



**DESTINI GROUP**  
**ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**  
*Version 1.0 (2020)*

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**Acknowledgement Sheet**

I hereby acknowledge having read and understood the “Destini Group Anti-Bribery and Anti-Corruption Policy” of Destini Group.

Name	Initial	Date

**Document Update History**

Any updates to the “*Destini Group Anti-Bribery and Anti-Corruption Policy*” must be recorded in the Document Update History as below:

<b>Request / Review No.</b>	<b>Date</b>	<b>Page No</b>	<b>Description</b>	<b>Approved By</b>

## Definitions

**AA** Approving Authorities and Authority Limit as approved by Destini Berhad's Board of Directors.

**Bribery** Is referred to gratification as defined under Section 3 of MACC Act 2009 as follows:

"Gratification" means-

- a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property (being property of any description whether moveable or immoveable), financial benefit or any other similar advantage;
- b) any office, dignity, employment, contract of employment or services, or agreement to give employment or render services in any capacity;
- c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- e) any forbearance to demand any money or money's worth or valuable thing;
- f) any other service or favor of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and
- g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).

<b>Board</b>	Refers to the Board of Directors of Destini Berhad.
<b>Board Meeting</b>	Refers to the Board Meetings stipulated under Chapter 11 (A) of Destini Berhad's Board Charter.
<b>Corruption</b>	Offence of accepting gratification (Part IV of MACC Act 2009 – Offences and Penalties).
<b>Director</b>	Individual appointed as Independent or Non-Independent Director that form the Board of Directors of Destini Berhad. The term "Director" or "Directors" shall have the meaning and may be used interchangeably.
<b>Employee</b>	All personnel including P/CEO, senior and top management, managers, executive and non-executives under the employment of Destini Group (permanent or on contract basis), temporary staff, intern and management trainee. The term "Employee" or "Employees" shall have the same meaning and may be used interchangeably.
<b>Scheme of Services and Code of Ethic</b>	Sets out the terms and conditions of service governing all Employees of Destini Group.
<b>Entertainment</b>	Including entertainment and hospitality but not limited to lunches, dinners.
<b>External Party/ Parties</b>	All parties which may have business dealings (directly or indirectly) with Destini Group including but not limited to Destini Group's stakeholders, vendors, suppliers, contractors.
<b>Facilitation Payments</b>	Payment made to secure or expedite the performance by a person performing a routine or administrative duty or function.
<b>Gift(s)</b>	Including but not limited to cash money, shares, free fares, lottery tickets, travelling facilities, entertainment expenses, services, club membership, any form of commission, hampers, jewelry and decorative items with or without commercial values.
<b>Public or Government Official</b>	Includes without limitation, candidates for public office, official of any political party and official of government-owned enterprise other than Destini Group.
<b>The Company</b>	Refers to Destini Group
<b>The Policy</b>	Refers to Destini Group's Anti-Bribery and Anti-Corruption Policy.

## **PART 1: ABOUT THIS DOCUMENT**

### **1.1 Introduction**

Destini Group has adopted a zero-tolerance policy against all form of bribery and corruption practices. The Company's expects all its directors and employees to perform their duties in accordance with the principle and high integrity.

### **1.2 Policy Statement**

Destini Group takes a zero-tolerance approach to bribery and corruption and is committed to act professionally, fairly and with integrity in all its business dealings and relationship. Destini Group resolves to:

- 1.2.1 Uphold all laws relevant to countering bribery and corruptions. Remain bound by the laws of Malaysia, including
- 1.2.2 Malaysia Anti-Corruption Commission Act 2009 & Malaysia Anti-Corruption Commission Act (Amendment) 2018;
- 1.2.3 Commit in combating and preventing bribery and corruption and implementing an Anti-Bribery Management System (ABMS–ISO 37001:2016);
- 1.2.4 Undertake a periodic bribery and corruption risk assessment across its business to understand the risks it faces and ensure that it has adequate procedures in place to address those risks.

### **1.3 Purpose**

The purpose of this Destini Group Anti-Bribery and Anti-Corruption Policy ("the Policy") is to ensure that the Directors and Employees clearly understand Destini Group's approach and that all business transactions are impartial and objective, without any external influence.

This policy elaborates upon those principles, providing guidance to directors and employees concerning how to deal with improper solicitation, bribery and other corrupt activities and issue that may arise in the course of business. It also attended to provide a framework for setting, reviewing and achieving its anti-bribery and corruption objectives. This also includes management's commitment to satisfy and provide continuous improvement on Destini Group Anti-Bribery and Anti-Corruption Policy.

## **1.4 Scope of Coverage**

The Policy is written for and shall be circulated to Destini Berhad's Directors and Employees of Destini Group and applicable to all departments that are involved directly or indirectly with external parties. All relevant personnel are required to understand thoroughly the Policy and to ensure compliance at all times. This policy should be read together with the Destini Group Anti-Bribery and Corruption Guidelines.

## **1.5 Policy Owner**

**Integrity and Compliance Unit ("ICU")** is responsible for the development, update and review of this Policy.

## **1.6 Interpretation of Policy**

It is the responsibility of all Director and Employee of the Company to observe and comply with the provisions of this policy. In the absence of written Policy or when in doubt or where interpretation of the Policy is required, ICU must be consulted.

## **1.7 Other Policy and Guidelines**

This Policy is to be read together with:

- i. Malaysia Anti-Corruption Commission Act 2009;
- ii. Malaysia Anti-Corruption Commission Act (Amendment) 2018
- iii. Whistleblower Protection Act 2010;
- iv. Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001;
- v. Destini Group Anti-Bribery and Anti-Corruption Guidelines, Scheme of Service and Code of Ethic, and other related internal guidelines and/or external guidelines issued by Destini Berhad or any other governing authorities.



## **1.8 Compliance with Laws and Regulations**

This Policy shall be subjected to the laws and regulations of Malaysia. In the event of conflict or inconsistency between the provisions of this Policy and the laws and regulations of Malaysia, the latter shall prevail.

## **1.9 Exception to the Policy**

Any exception to this Policy must be approved by the Board of Destini Berhad.

## **1.10 Infringement of the Policy**

Any infringement of the Policy shall constitute a serious misconduct or offence and regulations, warranting disciplinary action against the offender.

## **1.11 Review of the Policy**

This Policy shall be reviewed at least **once in two (2) years** or as and when deemed necessary by the Board.

## **1.12 Getting Help**

Any queries regarding this Policy are to be forwarded to ICU.

## **PART 2: DESTINI GROUP ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

### **1. OBJECTIVE/PURPOSE**

The purpose of Destini Group Anti-Bribery Policy and Anti-Corruption Policy is to set out the responsibilities in observing and upholding the company's position on bribery and corruption, and to provide information and guidance to those working for the company on how to recognize and deal with bribery and corruption issues. DAB is particularly important for the company as Destini Berhad and its Subsidiaries ventures in various industries, which has been subject to bribery and corruption activities. Bribery and corruption undermine the rule of law and the principle of fair competition, causing significant damage to the industries and societies. The company is committed to plays its part in supporting an ethical marketplace.

### **2. BACKGROUND/CONTEXT**

Destini Group Anti-Bribery Policy and Anti-Corruption Policy applies to all employees of Destini Berhad, its subsidiaries and "Third Parties". Third parties in this context include agents, contractors, consultants, business partners and any other parties associated with the company or any of its affiliates.

All employees must ensure that they observe the requirements of this Policy at all times. Any breach of this Policy will be dealt with by the Company's disciplinary procedure and could result in dismissal.

The Company requires that each third party will at all times observe the requirements of this Policy. Any breach of this Policy will be dealt with by all means available to the Company, such as contractual provisions for audit, termination and damages.

#### **Statement of Policy**

Bribery is both a criminal offence and bad business. Not only can individuals be guilty of an offence but also a company can be prosecuted if it fails to prevent bribery under the Malaysian Anti-Corruption Commission Act 2009.

Without exception, Destini Berhad and its subsidiaries act with integrity in all of its dealings and strictly prohibit bribery and corruption in any form. Destini Berhad and its subsidiaries commit itself to:

- Conduct its business fairly, honestly, accountability and transparently;
- Avoid offering or accepting inducements or bribes, whether directly or indirectly, to gain business advantages or for any other purposes;
- Not using a third party as a conduit, whether directly or indirectly, to channel bribes or other inducements to others;
- Developing a program to implement and support these principles. These are the values by which the company expects its staff to carry out its work on its behalf.

**Definition**

Bribery involves the following:

- When a financial or other advantage is offered, given or promised to another person with the intention to induce or reward them or another person to perform their responsibilities or duties improperly (it does not have to be the person to whom the bribe is offered that acts improperly); or
- When a financial or other advantage is requested, agreed to be received or accepted by another person with the intention of inducing or rewarding them or another person to perform their responsibilities or duties inappropriately (it does not have to be the person who receives the bribe that acts improperly).

It does not matter whether the bribe is:

- Given or received directly or through a third party; or
- For the benefit of the recipient or some other person.

Bribes can take many forms such as:

- Money or cash equivalent;
- Unreasonable gifts, entertainment or hospitality;
- Kickbacks;
- Unwarranted rebates or excessive commissions;
- Unwarranted allowances or expenses;
- Facilitation payments;
- Political or charitable contributions;
- Uncompensated use of company services or facilities; or
- Anything else of value.

**What Is Not Permitted?**

Bribery and corruption can take many forms therefore it is important to understand what is expected in this regard.

It is not permitted to:

- Give, promise to give, or offer a payment, gift, hospitality or other financial advantage with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- Give, promise to give or offer a payment, gift, hospitality or other financial advantage to a government official, agent or representative to 'facilitate' or expedite a routine procedure;
- Accept or solicit payment, gift, hospitality or any other financial advantage from a third party if they know or suspect that it is offered or provided with an expectation that a business advantage will be provided in return;
- Retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy;
- Do something that is improper, illegal or a breach of trust in the course of working or doing business; and/or

- Engage in any other activity that is in breach of this policy.

It is also not permitted to falsify the company's books and record for the purpose of bribery or of hiding bribery such as:

- Maintain off-books accounts;
- Fail to record or inadequately record transactions;
- Inaccurately identify liabilities;
- Knowingly use false documents.

### **Compliance and Violation of The Policy**

Ultimate responsibility for compliance with this policy throughout the group is taken by Integrity and Compliance Unit. However, each of us has an obligation to act with integrity and to ensure that we understand and comply with the policy. Ongoing compliance will be monitored and reported by Internal Audit. In addition, all employees will be required to confirm that they have understood and complied with the policy annually.

Destini Berhad and its subsidiaries will always ensure that no employee will suffer dismissal, demotion or any other penalty or adverse consequence for refusing to engage in, or for reporting, questionable conduct. The company insists on strict compliance with this policy by all staff and others to whom this policy applies.

All employees of Destini Group and its subsidiaries can be responsible for acts of corruption and bribery committed on its behalf even without the company's knowledge. The company expects all those who are obliged to follow those rules to abide by the following principles:

- Ensure that they read, understand and comply with this policy;
- Sign the declaration that confirms the above; and
- Raise concerns as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- Any violation of this policy by an individual acting on the company's behalf may result in disciplinary action up to and including summary dismissal for gross misconduct and/or termination of the business relationship. In addition, the penalties for violating the relevant legislation against bribery and corruption are both civil and criminal and include fines and imprisonment for individuals. The penalties may cause a significant reputational damage for Destini Berhad and its subsidiaries.

### **PART 3: REFERRAL POLICY**

The Company will deal with any instance of suspected bribery or corruption seriously. Any actual instance will result in disciplinary action against those involved, up to and including termination of employment or contract, and reporting of those persons to relevant regulatory and enforcement agencies.

## **PART 4: GIFT & ENTERTAINMENT POLICY**

### **4.1 Gift Policy**

Destini Group is committed to an ethical environment for all employees. This Gift Policy applies to all employees of Destini Group. Any violation of this policy may result in disciplinary action, including but not limited to, termination of employment. A “Gifts” is anything of value that is given to or received from certain persons or organizations outlined in this policy.

Destini Group employees must disclose any Gifts they receive which the value is equal to or greater than RM500.00 (Ringgit Malaysia Five Hundred Only) or equivalent. Disclosure is to be made to their immediate supervisor or Supervising Executive who reports directly to the Group CEO or CEO of the subsidiaries (“CEO”). In addition, before receiving or providing Gifts from any entity or person other than Destini Group, employees must first obtain written approval from their immediate supervisor or Supervising Executive who reports directly to the CEO.

All Gifts given must be recorded and explained, in a proper and timely manner and must comply with all applicable rules, laws and regulations.

### **4.2 Entertainment Policy**

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

#### **Providing Entertainment**

Employees and directors are strictly prohibited from providing or offering to provide entertainment with a view to improperly cause undue influence on any party in exchange for some future benefit or result. Any acts of this nature, whether provided directly or indirectly through an intermediary may be construed as an act of bribery. Thus, any entertainment that is illegal or morally wrong is strictly prohibited.

#### **Receiving Entertainment**

It is important for employees and directors to exercise proper care and judgement before accepting entertainment offered or provided by third party. This is not only to safeguard of Destini Group’s reputation, but also to protect employees and directors from allegations of impropriety or undue influence.

The above policy is to be read together with Destini Group Anti-Bribery and Anti-Corruption Guidelines.

## **PART 5: DONATIONS, SPONSORSHIP AND CORPORATE SOCIAL RESPONSIBILITY (CSR)**

As a responsible corporate citizen, Destini Group is committed to cultivating a strong relationship with the local communities in which we live and work by contributing to the well-being of the people, community, market place, environment and the nation. It is however important for the Company that all donation, sponsorship and CSR are allowed by applicable laws and being conducted properly by upholding integrity principle and transparency.

- Donation, sponsorship & CSR by the Company cannot be used to secure an improper business advantage or gaining favorable terms from that organization or its affiliates/connected parties.
- Donations, sponsorships and CSR will not be considered for the following:
  - a) Political organizations;
  - b) Political office holder or candidate;
  - c) Event relating to political organization;
  - d) Requester that have already received donation, sponsorship or CSR from the Company during the same year;
  - e) In conjunction with, as part of or in relation to any bid, tender, contract renewal or prospective business relationship.
- In providing donation, sponsorship and CSR, the Company's will ensure that adequate steps are taken to ensure it was given to the needy and have a valid charitable purpose. In ensuring this, the Company will conduct due diligence, establish criteria, conduct proper evaluation and analyze each application.
- The Company encourages employees to propose donation, sponsorship and CSR application with the following conditions:
  - a) Directors and Employee must declare their interest in the application if any (position within the organization etc.);
  - b) Subject to para (a) above, the directors and employee shall not be involved in the decision-making process of the application.
- In any event, directors and employees are prohibited from requesting or obtaining any form of donation, sponsorship and CSR from any third party that having a business with the Company either:
  - a) For their own interest/benefit; or
  - b) On behalf of any organization/entity that the employee represented.

The above policy is to be read together with Destini Group Anti-Bribery and Anti-Corruption Guidelines.

## PART 6: FACILITATION PAYMENT

Facilitation payments are typically small payments or other advantages (directly or indirectly) generally made to public or government officials or private sector officials or counterparties in order to expedite or speed up routine action to which the payer already has a legal or other entitlement at no cost. It is commonly referred to as “grease payments”. It is usually demanded in cash or in kind by the official using their position or title as leverage. Examples are:

- Payments to clear goods through customs;
- Payments for approvals or for delivery or services such as water and electricity;
- Payments to allow entry / exit to / from a country when all the documentation is in order;
- Obtaining permits, licenses, or other official documents;
- Processing of governmental documents such as visas and work permits;

The purpose of FP policy is to set out the zero tolerance of facilitation payments. The payment of facilitation fees by employees or contractors either directly or indirectly is strictly forbidden. Paying the facilitation payments could cause serious harm to Destini Berhad and its subsidiaries.

However, as the company is conducting cross border business and if there is any dangerous event that the employee are faced with having to make a facilitation payment in order to protect their security and liberty, than it is allowed and the matter should be reported to the employee immediate supervisor and or ICU on immediate basis. Making facilitation payment in such situation is the only exception which can be used as a defense when faced with allegations of bribery and corruption

This policy applies to all employees of Destini Berhad and its subsidiaries. All employees must ensure that they observe the requirements of this Policy at all times. Any breach of this Policy will be dealt with by the Company’s disciplinary procedure and could result in dismissal.

The above policy is to be read together with Destini Group Anti-Bribery and Anti-Corruption Guidelines.



**PART 7: INTERACTIONS WITH GOVERNMENT OFFICIAL POLICY**

Destini Berhad and its Subsidiaries may have interactions with Government Officials in expressing views that affect company's business and industry. Interactions with Government Officials must comply with company's policies, regulations and applicable laws. Activities that may be acceptable when dealing with private-sector company employees could be inappropriate or illegal when dealing with Government Officials. Company's representatives should exercise extra caution when interacting with Government Officials. Employees shall not engage in any interactions with Government Officials unless they are authorized to do so by the Company.

Employees and directors are strictly prohibits from any activity that seeks to bribe, corrupt or otherwise influence a Public Official to gain a business advantage, or for that Public Official to act or omit to act in a way that differs from that official's proper duties, obligations and standards of conduct.

As the company is conducting cross border business, caution must be exercised when dealing with public officials as the laws of bribery and corruption in some countries are more stringent and provides for stricter punishments. Providing gift, entertainment or corporate hospitality to public officials or their family/household members is generally considered a "red flag" situation in most jurisdictions.

The above policy is to be read together with Destini Group Anti-Bribery and Anti-Corruption Guidelines.

## **PART 8: CONFLICT OF INTEREST**

Conflict of interest arise in situations where there is personal interest that could be considered to have potential interference with objectivity in performing duties or exercising judgement on behalf of the company. All personnel should avoid situations in which personal interest could conflict with their professional obligations or duties. Personnel must not use their position, official working hours, Company's resources and assets, or information available to them for personal gain or to the Company's disadvantage.

The above policy is to be read together with Destini Group's Scheme of Service and Code of Ethics.

**PART 9: FINANCIAL & NON-FINANCIAL CONTROL**

- 91 The company will ensure that internal control is adequately in place in working procedures to mitigate any probability fraud, corruption etc. that may jeopardize the organization.
- 92 The company will establish approving authority matrix relating but not limited to:
- i. Payment
  - ii. Claims
  - iii. Procurement
  - iv. Recruitment
  - v. Employee Promotions
- 93 The company shall ensure segregation of duties in all business processes.
- 94 All financial and non-financial records maintained by the Company must be kept completely and accurately as to enable the Company to substantiate and justify any transaction made with the External parties. All accounts, invoices, memorandum and other documents and records relating to dealing with the External Parties must be prepared and maintained accurately. No account must be kept “off-book” to facilitate or conceal improper transaction.

**PART 10: DEALING WITH THIRD PARTY**

- a) All business associates (including external providers such as consultants, advisors, and agents) acting on behalf of Destini Group are required to comply with this Policy and all other policies as it relates to them.
- b) In circumstances where Destini Group retains controlling interest, such as in certain joint venture agreements, business associates are required to adhere to this Destini Group Anti-Bribery and Anti-Corruption Policy. Where Destini Group does not have controlling interest, business associates are encouraged to comply with the same.
- c) Due diligence should also be carried out with regards to any business associates intending to act on the Company's behalf as an agent or in other representative roles, to ensure that the entity is not likely to commit an act of bribery or corruption in the course of its work with Destini Group.
- d) The extent of the due diligence should be based on a bribery and corruption risk assessment. Due diligence may include a search through relevant databases, checking for relationships with public officials, self-declaration, and documenting the reasons for choosing one particular Business associate over another. The results of the due diligence process must be documented, retained for at least seven years and produced on request by the custodian of the process.
- e) Destini Group shall include standard clauses in all contracts with business associates enabling the Company to terminate the contract in the event that bribery or an act of corruption has been proved to occur. Additional clauses may also be included for business associates acting on Destini Group's behalf where a more than minor bribery risk has been identified.

The above policy is to be read together with Destini Group Anti-Bribery and Anti-Corruption Guidelines for further details.

## **PART 11: RECRUITMENT**

Destini Group, being a diversified business entity, provides equal opportunity for any qualified and competent individual to be employed by the company from various multicultural and multiracial background, sourced internally or externally, local and internationally.

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.

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 in management positions, as they would be tasked with decision making obligations.

The above policy is to be read together with Destini Group's Scheme of Service and Code of Ethics and Human Resource Standard Operating Procedure.

## PART 12: WHISTLEBLOWING POLICY

Destini Group encourages openness and transparency in its commitment to the highest standard of integrity and accountability.

The Company's encourage director, employees, external parties & member of public to disclose on any wrongdoing in relation to the Company as early as possible and without fear. This is to enable the Company to deal with the issue at early stage in order to limit any potential damage it may cause.

The whistle blowing policy is crafted to ensure each disclosure within the coverage of this policy is attended appropriately, and the Whistleblower shall be notified accordingly. As well as a strategy against malpractice and act as a deterrent to those who may be considering an illegal, improper or unethical practice.

The Company pledges to:

- i. take all necessary measures to ensure that the identity and personal information of the Whistleblower shall be protected at all time and kept confidential, to the extend reasonably practicable unless otherwise required by the law or for the purpose of any proceedings by the Company. In such a case, the Company shall notify the Whistleblower before revealing their identity.
- ii. provide protection the directors and employees that make a disclosure in good faith and without malice from possible reprisals or victimization. This is to ensure that both the Whistleblower and the alleged wrongdoer would be given a fair treatment. Any aspects and elements relating to staff protection and employee rights, benefits and obligations, however, shall not apply to the external parties performing services for the Bank and members of the public.

The above policy is to be read together with Destini Group's Whistleblowing Policy.

## PART 13: REPORTING AND CONSEQUENCES OF BREACH

- 1) There are two (2) primary avenues to raise concern if becoming aware of the or suspect a breach of this Policy by Directors or Employees of Destini Group:
  - a. Whistleblowing channels
  - b. Integrity and Compliance Unit
  
- 2) Directors or Employees acting in contradiction to this policy will be dealt in accordance to:
  - a. Destini Berhad Scheme of Service and Code of Ethic for disciplinary action ranging from an official warning to suspension or dismissal; and
  - b. MACC Act 2009 and MACC Act (Amendment) 2018 particularly the following sections:
    - i. Section 16 : Offence of accepting gratification by any person
    - ii. Section 17 : Offence of giving or accepting gratification by an Agent
    - iii. Section 18 : Offence of intending to deceive principal by agent
    - iv. Section 23 : Offence of using office or position for gratification
    - v. Section 25 : Duty to report bribery transaction

Penalty for offences under sections 16, 17, 18 and 23;

- a. Imprisonment not exceeding twenty (20) years;
- b. A fine not less than five (5) times the value of gratification, or ten thousand ringgit (RM10, 000) whichever is higher.

Penalty for offence under Section 25:

- a. Any gratification is given, promised or offered – a fine not exceeding one hundred thousand ringgit (RM100, 000) or imprisonment not exceeding ten (10) years or both; or
  - b. Any gratification has been solicited or obtained - a fine not exceeding ten thousand ringgit (RM 10,000) or imprisonment not exceeding two (2) years or both.
  - c. Other local laws (whichever applicable).
- It is therefore extremely important that Employee familiarize themselves with this Policy and strictly adhere to it.

**PART 14: REVIEWING AND MONITORING**

- 14.1 The Board is responsible for reviewing and approving of this Policy. The Board shall in general provide oversight on the implementation and effectiveness of this Policy.
- 14.2 Head of Department/Unit are responsible for ensuring those reporting to them are made aware and understand of this Policy and are given adequate and regular training on it.
- 14.3 ICU in collaboration with Human Capital and Administration Department will on continuous basis provide training on this Policy and on anti-corruption laws in general to all employees. Training on this Policy forms part of the induction process for all new employees.
- 14.4 All breaches to this policy will be escalated to Integrity Unit. ICU will monitor the effectiveness and review the implementation of this Policy as and when required considering its suitability, adequacy and effectiveness. Internal control systems and procedure will be subject to regular audit to provide assurance that they are effective in combating bribery and corruptions.
- 14.5 The zero-tolerance approach to bribery must be communicated to all stakeholders at the onset of the business relationship.
- 14.6 This Policy shall be reviewed by ICU after every two (2) years or on need basis. Directors and employees will be fully informed of any material revisions of this Policy.



***DESTINI***