



WANG-ZHENG BERHAD

**POLICIES AND PROCEDURES OF
ANTI – CORRUPTION & BRIBERY
(PPACB)**

Summarised version

TITLE	Policies and Procedures of Anti – Corruption & Bribery (PPACB).
VERSION	1.0
APPLICABILITY	Wang-Zheng Berhad (WZB) And All Its Subsidiaries.
APPROVED BY	Board of Directors :
	Managing Director:
APPROVAL DATE	June 2020
EFFECTIVE DATE	June 2020
SCOPE	This Policies and Procedures of Anti – Corruption & Bribery (PPACB) applicable to Wang-Zheng Berhad and across all subsidiaries of WZB, all levels, and all business/support units in WZB.
REGULATORY REQUIREMENTS	<ol style="list-style-type: none"> 1. Malaysian Anti-Corruption Commission Act 2009 2. Malaysian Anti-Corruption Commission (Amendment) Act 2018

CONTENTS

SECTION OF PROCEDURES		Page
	Abbreviations	4
1.	Introduction	5
2.	Policy Statement	5
3.	Applicability	5
4.	Bribery	6
5.	Unacceptable Practices	6
6.	Facilitation Payments and Kickbacks	6
7.	Company Making Donations	7
8.	Dealing with Third Parties	7
9.	Gifts and Entertainment	7
10.	Associates' Responsibilities	8
11.	Record Keeping	8
12.	Raising Concern and Protection for Raising Concern	8
13.	On-Going Training	9
14.	Monitoring and Review	9
15.	Waiver	9
16.	Continuous Improvement	9

**WANG-ZHENG BERHAD (WZB)
AND SUBSIDIARIES**



EFFECTIVE DATE

POLICIES AND PROCEDURES ANTI-CORRUPTION & BRIBERY

June 2020

DETAILS

SECTION OF POLICIES

Abbreviations

Term	Descriptions
Associate(s)	A person that refers to directors, senior managers, officers, employees, consultants, contractors, trainees, agency staff, volunteers, interns, agents, sponsors or any person associated with the Company or any of the branches or subsidiaries where the engagement has a relation in between the commercial organisation and its business associates which shall have the same meaning per MACC Act.
Board of Directors	Means the Board of Directors of Wang-Zheng Berhad , unless specifically stated otherwise.
Committee	The appropriate Committee of the Board of Directors and/or Senior Management.
Company	All individuals working with Wang-Zheng Berhad and its subsidiaries whether at HQ or at any Branch or subsidiaries and affiliates (if any).
MACC	Malaysia Anti-Corruption Commission.
MACC Act	Malaysia Anti-Corruption Commission Act of 2009 (amended in 2018).
PPACB	Policies And Procedures Of Anti - Corruption & Bribery
Third parties	Means any individual or organisation that an associate shall come in contact within the course of work or engagement with the Company and includes existing clients, potential clients, suppliers, distributors, third-party vendors, service providers, agents, advisers, business associates and government / regulatory bodies including their advisors, representatives and officials, politicians and political parties.
Top-level management	The Board of Directors of the Company and subsidiaries Directors/Others, unless specifically stated otherwise.

**WANG-ZHENG BERHAD (WZB)
AND SUBSIDIARIES**

EFFECTIVE DATE

June 2020



POLICIES AND PROCEDURES ANTI-CORRUPTION & BRIBERY

DETAILS

1. Introduction

The Board of Directors of Wang-Zheng Berhad (WZB) And its subsidiaries has established and adopted this **Policies And Procedures Of Anti - Corruption & Bribery (PPACB)**. This policy is established to set out the principles and provide guidance on dealing with improper solicitation, bribery and other corrupt activities that may arise in the executing or undertaking of professional duties, obligations and responsibilities.

This policy is not intended to be exhaustive as it may be expected for additional obligations to be adhered to, and it should be read in conjunction with the Code of Ethics & Conducts, Whistle Blowing Policy and other governance policies which are available on our website at <https://wangzhengberhad.com/>

2. Policy Statement

We are committed to conducting our business with integrity. With such a commitment, we have developed our **(PPACB)** and as our clients and service provider, you must comply with the terms as contained herein for your activities with us.

We take a zero-tolerance approach to bribery and corruption, regardless of the amount involved and at whatever level of the organisation. Clients and service providers shall take all and any measures to prevent corrupt practices in their dealings with us. We are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships.

Clients and service providers are prohibited from engaging in any bribery or bribery attempt which includes but not limited to payments through third parties.

Clients and service providers shall not offer or provide, either directly or indirectly any bribe, gift, reward, consideration, favour or any advantage (material or otherwise) to any of our representatives for the purpose of influencing them to act in contrary of our PPACB or obtain any rewarding treatment with respect of any terms, conditions or price of a contract.

Clients and service providers shall not collude with other parties to compromise or instigate any third party to perform any such actions.

This PPACB aims to set out our responsibilities to comply with the laws against bribery and corruption and to provide guidance on how to identify and deal with issues relating to bribery and corruption.

The period risk assessment shall be undertaken and such assessment shall be documented and periodically reviewed. The Committee shall be updated on a half-yearly basis in accordance with applicable laws and regulations.

3. Applicability

This PPACB is applicable to the Company at all levels and grades, which includes associates and third parties.

**WANG-ZHENG BERHAD (WZB)
AND SUBSIDIARIES**

EFFECTIVE DATE

June 2020



POLICIES AND PROCEDURES ANTI-CORRUPTION & BRIBERY

DETAILS

4. Bribery

Bribery is the corrupt solicitation, acceptance, or transfer of value in exchange for official action. Bribery refers to the offering, giving, soliciting, or receiving of any item of value as a means of influencing the actions of an individual holding a public or legal duty. Bribery constitutes a crime and either the offer or the recipient can be criminally charged. Bribery not only refers to direct payments but also includes the authorizing or permitting an associate or third party to commit any of the acts or take part in any actions identified below.

It includes:-

- i) The offer, promise or receipt of any gift, hospitality, loan, fee, reward or other advantages to induce or reward behaviour which is dishonest, illegal or a breach of trust, duty, good faith or impartiality in the performance of one's functions or activities (whether public or in their employment or connected with the business); or
- ii) The offer or promise of any gift, hospitality, loan, fee, reward, or other advantages to a public official with the intention of influencing/obtaining a business advantage.

5. Unacceptable Practices

It is **NOT** acceptable to:

- i) Give, promise to give, offer a payment, gift or hospitality to secure or award an improper business advantage;
- ii) Give, promise to give, offer a payment, gift or hospitality to a government official, agent or representative to facilitate, expedite or reward any action or procedure;
- iii) Accept payment from a third party knowing or suspecting it is offered with the expectation that it will obtain a business advantage from them;
- iv) Induce another individual or associate to indulge in any prohibited acts;
- v) Give or accept any gift which could be reasonably perceived to be in contravention of this PPACB or applicable laws and regulations; or
- vi) Engage in any activity that may lead to the breach of this PPACB.

6. Facilitation Payments and Kickbacks

The Company prohibits making or accepting any facilitation payments or kickbacks of any kind. Small payments made to secure or expedite a routine action is considered a facilitation payment whilst payments made in return for a business favour or advantage would constitute a kickback.

WANG-ZHENG BERHAD (WZB)
AND SUBSIDIARIES

EFFECTIVE DATE

June 2020



POLICIES AND PROCEDURES ANTI-CORRUPTION & BRIBERY

DETAILS

7. Company Making Donations

The Company may make donations so long as it does not contravene any applicable laws or regulations. All donations are to be approved by the **Company's Committee** and **must be accurately documented**.

8. Dealing with Third Parties

Appropriate **due diligence** to be conducted when dealing **with third parties to avoid** the Company from being exposed to risks of third parties not following **ethical business practices**. The Company takes care of its dealing with third parties and requires all third parties to be ethical and comply with Anti-Bribery Laws. **The Company to have in place adequate procedures to vet third parties** within the specific/**relevant Departments**. Should it become likely during the course of the relationship that a third party is engaging in inappropriate actions, then the **Company's Committee must be contacted for guidance**.

9. Gifts and Entertainment

The Company shall not accept gifts and entertainment if they are likely to be seen to conflict with any duties owed to clients.

Gifts and entertainment should only be given as a purely personal matter and must not be likely to induce the recipient to give anything in return. If the **Company receives any proposal or suggestion** to make **(or indeed receive)** any such payment, it has to be reported immediately to the **Head of Groups / Departments and HR Department**.

Types of entertainment that must be reported and approved before being incurred or received:

- i) Significant travel expenses, particularly foreign travel costs;
- ii) Overnight accommodation;
- iii) Unaccompanied entertainment; and
- iv) Entertainment received on a regular basis from one person or organisation.

The **Head of Departments** must maintain a log of all **approvals** together with copies of the approved **written requests**.

WANG-ZHENG BERHAD (WZB)
AND SUBSIDIARIES

EFFECTIVE DATE

June 2020



POLICIES AND PROCEDURES ANTI-CORRUPTION & BRIBERY

DETAILS

10. Associates (Staff) Responsibilities (VIP)

Associates dealing with the Company must read and understand the requirements under this PPACB and **must at all times adhere to the terms and conditions contained herein.**

Associates are responsible to prevent, detect and report corruption of all those working for us or under our control and to avoid any activity which may lead to, or suggest a breach of any term in this PPACB.

Associates are to immediately notify your reporting **Superior** or to the **Human Resource Department** if you become aware or suspect or have reason to believe that a breach of any term of this PPACB has happened or is likely to take place.

Any associate in breach of this PPACB will face appropriate disciplinary action, which could result in termination for breach. The Company reserves the right to terminate a contractual relationship with other associates should they breach any of the terms of this PPACB.

Each employee of **Wang-Zheng Berhad** must read, be familiar with, and strictly comply with this policy which shall be available on-line and in hard copy via our HR function. Training on all applicable laws and regulations shall be compulsory upon joining the organisation and from time to time by way of refresher and update.

Laws, regulations, and contractual requirements are subject to change, which could require revision to this policy. All personnel to which this policy is applicable shall keep themselves current with any such changes and shall comply with such changes regardless of whether or not the changes have been incorporated into any given version of this policy.

11. Record Keeping

The Company to maintain proper and complete financial records and have in place sufficient internal controls to evidence payments made to or received from third parties.

12. Raising Concern and Protection for Raising Concern

12.1 Raising Concern

Associates are encouraged to raise concerns of potential or current suspicion of malpractices to their immediate superior or in the event of the uncertainty of chain of reporting, to the **Human Resource Department** immediately. Please see **Schedule 1** for the potential risk scenarios as a reference.

**WANG-ZHENG BERHAD (WZB)
AND SUBSIDIARIES**

EFFECTIVE DATE

June 2020



POLICIES AND PROCEDURES ANTI-CORRUPTION & BRIBERY

DETAILS

12.2 Protection for Raising Concern

We take responsibility to ensure we act with integrity and encourage openness and will support anyone who raises a genuine concern in good faith. The Company assures that we are committed to ensuring no unfair or detrimental treatment for reporting in good faith.

13. On-Going Training

Communication/dissemination of this PPACB shall be made available to everyone within the Company. The Company's stand on zero policy toward bribery and corruption should be **communicated** to all and to this end continued on-going training will be conducted. **Adequate training** to be given to **employees and business associates** to ensure their thorough understanding of the Company's anti-corruption and **anti-bribery position**.

14. Monitoring and Review

The **HR Department/PIC** shall monitor the effectiveness and review the implementation of this PPACB. Regular checks on the effectiveness of this PPACB including but not limited to reporting and escalation should be reviewed from time to time and where necessary make the necessary changes to be inclusive. **HR Department/PIC** shall assist in the implementation of this PPACB.

15. Waiver

Any deviation or waiver from this policy must be approved either by the Audit Committee or Board of Directors.

16. Continuous improvement

The company acknowledge to continuously improving its policies and procedures relating to Policies and Procedures of Anti - Corruption & Bribery (PPACB). Therefore, endeavour to develop further integrity/governance measures and attest the company PPACB are as adequate.