forms of business transaction.
- 1.3. This Policy applies to every director and employee of the Company (including executive and non-executive director), and business associates that include, but do not limit to, business partners, agents, consultants, auditors, advisors, suppliers, contractors, customers or representatives that that work with directly or indirectly with the Company (hereinafter as "**third party**").
- 1.4. This Policy outlines our responsibilities including every individual that works for the Company in fighting bribery and corruption, and the necessary information and guidance for the third party on recognising and dealing with issues relevant to bribery and corruption.
- 1.5. In the event of any conflict or inconsistency arises between this Policy and the Act or the Malaysian laws and regulations, the latter shall prevail.

2. RESPONSIBILITIES OF ALL PARTIES

- 2.1. Directors and employees of the Company and any third party are expected to read, understand and strictly adhere to the definitions and requirements set out in this Policy. No exemptions or exceptions will be granted to any party that deviates from this Policy.
- 2.2. All parties mentioned in Clause 2.1 is responsible of ensuring any business transaction of the Company is completed smoothly without engaging in bribery and corruption practices. Non-compliance with this Policy and the applicable Malaysian laws and regulations will result in severe consequences to the affected individual(s) and the corresponding company(ies). This may include, but not limited to, disciplinary actions, termination of employment/service and business arrangements, legal action and/or report to the relevant regulatory authorities.
- 2.3. Any suspect of, a violation or potential violation of this Policy should be reported promptly to the Board of Directors of the Company as set out in Clause 14 of this Policy.

3. RECOGNISING BRIBERY, CORRUPTION AND THE LIKE

3.1. Bribery

Bribery is commonly known as offering, promising, giving, accepting, soliciting of an advantage as an inducement to gain any commercial, contractual, regulatory or business or personal advantage. Inducements can come in the form of gratification as listed in Clause 3.4 in this Policy.

3.2. Corruption

Corruption is commonly known as an action done with the intention of gaining an advantage that is inconsistent and/or unaligned with official duty and the rights of others.

3.3. Business Advantage

A business advantage means a better financial, economical or reputational position, or in any other way that is beneficial to the Company.

3.4. Gratification

According to the Act, a gratification (hereinafter as “**gratification**”) means:

- 3.4.1. money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
- 3.4.2. any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- 3.4.3. any payment release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- 3.4.4. any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- 3.4.5. any forbearance to demand any money or money’s worth or valuable thing;
- 3.4.6. 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
- 3.4.7. any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding Clauses 3.4.1 to 3.4.7.

3.5. Extortion

Extortion is generally known as soliciting or accepting a bribe or any form of gratification and/or agreeing to corruption.

As the standard terms used in this Policy, all types of gratification and extortion are referred to as “*bribery and corruption*”; any actions equivalent to soliciting or agreeing to receive a bribe is referred to as “*receiving*”; and any actions equivalent to agreeing to give, promise or offer a bribe are referred to as “*providing*”, “*giving*” or “*paying*”.

4. CONFLICT OF INTEREST

- 4.1. As much as the Company commits to fight bribery and corruption at its level best, we may encounter actual or potential conflicts of interest from time to time where our position or responsibilities within or owed to the Company presents an opportunity for us or an individual that we know to obtain gratification(s).

- 4.2. It is our responsibility to avoid this situation and abstain from involvement in any acts of bribery and corruption, or keep the Company informed by declaring any actual or potential conflicts that come into our knowledge. All declaration of conflicts shall be made to the Board of Directors of the Company stated in Clause 14 in this Policy.

5. STANDARDS OF ANTI-BRIBERY AND ANTI-CORRUPTION

- 5.1. It is strictly prohibited for the Company or its directors, employees or third party to:
- 5.1.1. give, promise to give, or offer any form of gratification to any individual or organisation or otherwise involve in or permit a bribery and corruption offence to occur, with the expectation or hope that an advantage in business will be received, or to reward a business advantage already given;
 - 5.1.2. give, promise to give, or offer any form of gratification to any individual or organisation to "*facilitate*" or expedite a routine procedure;
 - 5.1.3. solicit or accept any form of gratification from any individual or organisation that is offered or provided with an expectation that a business advantage will be provided by the Company in return;
 - 5.1.4. threaten or retaliate against another individual or organisation who has refused to commit a bribery and corruption offence or who has raised concerns under this Policy or the Company's Whistle Blowing Policy; and
 - 5.1.5. engage in any activity that might lead to a breach of this Policy.
- 5.2. Should any directors, employees or third party of the Company failed to adhere to any provision set out in this Policy, he/she may result criminal or civil penalties which will vary according to the offence. A director or an employee of the Company acting in contravention of the Policy will also face disciplinary action up to and including summary dismissal or legal action as regulated by the Malaysian laws.

6. GIFTS, ENTERTAINMENT, HOSPITALITY AND TRAVEL

6.1. Gifts

- 6.1.1. The Company adopts a "NO GIFT" policy, subject to narrow exceptions. This means that all directors, employees and third party of the Company are prohibited from directly or indirectly receiving and/or giving any gifts that may influence good judgement and decision making.
- 6.1.2. Gifts valued at Ringgit Malaysia Five Hundred (RM500.00) and above must be declared by submitting the declaration form in Appendix A to the Company's Board of Directors or administrative personnel for approval, regardless an individual item or accumulated in value. According to the Act, Civil servants are allowed to receive gifts provided the value of the item is $\frac{1}{4}$ of the emoluments or less than RM500. In the case that the item is valued more than the allowable value, the officer is required to report the item to the Head of Department for approval. However, there are exceptions for gifts exceeding RM500 under certain circumstances such as gifts received from friends due to retirement, transfer, engagement and marriage. Should there be any doubt on the receipt of such gifts, it must be reported to the Company's Board of Directors for further action and clarification.
- 6.1.3. In the event of rejecting gift is impossible, difficult or impractical where the rejection of the gift may affect the relationship between the Company and the individual or organisation (other than cash or cash equivalent) or rejecting them is deemed as offensive given the local custom, we may accept the gift(s) on behalf of the Company and will declare the gift as stated in Clause 6.1.2 and the gift will become the property of the Company. The use of the gift is to be determined by the Board of Directors of the Company based on the following:
- (a) donate the gift to charity;
 - (b) register it as company property to be used generally by all employees;
 - (c) display the gift in common area;
 - (d) share the consumption of the gift with employees; or
 - (e) permit the gift to be retained by the employee.
- 6.1.4. The Company directors and employees are not allowed to provide any gifts to third party. Gifts to third party shall only be offered mainly as a business courtesy to foster healthy business relationship.

The gift must be unsolicited and not affecting, or be perceived as affecting, any business judgement or decision making.

6.2. Entertainment

6.2.1. The Company's employee must obtain approval from the senior management or Board of Directors for any form of business entertainment extended to the employee. The following need not be declared:

- (a) annual dinner/ gala dinner/ cocktail events which are also attended by the employee;
- (b) working lunches and other meals including those following / preceding official meetings; and
- (c) invitations to official opening ceremonies / seminars.

6.2.2. Business entertainment that directly or potentially compromises the employee's ability to or appear to hinder business duties in a professional manner should not be accepted.

6.3. Hospitality and Travel

6.3.1. Business-related travel expenditures, such as travel, meals or accommodations, may be incurred depending on the business arrangement with any third party when performing a work or task relating to the Company's business such as factory visits, site audits and business trips (hereinafter as "**Third Party Travel**"). However, inappropriate, excessive or unnecessary Third-Party Travel poses a risk of bribery, especially when the business activity in question involves a material interest of a specific party. The Company strictly prohibits from providing non-business-related travels to any third party or receiving non-business-related travels from any third party.

7. DONATIONS AND SPONSORSHIPS

7.1. The Company is allowed to give donation or sponsorship with the following criteria:

- 7.1.1. the objective of the donation or sponsorship is not contradictory with the Company's and/or the intended recipient's values;
- 7.1.2. the donation or sponsorship is permitted by applicable laws;
- 7.1.3. the intended recipient is a legitimate organisation and proper due diligence/background checks have been conducted;
- 7.1.4. obtained all necessary authorisation (if required); and
- 7.1.5. there is no actual or potential improper advantage to the Company.

7.2. All donations and sponsorships made or received by the Company must be clearly and properly stated in the Company's financial records.

7.3. The Company has no political affiliation and does not provide monetary or any in-kind political contribution to political parties, political party officials or candidates/representatives for any political office. If any contribution of such is made as permissible under applicable laws, the Company must not be made with any promise or expectation of favourable treatment in return and will document the contribution properly in the Company's financial records.

8. FACILITATION PAYMENTS

8.1. The Company strictly prohibits facilitation payments that include, but not limited to, unofficial and improper payments or benefit, given to secure or expedite a routine or necessary action to which the Company is entitled, legally or otherwise.

8.2. There are certain circumstances where payments may be made in exchange for a lawful express or preferential service, which are not considered as facilitation payments, provided they meet the following criteria:

- 8.2.1. the lawful express or preferential service is available to everyone;

8.2.2. the payment for express or preferential service is payable to the organisation or entity, not an individual, and it must be made in accordance with an official and published price list; and

8.2.3. an official receipt is issued by the organisation or entity for express or preferential service.

8.3. All employees of the Company must keep the Board of Directors or their supervisors notified when a facilitation payment is requested by any party or if the employee is unsure of the nature. It is the employee's responsibility to ensure all payments made are properly recorded in the Company's financial records.

9. FINANCIAL AND NON-FINANCIAL CONTROLS

9.1. The Company adopts a clear and proper documentation and record of all transactions and disbursement of monies that follow appropriate delineation process and approval matrix of the Company and applicable laws.

9.2. The Company adopts a clear segregation of job functions and responsibilities for all positions and decision-making processes, whether financially or non-financially related.

10. DUE DILIGENCE

10.1. The extent of the due diligence will be risk-based and shall include a bribery risk assessment to ensure compliance with this Policy, which may include searching on relevant databases, conducting background checks to ensure the personnel has the integrity and professionalism to perform the role/service, checking for relationships with public officials, and documenting the reasons for choosing one particular service provider over another.

10.2. The Company expects all directors, employees and third party acting behalf of and/or associating with the Company to contractually and mutually agree to refrain from bribery and corruption by adhering to this Policy and applicable laws.

11. WHISTLE BLOWING AND REPORTING OF VIOLATIONS

11.1. As a responsible corporation, the Company is committed to conduct its business and affairs in a lawful, ethical and professional manner. The Company has adopted a Whistle Blowing Policy appended in this Policy that is applicable to all directors and employees of the Company and outlines the procedures for reporting violations of laws, rules, regulations or the Company's corporate policies.

11.2. A whistle blower is encouraged to report on any actual or potential corruption incidents or inadequacies to the Company's Board of Directors promptly. The Company strictly prohibits retaliatory action against any individual who raises a concern in good faith and will address the report in a timely manner without incurring fear of reprisal or victimisation regardless of the outcome of any investigation.

12. RECORD-KEEPING

12.1. The Company is aware of the importance to keep proper and complete financial records and documentation of all transactions made by and matters involving the Company for seven (7) years that would be served as evidence to prove the recorded transactions were made bona fide, ethical and legally adhered to the Policy and applicable laws.

12.2. All documentations and records will be retained by the administrative department of the Company. Any disposal of the documents will require approval from the Board of Directors of the Company.

13. RISK ASSESSMENT

13.1. A bribery and corruption risk assessment will be carried out periodically on an annual basis or as and when there is a change in law or circumstance of the business to identify, analyse, assess and prioritise the internal and external bribery and corruption risks of the Company.

13.2. The assessment should consider the following:

- 13.2.1. overall risks bribery and corruption associated with a specific jurisdiction;
- 13.2.2. risks associated with a business transaction undertaken by the Company or third party;
- 13.2.3. risks associated with pursuing or obtaining business opportunities; and/or
- 13.2.4. risks deriving from relationships or partnerships with any third party.

14. ENQUIRY ON THIS POLICY

14.1. Should you require any clarification or information about this Policy, or if there are any doubts pertaining to the provisions stated in this Policy, please get in touch with the Board Directors of the Company as follows:

- 14.1.1. Chong Kok Yee (alexander@perfecdot.com), and
- 14.1.2. Law Marn Theng (kimberly@perfecdot.com)

15. REVIEW AND COMMUNICATION OF THE POLICY

15.1. The Company will continue to improving this Policy to ensure it is adhered to the Act and Malaysian laws relevant to anti-corruption and anti-bribery, and enhance its integrity measures from time to time by reviewing this Policy every three (3) years or as and when deemed necessary by the Board of Directors of the Company.

15.2. The Company will conduct a training session on anti-bribery and anti-corruption measures once a year for its employees. For new employees, the Company will conduct the training session within the first month of their employment.

15.3. A digital version of this Policy can be viewed at our website at <https://perfecdot.com/abac-policy>.

PERFECDOT SDN BHD

WHISTLE BLOWING POLICY (hereinafter as “WB Policy”)

1. INTRODUCTION

Perfecdot Sdn Bhd together with its subsidiaries, affiliates, related and associated companies (hereinafter as “**Company**”, “**we**”, “**us**”, or “**our**”) are committed to conducting and maintaining our businesses and professional activities with a high standard of professionalism and ethics.

Whistleblowing is the voluntary disclosure of inappropriate, unethical or unlawful behaviour and practices by the management or employees that include the following unethical conduct (hereinafter as “**Unethical Conduct**”):

- 1.1. Incidents of fraud, theft, embezzlement or dishonesty;
- 1.2. Any unlawful or illegal activities, whether criminal or breach in civil law;
- 1.3. Corruption, bribery and blackmail;
- 1.4. Improprieties in matters of financial reporting;
- 1.5. Failure to comply with regulatory requirements;
- 1.6. Abuse of power or information;
- 1.7. Conflict of interest;
- 1.8. Criminal breach of trust;
- 1.9. Unethical behaviour, malpractices or illegal acts;
- 1.10. Forgery or alteration of any documents belonging to the Company, customers, another Financial Institution, or agents of the Company;
- 1.11. Criminal offences;
- 1.12. Poor or unethical sales practices, including mis-selling;
- 1.13. Gross mismanagement or dereliction of duties;
- 1.14. Miscarriage of justice;
- 1.15. Harassment, bullying, abuses and intimidation;
- 1.16. Endangerment of an individual’s health and safety;
- 1.17. Profiteering as a result of insider knowledge; and
- 1.18. Deliberate concealment of any or a combination of the above.

In line with the Company’s continuous effort to maintain and deliver high standards of professionalism and ethics, the Company reserves the right at its sole discretion to update or amend this WB Policy from time to time.

2. APPLICATION OF THE POLICY

The WB Policy applies to all directors and employees of all levels and departments of the Company including officers, consultants, contractors, suppliers, part-time and contractual staff, agents, clients and any parties with employment or business relationship with the Company (hereinafter as “**Relevant Individuals**”).

This WB policy sets out avenues for legitimate concerns to be objectively investigated and addressed. This WB Policy is created to establish a transparent and secured communication platform for Relevant Individuals to raise their legitimate concerns on unethical, questionable or improper conduct within the Company and enable the Company to take swift, fair and effective corrective actions that will enable us to comply with our social and corporate responsibilities and maintain the support and trust of Relevant Individuals.

3. REPORTING

A disclosure of Unethical Conduct may be made by submitting the Whistle Blowing Form in Appendix B to our Board of Directors of the Company as follows:

3.1. Chong Kok Yee (alexander@perfecdot.com), and

3.2. Law Marn Theng (kimberly@perfecdot.com)

The whistle-blower is responsible to ensure that the disclosure is made in good faith, free from malicious intent, and is not for professional and/or personal gains. This procedure strictly prohibits frivolous, vexatious, mala-fide, bogus disclosure for personal gain or with personal agenda. If the investigation reveals that the disclosure was made with malicious intent, appropriate action can be taken against the whistle-blower. If the investigation results in a proven case of wrongdoing/malpractice and confirms the allegations, disciplinary action shall be taken against the related employees in accordance with the Company's policy.

4. WHISTLE-BLOWER PROTECTION

The Company commits to ensuring that

- 4.1. all disclosed information including the identity of the whistle-blower shall be treated with strict confidentiality to the extent reasonably practicable unless he/she agrees otherwise;
- 4.2. all concerns raised will be treated fairly and objectively;
- 4.3. the Company/Group will not tolerate harassment or victimisation of anyone raising a genuine concern;
- 4.4. no one will be at risk of suffering some form of reprisal as a result of raising a concern even if the individual is mistaken. The Company, however, does not extend this protection to the whistle-blower if he/she is found involved in the Unethical Conduct or have made the disclosures in bad faith.

5. NOTIFICATION

Upon completion of the investigation, the whistle-blower will be accorded to the privilege to be notified on the result of the disclosure.

**ACKNOWLEDGEMENT OF ANTI-CORRUPTION & ANTI-BRIBERY POLICY
AND WHISTLE BLOWING POLICY
OF PERFECDOT SDN BHD**

I, _____(NAME), _____
(DESIGNATION) of _____(COMPANY NAME), hereby
declare that I have read, understood and agree to comply with the Anti-Corruption & Anti-Bribery Policy and
Whistle Blowing (“Policies”) of Perfecdot Sdn Bhd (“Company”).

I will adhere to the provisions set out in this Policy and aware that the following actions may be taken against me
for breaching the Policies:

1. Dismissal;
2. Disciplinary and/or legal action by the Company or legal parties;
3. The Company filing a police report; and/or
4. The Company filing a report to the Malaysian Anti-Corruption Commission (MACC).

I further hereby declare that I have not violated the provisions of the Policies and am not aware of any violations
of the Policies as of the date hereof.

Name:

NRIC:

Signature:

Date:

Company Stamp:

APPENDIX A

EMPLOYEE DECLARATION FORM ON GIFT AND HOSPITALITY

Employees must submit this declaration form to the administrative personnel of Perfected Sdn Bhd ("Company") within three (3) working days from the date of receipt or giving of gift in support of the Company's compliance with its Anti-Corruption & Anti-Bribery Policy ("Policy").

EMPLOYEE'S DETAILS	
Name:	
Designation:	
Employee ID:	
Department:	
PURPOSE OF DECLARATION	
Receiving Date:	
Receiving From:	
Giving Date:	
Giving To:	
Business Relationship with the Company:	
DETAILS OF GIFTS / HOSPITALITY	
Estimated Value Less Than RM500.00	Estimated Value More Than RM500.00
Brief Description:	Brief Description:
DECISION REGARDING GIFT/HOSPITALITY	
<input type="checkbox"/> Accept: <input type="checkbox"/> Reject: <input type="checkbox"/> Transfer to (Please specify name of organisation/individual):	

I hereby declare that I have read, understand and agree to the Company's Anti-Corruption & Anti-Bribery Policy. I certify that the statement and details provided here are true, correct and accurate to the best of my knowledge and belief.

Name: _____ NRIC: _____

Signature: _____ Date: _____

FOR OFFICE USE ONLY

Acknowledged by: _____ Approved by: _____

Name: _____ Name: _____

Date: _____ Date: _____

APPENDIX B

WHISTLE BLOWING FORM

Please provide the following details for any suspected Unethical Conduct as set out in the Company's Whistle Blowing Policy or any breach or suspected breach of law or regulation that may adversely impact the Company. Please note that you may be called upon to assist in the investigation, if required.

REPORTER'S DETAILS
Name:
Designation:
Contact No. / Email Address:
Department:
SUSPECT'S DETAILS
Name:
Designation:
Contact No. / Email Address:
Department:
WITNESS' DETAILS
Name:
Designation:
Contact No. / Email Address:
Department:
DETAILS OF CONCERN
Date / Time:
Location:
Description:
SUPPORTING INFORMATION (Please attach supporting evidence to substantiate your report and assist in the investigation. You may use additional sheets if necessary.)
REPORTING TO OTHER PARTIES
Have you raised your concern to other individual / department / authority?
<input type="checkbox"/> Yes (please provide the details of the individual / department / authority): Name: Contact No.: Email Address: Department: Date of Report: Copy of the Report (if any, you may attach separately):
<input type="checkbox"/> No
ACKNOWLEDGEMENT
Date:
Signature: