



# **Tune Protect Group Berhad**

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

## **Group Anti-Bribery and Corruption Policy**

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## 1.0 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 applicable to this policy to act with honesty and the highest level of integrity.
- ii. Tune Protect Group is committed to incorporating the T.R.U.S.T. Principles Guidelines.
- iii. Tune Protect Group is committed to incorporating the Malaysian Anti-Corruption Commission Act 2009 requirements on implementing Adequate Procedures.
- iv. Tune Protect Group is committed to incorporating required Bank Negara Malaysia's Policy Document on claims and other Policy Documents that expressly prohibits claims personnel from receiving any form of gifts (including cash or non-cash benefits) from repairers, registered adjusters and lawyers.
- v. Tune Protect Group is committed to preventing, detecting, monitoring and responding to any incidence of bribery, corruption, fraud, money laundering, abuse of power, conflict of interest and corrupt conduct guided by underpinned 4 key themes: Prevent, Detect, Monitor and Respond.

### 1.1 Prevent

To proactively prevent bribery and corruption, the Group will:

- Incorporate Bribery and Corruption Risk Assessment (BCRA) and monitoring via the Tune Protect Group risk assessment process to:
  - a) Determine fraud, bribery and corrupt conduct risks;
  - b) Determine the strength and efficiency of existing controls; and
  - c) Identify additional risk mitigation measures to manage or mitigate current exposure.
- Ensure employees understand the fraud, bribery and corrupt conduct risks that Tune Protect Group is exposed to.
- Establish and maintain adequate internal controls to ensure the security and accountability of resources, and to prevent or reduce the opportunity for fraud, bribery or corruption to occur.
- Establish, promote and maintain a top-down culture to demonstrate that any active control of fraud, bribery and corruption is a shared 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 in relation to fraud, bribery and corruption.

### 1.2 Detect

To promptly detect any potential or actual incidents of bribery or corruption, 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 whistleblowing 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.
- Provide mechanism to detect and monitor red flags.

### 1.3 Monitor

To ensure that the ABC controls remain effective, Tune Protect Group will:

- Maintain oversight across internal controls for identified high bribery and corruption 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.

### 1.4 Respond

In responding to any potential identified bribery and corruption case, Tune Protect Group will:

- Promptly investigate the reported fraud, bribery or corrupt conduct at a level of inquiry.
- Instigate disciplinary proceedings and recovery action. In the event legal advice is obtained, to initiate legal action according to the severity of the matter.
- Reporting to regulator or law enforcement (if applicable).
- Actively seek improvement and feedback on the ABCS framework and act on any remedial action to enhance the effectiveness of the ABCS framework.

## 2.0 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 Senior 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 allegations will be fully investigated by relevant parties as decided by Board or ExCom subject to channel of complaints and without any repercussions to any person reporting such activity in good faith. [The Group Whistleblowing Policy refers.](#)

### 3.0 Scope

- This Policy applies to all directors, personnel and other third parties/stakeholders, including permanent, temporary, part-time hires, interns and independent contractors of Tune Protect Group Berhad and its subsidiaries. Associate and joint venture companies are encouraged to adopt this policy by way of formal incorporation and should be used if you have a concern (perceived and/or actual) about serious misconduct or malpractice including bribery, corruption, conflict of interest, fraud, money laundering and abuse of power in all the below-mentioned 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 Whistleblowing Policy](#)
  - c. Tune Protect Group Sustainability Policy
  - d. Tune Protect Group Motor & Non-Motor General Claims Procedure
  - e. [Tune Protect Code of Conduct & the List of Misconduct](#)
  - f. [Tune Protect Code of Business Conduct for 3<sup>rd</sup> Parties](#)
  - g. Malaysian Anti-Corruption Commission Act 2009
  - h. Whistleblowers Protection Act 2010 (Act 711)
  - i. Anti-Money Laundering, Anti- Terrorism Financing and Proceeds of Unlawful Act 2001 (AMLATFPUAA)
  - j. Bank Negara Malaysia Policy Documents requirements and directives.
  - k. United Nations Convention Against Corruption Provisions
  - l. All other applicable laws in Malaysia, Thailand, United Arab Emirates, and other jurisdictions that apply.
- Breach of Tune Protect Group'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 malpractice or misconduct in any of the above.
- Retaliation or reprisal against an employee or 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.

#### 4.0 Definition

Abbreviation	Meaning
<a href="#">Code of Conduct</a>	<a href="#">Tune Protect Group's Code of Conduct Manual</a> .
Personnel	Any person employed by or associated with Tune Protect Group including all permanent consultants, or contract staff (whether full-time or part-time).
Delegated Officer	An officer delegated with authority to approve on behalf of CEO.
Third Parties / Stakeholders	Third parties include agents, brokers, external consultants and contractors, intermediaries, interns, service providers, suppliers, vendors, and others who provide work, products, goods, equipment, materials or services or act for or on behalf of the Tune Protect Group, partners, business associates and companies doing business directly or indirectly or having a business relationship / collaboration with Tune Protect Group ("Third Parties") including, but not limited to their employees, affiliates, interns or any other third parties or sub-contractors that has been engaged by the Third Parties to work with or perform services for, or provide products to, or act for or on behalf of the Tune Protect Group (collectively "Personnel"). This policy also applies to all Third Parties and their Personnel who provide work, goods or services to or act on behalf of the Tune Protect Group or those having a business relationship with the Tune Protect Group.
Gratification	Gratification is defined <a href="#">in the Code of Business Conduct for Third Parties (CoBC)</a> .
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 actual (past or present) or suspected improper conduct within the Group or organisation based on his or her reasonable belief.
Whistleblower	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 3.0 above.

## 5.0 Responsibilities

**5.1** 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 of Directors	<ul style="list-style-type: none"> <li>➤ Ensure sound and prudent oversight of fraud, bribery and corruption risks (as part of overall risk management oversight).</li> <li>➤ Ensure adequate resources, expertise and support to effectively implement fraud, bribery and corruption policies and procedures.</li> <li>➤ Review and assess, through the Internal Audit/Audit Committee, the adequacy and effectiveness of risk management controls concerning fraud, bribery and corruption risks.</li> </ul>
ii. Risk Management Committee (RM)	<ul style="list-style-type: none"> <li>➤ Review and assess the adequacy of risks management policies, processes, systems and controls pertaining to fraud, bribery and corruption to mitigate such risks.</li> <li>➤ Recommend to the Board for approval the fraud, bribery and corruption risks management strategy.</li> <li>➤ To oversee and review the annual Bribery and Corruption Risk Assessment (BCRA) and have the responsibility to: <ul style="list-style-type: none"> <li>a) ensure that corruption risk is incorporated into the general risk register of the Company;</li> <li>b) receive and review risk assessment reports on bribery and/or corruption and ensure that appropriate mitigating actions are put in place to manage risk exposures; and</li> <li>c) update the Board on BCRA and mitigating action to manage risk exposure;</li> </ul> </li> <li>➤ Oversee and review the effectiveness of policy and procedures on anti-corruption and whistleblowing including comprehensive BCRA assessment once every three (3) years.</li> </ul>
iii. Audit Committee (AC)	<p>The AC's roles, responsibilities and powers include the following:</p> <ul style="list-style-type: none"> <li>➤ To consider and recommend to the Board the appointment, reappointment or removal of the External Auditor, the audit fees and to consider any questions of resignation or dismissal of the External Auditor.</li> <li>➤ To assess the suitability, objectivity and independence of the External Auditor including the provision of non-audit services by the External Auditor.</li> <li>➤ To review annually the External Auditor's audit plans, scope of their audits and their audit reports, including the External Auditor's evaluation of the system of internal controls.</li> <li>➤ To provide a line of communication between the Board and</li> </ul>

Party	Responsibilities
	<p>the External Auditor</p> <ul style="list-style-type: none"> <li>➤ To review the quarterly and year-end financial statements of the Group and the Company before the approval by the Board, focusing particularly on:           <ul style="list-style-type: none"> <li>(i) any changes in or implementation of major accounting policies and practices;</li> <li>(ii) significant adjustments arising from the audit;</li> <li>(iii) litigation that could affect the results materially;</li> <li>(iv) significant matters highlighted including financial reporting issues, significant judgements made by Management, significant and unusual events or transactions; and how these matters are addressed;</li> <li>(v) the going concern assumption.</li> <li>(vi) compliance with approved accounting standards and other legal requirements; and</li> <li>(vii) ensuring the timely release of such financial statements;</li> </ul> </li> </ul>
iv. Executive Committee (ExCom)	<ul style="list-style-type: none"> <li>➤ 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.</li> <li>➤ Undertake necessary due diligence before engaging in any business relationship with third parties.</li> <li>➤ 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.</li> <li>➤ Report any incident of suspected bribery and corruption/fraud or anonymously via Tune Protect Group's whistleblowing channel.</li> <li>➤ Ensure that this Policy and the other corporate policies of the Tune Protect Group are communicated and understood by all employees under their responsibility.</li> </ul>

**5.2** 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. All employees and all third parties seconded to Tune Protect	<ul style="list-style-type: none"> <li>➤ Shared responsibility between all parties to promote and enforce <b>ZERO TOLERANCE AGAINST BRIBERY &amp; CORRUPTION</b>.</li> <li>➤ 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.</li> <li>➤ Adhere to all Tune Protect Group's policies and internal control procedures.</li> <li>➤ Ensure that all transactions and payments are properly documented and recorded, with sufficient details, information and supporting documents such as payment receipts. This is to ascertain a clear, accurate, transparent and complete audit trail documented for any review by internal / external auditors and senior management, or as and when is required.</li> <li>➤ Ensure that the operations of internal controls provide reasonable assurance that: <ul style="list-style-type: none"> <li>• 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).</li> <li>• 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</li> <li>• Access to the Tune Protect Group's assets is permitted only in accordance with management's general or specific authorization.</li> </ul> </li> <li>➤ Report suspicions of bribery and corruption / fraud and cooperate in investigations.</li> </ul>
Second Line of Defense	
ii. Integrity	<p>Integrity Lead owns / champions this policy and collaborates with all relevant parties on the following:</p> <ul style="list-style-type: none"> <li>➤ Establish and timely updates to the Group Anti-Bribery and Corruption Policy, in line with the regulatory requirements as specified under section 3.0.</li> <li>➤ Assist business units in identifying bribery and corruption / fraud related risk, indicators and red flags.</li> <li>➤ Profile and highlight emerging bribery and corruption / fraud risks and corresponding proposed controls to the Risk Management Committee.</li> </ul>

Party	Responsibilities
	<ul style="list-style-type: none"> <li>➤ Ensure that all applicable / relevant statutory/regulatory disclosure / reporting (as required) are made arising from bribery and corruption/fraud perpetration and investigations.</li> <li>➤ 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.</li> <li>➤ Initiate, develop, test, publish, study feedback, review and improve on Tune Protect Group's T.R.U.S.T Principles Adequate Procedures Defenses initiatives in collaboration with relevant stakeholders.</li> <li>➤ Increase awareness in ABC within the Group by establishing relevant training and awareness.</li> </ul>
iii. Risk Management	<ul style="list-style-type: none"> <li>➤ Perform BNM Operational Risk Reporting on the detected fraud, bribery and corruption event.</li> <li>➤ Perform quarterly Bribery and Corruption Risk Register Assessment (BCRA) on the fraud, bribery and corruption risk at business unit and company level.</li> <li>➤ Perform fraud incident reporting to senior management and board.</li> <li>➤ Risk registers assessment – fraud risks captured and discussed.</li> <li>➤ Incident reporting (internal)</li> <li>➤ Ensure that all applicable / relevant statutory / regulatory disclosure / reporting (as required) is made arising from bribery and corruption/fraud perpetration and investigations.</li> </ul>
iv. Compliance	<ul style="list-style-type: none"> <li>➤ Perform review and testing on the ABC program as and when required by the regulators, management and board.</li> <li>➤ Reporting of Suspicious Transaction Report related to money laundering to BNM (if any).</li> <li>➤ Review policies to ensure alignment with regulatory and statutory requirements.</li> <li>➤ Ensure that all applicable / relevant statutory / regulatory disclosure / reporting (as required) is made arising from bribery and corruption/fraud perpetration and investigations.</li> </ul>
<b>Third Line of Defense</b>	
v. Internal Audit	<ul style="list-style-type: none"> <li>➤ Independently assess the adequacy and effectiveness of internal controls to mitigate bribery and corruption / fraud risk.</li> <li>➤ Investigate all reported / suspected fraud incidents and / or as requested by the Audit Committee.</li> </ul>

## 6.0 Bribery

- i. Bribery is defined as the act of 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, but not limited to:
  - 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 corrupt conduct.
  - Collusion (voluntary or coerced) to engage in 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 process of placing "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 activities are:
  - Facilitating or 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 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 to inflate overtime payments.
  - Altering sales numbers or manipulating accounts 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 cards 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 position, power, authority or influence in making a decision or taking action for the benefit of himself, his relative or associate.
- ii. Such abuse may or may not lead to personal gain and conflict of interest in favour of the abuser.

## 11.0 Gifts & Prizes

<u><b>NO GIFT POLICY GENERAL RULE</b></u>				
<b>Directors &amp; Personnel are NOT PERMITTED to:</b>				
(1) Solicit, accept, offer, give, promise, or attempt any of the above by themselves, or with someone's assistance.	(2) Obtain any form of gift, undue advantage, gratification or anything of value (cash or in kind).	(3) Whether directly or indirectly, from or to any person, company or organization.	(4) Whether to gain or retain a direct or indirect personal and / or business advantage for Tune Protect Group.	(5) All Tune Protect Group's personnel handling claims are expressly prohibited under this policy from receiving any form of gift (including cash or non-cash benefits) from repairers, registered adjusters and lawyers. This is to align with the latest regulatory requirements.
<u><b>CONDITIONS FOR LIMITED EXCEPTIONS TO THE NO GIFT POLICY GENERAL RULE</b></u>				
<p>All may accept, offer and give gifts / prizes ONLY IF ALL the following are met:</p> <ul style="list-style-type: none"> <li>✓ Full compliance with the MACC Act, other applicable laws &amp; regulations.</li> <li>✓ Full compliance with all guidelines in this policy and the <a href="#">Code of Conduct</a>.</li> <li>✓ NO INTENTION to accept, offer and give bribes disguised as gifts / prizes. <ul style="list-style-type: none"> <li>✓ NO undue advantage &amp; gratification present.</li> <li>✓ NO personal or business advantage to be obtained &amp; retained. <ul style="list-style-type: none"> <li>✓ No undeclared potential / actual Conflict of Interest.</li> </ul> </li> <li>✓ Gifts/prizes are accepted and given in the normal course of business. <ul style="list-style-type: none"> <li>✓ Gifts / prizes must be declared as stipulated in this policy.</li> </ul> </li> </ul> </li> </ul> <p>Gifts / prizes fall within the 5 categories stated in the tables below:</p>				

### 1. INTERNAL TUNE PROTECT PRIVATE EVENTS

#### A. Accepting and Giving Gifts\* / Prizes\*\* at Tune Protect annual dinners, appreciation events, festive celebrations, kick-offs, teambuilding, town halls, etc.

\*Gifts to welcome guests (door gifts), including gifts for birthdays, festivals, retirement, etc.

\*\*Prizes for challenges, competitions, launches, lucky draws, teambuilding, etc.

- ✓ No Gift / Prize Threshold
- ✓ No Declaration Required

## 2. EXTERNAL TUNE PROTECT OR COLLABORATIVE PARTNERS' EVENTS

### A. Accepting and Giving Corporate Branding\* Gifts / Prizes at competitions, conferences, festive celebrations, launches, opening ceremonies, roadshows, and other public events.

\*Corporate Branding gifts / prizes with logo or company name on caps, earphones, hoodies, mugs, power banks, reusable bags, stationery, t-shirts, tumblers, trophies, umbrellas, etc.

- ✓ No Gift/Prize Threshold
- ✓ No Declaration Required

### B. Accepting Non-Corporate Branding\* Gifts / Prizes at Collaborative Partner's Public Events

\*Non-Corporate Branding Gifts / Prizes such as lucky draw prizes, vouchers, free stays, trips, etc.

- ✓ Gift / Prize Threshold of Up to RM400 (or its equivalent) Per Gift / Prize
- ✓ Personnel Accepting MUST Declare via Gift / Prize Received Declaration Form Within 14 Working Days from Day of Receipt
- ✓ GCEO / CEO / Delegated Officer to Approve or Redistribute Gift / Prize
- ✓ Director Accepting MUST Declare via Gift / Prize Received Declaration Form Within 14 Working Days from Day of Receipt to Record "Top-Level Commitment"

## 3. SPECIAL OCCASIONS

### A. Accepting and Giving Celebratory\* or Sympathy Gifts\*\* from 3<sup>rd</sup> Parties / to agents for bereavement, births, hospitalisation, marriages and business opening ceremonies

\*Appropriate Celebratory gifts such a congratulatory balloon, hampers, baby products, flowers, wedding gifts, etc.

\*\*Appropriate Sympathy Gifts such as "Get Well Soon" hampers, nutritional product hampers, wreaths, etc.

Note: Covers occasions affecting directors, personnel and agents' immediate family members (parent, spouse and children)

- ✓ Gift Threshold of Up to RM400 (or its equivalent) Per Gift
- ✓ Personnel Accepting MUST Declare via Gift / Prize Received Declaration Form Within 14 Working Days from Day of Receipt

- ✓ GCEO / CEO / Delegated Officer to Approve or Redistribute Gift / Prize
- ✓ Director Accepting MUST Declare via Gift / Prize Received Declaration Form Within 14 Working Days from Day of Receipt to Record "Top-Level Commitment"
- ✓ Personnel Giving MUST Apply via Gift Application Form Before Purchase
- ✓ GCEO / CEO / Delegated Officer to Approve / Reject Gift Application

**B. (NEW) Accepting and Giving Customary Gifts\* To / From 3<sup>rd</sup> Party Business Partners to celebrate business anniversary, collaborative meetings, opening ceremonies, etc.**

\*Appropriate customary gifts such as corporate branding gifts, commemorative mementos, delicacies, token gifts, etc.

- ✓ Gift Threshold of Up to RM400 (or its equivalent) Per Gift
- ✓ Personnel Accepting MUST Declare via Gift / Prize Received Declaration Form Within 14 Working Days from Day of Receipt
- ✓ GCEO / CEO / Delegated Officer to Approve or Redistribute Gift / Prize
- ✓ Director Accepting MUST Declare via Gift / Prize Received Declaration Form Within 14 Working Days from Day of Receipt to Record "Top-Level Commitment"
- ✓ Personnel Giving MUST Apply via Gift Application Form Before Purchase
- ✓ GCEO / CEO / Delegated Officer to Approve / Reject Gift Application

#### 4. TUNE PROTECT TOKEN GIFTS

**A. Accepting & Giving Tokens of Appreciation\* for participating in customer feedback surveys, trial runs, questionnaires, etc.**

\*Branding gifts, complimentary insurance coverage, vouchers, etc.

- ✓ Token Threshold of Up to RM200 (or its equivalent) Per Token
- ✓ Personnel Accepting MUST Declare via Gift / Prize Received Declaration Form Within 14 Working Days from Day of Receipt
- ✓ GCEO / CEO / Delegated Officer to Approve or Redistribute Token
- ✓ Director Accepting MUST Declare via Gift / Prize Received Declaration Form Within 14 Working Days from Day of Receipt to Record "Top-Level Commitment"
- ✓ Personnel Giving MUST Apply via Gift Application Form Before Purchase
- ✓ GCEO / CEO / Delegated Officer to Approve/Reject Gift Application

## 5. FESTIVE GIFTS

### A. Accepting & Giving Festive Gifts\* To / From External Parties for Chinese New Year, Easter, Hari Raya, Deepavali, Mooncake Festival, Christmas, etc.)

\*Festive gifts such as Chinese New Year oranges, Hari Raya palm dates, Easter chocolates eggs, Deepavali murukku, mooncakes, Christmas pudding, festive delicacies, hampers, cakes, cookies, etc.

**NOTE: Festive Gifts must NOT be Gratification in disguise offered, given or accepted with any INTENTION to bribe and to gain / retain a personal / business advantage for Tune Protect.**

- ✓ Gift Threshold of Up to RM400 (or its equivalent) Per Gift
- ✓ Personnel Accepting MUST Declare via Gift / Prize Received Declaration Form Within 14 Working Days from Day of Receipt
- ✓ GCEO / CEO / Delegated Officer to Approve or Redistribute Gift / Prize
- ✓ Director Accepting MUST Declare via Gift / Prize Received Declaration Form Within 14 Working Days from Day of Receipt to Record "Top-Level Commitment"
- ✓ Personnel Giving MUST Apply via Gift Application Form Before Purchase
- ✓ GCEO / CEO / Delegated Officer to Approve / Reject Gift Application

## 12.0

### Principles of 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.

### **13.0 Hospitality and Entertainment**

- i. Tune Protect Group recognises that it may be 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 events, 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 are NOT permitted to provide any H&E to public officials, regardless of value, unless approved by Group CEO / CEO or Delegated Officer of respective entities.
- 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"> <li>Allowed with LOA approval</li> </ul>	<ul style="list-style-type: none"> <li>Allowed only with Group CEO / CEO or Delegated Officer's approval after LOA approval.</li> </ul>
Giving (public officials)	<ul style="list-style-type: none"> <li>Allowed only with Group CEO, CEO's or Delegated Officer's approval</li> </ul>	<ul style="list-style-type: none"> <li>For group event, it must be governed by the event budget and plan.</li> <li>Allowed only with Group CEO's / CEO's or Delegated Officer's approval.</li> <li>Declaration by email, <b>without any undue delay</b>, to the Line Manager, Head of Department and Integrity.</li> </ul>

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

### iii. Receiving H&E

- 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.
- 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.
- When in doubt, you should either politely decline the offer or seek advice from HOD Line Manager or Integrity.

### 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:

- Any H&E with a view to improperly causing undue influence on any party in exchange for some future benefit or result.
- Any H&E with a direct / indirect suggestion, hint, understanding or implication that some expected or desirable outcome is required.
- Any H&E involving parties engaged in a tender or competitive bidding exercise.
- Any H&E that would be illegal or in breach of any applicable laws.
- Any H&E that is sexually oriented; and / or
- Any H&E that would be perceived as lavish or excessive or may adversely tarnish the reputation of Tune Protect Group.

## 14.0 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 done 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:

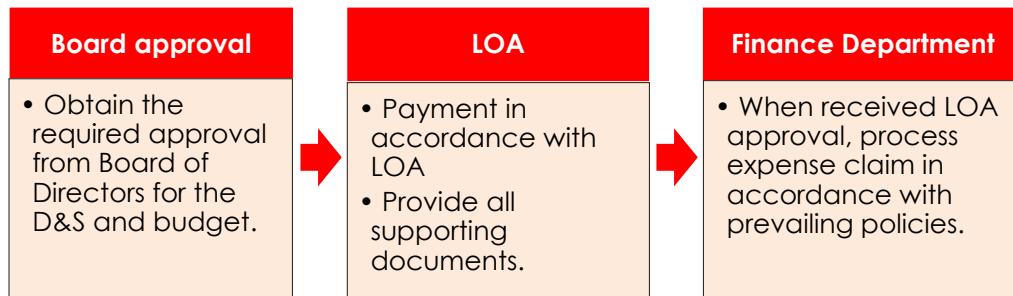
- a) All D&S must be approved by the Board of Directors and once the D&S budget has been approved by the Board of Directors, the payment is subject to Tune Protect Group's Limits of Authority together with full supporting documents.
- b) Due diligence must be conducted by the requestor to ensure that 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**



## 15.0 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.

## 16.0 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 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 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.

## 17.0 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.

## 18.0 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. 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.

## 19.0 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 established 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.

## 20.0 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. (NEW) Tune Protect Group Motor & Non-Motor General Claims Procedure
- v. [Tune Protect Code of Conduct & the List of Misconduct](#)
- vi. [Tune Protect Code of Business Conduct for 3rd Parties](#)
- vii. Malaysian Anti-Corruption Commission Act 2009
- viii. Whistleblowers Protection Act 2010 (Act 711)
- ix. Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Act 2001 (AMLATFPUAA)
- x. (NEW) Bank Negara Malaysia Policy Documents Requirements & Directives
- xi. United Nations Convention Against Corruption Provisions
- xii. All other applicable laws in Malaysia, Thailand, United Arab Emirates and other relevant jurisdictions that apply.

## Appendix

### QR Codes for the Digitized Gift Received Declaration Form and Gift Application Form



**Tune Protect Gift / Prize Received Declaration Form**



**Tune Protect Gift Application Form**