



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

20 April 2021

## CONTENT

1.	INTRODUCTION.....	2
1.1	Objectives.....	2
1.2	Application .....	2
1.3	Definition .....	3
2.	RISK ASSESSMENT APPROACH.....	4
3.	CONFLICTS OF INTEREST.....	4
4.	GIFT, ENTERTAINING, HOSPITALITY AND TRAVEL.....	5
4.1	Receiving Gift .....	5
4.2	Exceptions to the “No-gift” Policy.....	5
4.3	Approval Process for Receiving Gift .....	6
4.4	Providing Gift .....	6
4.5	Approval Process for Providing Gift .....	6
5.	DONATIONS AND SPONSORSHIP .....	6
6.	FACILITATION PAYMENTS.....	6
7.	POLITICAL CONTRIBUTIONS .....	7
8.	PREFERENCES, FAVORS OR UNDUE ADVANTAGES .....	7
9.	THIRD PARTIES INTERACTING WITH PUBLIC OFFICIALS .....	7
10.	REPORTING PROCESS AND CHANNEL.....	7
11.	INTERNAL MONITORING AND REVIEW.....	8
12.	RECORD KEEPING.....	8
13.	TRAINING AND COMMUNICATIONS OF POLICIES.....	8
	APPENDIX A – GIFT CLAIM FORM .....	10
	APPENDIX B – REPORTING FORM.....	11

2

## 1. INTRODUCTION

Astramina Advisory Sdn Bhd ("**ASTRAMINA ADVISORY**") has adopted a zero tolerance policy against all forms of bribery and corruption. The ASTRAMINA ADVISORY's Anti-Bribery and Corruption Policy and Procedures ("**Anti-Bribery & Corruption P&P**") shall form part of ASTRAMINA ADVISORY's Employees Handbook version 1.0, dated 24 March 2008. All the employees and directors of ASTRAMINA ADVISORY must read and fully understand this Anti-Bribery & Corruption P&P.

The Anti-Bribery & Corruption P&P provides guidance to ASTRAMINA ADVISORY's employees and key stakeholders concerning on how to deal with improper solicitation, bribery and other corrupt activities and issues that may arise in the course of business.

If you have any doubt about the scope of applicable laws or the application of ASTRAMINA ADVISORY's policy concerning the fight against bribery and corruption, you should contact the Policy Monitoring Officer immediately.

Employee who breaches this policy will subject to disciplinary action, including termination of employment.

### 1.1 Objectives

- (i) To ensure adequate and standardised Anti-Bribery & Corruption P&P consistently applied throughout ASTRAMINA ADVISORY by all the employees and directors; and
- (ii) To ensure that business operations within ASTRAMINA ADVISORY are strictly adhering to the Anti-Bribery & Corruption P&P.

### 1.2 Application

This Anti-Bribery & Corruption P&P is intended to apply to the following key stakeholders:-

- (i) every employee of ASTRAMINA ADVISORY;
- (ii) directors of ASTRAMINA ADVISORY;
- (iii) consultants, agents, representatives and others performing work or services for or on behalf of ASTRAMINA ADVISORY.

If a law conflicts with a policy set out in this Anti-Bribery and Corruption P&P, you should comply with the law. If you have any questions about any of the perceive conflicts, please consult your Policy Monitoring Officer, rather than disregard this Anti-Bribery and Corruption P&P without consultation.



### 1.3 Definition

Astramina Advisory Board	: Astramina Advisory Sdn Bhd
Bribery	: refers to the act of corruptly authorising, giving, agreeing to give, promising, offering, soliciting, receiving, or agreeing to receive any gratification
Corruption	: means an act of giving or receiving of any gratification or reward in the form of cash or in kind of high value for performing task in relation to his/her job description
Employees	: staff (includes temporary, fixed-term, or permanent), trainees, seconded staff, casual workers, agency staff, volunteers, interns, agents
Gratification	: (a) 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; (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; 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).
Public Officials	: means official of any governments, government agencies or any regulatory, statutory or administrative bodies, whether local or foreign



## **2. RISK ASSESSMENT APPROACH**

ASTRAMINA ADVISORY shall undertake a risk assessment every three (3) years to assess the following:-

- (a) Opportunities for corruption and fraud activities resulting from weakness in the organisation's governance framework and internal system procedures;
- (b) Financial transactions that may disguise corrupt payments;
- (c) Business activities in countries or sectors that pose a higher corruption risk;
- (d) Non-compliance of external parties acting on behalf of ASTRAMINA ADVISORY regarding to the Anti-Bribery & Corruption P&P;
- (e) Relationship with third parties in the supply chain (e.g. agents, vendors, contractors, and suppliers) which are likely to expose ASTRAMINA ADVISORY to corruption

## **3. CONFLICTS OF INTEREST**

A conflict of interest arises in a situation in which an individual is in a position to take advantage of his or her role in ASTRAMINA ADVISORY for his or her personal benefit, including the benefit of his or her family/household and friends. This would undermine the duties of good faith, fidelity, diligence and integrity as expected by ASTRAMINA ADVISORY from its employees and directors in the performance of their duties and obligations.

The Board and Employees must not use their position, official working hours, ASTRAMINA ADVISORY's resources and assets, or information available to them for personal gain or to ASTRAMINA ADVISORY's disadvantage.

In situations where conflict of interest arises, Employees are required to immediately declare the matter to the Policy Monitoring Officer.





#### **4. GIFT, ENTERTAINING, HOSPITALITY AND TRAVEL**

ASTRAMINA ADVISORY has adopted a "No Gift" policy whereby, subject only to certain exceptions, ASTRAMINA ADVISORY's employees and directors (executive and non-executive) are prohibited from, directly or indirectly, receiving or providing gifts.

ASTRAMINA ADVISORY requires employees and directors to abide by this policy to avoid conflict of interest or the appearance of conflict of interest for either party in on-going or potential business dealings between ASTRAMINA ADVISORY and external parties as a gift can be seen as a bribe that may tarnish ASTRAMINA ADVISORY' reputation or be in violation of anti-bribery and corruption laws.

It is the responsibility of employees and directors to inform the external parties involved in any business dealings with ASTRAMINA ADVISORY the practice of "No Gift Policy" and to request the external party's understanding for and adherence with this policy.

##### **4.1 Receiving Gift**

Although generally ASTRAMINA ADVISORY practices a "No Gift" Policy, some external parties may still insist in providing gifts to ASTRAMINA ADVISORY's employees and directors, whereby refusing the gift is likely to seriously offend and may sever ASTRAMINA ADVISORY' business relationship with the third party. However, in no circumstances may an employee, director or his/her family/household members accept gifts in the form of cash or cash equivalent

##### **4.2 Exceptions to the "No-gift" Policy**

There are certain exceptions to the general rule whereby the receiving and provision of gifts are permitted in the following situations:-

- (i) Work related conference, branch visits, meeting in client's office (where travel is involved, ASTRAMINA ADVISORY with pay for the flights, toll, parking, petrol, train tickets, travelling expenses to the airport and accommodation); or
- (ii) Working lunches or dinners which shall not be more than RM300.00; or
- (iii) Gift from external parties worth not more than RM300.00; or
- (iv) Gifts from ASTRAMINA ADVISORY to employees and directors and/or their family members in relation to an internal or externally recognised function, event and celebration by ASTRAMINA ADVISORY (e.g. in recognition of an employee's/director's service to the ASTRAMINA ADVISORY).



#### **4.3 Approval Process for Receiving Gift**

Employee should discuss with their Policy Monitoring Officer before accept a gift offered. Thereafter, the Employee is required to fill up the Gift Claim Form in Appendix A and submit to the Policy Monitoring Officer within one week after he/she received the gift.

The Policy Monitoring Officer shall decide whether to approve, decline, donate or return the gift. For gift worth more than RM300.00, the Policy Monitoring Officer is required to notify the Managing Director to decide on how to deal with the gift.

#### **4.4 Providing Gift**

Only the Managing Directors is allowed to provide gifts to third party.

Employees are not allowed to provide gifts to third parties save and except for items set out in clause 4.2(i) and 4.2(ii).

#### **4.5 Approval Process for Providing Gift**

The Employees is required to fill up the monthly expenses claim form for the expenses value below RM300.00. The expenses above RM300.00 requires prior written approval from Managing Director via the Gift Clam Form as set out in **Appendix A.**

### **5. DONATIONS AND SPONSORSHIP**

No donation to be offered or made on behalf of ASTRAMINA ADVISORY without the prior approval from the Managing Director.

### **6. FACILITATION PAYMENTS**

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a Public Official for a routine or administrative duty or function.

The Board and Employees are prohibited from making facilitation payments. ✓



## **7. POLITICAL CONTRIBUTIONS**

Employees and Board may participate in the political activities on an individual basis but does not permit to use ASTRAMINA ADVISORY's resources for such activities. Any form of donations at ASTRAMINA ADVISORY's level to the political parties must be approved by the Managing Director. The political contributions made must be permissible under applicable laws and must not be made with any promise or expectation of favourable treatment in return.

## **8. PREFERENCES, FAVORS OR UNDUE ADVANTAGES**

Do not offer, promise, make, accept or ask for any preference, favors or other undue advantages that could influence or appear to influence the employees or the recipient's professional objectivity.

## **9. THIRD PARTIES INTERACTING WITH PUBLIC OFFICIALS**

ASTRAMINA ADVISORY is held liable for acts of bribery or corruption by third parties whilst interacting with public officials on our behalf. The third parties include financiers, accountant, lawyers, consultants, tax advisors, contractors and service providers.

## **10. REPORTING PROCESS AND CHANNEL**

All the Employees has a responsibility to help to detect, prevent and report instances of bribery and corruption. Employees are required to report or discuss with the Policy Monitoring Officer if they are unsure whether a particular act constitutes bribery or corruption. An Employee may raise the concern using the form in **Appendix B.**

All concerns reported will be taken seriously, treated in confidential manner and investigated immediately. Your anonymity will be protected unless the disclosure is required by law pursuant to an investigation or legislation, but you may be required to provide a statement as supporting evidence to any investigation. Any retaliation directed against anyone making such report will not be tolerated.





All reports shall be made in good faith and the report must be legitimate. Anyone who makes any malicious, scandalous or vexatious report, and particularly if they persist with such untrue allegations, they will be subjected to ASTRAMINA ADVISORY's disciplinary actions.

The Policy Monitoring Officer shall ensure the policy set out in this Anti-Bribery & Corruption P&P are complied with at all-time pertaining to all the concerns on bribery and corruption raised or reported to him or her.

## **11. INTERNAL MONITORING AND REVIEW**

Payment to the Employees' claims and Directors' claims are subject to the review by the outsourced finance department and shall be approved by the Managing Director prior to any payment being made to the Employees or Directors.

The Policy Monitoring Officer shall immediately report any non-compliance of this Anti-Bribery and Corruption P&P to the Managing Director for the next course of action.

## **12. RECORD KEEPING**

Records of gifts, hospitality and entertainment expenses received or accepted are kept by the Policy Monitoring Officer.

The payment for the gift, hospitality and entertainment must be filed together with the invoices or bills which are kept by the outsourced finance department.

The record of all the concerns raised or reported by the Employees shall be kept by the Policy Monitoring Officer.

## **13. TRAINING AND COMMUNICATIONS OF POLICIES**

Training on this Anti-Bribery & Corruption P&P forms part of the induction process for all the new Employee. Existing Employees are required to read, acknowledge and understand this Anti-Bribery & Corruption P&P on yearly basis.



Any amendment or update to this Anti-Bribery and Corruption P&P shall be communicated as soon as possible to the Employees once the updated Anti-Bribery and Corruption P&P is approved by the Board. The Policy Monitoring Officer shall circulate the updated Anti-Bribery and Corruption to the Board and all the Employees via email.

A copy of the latest Anti-Bribery and Corruption P&P is published on ASTRAMINA ADVISORY's website. All internal procedures and forms relating to anti-bribery and anti-corruption will be circulated by the Policy Monitoring Officer to all the Employees via email.

A handwritten signature, possibly of the Policy Monitoring Officer, is written below the text.

## APPENDIX A – GIFT CLAIM FORM

### (A) Receives Gift

No.	Particulars	Description
1.	Date Received	:
2.	Recipient's Name	:
3.	Description of Gift	:
4.	Value (RM)	:
5.	Reason of Gift Acceptance	:
6.	Decision on how to deal with the Gift	:
7.	Name of Approver	:
8.	Approval Date	:

### (B) Provides Gift

No.	Particulars	Description
1.	Offered Date	:
2.	Name of Offeror	:
3.	Recipient's Name, Company's Name and Designation	:
4.	Description of Gift	:
5.	Value (RM)	:
6.	Reason of Gifting	:
7.	Decision:	:
8.	Name of Approver	:
9.	Approval Date	:

e



## APPENDIX B – REPORTING FORM

No.	Particulars	Description
1.	Date of Report	:
2.	Name	:
3.	Contact Number	:
4.	Complaint	:
5.	Report Received Date	:
6.	Decision or Next Course of Action	:
7.	Date of Decision Made	:
8.	Update Post Action Taken	:
9.	Date of Update	: