



Tune Protect Group Berhad

(Registration No.: 201101020320 (948454-K))

Group Anti-Bribery and Corruption Policy

TABLE OF CONTENTS

<u>No.</u>	<u>Subject</u>	<u>Page</u>
1.0	Purpose.....	3
2.0	Scope.....	3
3.0	Definition.....	4
4.0	Responsibilities.....	5
5.0	Policy Statement.....	7
5.1	Prevent.....	7
5.2	Detect.....	7
5.3	Monitor.....	8
5.4	Respond.....	8
6.0	Bribery.....	8
7.0	Corrupt Conduct.....	8
8.0	Money Laundering.....	9
9.0	Fraud.....	9
10.0	Abuse of Power.....	9
11.0	Gifts & Prizes.....	10
12.0	Hospitality & Entertainment.....	13
13.0	Donation & Sponsorships.....	15
14.0	Political Contribution.....	16
15.0	Facilitation Payment and/or Extortion Payment	17
16.0	Third Parties.....	17
17.0	Whistleblowing/Reporting of Incidents.....	17
18.0	Investigation of Complaints and incidents.....	17
19.0	Associated documents.....	18
	Appendix.....	19

1.0 Purpose

- i. Tune Protect Group has put in place an Anti-Bribery and Corruption System ("**ABCS**") to consolidate and manage policies, objectives and processes in relation to bribery and corruption risks in the Tune Protect Group.
- ii. This policy outlines Tune Protect Group's commitment and framework against bribery, corruption fraud, money laundering and abuse of power. The policy is aimed at achieving the following objectives:
 - Ensuring that directors and management are aware of their responsibilities in relation to detection and prevention of bribery, corruption, fraud, money laundering and abuse of power, including establishing controls to detect and prevent the same.
 - Promoting **ZERO TOLERANCE AGAINST BRIBERY & CORRUPTION**, fraud, money laundering, abuse of power and a culture of integrity by providing clear guidelines to directors, employees and business partners, forbidding them from engaging in any bribery and corruption/fraudulent activity as well as establishing actions which will be taken if such actions are brought to their attention.
 - Providing assurance that all suspected bribery, corruption, fraud, money laundering and abuse of power activity will be fully investigated and without any repercussions to any person reporting such activity in good faith.

2.0 Scope

- i. This Policy applies to all directors, personnel and other third parties/stakeholders of the Tune Protect Group, consisting of the Tune Protect Group Berhad, Tune Insurance Malaysia Berhad, Tune Protect Re Limited, White Label Sdn. Bhd., Tune Protect Ventures Sdn. Bhd., Tune Protect Thailand and Tune Protect EMEA (collectively referred to as the "**Tune Protect Group**") and third parties dealing with the Tune Protect Group and should be used if you have a concern (perceived and/or actual) about serious misconduct or malpractice including in addition to bribery, corruption, fraud, money laundering and abuse of power within Tune Protect Group in the following areas:
 - Improprieties in matters of financial reporting (e.g., falsification or destruction of business / financial records; misrepresentation/suppression of financial information; non-adherence to internal financial reporting policy/controls including management overrides; and auditor independence concerns).
 - Suspected fraudulent activity (e.g., theft; defalcation; unlawful or improper payments).
 - Conduct or activity that breaches any of the following:
 - a. Tune Protect Group Anti-Bribery & Corruption Policy
 - b. Tune Protect Group Sustainability Policy
 - c. Tune Protect Group Whistleblowing Policy
 - d. Tune Protect Code of Conduct & the List of Misconduct
 - e. Tune Protect Code of Business Conduct for 3rd Parties
 - f. Malaysian Anti-Corruption Commission Act 2009
 - g. Whistleblowers Protection Act 2010 (Act 711)

- h. Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Act 2001 (AMLATFPUAA)
 - i. United Nations Convention Against Corruption Provisions
 - j. All other applicable laws in Malaysia, Thailand, United Arab Emirates and other relevant jurisdictions that apply.
- Breach of the company's policies, procedures, practices or other rules of conduct (e.g., corrupt practice of giving or receiving bribes or improper benefits; abuse of authority; breach of client's confidentiality or privacy; conflict of interest concerns; other violations of governing laws and regulations; and non-adherence to internal compliance policies).
 - Deliberate concealment of information tending to show the malpractice or misconduct in any of the above.
 - Retaliation or reprisal against an employee/third party who reports a concern (e.g., statements, conduct or actions involving discharging, demoting, suspending, harassing or discriminating against an individual reporting a concern in good faith in accordance with the Guidelines).

The scope of the Guidelines does not include grievances or complaints in relation to normal work-related issues for which specific procedures have been established.

3.0 Definition

Abbreviation	Meaning
Code of Conduct	Tune Protect Group's Code of Conduct Manual/Handbook.
Personnel	Anyone engaged by or associated with Tune Protect Group and includes all permanent, consultants, or contract staff (whether full-time or part-time).
Delegated Officer	An officer delegated with the authority to approve on behalf of CEO.
3 rd Parties/Stakeholder	Agents, vendors, customers, interns, contractors, investors, suppliers, shareholders and other business partners which have direct or indirect business dealings with the company.
Whistleblowing	The deliberate, voluntary disclosure or reporting of an individual or organizational malpractice made in good faith by any person (who has privileged access to information) on an actual (past or present) or suspected improper conduct within the Group or organisation based on his or her reasonable belief.
Whistle-Blower	Person who reports/alerts the serious concerns of improper conduct.
Improper Conduct	Any unethical behaviour, malpractices, illegal acts or any other wrongful or improper conduct within Tune Protect Group which if proved, constitutes a disciplinary offence or a criminal offence. This includes, without limitation, any actual, attempted, or suspected bribery or corruption or non-compliance with this Group ABC policy, all other policies and legal instruments specified in 2.0 above.

4.0 Responsibilities

4.1 The governance in managing fraud, bribery and corruption risks in the Tune Protect Group is structured along the following oversight roles:

Party	Responsibilities
i. Board/Audit Committee	<ul style="list-style-type: none"> ➤ Ensure sound and prudent oversight of fraud, bribery and corruption risks (as part of overall risk management oversight). ➤ Ensure adequate resources, expertise and support to effectively implement fraud, bribery and corruption policies and procedures. ➤ Review and assess, through the Internal Audit/Audit Committee, the adequacy and effectiveness of risk management controls concerning fraud, bribery and corruption risks.
ii. Risk Management Committee	<ul style="list-style-type: none"> ➤ Conduct periodic corruption risk assessments or when there is a change in law or circumstance in business. ➤ Identify, analyse, assess and prioritise internal and external fraud, bribery and corruption risks as part of the enterprise risks management process. ➤ Review and assess the adequacy of risks management policies, processes, systems and controls pertaining to fraud, bribery and corruption to mitigate such risks. ➤ Approve the fraud, bribery and corruption risks management strategy.
iii. Executive Committee (ExCom)	<ul style="list-style-type: none"> ➤ Develop and maintain effective internal controls within respective areas of responsibilities to prevent bribery and corruption/fraud and to ensure that if bribery and corruption/fraud does occur, it will be detected promptly. ➤ Undertake necessary due diligence before engaging in any business relationship with third parties. ➤ Be vigilant of the types and areas susceptible to fraud, bribery and corrupt conduct and red flags that might occur within respective areas of responsibilities; including in planning new initiatives or when there are major changes to the operating environment. ➤ Report any incident of suspected bribery and corruption/fraud or anonymously via Tune Protect Group's whistleblowing channel. ➤ Ensure that this Policy and the other corporate policies of the Tune Protect Group are communicated and understood by all employees under their responsibility.

4.2 The accountability and responsibility for management of fraud, bribery and corruption risks are reinforced by the following structure:

Party		Responsibilities
First Line of Defense		
i. Business Units/Operating Companies		<ul style="list-style-type: none"> ➤ Shared responsibility between all parties to promote and enforce ZERO TOLERANCE AGAINST BRIBERY & CORRUPTION. ➤ Be familiar with this Policy, and respective roles and responsibilities pertaining to the ABCS framework and be aware of the areas susceptible to fraud, bribery and corruption. ➤ Adhere to all Tune Protect Group's policies and internal control procedures. ➤ Ensure that all transactions, payments and receipts are properly documented and recorded, with sufficient detail so that a clear, accurate, transparent and complete paper trail is established for the review by internal/external auditors and senior management. ➤ Ensure that the operations of internal controls provide reasonable assurance that: <ul style="list-style-type: none"> • Transactions are executed in accordance with management's general or specific authorization / approval (including any authorization matrix as approved by senior management and/or the Board); • Transactions are properly recorded (a) to permit the preparation of true and fair financial statements in conformity with generally accepted accounting principles and the Tune Protect Group's financial and accounting policies, and (b) to provide accountability for the Tune Protect Group's assets; and • Access to the Tune Protect Group's assets is permitted only in accordance with management's general or specific authorization. ➤ Report suspicions of bribery and corruption/fraud and cooperate in investigations.
Second Line of Defense		
ii. Integrity/Compliance/Risk Management		<p>Integrity Lead owns/champions this policy and collaborates with Compliance and Risk Management on the following:</p> <ul style="list-style-type: none"> ➤ Assist business units in identifying bribery and corruption/fraud related risk, indicators and red flags. ➤ Profile and highlight emerging bribery and corruption/fraud risks and corresponding proposed controls to the Risk Management Committee. ➤ Ensure that all statutory/regulatory (BURSA/SSM/BNM/SC) disclosure/reporting (as required) are made arising from bribery and corruption/fraud perpetration and investigations.

Party	Responsibilities
	➤ Collaborate with 1st and 3rd line of defense (as appropriate) to investigate all near misses and/or actual non-compliance incidents and report to Risk Management Committee.
Third Line of Defense	
iii. Internal Audit	➤ Independently assess the adequacy and effectiveness of internal controls to mitigate bribery and corruption/fraud risk. ➤ Investigate all reported/suspected fraud incidents and/or as requested by the Audit Committee.

5.0 Policy Statement

- i. Tune Protect Group adopts a **ZERO TOLERANCE against bribery, corruption, fraud, money laundering, abuse of power** and expects all employees and personnel covered under this policy to act with honesty and the highest level of integrity.
- ii. Tune Protect Group's commitment to prevent, detect, monitor and respond to any incidences of fraud, bribery and corrupt conduct is underpinned by 4 key themes: Prevent, Detect, Monitor and Respond.

5.1 Prevent

Tune Protect Group will:

- Incorporate risk assessment and monitoring in the annual Tune Protect Group-wide risk assessment process to:
 - a) Determine fraud, bribery and corrupt conduct risks;
 - b) Determine the strength of existing controls; and
 - c) Identify additional risk treatments to manage or mitigate current exposure.
- Ensure employees understand the fraud, bribery and corrupt conduct risks Tune Protect Group is exposed to;
- Establish and maintain adequate internal controls that provide for the security and accountability of resources and prevent/reduce the opportunity for fraud, bribery or corrupt conduct to occur;
- Establish, promote and maintain a culture and environment from the top down that makes active fraud, bribery and corrupt conduct control a responsibility of all employees; and
- Establish training programs incorporating Tune Protect Group's Code of Conduct, and key policies and standards to ensure employees are aware of their responsibilities to Tune Protect Group in relation to fraud, bribery and corrupt conduct.

5.2 Detect

Tune Protect Group will:

- Monitor the adequacy and efficacy of internal controls;
- Foster an environment that encourages employees and any third parties to report

suspected incidents of fraud, bribery and corrupt conduct through the whistle blowing process without any repercussion to any person making such a report; and

- Articulate clear standards and procedures to encourage deterrence of fraud, bribery or corrupt conduct.

5.3 Monitor

Tune Protect Group will:

- Maintain oversight across internal controls over identified high risk areas as directed by the Audit Committee to mitigate identified risks; and
- Demonstrate compliance through constant monitoring, reviewing and the continuous improvement of risk management and internal controls.

5.4 Respond

Tune Protect Group will:

- Promptly investigate allegations of fraud, bribery or corrupt conduct at a level of inquiry;
- Instigate disciplinary proceedings, recovery action and/or if legally advised, to initiate prosecution according to the seriousness of the matter;
- Actively seek improvement and feedback on the ABCS framework and act on any remedial action to enhance the effectiveness of the ABCS framework.

6.0 Bribery

- i. Bribery is the offering, promising, giving, accepting or soliciting of an undue advantage or gratification of anything in value (cash or in kind) to or by another person to obtain or retain a personal or business or other advantage in violation of applicable law and other than by legitimate and proper means.
- ii. Bribery does not have to involve cash or an actual payment. Bribery can take many forms such as a gift (i.e., lavish treatment during a business trip or tickets to an event).
- iii. Acts of bribery would include the following situations:
 - When you directly or indirectly offer, promise or give a financial or other advantage to a person in charge of public or legal duty with intention to influence or appear to influence action of the person in making a decision in favour of Tune Protect Group.
 - When you request, agree to receive, or accept a financial or other advantage intending that in consequence a relevant function or activity should be performed improperly.
 - Unofficial (including verbal) payments requested and/or made to public officials with the intent to secure, expedite or facilitate decision or performance of actions such as the provision of a visa, customs clearance, permit, license, work order, police protection, utility services, contract performance and actions of a similar nature (Facilitation Payments).

7.0 Corrupt Conduct

- i. Corrupt conduct means misuse of position of power to obtain or attempt to obtain a personal benefit or advantage.
- ii. Examples of corrupt conduct may include (but are not limited to) the following:
 - Inaction or turning a blind eye to observe professional duty of care which facilitated corruption.
 - Willful blindness or failure to report any irregularities which facilitated corruption.

- Conspiracy to engage in a corrupt conduct.
- Collusion (voluntary or coerced) to engage in a corrupt conduct.
- Any other conduct which may result in a breach in anti-corruption laws.

8.0 Money Laundering

- i. Money laundering is defined as the placing of “dirty”/illegally obtained cash/funds into a legitimate financial system, with the intention of concealing its source and ultimate real purpose which can be illegal.
- ii. Examples of money laundering include the following:
 - Involvement in a transaction dealing with proceeds sourced from an unlawful activity.
 - Dealing with the proceeds sourced from an unlawful activity.
 - Placing cash/funds/proceeds sourced from an unlawful activity.
 - Misrepresenting the nature of the proceeds sourced from of an unlawful activity.

9.0 Fraud

- i. Fraud is defined as the intentional, false representation or concealment of facts for your benefit or the benefit of others.
- ii. Examples of fraud may include (but are not limited to) the following:
 - Improperly handling or reporting of money or financial transactions.
 - Falsifying or presenting falsified medical records to obtain medical or leave benefits.
 - Falsification of any document (e.g., payroll records, expense claims, invoices, cheques, etc.).
 - Overstating time sheets in order to inflate overtime payments.
 - Altering sales numbers or manipulating accounts in order to meet targets for self and/or others.
 - Failing to disclose close relationships with competitors, partners, agents, suppliers, contractors, consultants or other third parties that may give rise to conflict of interest.
 - Manipulation of documents to gain access to customer funds.
 - Unauthorised sale of Tune Protect Group's assets for personal gain.
 - Use of corporate credit card for personal expenses.
 - Taking Tune Protect Group's supplies for personal use.
 - Profiteering as a result of insider trading activities.
 - Fraudulent representations in sales and marketing activities.

10.0 Abuse of Power

- i. Abuse of power is defined as the improper use of one’s power, authority or influence for personal gain or for/against another person for personal reasons.
- ii. Such abuse may or may not lead to personal gain and conflict of interest in favour of the abuser.

11.0 Gifts & Prizes

- i. As a general rule, the Tune Protect Group practices a "No Gift Policy". Unless permitted under this ABC policy, all Personnel are NOT permitted to accept and/or offer gifts/prizes from or to any person or company in connection with the business of Tune Protect Group, whether directly or indirectly.

- ii. **Accepting Gifts/Prizes**

Gifts/Prizes may be accepted ONLY in the following situations or circumstances, subject to the Gift/Prize threshold of RM300. In general, anything above RM300 (RM300.01 and above) would exceed the Gift/Prize threshold and would not be allowed.

- a) **Gifts/Prizes Received During Internal or Official Tune Protect Group Events or Functions**

Personnel may accept such gifts/prizes of any value and/or any kind such as Lucky Draw Prizes, Farewell Gifts, Employee of the Year Awards and the like, presented openly and transparently during/in conjunction with any Tune Protect Group event or function.

Personnel are NOT required to declare receipt of such gifts via the digitized Gift Received Declaration Form.

- b) **Token Corporate Gifts/Prizes Bearing a Third Party's Company's Logo**

Personnel may accept token corporate gifts which bear a third party's company's name or logo provided the value of such gift does NOT exceed the Gift/Prize Threshold of RM300 and below.

Personnel ARE REQUIRED to declare the receipt of all such gifts irrespective of value to their respective Line Managers, Heads of Department via the digitized **Gift Received Declaration Form without any undue delay**. The system will automatically notify the Integrity Lead and Operational Compliance Lead who may contact the winner for clarification and/or provide guidance about the gift if necessary.

In the even the gift value exceeds RM300, then the relevant HOD, in consultation with the entity CEO/PO, has the discretion to allow the personnel to keep the gift or request for the gift to be handed over as a Lucky Draw Prize or the like during an upcoming official Tune Protect Group event or function.

- c) **Gifts/Prizes Received at Third Party's Official External Events or Functions**

Personnel may accept gifts/prizes received during a third party's official external events or functions PROVIDED the value of such gift does NOT exceed the Gift/Prize Threshold of RM300. This would include door gifts and branding/marketing items.

The ONLY EXCEPTION under this subsection that would allow would be Lucky Draw Prizes that may include luxury watches, electronical equipment, mobile phones, drones, and other prizes that exceed the Gift/Prize Threshold of RM300. Personnel who receive such gifts ARE REQUIRED to declare the receipt of all such gifts to their respective Line Managers and Heads of Department via the digitized **Gift Received Declaration Form without any undue delay**. The system will automatically register the gift, notify the Integrity Lead and Operational Compliance Lead who may contact the winner for clarification and/or provide guidance about the gift if necessary.

- d) **Festive Gifts**

Personnel may NOT accept gifts offered in conjunction with festive celebrations and special

events. Such gifts include ang pau, duit raya, hampers, moon cakes, oranges, liquor, dates, fruit baskets, birthday presents, bouquet of flowers, etc.

All personnel are required to provide their business partners, vendors, suppliers and third parties advance notice ahead of all festive celebrations and special events, very respectfully, NOT to send any such items over in line with the Tune Protect Group's "No Gift Policy".

In the event the festive gifts are still delivered, the receiver shall declare receipt via the digitized **Gift Received Declaration Form** to their respective Line Manager and HOD **without any undue delay**. The system will automatically notify the Integrity Lead and Operational Compliance Lead who will initiate clarification and/or provide guidance about the gift as necessary. The receiver shall then consult the relevant HOD and Line Manager, who shall contact the Integrity Lead and Operational Compliance Lead about returning the gift or handing it over for general distribution within the company, including as internal Lucky Draw Prize or the like.

The only exception under this section would be gifts for deliveries, hospitalization and/or bereavement. Such gifts must not be lavish and extravagant in nature and **MUST** be recorded in the digitized **Gift Application Form without any undue delay**.

e) Conflict of interest

Where there is a conflict of interest, the gift/prize must be politely returned with a note explaining the Tune Protect Group's "No Gift Policy". The personnel shall **declare the potential and/or real conflict in writing by email** to the personnel's Line Manager, HOD, Integrity Lead and the Operational Compliance Lead **without any undue delay**.

The Gift / Prize Threshold is **RM300**. All gifts received shall be guided by the following table using the digitized **Gift Received Declaration Form (Appendix 1)**:

GIFTS	RM300 and Below	Above RM300 (RM300.01 and above)
Receiving	<ul style="list-style-type: none"> Allowed for (a)-(c) subject to terms and conditions stipulated 	<ul style="list-style-type: none"> Allowed only with the approval from Group CEO/CEO/PO or an officer delegated the authority to approve on behalf of CEO ("Delegated Officer"), provided it is in accordance with the Principles on Accepting and Offering Gifts stated below. Group CEO/CEO/PO/Delegated Officer to decide on treatment of gift received in consultation with the Integrity Lead and Operational Compliance. If the Group CEO/CEO/PO/Director receives a gift exceeding RM300, to declare to the Chairman of the Board. Declaration, without any undue delay, to the relevant Line Manager, Head of Department, Integrity and Operational Compliance using the digital Gift Received Declaration Form is required.

iii. Offering Gifts/Prizes

Personnel may only offer gifts in the following situations or circumstances:

- Gifts/Prizes to third parties during official Tune Protect Group's official events or functions, of any value and/or any kind such as Lucky Draw Prizes, etc., that are presented openly and transparently during and/or in conjunction with the occasion;
- Token gifts/prizes of nominal value such as t-shirts, hoodies, reusable bags, caps, stationery,

power banks, etc., that are not lavish and not exceeding the Gift/Prize Threshold and bearing the Tune Protect Group's logo as part of the Tune Protect Group brand building or promotional activities;

- c) Gifts/Prizes (CSR/Branding) to third parties during official external third-party events or functions subject to the LOA.
- d) Gifts for deliveries, hospitalization and/or bereavement. Such gifts must not be lavish and extravagant in nature and **MUST** be recorded in the digitized Gift Application Form **without any undue delay**.

All gifts offered regardless of value must be approved in accordance with the Tune Protect Group's Limits of Authority. All gifts offered which exceed the Gift/Prize Threshold must be approved by the Group CEO/CEO/PO or Delegated Officer and declared to Integrity and Operational Compliance using the Gift Received Declaration Form and Gift Application Form as follows:

GIFTS	RM300 and Below	Above RM300 (RM300.01 and above)
Giving	<ul style="list-style-type: none"> • Allowed with LOA approval 	<ul style="list-style-type: none"> • Allowed only with the approval from Group CEO/CEO/PO or Delegated Officer after LOA approval. • Declaration to People & Culture and Compliance is required. • Declaration, without any undue delay, to the relevant Line Manager, Head of Department, Integrity and Operational Compliance using the digital Gift Received Declaration Form is required.

Refer to **Appendix 1** for the QR Codes for the Gift Received Declaration Form and Gift Application Form.

iv. Principles on Accepting and Offering Gifts

All Personnel are to abide by the following principles with respect to accepting and/or receiving gifts:

a) Exercise proper judgment

All Personnel are expected to exercise proper care and judgment, taking into account relevant circumstances and the business context as well as the applicable laws and cultural norms. No gift can be accepted, given, offered and attempted to be given / offered in the following circumstances:

- Where it is in return for any personal and/or business advantage or a bribe in disguise;
- Where it could affect or be perceived to affect the outcome of business transactions; and/or
- Where it is not reasonable or bona fide business expenditures.

The value of congratulatory flowers or wreaths can be subject to the market norm.

b) Strict prohibition

For the avoidance of doubt, all Personnel are strictly prohibited from accepting and/or attempting to accept/offer the following, whether directly or indirectly:-

- Any gift/prize of cash or cash equivalent (including vouchers, discounts, coupons, shares, commission, concert tickets, trips, airfare, hotel stays, etc.)
- Any gift/prize received from or given to parties engaged in a tender or competitive bidding exercise;
- Any gift/prize that comes with a direct/indirect suggestion, hint, understanding or implication that some expected or desirable outcome is required in return for the gift;
- Any gift/prize that would be illegal or in breach of applicable laws on bribery and corruption; and/or
- Any gift/prize that is lavish and/or excessive or may adversely tarnish the reputation of Tune Protect Group.
- Any gift/prize for public services personnel from government ministries, government bodies, government-linked companies, government servants, local councils AND for any party introduced by any one of these.

c) Record

All gifts received or offered above the Gift Threshold must be recorded in the gift register along with the supporting documents. The gift register is managed by Integrity and Operational Compliance.

12.0 Hospitality and Entertainment

- i. Tune Protect Group recognises that it may be a common practice to provide and/or receive modest hospitality and/or entertainment ("**H&E**") for the purpose of building and fostering business relationships. However, all H&E provided to or received from third parties must be unsolicited and must not be perceived as a form of bribery. It must not be provided/received if it may affect or may be perceived to affect the outcome of business transactions and/or is not reasonable or bona fide business expenditures. In the case of group event, i.e., agency meetings, annual dinners, company special occasions, award and recognition nights, sales conventions or agency conventions, they will be governed by the event budget and plan.

For the avoidance of doubt, "H&E" includes all forms of hospitality provided to any third party incurred in connection with the business of Tune Protect Group whether directly or indirectly and includes meals, accommodation, transport, tickets to events, air tickets and other forms of entertainment.

ii. Providing H&E

All Personnel may provide H&E provided the following are complied with:

- a) H&E can only be provided for business purposes and must be approved in accordance with the Tune Protect Group's Limits of Authority.
- b) The value of H&E provided must not exceed the H&E Threshold.

- c) Personnel is NOT permitted to provide any H&E to public officials, regardless of value, unless approved by Group CEO/CEO/PO or Delegated Officer of respective entity.
- d) All claims for H&E provided must have supporting documents.

The H&E Threshold is **RM150** per pax.

ENTERTAINMENT	RM150 and Below per pax	Above RM150 per pax (RM150.01 and Above)
Giving	<ul style="list-style-type: none"> Allowed with LOA approval 	<ul style="list-style-type: none"> Allowed only with Group CEO/CEO /PO or Delegated Officer's approval after LOA approval.
Giving (public officials)	<ul style="list-style-type: none"> Allowed only with Group CEO, CEO's/PO's or Delegated Officer's approval 	<ul style="list-style-type: none"> For group event, it must be governed by the event budget and plan. Allowed only with Group CEO's/CEO's/PO's or Delegated Officer's approval. Declaration by email, without any undue delay, to the Line Manager, Head of Department, Integrity and Operational Compliance required.

All H&E offered above the H&E Threshold must be declared to Integrity and Operational Compliance by email **without any undue delay** together with the supporting documents.

iii. Receiving H&E

- a) Tune Protect Group strictly prohibits its Personnel from soliciting H&E, or accepting H&E in response to or in anticipation of a favourable business decision, save for cases such as sponsored training by an association, etc.
- b) All Personnel are required to exercise proper care and judgment before accepting H&E offered or provided by third parties. This is important to safeguard Tune Protect Group's reputation and to protect the Personnel from allegations of impropriety or undue influence.
- c) When in doubt, you should either politely decline the offer or seek advice from the HOD or Line Manager, Integrity and/or Operational Compliance.

iv. Strict Prohibition

For the avoidance of doubt, Tune Protect Group strictly prohibits the provision and/or receipt of H&E in the following circumstances:

- a) Any H&E with a view to improperly cause undue influence on any party in exchange for some future benefit or result;
- b) Any H&E with a direct/indirect suggestion, hint, understanding or implication that some expected or desirable outcome is required;

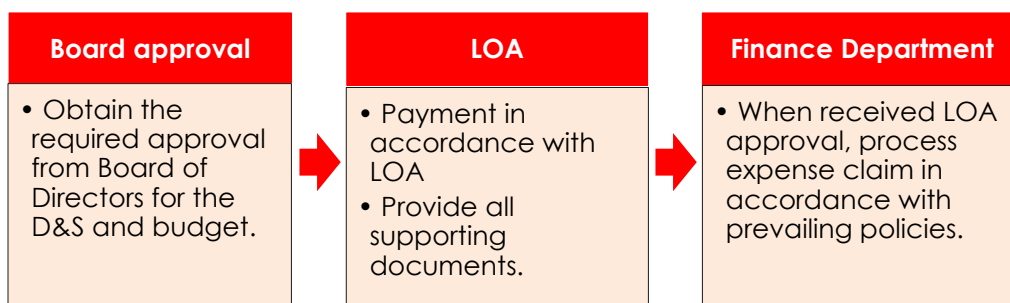
- c) Any H&E involving parties engaged in a tender or competitive bidding exercise;
- d) Any H&E that would be illegal or in breach of any applicable laws;
- e) Any H&E that is sexually oriented; and/or
- f) Any H&E that would be perceived as lavish or excessive or may adversely tarnish the reputation of Tune Protect Group.

13.0 Donations and Sponsorships

- i. As part of its commitment to corporate social responsibility and/or for branding purposes, Tune Protect Group provides assistance in appropriate circumstances and in an appropriate manner. However, Tune Protect Group recognizes that providing donations and/or sponsorships ("**D&S**") can pose a bribery risk as it involves payments to a third party without tangible return. As such, all D&S are to be made in accordance with the Tune Protect Group's policies.
- ii. All D&S requests must be carefully examined for legitimacy to ensure that they are not made to improperly influence a business outcome.
- iii. Tune Protect Group and its personnel shall NOT engage in any form of soliciting, applying for, inviting and/or accepting any donation(s) and sponsorship(s) of payment in kind from any existing or potential business partner, supplier, third party for any internal/external event/function or any part thereof. The only exception to this would be donations and/or sponsorships of prizes donated/sponsored by affiliates within the Tune Group eco-system for gifts/prizes presented openly and transparently specifically for Tune Protect Group official events or functions. (Please refer to the ExCom or Integrity for confirmation of the status of the Tune Group affiliate to be approached for donation/sponsorship).
- iv. As a financial services institution and pursuant to Tune Protect Group's **ZERO TOLERANCE AGAINST BRIBERY & CORRUPTION** mission, Tune Protect Group shall NOT engage in soliciting, applying for, inviting and/or accepting any donation(s) and sponsorship (s) or payment in cash and/or in kind, including advertorials in any publication, including for social media, annual reports, the press and the like.
- v. **Requirements**
All D&S must comply with the following requirements:
 - a) All D&S must be approved by the Board of Directors and once the D&S budget has been approved by the Board of Directors, the payment is subject to Tune Protect Group's Limits of Authority together with full supporting documents;
 - b) Due diligence must be conducted by the requestor to ensure that the D&S requests are legitimate and any red flags raised are solved prior to committing the funds and that the D&S is permitted by applicable laws;
 - c) Such contributions are only made to legitimate entities having an adequate organisational structure for proper administration of the funds; and
 - d) Such contributions are accurately stated in the Tune Protect Group's accounting books and records.
- vi. **Strict Prohibitions**
For the avoidance of doubt, Tune Protect Group strictly prohibits any D&S in the following circumstances:

- a) Any D&S that is made, directly or indirectly, to a recipient as a way of influencing, reasonably perceived as influencing or obtaining an advantage in business transactions;
- b) Any D&S that is made before, during or immediately after contract negotiations;
- c) Any D&S that is made as a means to cover up a bribery;
- d) Any D&S request that comes with a direct/indirect suggestion, hint, understanding or implication that some expected or desirable outcome is required;
- e) Any D&S that is illegal or in breach of any applicable laws;
- f) Any D&S that may otherwise tarnish the reputation of the Tune Protect s; and/or
- g) Any D&S for public services bodies such as government ministries, government bodies, government-linked companies, government servants, local councils AND for any party introduced by any one of those.

vii. **Approval Process for Making Donations/Sponsorships**



14.0 Political Contribution

- i. As a general rule, Tune Protect Group does not make political contributions, whether in the form of direct financial support, pledges or through the use of its assets to support any political candidate, incumbent or party. However, in limited circumstances, Tune Protect Group may make political contributions provided that such contributions are permitted by law.
- ii. Where political contribution is permitted, the following requirements must be complied with:
 - a) Such contribution must be approved by the Board of Directors;
 - b) Such contribution must be made in accordance with applicable laws and regulations;
 - c) Such contribution must not be made, directly or indirectly, to political parties, organisations or individuals engaged in politics as a way of influencing or obtaining (or could be reasonably perceived as influencing or obtaining) an advantage in business transactions;
 - d) Such contribution must not be made to an illegitimate political party; and
 - e) Such contribution must not be made before, during or immediately after contract negotiations which may be linked to the donation.
- iii. Notwithstanding the above, Tune Protect Group encourages its Personnel to participate in the political election process by voting. Personnel may choose to make personal political contributions as appropriate within the limits established by applicable laws. For the avoidance of doubt, under no circumstances will any employee be compensated or reimbursed in any way by Tune Protect Group for a personal political contribution.

15.0 Facilitation Payment and/or Extortion Payment

- i. Facilitation payment refers to an unofficial payment made in return for services which the payer is legally entitled to receive without making such payment. This usually occurs as a payment to a public official or a person who has authority to grant certification, licenses, permissions or permits, for the purpose of securing the grant or expediting the grant process. Tune Protect Group strictly prohibits accepting or offering any facilitation payments, whether directly or indirectly.
- ii. Extortion is the demanding of a gratification, whether or not coupled with a threat, if the demand is refused. Tune Protect Group strictly prohibits accepting or offering any extortion payments, whether directly or indirectly.

16.0 Third Parties

Tune Protect Group expects all third parties dealing with Tune Protect Group to share our commitment to actively promote **ZERO TOLERANCE AGAINST BRIBERY & CORRUPTION** by complying with this ABC policy and all applicable anti-corruption laws. All third parties including suppliers, vendors, contractors, and service providers performing work or services for or on behalf of Tune Protect Group will be provided with the Code of Business Conduct for Third Parties and are required to comply with the same and all other relevant policies.

17.0 Whistleblowing/Reporting of Incidents

- i. The Tune Protect Group encourages all its employees, business partners and customers to report any real and/or suspected bribery or corruption. Any employee/contractor/consultant/agent who discovers or suspect instances of bribery, corruption, fraud, money laundering and abuse of power should raise their concerns to their Line Manager or Function Head at first instance. Alternatively, they may raise their concern to Integrity and/or Operational Compliance. Please refer to TPG Risk & Compliance **Incidents Reporting Guidelines** for further guidance.
- ii. Anyone who makes a report, complaint or disclosure about any real and/or suspected bribery, corruption, fraud, money laundering and abuse of power is given the protection of confidentiality and will not suffer any detrimental action for making the report. This is provided that the report, complaint or disclosure is made in good faith, belief and without malicious intent. However, it is recognised that individuals may feel inhibited in certain circumstances. In this case, employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage through our confidential whistleblowing channels. Please refer to the Group **Whistleblowing Policy** for further guidance.
- iii. Tune Protect Group practices an open-door policy where we will listen and try to resolve all work concerns and issues. Any employee who feels the need to raise and resolve their grievances, please refer to the section on Code of Conduct and Grievance in the **Employee Handbook** for further guidelines.

18.0 Investigation of Complaints and incidents

- i. Investigation of complaints and incidents of bribery, corruption, fraud, money laundering and abuse of power raised via the whistleblowing channel and/or via the Risk & compliance incident log will commence upon receipt according to the procedures establish in the Whistleblowing Policy. Please refer to the Group Whistleblowing Policy for further guidance.

- ii. Any conduct which is non-compliant or in violation of this policy and/or the ABCS is taken seriously and any breach by a Personnel shall be subject to disciplinary action and may be referred to the relevant enforcement authorities as necessary.

19.0 Associated Documents

The Anti-Bribery and Corruption Policy shall be read together with the following act/regulatory standards/guidelines and/or internal policies:

- i. Tune Protect Group Anti-Bribery & Corruption Policy
- ii. Tune Protect Group Sustainability Policy
- iii. Tune Protect Group Whistleblowing Policy
- iv. Tune Protect Code of Conduct & the List of Misconduct
- v. Tune Protect Code of Business Conduct for 3rd Parties
- vi. Malaysian Anti-Corruption Commission Act 2009
- vii. Whistleblowers Protection Act 2010 (Act 711)
- viii. Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Act 2001 (AMLATFPUAA)
- ix. United Nations Convention Against Corruption Provisions
- x. All other applicable laws in Malaysia, Thailand, United Arab Emirates and other relevant jurisdictions that apply.

Appendix 1

QR Codes for the Digitized Gift / Prize Received Declaration Form and Gift Application Form



Tune Protect Gift / Prize Received Declaration Form



Tune Protect Gift Application Form