



ALTEL HOLDINGS

**ANTI-BRIBERY &  
CORRUPTION POLICY**



## INTRODUCTION

ALTEL Holdings Sdn. Bhd. and its subsidiaries (hereinafter referred to as “ALTEL or “ALTEL Group” or “Group”) are **committed to conduct business dealings with transparency and integrity by practicing zero tolerance approach against all forms of bribery and corruption.** ALTEL Holdings Sdn. Bhd. and its subsidiaries is committed to act in a professional and fair manner with high integrity in all business dealings and relationships with a wide range of parties, both internal as well as external.

The ALTEL Anti-bribery and Corruption Policy (hereinafter referred to as the “ABC Policy” or “Policy”) establishes the boundaries for interactions with all parties, elaborates upon those principles, provides guidance to its personnel on how to deal with improper solicitation, bribery and other corrupt activities and issues that may arise in the course of business. The scenarios provided within this ABC Policy do not limit its boundaries, which may be extended to cover all circumstances relating to bribery.

## APPLICATION

### ALTEL’S EMPLOYEES AND BOARD OF DIRECTORS

This ABC Policy applies to both ALTEL Board of Directors (Executive and non-executive) and its personnel (permanent and on contract), regardless of their role or position (“Employees”).

### ALTEL’S BUSINESS ASSOCIATES

This ABC Policy applies to ALTEL’s Business Associates, which include joint venture partners & consortium, vendors, contractors, sub-contractors, consultants, agents, representatives, tenants and other intermediaries who are performing of work or services, for and on-behalf of ALTEL.

### ORGANIZATIONS WITH CONTROLLED INTEREST OF THE GROUP

This ABC Policy is applicable to organizations of which ALTEL Group has the controlling interest.

Engaging in bribery and corruption, is illegal according to both local and international legislations. You must be aware that under the Malaysia Anti-Corruption Commission Act 2009 (MACC Act) if you participate in bribery and corruption, you may be subject to:

1. Imprisonment up to **20 years**; and
2. A **fine** of **not less than ten times the sum or value of the relevant bribe (gratification) or RM1,000,000.00 whichever is higher** (no upper limit).

If any of the provision of this Policy is contrary to the MACC Act, you should comply with the MACC Act. If you perceive that a provision in this ABC Policy is in conflict with the law, you should consult with the Compliance Department.



## OBJECTIVE

The purpose of this ABC Policy is not intended to provide definitive answers to all questions relating to bribery and corruption. Rather, this Policy is intended to **provide ALTEL's Employees the parameters, guidelines and compliance on anti-bribery and corruption in carrying out lawful and ethical behavior in business activities in line with the requirements under the Malaysian laws relating to anti bribery and corruption.**

## COMMITMENT

ALTEL is committed to conduct business dealings with high integrity. This means avoiding practices of bribery and corruption of all forms in the Group's daily operations.

This ABC Policy leverages the values and core principles set out in the ALTEL's Employees Handbook. Full compliance to both the spirit and the letter of this ABC Policy is mandatory and should be maintained using a principle-based approach.

## WHAT IS BRIBERY AND CORRUPTION?

Corruption is the **act of giving or receiving of any gratification or reward in the form of cash or in-kind irrespective of value for performing a task in relation to one's job description.**

The forms of Corruption are as follows:

1. Bribery
2. Embezzlement
3. Collusion/Bid-Rigging
4. Abuse of Power
5. False Claim
6. Disclosure of Confidential Information



## GIFTS, ENTERTAINMENT & CORPORATE HOSPITALITY

### “No Gift” Policy

This Policy prohibits the exchange of gifts directly or indirectly within and outside of the workplace, in the course of their official duties and business dealings which may influence in a decision-making process or put ALTEL in a conflict of interest position.

### Giving Gifts

ALTEL prohibits the giving of gifts and/or use of ALTEL’s resources for purposes that are:

1. illegal or unduly dangerous;
2. indecent or immoral;
3. inconsistent with ALTEL’s commitment to respect and care; and/or
4. intended to improperly influence any person to take action in favour of ALTEL or otherwise.

### Receiving Gifts

If ALTEL Employees or their family members receive any gift outside office premises (e.g. at home) from a Business Associate or other party engaged in business with ALTEL, the Employees must refuse and report the incident to the Compliance Officer.

If there is a conflict of interest situation (e.g bidding is in progress and the company that gave the gift is one of the bidders) then the Head of Department/ Head of Division cannot approve the acceptance of said gift. In this situation, the gift must be politely returned with a note of explanation about the Group’s “No Gift” policy.

## GIFTS, ENTERTAINMENT & CORPORATE HOSPITALITY (cont’d)

### Entertainment and Recreation

ALTEL’s Employee are allowed to offer or accept entertainment and recreation provided there is proper justification and prior approval from the Senior Management.

### Providing Entertainment

ALTEL recognizes that providing modest entertainment is a legitimate way of building business relationships and as such a common practice within the business environment to foster good business relationship with external clients.

ALTEL’s Employee are required to comply with the policies and procedures as stated in the ALTEL’s Employees Handbook, and maintain expenses within the limits of entitlement, when carrying out entertainment activities.

### Receiving Entertainment

ALTEL recognises that the occasional acceptance of a reasonable and modest level of entertainment provided by third parties in the normal course of business is a legitimate way to network and build good business relationships.

It is important for ALTEL’s Employees and Directors to exercise proper care and judgment before accepting entertainment offered or provided by a third party.

### Corporate Hospitality

Corporate hospitality is generally defined as “corporate events or activities organised by an organisation which involves the entertainment of employees and third parties for the benefit of that organisation”. Third parties may include customers, potential customers, contractors, external companies and any other stakeholders with whom a business relationship, whether current, prospective or historic exists.



## CHARITABLE DONATIONS, SPONSORSHIPS & CORPORATE SOCIAL RESPONSIBILITIES

ALTEL requires employees to use good judgment and common sense in assessing the requests. When in doubt, employees should seek further advice from the Compliance Department to determine the authenticity of such requests.

## POLITICAL CONTRIBUTIONS

ALTEL does not make political donations (i.e donations to politicians and political campaigns) and ALTEL's resources should not be used for this purpose.

Under no circumstances, however, will any ALTEL's Employees be Compensated or reimbursed in any way by ALTEL for a personal political contribution.

## MONEY LAUNDERING

Money laundering defines as occurring when the criminal origin or nature of money or assets is hidden in legitimate business dealings or when legitimate funds are used to support criminal activities, including financing terrorism.

ALTEL prohibits practices related to money laundering, including dealing in the proceeds of criminal activities. Compliance Officer shall conduct due diligence on ALTEL's Employees, Business Associates, projects and major business activities, in particular where there is significant exposure to bribery and corruption risk.

## FACILITATION PAYMENTS

ALTEL prohibits any kind of facilitation payments made by its employees and Business Associates.

Facilitation payments are unofficial payments made to secure or expedite an action to any person or entity who are in authority in any dealings such as the issuing of a visa, work permit, customs clearance or installation of a telephone.



## SUPPORT LETTERS

A “support letter” is a directive or decision from highly influential persons, to influence decision-making and request for special privileges to be given to an individual or organization for project award or application.

Issuance of support letters by ALTEL for request for any project awards or applications is not allowed and prohibited.

## RECRUITMENT, PROMOTION & EMPLOYMENT OF RELATIVES

ALTEL recognizes the value of integrity in its Employees and Business Associates. ALTEL recruitment, training, performance evaluation, remuneration, recognition and promotion for all ALTEL’s Employees, including management, shall be designed and updated regularly to recognize integrity.

## BUSINESS ASSOCIATES & THIRD PARTIES

All Business Associates (including external providers such as consultants, advisors, and agents) acting on behalf of ALTEL are required to comply with this ABC Policy, ALTEL’s business code of conduct, and all other policies as it relates to them.

ALTEL shall include clauses in all contracts enabling ALTEL to terminate any contract in which bribery or corruption has been observed. Additional clauses may also be included for Business Associates acting on ALTEL’s behalf where a more than low bribery risk has been identified.

## RESPONSIBILITIES OF ALTEL’S EMPLOYEES

ALTEL’s Employees (including its directors, and directors and employees of its controlled organizations) are required to carry out those responsibilities and obligations relating to ALTEL’s anti-bribery and corruption stance, alongside those already in existence

ALTEL’s Employees are allocated responsibilities to ensure that the Anti-Bribery and Corruption management system requirements are applied and complied with within their department or function. They must ensure that their subordinates holding Exposed Positions attending relevant training.



## CONFLICT OF INTEREST

A conflict of interest arises in a situation where you are or may be in a position to take advantage of your role by using confidential information, assets or intellectual property for the benefit of yourself or a closely related person.

In such situation, ALTEL's Employees are strictly required to make immediate declaration of conflicts of interest should any actual, potential or perceived conflicts arise.

## EMPLOYEES' DECLARATIONS

ALTEL's Employees shall certify in writing that they have read, understood and will abide by this ABC Policy. A copy of this declaration shall be documented and retained by Compliance Department for the duration of the ALTEL's Employees' employment. A sample declaration is available in the Appendix of this ABC Policy.

## WHISTLEBLOWING

ALTEL encourages openness and transparency in its commitment to achieve highest standard of integrity and accountability. Therefore, we strongly encourage reporting (whistleblowing) of any matters related to bribery and corruption including actual non-compliance or suspected cases of bribery and corruption without fear of retaliation or reprisal.

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

## AUDIT AND COMPLIANCE

Regular audits shall be conducted to ensure compliance to this Policy and all applicable laws and regulations relating to anti bribery and corruption. Such audits may be conducted internally by ALTEL or by ALTEL's appointed external party as may be appointed by ALTEL.

ALTEL regards bribery and act of corruption as a serious matter. Penalties and/or other appropriate actions shall be imposed in the event of non-compliance with this ABC Policy. Non-compliance involving ALTEL's Employees may lead to disciplinary action including termination of employment.



## CONTINUOUS IMPROVEMENT

ALTEL is committed to continually improving its policies and procedures relating to anti-bribery and anti-corruption. Compliance department shall from time to time develop effective integrity measures including conducting continuous awareness programme to its Employees and parties related to business dealings of ALTEL. ALTEL will therefore endeavor to develop further integrity measures and certify ALTEL's anti-bribery procedures as adequate where certification is available.

## CONTACT

For more information, please contact the Compliance Department **+603 8313 6988** or send an email to [compliance@altel.my](mailto:compliance@altel.my)

## REFERENCES

1. MS ISO 37001:2016 – Anti-bribery Management Systems
2. National Centre for Governance, Integrity and Anti-Corruption (GIACC) - Guidelines on Adequate Procedures
3. Malaysia Anti-Corruption Commission Act 2009
4. Malaysia Anti-Corruption Commission Amendment Act 2018
5. Whistleblower Protection Act 2010
6. Companies Act 2016
7. Personal Data Protection Act 2010
8. ALTEL's Employees' Handbook

# APPENDIX



## DEFINITIONS

### ABC Policy

ALTEL Group Anti-bribery and Corruption Policy

### Bribery

Bribery is defined as any action, which would be considered as an offence of giving or receiving 'gratification' under 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 in a position of trust within an organisation.

'Gratification' is defined in the MACC Act 2009 to mean the following:

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;
2. any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
3. any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
4. any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
5. any forbearance to demand any money or money's worth or valuable thing;

## DEFINITIONS (cont'd)

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
7. any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).

Bribery may be 'outbound', where someone acting on behalf of ALTEL attempts to influence the actions of someone external, such as a Government official or client decision-maker.

It may also be 'inbound', where an external party is attempting to influence someone within ALTEL such as a decision-maker or someone with access to confidential information.

Bribery and corruption are closely related. However, corruption has a wider remit. See 'Corruption' definition below.

### Business Associate

An external party with whom the organisation has, or plans to establish, some form of business relationship. This primarily include i.e. clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors (ISO 37001 definition).



## DEFINITIONS (*cont'd*)

### Conflict of Interest

When a person's own interests either influence, or have the potential to influence, or are perceived to influence their decision-making in ALTEL. This includes situations where business, financial, family, political or personal interests could interfere with the judgment of persons in carrying out their duties for the organization.

### Controlled organization

An entity where ALTEL has the management control over the organization and has the right to appoint directors and this is normally applicable if ALTEL possesses more than 50% of the share ownership, but it could be where there is an agreement that ALTEL has the right to appoint the management, for example a joint venture where ALTEL is allocated the voting shares.

### Corporate Gift

Something given from one organisation to another, with the appointed representatives of each organisation giving and accepting the gift. Corporate gifts may also be promotional items given out equally to the general public at events, trade shows and exhibitions as a part of building the company's brand. The gifts are given transparently and openly, with the implicit or explicit approval of all parties involved. Corporate gifts normally bear the company name and logo and are of nominal value. Examples of corporate gifts include items such as diaries, table calendars, pens, notepads, plaques, and festive gifts such as hampers, oranges and dates.

## DEFINITIONS (*cont'd*)

### Corruption

For the purpose of this Policy, corruption is defined primarily as any action, which would be considered as an offence of giving or receiving 'gratification' under the MACC Act 2009 ('Bribery' as defined above).

In addition, corruption may also include acts of extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.

### Donation

Charitable contributions made for the purpose of corporate social responsibility.

### Directors

Directors include all independent and non-independent directors, executive and non-executive directors of ALTEL and shall also include alternate or substitute directors.

### Employees

Directors and all individuals directly contracted to ALTEL on an employment basis, including permanent and temporary employees.



## DEFINITIONS (*cont'd*)

### Exposed Position

An Employee's position identified as vulnerable to bribery through a risk assessment. Such positions may include but is not limited to any role involving procurement or contract management; financial approvals; human resource; relations with government officials or government departments; sales; positions where negotiation with an external party is required; or other positions which the company has identified as vulnerable to bribery.

### Personal Gift

Gifts given from one individual to another, with the intention of creating or enhancing a personal relationship. The gifts are given in a private setting, without the knowledge or approval of the company management of one or both parties. Personal gifts may include cash, cash equivalents such as credit cards, bit coin or savings accounts, electronic items, watches, luxury pens, property, vehicles, free fares, shares, interest free loans, lottery tickets, travel facilities, entertainment, services, club memberships, any forms of discount or commission, jewelries, decorations, souvenirs, vouchers or any other valuable items.