



Anti-Corruption and Anti-Bribery Policy

1. Introduction

ShareInvestor Malaysia is committed to conducting its business ethically, as well as in conformity with all applicable laws, which include compliance with the Malaysian Anti-Corruption Commission Act 2009 and the Malaysian Anti-Corruption Commission (Amendment) Act 2018 and any of its amendments or re-enactments that may be made by the relevant authority from time to time.

ShareInvestor Malaysia is committed to a zero-tolerance approach in its efforts to prevent bribery and corrupt practices. All of ShareInvestor Malaysia's business dealings are conducted in an ethical and transparent manner. In order to ensure the continued efficiency in the enforcement of anti-corrupt and anti-bribery practices within ShareInvestor Malaysia, the Company has taken the following steps:-

	Implementation of this Policy: To conduct comprehensive corruption and bribery risk assessment across ShareInvestor Malaysia when appropriate, to mitigate such risks by ensuring that adequate procedures and safeguards have:
A	been implemented;
B	Implementation of training programs for personnel of ShareInvestor Malaysia operating in areas which are at high risk of exposure to corrupt and bribery practices; and
C	undertaking periodic review to update this Policy to be in line with the latest developments of anti-corruption laws in Malaysia.

This Policy provides principles, guidelines and requirements on how to deal with bribery and corrupt practices that may arise in the course of daily business and operational activities within ShareInvestor Malaysia. Unless otherwise stated, any references to "we", "us" and "our" in this Policy are to our Company and related companies, collectively.

2. Purpose

The purpose of this Policy is to set out the responsibilities of ShareInvestor Malaysia and the personnel working for ShareInvestor Malaysia to comply with laws against bribery/corruption and to further provide information and guidance to all personnel working for ShareInvestor Malaysia on how to recognize and deal with bribery and/or corruption issues.

3. Definitions

A	“Benefit” means any advantage or benefit that may be considered of value that constitute, or derive from funds or assets belonging to ShareInvestor Malaysia or to third parties.
B	“Board” means the Board of Directors of ShareInvestor Malaysia.
C	“Bribery” is offering, giving or receiving anything of value with the intention of inducing a person to act or to reward a person for having acted
D	“Bribe” (“Gratification”) means money, donation, gift, any valuable thing of any kind, any forbearance to demand any money or money’s worth or valuable thing, any other service or favour of any kind, or any offer, undertaking or promise of any such gratifications
E	“Business Transaction” means the business dealings entered into between ShareInvestor Malaysia with any Third Parties including but not limited to tenders, quotations, contracts, letter of awards and purchase orders
F	“Corruption” means the dishonest or fraudulent conduct by those in power, typically involving bribery.
G	“Conflicts of interest” means the situation in which commercial, economical, familial, political or personal interests may interfere with the decision-making capacity of individuals during the performance of their duties for ShareInvestor Malaysia
H	“Employees” means all employees, senior managers, managers and individuals working for ShareInvestor Malaysia, of all levels and positions (whether full time, part-time, contract or temporary);
I	“Entertainment” means the provision of recreation or provision of accommodation, travel arrangement in relation to the purpose of facilitating recreation (with or without consideration) made in the promotion of any trade or business transactions.
J	“Facilitation Payments” means unofficial payments of modest value, made in order to expedite, favour or ensure routine activities of public officers and/or Third Parties that has a business relationship with ShareInvestor Malaysia
K	“Third Parties” means any legal or natural person outside ShareInvestor Malaysia that has a business relationship with ShareInvestor Malaysia, including non-financial relationships which may include but not limited to system integrator (SI) partners, content/digital solution providers, suppliers, contractors, agents, consultants, outsourced personnel, distributors, advisers, government and public bodies including their advisors, representatives and officials

4. Scope

This Policy applies to all individuals working for the Company and all companies related with ShareInvestor Malaysia of all levels and positions. This includes the Board, Employees and any Third Parties associated with the company.

5. Gifts and Entertainment

The Board, Employees, family members or agents acting for or on behalf of the Board, Employees or their family members are prohibited from, directly or indirectly:-

	receiving gifts and/or entertainment from any Third Parties that have business transactions with ShareInvestor Malaysia; or
	providing gifts and/or entertainment to Third Parties that have business transactions with ShareInvestor Malaysia

This objective of this is to avoid conflicts of interest or the appearance of conflicts of interest for either party in the ongoing or potential business transactions between ShareInvestor Malaysia and Third Parties as such gifts can be construed as a bribe or gratification, in violation of anti-corruption and anti-bribery laws. The Board and Employees are to refuse or return gifts and/or entertainment received from Third Parties. Generally, Employees are not allowed to provide gifts and/or entertainment to Third Parties unless it is in accordance with the following:-

(a)	be provided in relation to actual business purposes;
(b)	reasonable and in good faith;
(c)	comply with the Company's applicable rules and procedures, including the relevant authorisation process;
(d)	be recorded and supported by appropriate documentation;
(e)	not intended to improperly influence any person to take action in favour of ShareInvestor Malaysia or otherwise; and
(f)	shall never be in cash

6. Facilitation Payments

The Board and Employees do not make and will not accept any form of Facilitation Payments. All Third Parties must also avoid any activity that might lead to Facilitation Payments being made or accepted. Any individual with suspicions, concerns or information relating to Facilitation Payment being made or potentially made on behalf of ShareInvestor Malaysia or any instances of improper business practices, are encouraged to report such issues to ShareInvestor Malaysia via email to (governance.my@shareinvestor.com).

7. Political Contributions

The Board and Employees do not make any form of charitable donations or contributions (directly or indirectly) to political parties or movements, or their representatives or candidates on behalf of ShareInvestor Malaysia unless made solely in their personal capacity and with prior notice to the Board or the managing director/group chief executive officer.

All forms of charitable donations or contributions made in the Board's and/or Employees' personal capacity will not be reimbursed by ShareInvestor Malaysia.

8. Charitable Contributions

All charitable contributions or donations made by ShareInvestor Malaysia to any community projects or charities shall first be approved by the Board and need to be made in good faith (in compliance with the Company's Code of Business Conduct and Ethics, this Policy and internal procedures governing such contributions). Any charitable donation which breaches or perceived to breach the anti-corruption laws in Malaysia and/or this Policy is strictly prohibited.

9. Relationship with Third Parties and Due Diligence

In carrying out its business transactions with Third Parties and in consideration of the varying degrees of relationships ShareInvestor Malaysia has with such Third Parties, there will undoubtedly be risks of noncompliance with anti-corruption laws. In order to minimise and mitigate the potential risks relating to the above, ShareInvestor Malaysia has implemented the following:-

(a)	Procurement and selection process of Third Parties that adheres to the system of internal controls / guidelines and such process shall not be based on any receipt of Gratification, Benefit or Entertainment;
(b)	Procurement and selection process will be conducted in a transparent manner and open to all qualified Third Parties;
(c)	Selection of Third Parties shall be subjected to (past, present and future) compliance to this Policy and the Code of Business of Conduct and Ethics of the Company by the Third Parties;
(d)	Conduct of Due Diligence by ShareInvestor Malaysia on Third Parties to ascertain the existence of sound business reason for the Business Transaction AND the absence of any specific risk factors relating to corruption and bribery activities in the relationship with the Third Parties; and
(e)	Requirement for all Third Parties who intend to conduct Business Transactions with ShareInvestor Malaysia to sign an 'integrity pledge' which ensures compliance by the Third Parties with ShareInvestor Malaysia's (Company No.: 201101027780 (955915-M)) relevant anti-corruption and anti-bribery policies and shall provide for the right of ShareInvestor Malaysia to terminate the business transaction in the event of any breach of anti-corruption laws.

10. Role and Responsibilities

The Board has oversight of this Policy and the managing director and other officers within ShareInvestor Malaysia in leadership positions, are responsible for ensuring the strict compliance with this Policy.

All Employees are required to be familiar with and comply with this Policy.

Any violation of this Policy will be taken seriously and will result in thorough investigation/inquiry and disciplinary action, including dismissal and termination where appropriate, in accordance with prevailing law. Any Employee, if found guilty of paying bribes / gratifications or authorizing, assisting, abetting or conspires with anyone in breach of this Policy and/or the anti-corruption or anti-bribery laws will be held individually liable.

Any individual or Employee with suspicions, concerns or information relating to the breach or potential breach of this Policy and any instances of improper business practices, are encouraged to report such issues to ShareInvestor Malaysia via email to (governance.my@shareinvestor.com).

11. Record Keeping

All financial records and proper documentations' trail of ShareInvestor Malaysia with Third Parties will be properly kept and we will have appropriate control measures in place to evidence, substantiate and justification for the business reason for making of payments to, and receiving of payments from Third Parties. All expenses and claims relating to any gifts or entertainment made to Third Parties will be subjected to rigorous screening process in accordance with ShareInvestor Malaysia 's internal reimbursement procedures in order to minimise the risk of financial outflow in contravention of anti-corruption or anti-bribery laws. All documents, accounts and records relating to business transactions with Third Parties will be prepared and maintained with strict accuracy and completeness. No documents (as aforementioned) are to be kept "off-book" to facilitate or conceal any improper payments.

12. Confidentiality and Reporting

ShareInvestor Malaysia encourages openness and will provide support to any individual who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed in ensuring that no individuals are subject to any form of detrimental treatment by virtue of their refusal to partake in corruption/bribery activities, any form of activities that may contravene the law or because of concerns in reporting wrongdoings as prescribed in this Policy. Thus, all reports made to ShareInvestor Malaysia pursuant to the Whistleblowing policy and procedure are kept confidential and we will not divulge any details and identities of the individuals who made such reports.

13. Selection, hiring and management of Employees

The process of selection, hiring and management of Employees shall comply with internal procedures and applicable laws, specifically with respect to, assessment of reputational and conflicts of interest risks in the hiring stage.

(a)	update of the conflicts of interest assessment either on actual or potential situations, including personal relations with government and public officers;
(b)	periodic self-declaration on compliance with the Code of Business Conduct and Ethics, this Policy and anti-corruption/anti-bribery laws;
(c)	conduct of specific training activities and programmes; and
(d)	conduct of proper background checks including past convictions and

14. Monitoring and Review

All Employees and Third Parties are responsible for the success of this Policy and should ensure adherence to this Policy and use it to disclose any suspected wrongdoing. All internal control systems and procedures will be subject to periodic reviews and audits to ensure the continued effectiveness in preventing corrupt and bribery practices within ShareInvestor Malaysia. We will also ensure continual improvement of the suitability, adequacy, and effectiveness of this Policy from time to time.

Any amendments to this Policy shall be approved by the Board.

Date: June 6th, 2022