



Wang-Zheng Berhad
200301009817 (612237-K)
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23 June 2020

To all our:
Customers, Suppliers, Business Associates and Partners

REF: WANG-ZHENG BERHAD AND ITS SUBSIDIARY'S POLICIES AND PROCEDURES OF ANTI - CORRUPTION & BRIBERY (PPACB).

Reference to the above and enclosed our summary Policies and Procedures of Anti - Corruption & Bribery for your attention. We have a detailed PPACB for all our staff and Associates.

Would appreciate if you could brief the relevant staff (who are in business contact/communication with our staff) on the above PPACB requirement. Further If you are aware any of our employees, agents or other person or body acting on behalf of our Company which contravene our Policy please report to us immediately via email: genmohan@gmail.com

Kindly sign and stamp this notice and return a copy to us for our record.

Yours faithfully,
For Wang-Zheng Berhad

Li Wai Leung
Executive Director

I/we on behalf of our company acknowledge receipt of the above Policies and Procedures of Anti - Corruption & Bribery. I understand the content of this Policy and will communicate it to our respective employees and business associates.

Name:
Designation:
Date:



WANG-ZHENG BERHAD

POLICIES AND PROCEDURES OF ANTI - CORRUPTION & BRIBERY (PPACB)


TITLE	Policies and Procedures of Anti – Corruption & Bribery (PPCAB)
VERSION	1.0
APPLICABILITY	Wang-Zheng Berhad (WZB) And All Its Subsidiaries.
APPROVED BY	Board of Directors :
	Managing Director:
APPROVAL DATE	17 th June 2020
EFFECTIVE DATE	17 th June 2020
SCOPE	This Policies and Procedures of Anti – Corruption & Bribery 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


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<p>WANG-ZHENG BERHAD (WZB) AND SUBSIDIARIES</p> <p>EFFECTIVE DATE</p> <p>17/06/2020</p>	<p>POLICIES AND PROCEDURES</p> <p>ANTI-CORRUPTION & BRIBERY</p>	 <p>皇城集团 WANG-ZHENG BERHAD 200301009817 (612237-K)</p>																				
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<p>WANG-ZHENG BERHAD (WZB) AND SUBSIDIARIES</p> <p>EFFECTIVE DATE</p> <p>17/06/2020</p>	<p>POLICIES AND PROCEDURES</p> <p>ANTI-CORRUPTION & BRIBERY</p>	 <p>皇城集团 WANG-ZHENG BERHAD 200301009817 (612237-K)</p>
<p>DETAILS</p>		<p>RESPONSIBILITY</p>
<p>1. Introduction</p> <p>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.</p> <p>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/</p> <p>2. Policy Statement</p> <p>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.</p> <p>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.</p> <p>Clients and service providers are prohibited from engaging in any bribery or bribery attempt which includes but not limited to payments through third parties.</p> <p>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.</p> <p>Clients and service providers shall not collude with other parties to compromise or instigate any third party to perform any such actions.</p> <p>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.</p> <p>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.</p> <p>3. Applicability</p> <p>This PPACB is applicable to the Company at all levels and grades, which includes associates and third parties.</p>		<p>All Directors And Staff</p>


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DETAILS		RESPONSIBILITY
<p>4. Bribery</p> <p>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.</p> <p>It includes:-</p> <ul style="list-style-type: none"> 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. <p>5. Unacceptable Practices</p> <p>It is NOT acceptable to:</p> <ul style="list-style-type: none"> 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. <p>6. Facilitation Payments and Kickbacks</p> <p>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.</p>		


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<p>DETAILS</p>		<p>RESPONSIBILITY</p>
<p>7. Company Making Donations</p> <p>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.</p> <p>8. Dealing with Third Parties</p> <p>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.</p> <p>9. Gifts and Entertainment</p> <p>The Company shall not accept gifts and entertainment if they are likely to be seen to conflict with any duties owed to clients.</p> <p>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.</p> <p>Types of entertainment that must be reported and approved before being incurred or received:</p> <ul style="list-style-type: none"> 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. <p>The Head of Departments must maintain a log of all approvals together with copies of the approved written requests.</p>		


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<p>DETAILS</p>		<p>RESPONSIBILITY</p>
<p>10. Associates (Staff) Responsibilities (VIP)</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>11. Record Keeping</p> <p>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.</p> <p>12. Raising Concern and Protection for Raising Concern</p> <p>12.1 Raising Concern</p> <p>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.</p>		


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<p>12.2 Protection for Raising Concern</p> <p>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.</p> <p>13. On-Going Training</p> <p>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.</p> <p>14. Monitoring and Review</p> <p>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.</p> <p>15. Stakeholder of Policies & Procedures and Prevailing Law</p> <p>15.1 Stakeholder</p> <p>The Board of Directors shall be overall responsible to ensure the PPACB is adequate and effective and is in line with prevailing rules and regulations i.e. the MACC Act.</p> <p>15.2 Prevailing Law on MACC Act (Act 694) :</p> <ol style="list-style-type: none"> 1. Soliciting/Receiving Gratification (Bribe) [section 16 & 17(a) MACC Act 2009]. 2. Offering/Giving Gratification (Bribe) [section 17(b) MACC Act 2009]. 3. Intending to Deceive (False Claim) [Section 18 MACC Act 2009]. 4. Using Office or Position for Gratification (Bribe) (Abuse of Power/Position) [Section 23 MACC Act 2009]. 		


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<p>DETAILS</p>		<p>RESPONSIBILITY</p>
<p>Board of Directors are also to ensure that the Company has in place Adequate Procedures pursuant to the MACC Guidelines on Adequate Procedures (T.R.U.S.T) which encompass the following:-</p> <ul style="list-style-type: none"> (i) Top-Level Commitment; (ii) Risk Assessment; (iii) Undertake Control Measures; (iv) Systematic Review, Monitoring & Enforcement; and (v) Training & Communication <p>16. Corporate Social Responsibility (CSR)</p> <p>As part of our commitment to corporate social responsibility and sustainable development, as a general matter, Wang-Zheng Berhad provides such assistance in appropriate circumstances and in an appropriate manner. However, such requests must be carefully examined for legitimacy and not be made to improperly influence a business outcome.</p> <p>The proposed recipient must be a legitimate organisation and appropriate due diligence must be conducted in particular to ascertain whether any Public Officials are affiliated with the organisation.</p> <p>Any red flags must be resolved before committing any funds to the program. Even requests determined to be legitimate must be carefully structured to ensure that the benefits reach their intended recipients. If you are in any doubt as to whether a charitable contribution or social benefit is appropriate, consult your HR Department/Legal Advice for assistance.</p> <p>17. Political Contributions</p> <p>Wang-Zheng Berhad may, in very limited circumstances, make political contributions in countries where such contributions are permitted under the law. The authority to approve such political contributions is with the Group MD/CEO or the respective Board of Directors.</p> <p>If any contribution is made, it must be permissible under applicable laws and must not be made with any promise or expectation of favourable treatment in return and must be accurately reflected in Wang-Zheng Berhad's books and records.</p> <p>Good faith payments to a government entity such as payments to the host country's federal treasury required by contract or law are not prohibited, so long as they are made with due care to the government entity and not to any individual official.</p> <p>The Company encourages employees to participate in the political election process by voting. Employees may choose to make personal political contributions as appropriate within the limits established by law. Under no circumstances, however, will any employee be compensated or reimbursed in any way by the Company for a personal political contribution.</p>		


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<p>18. Money Laundering</p> <p>Money laundering 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.</p> <p>Wang-Zheng Berhad strongly objects to practices related to money laundering, including dealing in the proceeds of criminal activities.</p> <p>Money laundering is a very serious crime and the laws governing this type of crime can have an extraterritorial effect, i.e. the application of the law is extended beyond local borders. The penalties for breaching anti-money laundering legislation are severe and can include extradition and incarceration in foreign jurisdictions.</p> <p>To avoid violating anti-money laundering laws, employees are expected to always conduct counterparty due diligence to understand the business and background of Wang-Zheng Berhad prospective business counterparties and to determine the origin and destination of money, property, and services.</p> <p>Counterparty means any party that Wang-Zheng Berhad is currently in a relationship with or intends to do business with in the future, either on a regular or once-off basis. Counterparties include but are not limited to customers, contractors, suppliers, consultants, agents, JV partners, and any other business partners.</p> <p>A number of initiatives can be taken to strengthen anti-money laundering governance, they include the following:-</p> <ul style="list-style-type: none"> • Adequate training and compliance programs should be conducted to ensure understanding and strict compliance with any internal anti-money laundering policies. • Employees frequently involved in the decision-making process concerning counterparties particularly in matters on financial transactions should be properly acquainted with the applicable laws and regulations related to money laundering. • Employees should be attentive to and report suspicious behaviour by customers, consultants, and business partners using proper reporting channels, in-house experts on anti-money laundering should always be consulted. • Convoluted payment arrangements such as payment in cash, payment to a third party, or to accounts in other countries or requests for upfront payment for expenses or other fees. • Periodic audits should be conducted and a process should be developed to follow all available accounting, record-keeping, and financial reporting requirements applicable to cash and payments in connection with other transactions and contracts. 		


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	<p>DETAILS</p>	<p>RESPONSIBILITY</p>
<p>19. Recruitment Of Employees</p> <p>Wang-Zheng Berhad, being a diversified business entity, provides equal opportunity for any qualified and competent individual to be employed by the company from the various multicultural and multiracial background. The recruitment of employees should be based on approved selection criteria to ensure that only the most qualified and suitable individuals are employed. This is crucial to ensure that no element of corruption is involved in the hiring of employees.</p> <p>Integrity is the practice of being honest and showing consistent and uncompromising adherence to strong moral and ethical principles and values.</p> <p>In line with this, proper background checks should be conducted in order to ensure that the potential employee has not been convicted in any bribery or corruption cases nationally or internationally. More detailed background checks should be taken when hiring employees that would be responsible for management positions, as they would be tasked with decision-making obligations.</p> <p>If you find or suspect that another person subject to this policy has violated or about to violate this policy or applicable law, whether deliberately or inadvertently, you must forthwith report the same, in writing, to your Head of Department or your Human Resource Department.</p> <p>Both bribery and corruption are punishable offenses under the MACC Act 2009 (Amendment Act 2018).</p> <p>There are four (4) main offenses prescribed by the MACC Act 2009 (Amendment Act 2018):</p> <ul style="list-style-type: none"> • Soliciting/ Receiving Gratification (Bribe) as per section 16 & 17(a); • Offering/ Giving Gratification (Bribe) as per section 17(b); • Intending to Deceive (False Claim) as per section 18; and • Using Office or Position for Gratification (Bribe) as per section 23. <p>Failure to report on the above could lead to regulatory reprimand and fine as prescribed under the MACC Act 2009 (Amendment Act 2018).</p> <p>20. Financial & Non-Financial Controls</p> <p>Separation of Duties and Approving Powers</p> <p>Wang-Zheng Berhad adopts a clear separation of duties for all job functions either it is financially or non-financially related.</p>		


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	<p>DETAILS</p>	<p>RESPONSIBILITY</p>
<p>For jobs related to non-financial activities, there must be at least two-layers of checking i.e. maker and checker. Nonetheless, in most circumstances, the non-financial job functions will have three layers of checking.</p> <p>For jobs related to financial activities, Wang-Zheng Berhad had since adopted four-layers of checking which shall comprise of the maker, checker, and approver/ internal audit verification.</p> <p>Further, for financial activities (such as disbursement and payment activities), Wang-Zheng Berhad strictly adopts multiple signatories to further mitigate any corruption risk.</p> <p>21. Corruption Risk Management (CRM)</p> <p>CRM is a management process that helps to identify structural weaknesses that may facilitate corruption, provides a framework for all staff to take part in identifying risk factors and treatments, and embeds corruption prevention within a well-established governance framework.</p> <p>All organisations are exposed to corruption risks. Corruption risks may exist at all levels of management, in all functions and activities, and potentially involve internal and external stakeholders.</p> <p>CRM serves as an important pillar in corruption prevention initiatives. Effective CRM requires commitment from Wang-Zheng Berhad's leadership/ employees in building a sound risk culture based on integrity and honesty, clarity in the expression of corporate values, and a comprehensive policy framework.</p> <p>22. Waiver</p> <p>Any deviation or waiver from this policy must be approved either by the Audit Committee or Board of Directors.</p> <p>23. Continuous improvement</p> <p>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.</p>		


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<p style="text-align: center;">SECTION OF PROCEDURES</p> <p>Adequate Procedures [T.R.U.S.T] The Adequate Procedures are established in accordance with the MACC guidelines on adequate procedures. The following are the Adequate Procedures on T.R.U.S.T.</p> <p>1. Top-Level Commitment</p> <p>1.1 The top-level management is primarily responsible for ensuring that the Company:</p> <table border="1" data-bbox="136 886 1208 1661"> <thead> <tr> <th data-bbox="136 886 578 999">Requirements per MACC guidelines on adequate procedures</th> <th data-bbox="578 886 1208 999">Company Practices</th> </tr> </thead> <tbody> <tr> <td data-bbox="136 999 578 1182">(i) Practices the highest level of integrity and ethics.</td> <td data-bbox="578 999 1208 1182">The top-level management will be practiced a sound anti-corruption and anti-bribery practices at the Company's level, to give confidence to the shareholders, and build a greater investors relationship for the Company.</td> </tr> <tr> <td data-bbox="136 1182 578 1514">(ii) Complies fully with the applicable laws and regulatory requirements on anti-corruption.</td> <td data-bbox="578 1182 1208 1514">The top-level management will take responsibility at his/her best knowledge to comply with the applicable laws and regulatory requirements on anti-corruption. Any gap(s) in the knowledge to comply with the anti-corruption's laws and regulations, internal Legal Personnel or assigned advocates & solicitors will be acted as a central person for reference.</td> </tr> <tr> <td data-bbox="136 1514 578 1661">(iii) Effectively manages the key corruption risks of the Company.</td> <td data-bbox="578 1514 1208 1661">Any corruption risk(s) identified the top-level management will make the decision for an action taken accordingly.</td> </tr> </tbody> </table>			Requirements per MACC guidelines on adequate procedures	Company Practices	(i) Practices the highest level of integrity and ethics.	The top-level management will be practiced a sound anti-corruption and anti-bribery practices at the Company's level, to give confidence to the shareholders, and build a greater investors relationship for the Company.	(ii) Complies fully with the applicable laws and regulatory requirements on anti-corruption.	The top-level management will take responsibility at his/her best knowledge to comply with the applicable laws and regulatory requirements on anti-corruption. Any gap(s) in the knowledge to comply with the anti-corruption's laws and regulations, internal Legal Personnel or assigned advocates & solicitors will be acted as a central person for reference.	(iii) Effectively manages the key corruption risks of the Company.	Any corruption risk(s) identified the top-level management will make the decision for an action taken accordingly.
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WANG-ZHENG BERHAD (WZB) AND SUBSIDIARIES EFFECTIVE DATE 17/06/2020	POLICIES AND PROCEDURES ANTI-CORRUPTION & BRIBERY	
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DETAILS	RESPONSIBILITY
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3.4 This PPACB should be:

Requirements per MACC guidelines on adequate procedures	Company Practices
(i) Endorsed by top-level management.	<p>This PPACB will be submitted for Board Resolution prior to formalization.</p> <p>Any updates or amendments to this PPACB will also be submitted for Board Resolution prior to enforcement.</p>
(ii) Kept up-to-date.	<p>This PPACB will be updated:</p> <ul style="list-style-type: none"> (i) Once in 2 years, or (ii) To be updated when there are substantial changes from any relevant laws and regulations on anti-corruption, subject to the review period of not more than 2 years; or (iii) To be updated at a more frequent basis (e.g. annual review / etc.) upon request by top-level management; or <p>There's a requirement by the relevant authority (e.g. Bursa on LR / etc.) which requires reviewing this PPACB on a more frequent basis (e.g. annual review / etc.).</p>
(iii) Publicly and/or easily available	<p>This PPACB is publicly and easily available by access to the internet and go to the official website of Wang-Zheng Berhad.</p>
(IV) Suitable for use where and when needed.	<p>This PPACB are interpreted in basic English language, to make it applicable and suitable for use by all level of staff.</p> <p>All staff is able to go to the official website of Wang-Zheng Berhad and read this PPACB for better understanding when needed.</p>

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4. Systematic Review, Monitoring & Enforcement


4.1 The assigned personnel who perform the review (the “reviewer”) should:

Requirements per MACC guidelines on adequate procedures	Company Practices
Ensure that regular reviews are conducted to assess the performance, efficiency, and effectiveness of the anti-corruption program.	The reviewer is to perform a regular review per their respective reviewer’s plan.
Ensure the program is enforced.	During the review, the reviewer is to review and to ensure the anti-corruption program is enforced. Any anti-corruption program not properly enforced, the reviewer is to raise the concern to the Board of Directors or Risk Management Committee , for their decision to give instruction to the senior management on action taken , to ensure the necessary anti-corruption program is enforced per relevant laws and regulations on anti-corruption & bribery.
Reviews may take the form of an internal audit, or an audit carried out by an external party.	Internal Audit, or assigned External Audit, or any other assigned personnel as decided and appointed by the Board of Directors (the “reviewer”), will carry out the reviews on the anti-corruption per their scheduled plan.
The reviews should form the basis of any efforts to improve the existing anti-corruption controls in place in the Company.	From the review, the reviewer is to raise the concerns (if any) to the Committee for action taken, to improve the existing anti-corruption controls accordingly.

4.2 The Company should consider to:

Requirements per MACC guidelines on adequate procedures	Company Practices
(i) Plan, establish, implement, and maintain a monitoring program, which covers the scope, frequency, and methods for review.	The planning, establishment, implementation, and maintenance of a monitoring program that covers the scope, frequency, and methods of the review will be based on the schedule per top-level management or Internal Audit or assigned External Audit’s plan .

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<p>DETAILS</p>		<p>RESPONSIBILITY</p>
<p>5. Training & Communication</p> <p>Per MACC guidelines on adequate procedures, the training, and communication on anti-corruption and bribery will cover 4 areas as below:</p> <ol style="list-style-type: none"> 1. Policy 2. Training 3. Reporting Channel 4. Consequences of Non-Compliance <p>5.1 Policy</p> <p>The policy herein refers to this PPACB. This PPACB is publicly available at the Company website, by access to the internet and go to the official website of Wang-Zheng Berhad. The communication of policies is appropriately communicated, by way of access to the Company website and read the PPACB by the associates and third parties. The other ways of communication of policies which may be practiced by the Company are as follows:</p> <ul style="list-style-type: none"> • An e-mail to the associates or a notice on the Company premises. • Circulation of Code of Conduct on anti-corruption & bribery which has been enforced to employees for compulsory reading. After which employees are to sign a declaration that they have read and understood the Code of Conduct & will at all times abide by it. <p>5.2 Training</p> <p>Training on anti-corruption and bribery are given to the company's directors and employees in one (1) of the following manner:</p> <ul style="list-style-type: none"> • Course or seminar organised internally or by external training provider; or • Self-directed learning via circulation of reading materials from regulators. Reading materials are to be circulated via e-mail to the directors and employees for reading; or • Video show on Anti-Corruption and Bribery Awareness. <p>Other ways of training which may be observed by the Company as below:</p> <ul style="list-style-type: none"> • An induction program featuring anti-corruption elements. • A role-specific training, which is tailored to corruption risks the position is exposed to. • Corporate training programs, seminars, videos, and in-house courses. • An intranet or web-based programs. • Retreats. • An out-reach programs. 		

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5.3 Reporting Channel

Any reports on anti-corruption and bribery will be reported via whistleblowing channels per Company's Whistleblowing Policies and Procedures. Below is the summary:

Criteria	Company Practices
The key point should be communicated	To provide the following: <ul style="list-style-type: none"> • The person involves (by given his/her name & designation). • Matters that relate to (e.g. few quotations but select a vendor with higher price/business interest / etc.). • The amount involves in MYR (an estimated amount to be involved).
Whom should be communicated	Communicated to the designated personnel per Whistleblowing Policies & Procedures.
How to communicate	Via e-mail to the designated personnel per Whistleblowing Policies & Procedures.
Time-frame for conducting the communication plan	As soon as practical not more than five (5) business days, subject to any unforeseen circumstance which may occur (if any).
Language of the material to be communicated	English.

5.4 Consequences of Non-Compliance

Training or communication to alert Directors and employees on the consequences of non-compliance will be appropriately delivered per 5.1 or 5.2 above, that any non-compliance to MACC Act, will subject to the penalties by MACC per following:

- A fine not less than 10 times of the sum or value of the gratification or RM 1 million whichever is higher; or
- To imprisonment for a term not exceeding 20 years; or
- Both of the above.

Staff Declaration Form

I, _____, hereby declare that I have read and understood **Wang-Zheng Berhad's / Subsidiaries'** Policies and Procedures of Anti – Corruption & Bribery (“said Policy and Procedures”) and the responsibilities required of me in relation to the said Policy and Procedures.

I will abide by the requirements and provisions set out in the said Policy and Procedures which shall be read together and forms part of my employment contract with **Wang-Zheng Berhad/Subsidiaries**.

I agree to comply with the following:

- a) Complied with all applicable laws, regulations, and sanctions relating to anti-bribery and anti-corruption including but not limited to the Malaysian Anti-Corruption Commission Act 2009 (“Act”) or any equivalent laws which I am/ it is subject to;
- b) Not engaged in any activity, practice, or conduct which would constitute an offence under the Act or equivalent laws;
- c) Taken a zero-tolerance approach to bribery and corruption and observed the highest ethical standards in my activities/ its own business activities and agree that neither I/ it nor any associated person have/ has offered, promised or accepted any payment or gift to or from any person (directly or indirectly) for the purpose of influencing a decision; and
- d) Maintained and complied with relevant policies and procedures designed to promote and achieve compliance with applicable anti-corruption laws.

I understand that if I am party to any breach of the said policy and procedures during the term of my employment, then it could be regarded as major misconduct which may result in disciplinary action, up to and including dismissal against me.

.....
Name :
NRIC :
Designation :

Gifts, Entertainment and Corporate Hospitality 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 RM200 or more), entertainment, and corporate hospitality within three (3) working days upon receiving the same to Chief Accountant (CA). Similarly, any meal treats (any value) accepted must also be declared in this form. The physical gifts valued at RM200 or more must be deposited to CA within three (3) working days upon receipt of the same. CA will seek the MD/CEO's direction on the best way to dispose of the gift. For gifts worth less than RM200, staff could accept the same with no declaration is required. As for hampers (any value), no declaration is required but the staff must share the hampers amongst colleagues/ placed at the pantry or common areas.

All declarations (with or without any gift, including entertainment and corporate hospitality) must be submitted to CA on a quarterly basis by the 5th of the following month and signed by the staff and CA. For instance, a Q1 declaration must be submitted to CA.

Employee Name	:							
Position	:							
Department	:							
Declaration Period ("x" the relevant box)	:	Q1	Q2	Q3	Q4	Year	:	

A. Without any gifts, meal, entertainment and corporate hospitality to declare

I confirm that to the best of my knowledge, there are no gifts, meals, entertainment, and/or corporate hospitality items that I need to declare for this quarter.	:	Staff Signature:
		Date:

B. With gifts, meal, entertainment, and corporate hospitality to declare

Item Received/Meal Date	Description of Item/Meal (for meals please include venue)	Estimated/ Actual Value (RM)	Given by (giver name and organisation)	Remarks
1.				
2.				

Please add rows as necessary

<p>I confirm that to the best of my knowledge, there are no gifts, meals, entertainment, and/or corporate hospitality items that I need to declare for this quarter.</p>	:	<p>Staff Signature:</p> <p>Date:</p>
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Administrative			
HOD's Remarks:	:		Name : Signature : Date:
CA's Remarks	:		Name : Signature : Date:
MD/CEO's Remarks	:		Name : Signature : Date:

Third-Party Declaration Form

第三方声明表

1. We are the contractors/ vendors/ suppliers/ solicitors/ agents/ consultants/ joint venture partners/ introducers/ government intermediaries of **Wang-Zheng Berhad/Subsidiaries**. 我们是皇城集团/子公司的承包商/供应商/供应商/律师/代理商/顾问/合资伙伴/介绍人/政府中介机构。

2. We hereby declare that we will comply with:

我们特此声明我们将遵守：

(i) All applicable laws and regulations relating to **Wang-Zheng Berhad/Subsidiaries's** Code of Conduct Policy, Anti-Fraud Policy, Integrity, and Anti-Corruption Policy & SOP, and Whistleblowing Policy & Procedures.

与皇城集团/子公司的《行为准则》政策，反欺诈政策，廉正和反腐败政策和SOP以及举报政策和程序有关的所有适用法律和法规。

(ii) The following anti-corruption principles: 以下是反腐败原则：

a) Committing to promote values of integrity, transparency, accountability, and good corporate governance.

致力于促进诚信，透明，问责制和良好公司治理的价值观。

b) Prevention of corruption and fighting any form of corrupt practice.

防止腐败并打击任何形式的腐败行为。

c) Supporting anti-corruption initiatives led by the government and the authorities.

支持由政府 and 当局领导的反腐败举措。

(Hereinafter collectively referred to as “the requirements”)

(以下统称为“要求”)

3. We have not been convicted nor are we subject to any investigation, inquiry, or enforcement proceedings by the relevant authorities of any actual or suspected breach and will report any actual or suspected breach as soon as reasonably practicable and to the extent permitted by the law, to **Wang-Zheng Berhad/Subsidiaries**.

我们没有被定罪，也没有受到有关当局对任何实际或怀疑的违反的调查，询问或执行程序，并且将在合理可行的范围内并在法律允许的范围内尽快报告任何实际或怀疑的违反，至皇城集团/子公司。

4. We undertake to promptly inform **Wang-Zheng Berhad/Subsidiaries** of any breach and/or alleged/ suspected breach of the requirements and cooperate with **Wang-Zheng Berhad/Subsidiaries** in any investigation of such breach involving Wang-Zheng Berhad's staff.

对于任何违反和/或涉嫌/怀疑违反要求的行为，我们承诺立即通知皇城集团/子公司，并与皇城集团合作对涉及皇城集团员工的任何此类违法行为进行调查。

5. We acknowledge that the provisions set out in this declaration form shall form part of the terms and conditions of our appointment and/ or contract of service.

我们承认，此声明表格中规定的条款应构成我们任命和/或服务合同的条款和条件的一部分

。

6. We further acknowledge that **Wang-Zheng Berhad/Subsidiaries** has the right to suspend or terminate the contract/ agreement/ job and disqualify us from tendering for future contracts/ jobs if we were found to have breached the requirements or any other terms and conditions implemented by **Wang-Zheng Berhad/Subsidiaries** pursuant to the contract/ agreement/ job.

我们进一步承认，如果发现我们违反了皇城集团/子公司的要求或执行的任何其他条款和条件，皇城集团/子公司有权中止或终止合同/协议/工作，并取消我们对未来合同/工作的招标资格。皇城集团根据合同/协议/工作。

Signature of Authorized Person :
授权人签名

Name of Company's Authorized Person :
公司授权人姓名

Company's Name 公司名称 :

Company's Stamp 公司印章 :

Date 日期 :

