

Big Dataworks Sdn. Bhd. Document No. POL/ABAC/GIA-BDW/1.5/2019	RESTRICTED ANTI-BRIBERY & ANTI-CORRUPTION POLICY	
	Effective Date 12 October 2023	Version No. 1.5



ANTI-BRIBERY & ANTI-CORRUPTION POLICY

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DOCUMENT HISTORY

Version	Summary of Change	Effective Date
1.0	Establishment of BDW Anti-Bribery & Anti-Corruption Policy	1 November 2019
1.1	<ol style="list-style-type: none"> Amended section 4.2 'Anti-Bribery and Anti-Corruption Policy Statement' for clarification Inclusion of new section 5 'Anti-Bribery Management System Objectives' Removed threshold table under sections 7.3.4 & 7.3.5 and included HOD/ Management approval requirement Updated email addresses under sections 13.5.1 and 14.1 Inquiries & Reporting 	1 December 2019
1.2	<ol style="list-style-type: none"> Elaborated exceptions for meals acceptance under section 7.3.4 Inclusion of new sections 7.3.5 & 7.3.6 to clarify process of receiving and providing hospitality & entertainment 	20 December 2019
1.3	<ol style="list-style-type: none"> Amended section 8.1 for further clarification Amended section 8.4 onwards to further elaborate CSR, donations & sponsorship requirements 	16 March 2020
1.4	<ol style="list-style-type: none"> Policy title amended from Anti-Bribery and Corruption (ABC) to Anti-Bribery & Anti-Corruption (ABAC) Reworded section 7.2.2 for clarification and inclusion of exceptions 	1 January 2023
1.5	<ol style="list-style-type: none"> Amended section 5 'ABMS System Objectives' Amended section 8.1 'CSR, Donation & Sponsorship' Inclusion of new section 14 'Anti-bribery and Anti-corruption Compliance Function' Updated email address under section 15 'Enquiries & Reporting' 	12 October 2023

TABLE OF CONTENT

NO.	CONTENT	PAGE
1	INTRODUCTION	3
2	APPLICATION	3
3	DEFINITION	4
4	ANTI-BRIBERY AND ANTI-CORRUPTION POLICY STATEMENT	9
5	ANTI-BRIBERY MANAGEMENT SYSTEM OBJECTIVES	10
6	BRIBERY OFFENCE	10
7	GIFT & HOSPITALITY	16
8	CSR, DONATION AND SPONSORSHIP	21
9	POLITICAL CONTRIBUTION	22
10	DEALING WITH BUSINESS ASSOCIATE	22
11	RESPONSIBILITY OF EMPLOYEE	23
12	INFRINGEMENT OF THE POLICY	24
13	WHISTLEBLOWING PROTECTION AND CHANNEL	25
14	ANTI-BRIBERY AND ANTI-CORRUPTION COMPLIANCE FUNCTION	26
15	INQUIRIES AND REPORTING	27

1. INTRODUCTION

- 1.1 BDW applies zero tolerance against all elements related to bribery, corruption, abuse of power and misappropriation. The document, namely Anti-Bribery & Anti-Corruption Policy (hereinafter referred to as ABAC Policy) addresses commitment of BDW to integrity and in promoting a culture of transparency, openness, honesty, ethical in the conduct of its operations and business activities.
- 1.2 ABAC 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 operation activities within BDW. It also intended to assist everyone in BDW in conducting the business and operation activities legally, ethically and with integrity.

2. APPLICATION

- 2.1 ABAC policy applies to all individuals working at all levels and grades, including senior management, officers, directors, employees (whether permanent, fixed-term or temporary), joint venture and/or business partners, consultants, contractors, or any other person associated with BDW, or any of its subsidiaries or their employees, wherever located.

3. DEFINITION

BDW - The term “BDW” means Big Dataworks Sdn. Bhd. and its subsidiaries and controlled companies. The expression “BDW” is used for convenience where references are made to BDW companies in general. The companies in which BDW has direct or indirect shareholding are distinct legal entities.

Bribery - Under the MACC Act, gratification or what most people call bribery means offering, giving, receiving or soliciting something of value (for example money or information) in an attempt to illicitly influence the decisions or actions of a person with a position of trust within an organisation.

Corruption - According to Transparency International, it means the abuse of entrusted power for personal gain. However, corruption has a broader definition than bribery. This Policy therefore refers to “bribery and corruption” as a standard term to cover all types of gratification.

Examples of gratification:

- Money
- Donations
- Gifts
- Loans
- Facilitation fee
- Rewards, position, title, etc.

Forms of Corruption:

- **Bribery**

A bribe can be any type of benefit. It can be a cash payment, or it can be in the form of a gift, entertainment, giving a donation or property, paying for a holiday, providing the promise of future employment, or titles (e.g. Dato', Tan Sri). Payment made to secure or expedite the performance by a person performing a routine or administrative duty or function is also deemed as bribery.

- **Collusion/Bid-Rigging**

Collusion occurs where two or more parties co-operate to defraud or deceive another party. This is a type of fraud and is often described as a “cartel”, “anti-trust” or “anti-competitive” offence.

- **Abuse of Power**

Abuse of power occurs where someone abuses a position of trust for the purposes of illicit gain. Abuse of power is often a separate criminal offence. However, it may also constitute bribery or fraud.

- **False Claim**

Dishonestly obtaining the property of another by some deception or misrepresentation of fact e.g. any person providing documents such as receipts or invoices that are false or contain false details with the intention of deceiving the principal.

- **Disclosure of Confidential Information**

Unauthorised use of BDW's proprietary information by Employees and Business Associates.

- **Kickbacks**

These are bribes fulfilled after a company has awarded a contract to a customer. They take place in purchasing, contracting, or other departments responsible for decisions to award contracts. The supplier provides the bribe by kicking part of the contract fee back to the buyer, either directly or through an intermediary.

- **Facilitation payments**

These are typically small payments made to secure or expedite the performance of a routine or necessary action to which the payer is entitled, legally or otherwise.

- **Charitable and political donations, sponsorship, travel, and promotional expenses**

These are legitimate activities for entities but can be abused by being used as a subterfuge for bribery.

- **Conflict of interest**

A conflict of interest occurs where a person or entity with a duty to the organisation has a conflicting interest, duty, or commitment. Having a conflict of interest is not in itself corrupt, but corruption can arise where a director, employee, or contracted third party breaches the duty due to the organisation by acting in regard to another interest.

- **Price fixing**

An agreement among competitors to raise, fix, or otherwise maintain the price at which their goods or services are sold. Price fixing can take many forms, and any agreement that restricts price competition may violate applicable competition laws.

- **Revolving door**

This is corruption linked to the movement of high-level employees from public sector jobs to private sector jobs and vice versa. The main concerns relate to how the practice by an organisation can compromise the impartiality and integrity of public office. For organisations, there may be risks in discussing or promising future employment to public officials or using former public officials as board members, employees, or consultants.

- **Patronage**

Favouritism in which a person is selected, regardless of qualifications, merit, or entitlement, for a job or benefit because of affiliations or connections.

- **Illegal information brokering**

The brokering of corporate confidential information obtained by illegal methods.

- **Insider trading**

Any securities transaction made when the person behind the trade is aware of non-public material information, and is hence violating his or her duty to maintain confidentiality of such knowledge.

- **Tax evasion**

The illegal non-payment of tax to the government of a jurisdiction to which it is owed by a person, enterprise, or trust who should be a taxpayer in that place.

Gifts - Money, movable or immovable property, vehicle, shares, travel tickets, entertainment, service, club membership, any form of discounts or commissions, hampers, jewellery, ornament, any gifts, souvenirs, or anything of value which is given to or received by an officer, his or her spouses or any other person on his behalf, without any or insufficient consideration known to the officer.

Hospitality - A generous and friendly treatment, reception or entertainment that can be perceived by a third party, to be for the purpose of bribery even if neither the giver nor the receiver intended it to be for this purpose.

Donation - Charitable gift, contribution, subscription, present, hand out, grant, offering, gratuity, endowment or other similar donation that can be perceived by a third party, to be for the purpose of bribery even if neither the giver nor the receiver intended it to be for this purpose. It can include giving or providing cash, venues, equipment, personnel time or other benefit.

Business Associate - Business associates includes but is not limited to clients, customers, joint-ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, sub-contractors, suppliers, vendors, advisors, agents, distributors, investors, representatives and intermediaries who are performing work or services, for and on behalf of BDW.

4. ANTI-BRIBERY AND ANTI-CORRUPTION POLICY STATEMENT

4.1 BDW, as a technology company providing solutions in data supply, data analytics and management of information, pledges to promote the culture of transparency, fairness and accountability at the workplace to keep up a high standard of integrity and governance.

4.2 In the effort to consistently and continuously combat against the risk of bribery and corruption, BDW are committed to:

- Provide and maintain an anti-bribery working environment for all employees and stakeholders;
- Comply with and adhere to the provisions of the Malaysian Anti-Corruption Commission Act 2009 (Act 694), Malaysian Anti-Corruption Commission (Amendment) Act 2018 (Act A1567) and other applicable laws, rules & regulations, procedures and other instructions;
- Provide avenue and encourage raising concerns regarding bribery and corrupt conduct through Whistleblowing Policy;
- Continually improve Anti-Bribery Management System; and
- Impose appropriate action such as disciplinary action and/or initiation of legal proceeding against any act of not complying with applicable anti-bribery policy.

5. ANTI-BRIBERY MANAGEMENT SYSTEM OBJECTIVES

BDW is committed to develop a bribery free culture within the organisation by:

- Maintain adherence to all applicable anti-bribery and corruption laws and regulation;
- Conduct an annual ABMS awareness training program for all employees;
- Perform an annual assessment to evaluate the overall awareness level and understanding of anti-bribery policies among employee; and
- Implement a semi-annual communication campaign to promote ABMS awareness among all employees and associates.

The objective will be accomplished through strong commitment and support from the management, employees' involvement, effective trainings and solid co-operation amongst the stakeholders.

6. BRIBERY OFFENCE

6.1 Offence of accepting gratification under Section 16, ACT 694

6.1.1 Any person who by himself, or by or in conjunction with any other person -

- a) corruptly **solicits** or **receives** or **agrees to receive** for himself or for any other person; or
- b) corruptly **gives, promises** or **offers** to any person whether for the benefit of that person or of another person,

Any gratification as an inducement to or a reward for, or otherwise on account of -

- a) any person doing or forbearing to do anything in respect of any matter or transaction, actual or proposed or likely to take place; or
- b) any officer of a public body doing or forbearing to do anything in respect of any matter or transaction, actual or proposed or likely to take place, in which the public body is concerned, commits an offence.

6.2 Offence of giving or accepting gratification by agent, Section 17, ACT 694

6.2.1 A person commits an offence if;

- a) being an agent, he corruptly **accepts** or **obtains**, or **agrees to accept** or **attempts to obtain**, from any person, for himself or for any other person, any gratification as an inducement or a reward for doing or forbearing to do, or for having done or forborne to do, any act in relation to his principal's affairs or business, or for showing or forbearing to show favour or disfavour to any person in relation to his principal's affairs or business; or
- b) he corruptly **gives** or **agrees to give** or **offers** any gratification to any agent as an inducement or a reward for doing or forbearing to do, or for having done or forborne to do any act in relation to his principal's affairs or business, or for showing or forbearing to show favour or disfavor to any person in relation to his principal's affairs or business.

6.3 Offence of intending to deceive principal by agent, Section 18, ACT 694

6.3.1 A person commits an offence if he **gives** to an agent, or being an agent he **uses** with intent to deceive his principal, **any receipt, account or other document** in respect of which the principal is interested, and which he has reason to believe contains **any statement which is false or erroneous or defective in any material particular**, and is intended to mislead the principal.

6.4 Bribery of officer of public body, Section 21, ACT 694

6.4.1 Any person who **offers** to an officer of any public body, or being an officer of any public body **solicits or accepts**, any gratification as an inducement or a reward for -

- a) the officer voting or abstaining from voting at any meeting of the public body in favour of or against any measure, resolution or question submitted to the public body;
- b) the officer performing or abstaining from performing or aiding in procuring, expediting, delaying, hindering or preventing the performance of, any official act;
- c) the officer aiding in procuring or preventing the passing of any vote or the granting of any contract or advantage in favour of any person; or
- d) the officer showing or forbearing to show any favour or disfavour in his capacity as such officer,

commits an offence, notwithstanding that the officer did not have the power, right or opportunity so to do, show or forbear, or accepted the gratification without intending so to do, show or forbear, or did not in fact so do, show or forbear, or that the inducement or reward was not in relation to the affairs of the public body.

6.5 Penalty for offences under sections 16, 17, 18, 20, 21, 22 and 23, Section 24, ACT 694

6.5.1 Any person who commits an offence under sections 16, 17, 20, 21, 22 and 23 shall on conviction be liable to;

- a) **imprisonment** for a term **not exceeding twenty years**; and
- b) **a fine of not less than five times** the sum or value of the gratification which is the subject matter of the offence, where such gratification is capable of being valued or is of a pecuniary nature, or **ten thousand ringgit, whichever is the higher.**

6.5.2 Any person who commits an offence under section 18 shall on conviction be liable to;

- a) **imprisonment** for a term **not exceeding twenty years**; and
- b) **a fine of not less than five times** the sum or value of the false or erroneous or defective material particular, where such false or erroneous or defective material particular is capable of being valued, or of a pecuniary nature, or **ten thousand ringgit, whichever is the higher.**

6.6 Duty to report bribery transactions, Section 25, ACT 694

- 6.6.1 Any person to whom any gratification is **given, promised, or offered**, in contravention of any provision of this Act shall **report** such gift, promise or offer together with the name, if known, of the person who gave, promised or offered such gratification to him to the nearest officer of the Commission or police officer.
- 6.6.2 Any person who fails to comply with the said subsection commits an offence and shall on conviction be liable to a **fine not exceeding one hundred thousand ringgit** or to **imprisonment** for a term **not exceeding ten years or to both**.
- 6.6.3 Any person from whom any gratification has been **solicited** or **obtained**, or **an attempt has been made** to obtain such gratification, in contravention of any provision of this Act shall at the earliest opportunity thereafter **report** such soliciting or obtaining of, or attempt to obtain, the gratification together with the full and true description and if known, the name of the person who solicited, or obtained, or attempted to obtain, the gratification from him to the nearest officer of the Commission or police officer.
- 6.6.4 Any person who fails, without reasonable excuse, to comply with the said subsection commits an offence and shall on conviction be liable to a fine **not exceeding ten thousand ringgit** or to **imprisonment** for a term **not exceeding two years or to both**.

6.7 Punishment for forgery, Section 465, ACT 574

- 6.7.1 Whoever **commits forgery** shall be punished with **imprisonment** for a term which may **extend to two years** or with **fine or with both**.

6.8 Offence by commercial organization, Section 17A, ACT A1567

6.8.1 A **commercial organization** commits an offence if a person **associated** with the commercial organization **corruptly gives, agrees to give, promises or offers** to any person any gratification whether for the **benefit** of that person or another person with intent –

- (a) to obtain or retain business for the commercial organization; or
- (b) to obtain or retain an advantage in the conduct of business for the commercial organization.

6.8.2 Any commercial organization who commits an offence under this section shall on conviction be liable to:

- (a) a **fine of not less than ten times** the sum or value of the gratification which is the subject matter of the offence, where such gratification is capable of being valued or is of pecuniary nature, or **one million ringgit**, whichever is the higher, or to
- (b) **imprisonment for a term not exceeding twenty years or to both.**

6.8.3 Where an offence is committed by a commercial organization, a person -

- (a) who is its **director, controller, officer or partner**; or
- (b) who is concerned in the management of its affairs, at the time of the commission of the offence, is deemed to have committed that offence unless that person proves that the offence was committed without his consent or connivance and that he exercised due diligence to prevent the commission of the offence as he ought to have exercised, having regard to the nature of his function in that capacity and to the circumstances.

6.8.4 If a commercial organization is charged for the offence referred to in the said subsection, it is a **defense** for the commercial organization to prove that the commercial organization had in place **adequate procedures** to prevent persons associated with the commercial organization from undertaking such conduct.

7. GIFT & HOSPITALITY

7.1 NO GIFT POLICY

7.1.1 BDW adopts “NO GIFT POLICY” whereby all employees shall not solicit or accepts any gift from any third parties that may have direct or indirect business with BDW, subject to certain limited exception.

7.1.2 Any gift of cash or cash value (e.g., vouchers, coupons, shares, commissions, etc.) is strictly prohibited at all times.

7.1.3 Any gift which violates the terms of “No-Gift Policy” must be declined/returned with an explanation note on BDW’s “No-Gift Policy” and proceeds to decline/return the gift accordingly.

7.2 RECEIVING AND PROVIDING GIFTS

7.2.1 In general, employees including family members (spouse, children, parent, grandparents and close relatives) are prohibited to receive and provide gifts to business associates and other parties engaging with BDW, subject to certain exception.

7.2.2 Although generally BDW practices a “No Gifts” Policy, employees are allowed to provide and receive gifts (via **Gift and Meal Log**, *Appendix I*) provided they fall within any of the following limited exceptions:

- A gift is worth less than **RM500** or **USD250** (for overseas) per item, feature company’s logo or brand or part of a marketing or promotional campaign;
- The gift is exchanged at a company-to-company level;
- The gift is a token of appreciation at an official function or public event;
- The gift is given as part of BDW’s Corporate Social Responsibility (“CSR”) programme; or
- Fruits, flowers, and hampers with an approximate/ actual value of less than RM500 are permitted.

7.2.3 Employee shall report the gift to the HOD/ Superior, who will make record in their Gifts Log. If the HOD/ Superior decides to accept the gift, he/she must determine the following treatment of the gift:

- **Allow** Employees to keep the gift; or
- **Display** the gift in public; or
- **Share** the gift among the employees.

7.2.4 In the event the employee is unable to decline/return a gift with an approximate/actual value of more than **RM500/USD250**, the employee must declare (via **Gifts Declaration Form, Appendix II**) and surrender such gift to Integrity & Governance Unit (“IGU”) Division. IGU will in turn seek the CEO or EC’s direction on how to dispose the gift. The CEO/EC, subject to their due considerations, will have the right to decide based on the following:

- (i) Donate the gift to charity; or
- (ii) Surrender it to BDW Marketing & Communication Division to be used publicly by all employees; or
- (iii) Register it as a company property to be used publicly by all employees; or
- (iv) Designate it as a display item; or
- (v) Share it with other employees; or
- (vi) Permit it to be retained by the employee.

7.2.5 All expenses incurred to provide gifts must be properly kept, documented and recorded by the respective division for audit purposes.

7.3 RECEIVING AND PROVIDING HOSPITALITY & ENTERTAINMENT

- 7.3.1 BDW strictly prohibits employees from soliciting or accepting corporate hospitality and entertainment that is excessive, inappropriate, illegal or given in response to, in anticipation of, or to influence a favourable business decision, particularly from parties engaged in a tender or competitive bidding exercise.
- 7.3.2 Employees are strictly prohibited from providing or offering to provide entertainment and hospitality with a view to improperly cause undue influence on any party in exchange for some future benefit or result. Any acts of this nature, whether provided directly or indirectly through an intermediary, may be construed as an act of bribery.
- 7.3.3 Hospitality should not be offered or accepted frequently with the same party, or during specific time periods, such as during tender or contract negotiations.
- 7.3.4 With certain limited exception, employees are allowed to offer or accept meals from business associates and other party engaged with BDW provided:
- The cost of the hospitality does not exceed the approved thresholds specified in the BDW Employee Code of Conduct;
 - It is not for spouse and other non-business guests;
 - The expenses will meet the rules or code of conduct of the recipient's organisation;

-
- It is business related, as per permitted occasions below:
 - Meetings
 - Workshops
 - Trainings
 - Audits

7.3.5 For any occasion or event not listed above (e.g., festive season gathering, farewell and etc.), Management approval must be obtained, and the Gift and Meal Log must be updated accordingly.

7.3.6 For hospitality, only eligible employees i.e. VP and above are allowed to offer and accept within the following limited exceptions:

- The cost of the hospitality does not exceed the approved thresholds specified in the BDW Employee Code of Conduct;
- It is business related;
- It is not for spouse and other non-business guests;
- The expenses will meet the rules or code of conduct of the recipient's organisation; and
- There is approval from the Top Management.

8. CSR, DONATION AND SPONSORSHIP

- 8.1 BDW only allows CSR, donations and sponsorships for legitimate reasons and as permitted by existing laws and regulations to legitimate organizations i.e., registered with Registrar of Society (such as sports and recreation club) and legitimate non-registered organization (such as religious institution, orphanage or elderly care home or shelter home for the poor and needy).
- 8.2 BDW does not allow requesting sponsorship from business associates and any parties engaging with BDW as it may be construed as an act of bribery.
- 8.3 CSR, donations and sponsorship activities conducted must not be used as a conduit to circumvent, avoid, or evade the laws or regulatory requirements. It shall not be used to facilitate corruption, illegal and money laundering activities.
- 8.4 All CSR, donations and sponsorships shall require to perform Due Diligence in accordance to the procedures in ABMS MANUAL 8.2 - Due Diligence and Business Associates Procedure.
- 8.5 Requests for donations and sponsorships must be supported by an approval memo that includes a justification for the donation or sponsorship.
- 8.6 All CSR, donations and sponsorship must obtain approval in accordance to PSG's Discretionary Authority Limit (DAL) and shall be made in accordance with the approval limits/ budget.
- 8.7 Payments and contributions made for CSR, donations, and sponsorships must be supported by proof of payment or receipt.
- 8.8 Payments and contributions made for CSR, donations, and sponsorships must be recorded accurately in the BDW's accounting records.

9. POLITICAL CONTRIBUTION

BDW does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office.

10. DEALING WITH BUSINESS ASSOCIATE

10.1 In order to ensure the Company's operations remain free of bribery and corruption, BDW are committed in establishing mutually beneficial relationships with business associates, who apply either the same or higher standards of ethics and integrity.

10.2 To help ensure that BDW do business with business associates that share BDW standards of integrity, the following need to be carried out:

- Conduct due diligence to assess the integrity of BDW' prospective business counterparties;
- All business associates are made aware of the BDW Business Partner Code of Conduct and ABAC Policy; and
- Continue to be aware of and to periodically monitor business associates performance and business practices to ensure ongoing compliance.

Business associates consist of, but are not limited to, clients, customers, joint ventures, joint venture partners, outsourcing providers, contractors, consultants, sub-contractors, suppliers, vendors, advisors, agents, distributors and investors.

10.3 Do not enter into any business dealings with any business associate reasonably suspected of engaging in bribery and improper business practices.

10.4 If at any point during the due diligence exercise or in the dealings with a business associate, there are conflicts of interest or “red flags” are raised, these warrant further investigation and must be sufficiently addressed before the engagement of the business associate.

10.5 Employees should seek advice from the Governance, Integrity and Audit Division whenever particular questions arise relating to business associates that BDW has appointed or is considering appointing.

11. RESPONSIBILITY OF EMPLOYEE

11.1 In the effort to restrict room and opportunities for bribery, BDW employees need to take actions as follow:

DO NOT ACCEPT

BDW employees are not allowed to request or accept any type of bribery.

REFUSE

BDW employees are required to refuse any offering or bribery.

REPORT

BDW employees are required to immediately report any bribery act to Integrity & Governance Unit.

11.2 BDW employees should report any act of bribery, supported with the following basic information (5W + 1H):

- i. Who is involved?
- ii. When did the incident happened?
- iii. Where did the incident take place?
- iv. What is the offence?
- v. Why did the offence occur?
- vi. How did the offence occur?
- vii. Witness or related documentation (if any)

12. INFRINGEMENT OF THE POLICY

12.1 Violation of the laws which includes but not limited to the MACCA 2009, Penal Code and AMLA 2001 shall be punishable with imprisonment or fine or both under the respective Acts.

12.2 Any breach of BDW policies could result in the following disciplinary actions:

1. Written warning
2. Suspension
3. Demotion
4. Dismissal / Termination

12.3 For BDW Business Partners, any breach of BDW policies could result in the following punishment:

1. Written warning
2. Suspension
3. Termination
4. Blacklist
5. Claim for damages

13. WHISTLEBLOWING PROTECTION AND CHANNEL

13.1 BDW encourages openness and transparency in its commitment to the highest standard of integrity and accountability. Therefore, BDW strongly encourage reporting (whistleblowing) of real or suspected cases of bribery and corruption without fear of retaliation or reprisal.

13.2 Employee who makes a report or disclosure about any actual or perceived bribery or corruption in good faith, belief, without malicious intent, that a breach or violation as aforesaid may have occurred or may about to occur, he/she will be accorded protection of confidentiality.

13.3 In addition, employees who whistle blow internally will be also protected against detrimental action for having made the disclosure, to the extent reasonably practicable.

13.4 BDW has formulated a Whistleblowing Policy & Procedures, which provides channels for secure reporting of concerns about instances of bribery and corruption and other forms of misconduct.

13.5 Whistleblowing Channels

13.5.1 The whistleblowing channels available include the following:

- Email whistleblowing@commercedc.com.my
- Telephone: 03-7985 5352
- Written letters/e-mails to Integrity & Governance Unit.

13.5.2 BDW employees may lodge an anonymous report. However, he/she must be aware that there must be sufficient evidence in order for an investigation. BDW employees are therefore encouraged to provide detailed, factual information to assist with the investigation (i.e., who, what, where, when, how).

13.5.3 All disclosures are protected with confidentiality and the whistleblower's identity will be protected against retaliation in any form, provided that the report is done in good faith.

14. ANTI-BRIBERY AND ANTI-CORRUPTION COMPLIANCE FUNCTION

14.1 Integrity & Governance Unit shall have the oversight of the implementation of compliance measures pertaining to this Policy and carry out adequate measures on anti-bribery and corruption.

14.2 Integrity & Governance Unit shall be the independent authority to act against corruption and bribery in the Group and is authorised to carry out investigation on any allegation and reasonable suspicion.

14.3 Integrity & Governance Unit shall report at planned intervals, and on an ad hoc basis, as appropriate, to the Governing Body and Top Management, on the adequacy and implementation of the ABMS, including the results of investigations and audits.

15. INQUIRIES AND REPORTING

15.1 Any inquiries or reporting on violations of this ABAC Policy may be directed to the following channels:

Attention to:

Integrity & Governance Unit

Level 4, Wisma Commerce Dot Com

15, Lorong Tandang 51/204b

46050 Petaling Jaya, Selangor

Telephone: 03-7985 5352

Email: integrity@bigdataworks.com.my

APPENDIX I

GIFT AND MEAL LOG

(For value worth less than RM500)

(This log is to be maintained by respective department's HOD/Team Leader)

Financial Year: e.g 2020

Company Name: e.g Commerce Dot Com Sdn Bhd

Department: e.g GIA

(Providing gift/meal)

No	Date Offered	Type (Gift/M meal)	Name of Organization/Party	Name & Position of Individual	Description of Gift/Events	Reason/Justification	Estimated Value (RM)	HOD Acknowledgement (Signature/Initial)

(Receiving of gift/meal)

No	Date Offered	Type (Gift/M meal)	Name of Organization/Party	Name & Position of Individual	Description of Gift/Events	Reason/Justification	Estimated Value (RM)	HOD Acknowledgement (Signature/Initial)	Treatment/Action

Remarks:

- * Treatment/Action:
 - Allow employees to keep the gift; or
 - Display the gift in public; or
 - Share the gift among the employees

BIG DATAWORKS SDN BHD

Gifts Declaration Form

This declaration form is in accordance with the Company's "**No-Gift Policy**". Therefore, all employees must declare all gifts (which is valued at **RM500 or more**) within **three (3) working days** upon receiving the same to IGU. The **physical gifts** valued at RM500 or more must be deposited to IGU within **three (3) working days** upon receipt of the same. IGU will seek CEO's direction on best way to dispose the gift.

1. **Date offered:** _____

Offered to:

2. **Offered by:** Organization or Individual

Name and title of person making offer:

.....

Type of organization: (e.g., supplier, prospective tenderer, industry stakeholder with commercial interest, etc.)

.....

Reason gift was offered:

.....

3. **Description of gift**

.....

4. **Estimated value of gift:**

.....

Signature of employee:

I confirm that the information provided is true and correct.

.....

Name :

Position :

Date :