

## Anti-Bribery & Corruption Policy (“Policy”)

Version 2 | May 2023

*This Policy shall be read in conjunction with the Malaysian Anti-Corruption Commission Act 2009 and its 2018 Amendment.*

Yayasan Generasi Gemilang (“GG”) adopts a zero-tolerance approach against all forms of bribery and corruption and is committed to acting professionally, fairly, and with integrity in all its business dealings and relationships. GG or any third party acting on GG’s behalf must not provide, offer, or accept bribes, kickbacks, corrupt payments, facilitation payments, or inappropriate gifts, to Government Officials or any commercial person or entity, regardless of local practices or customs.

### Interpretations

The terms used in this Anti-Bribery & Corruption Policy shall be interpreted as follows unless stated to the contrary.

- ‘GG’ refers to Yayasan Generasi Gemilang.
- ‘Employee’ refers to the person employed by GG.
- ‘Client’ refers to a child or group(s) of children, student(s), adult(s) and family(s).
- ‘Affiliates’ refers to individuals or entities who provide(s) service or skills to GG

### Scope

This Policy applies to all persons working for GG, including but not limited to employees at all levels whether permanent or temporary, directors, volunteers, interns, and affiliates. This Policy forms part of any employee’s contract of employment and may be amended at any time. This policy applies to all processes and any dealings with any customers, clients, partners, and suppliers.

### Procedures

#### 1. Bribes

Bribery is the offering, promising, giving, accepting, or soliciting of money, a gift, thing of value, or other advantages as an inducement to do something that is illegal or a breach of trust in the course of carrying out an organisation’s activities.

It is illegal to give or receive a bribe, and an organisation is liable for bribes taken or given on its behalf where it does not have adequate procedures in place.

#### 2. Gifts and Hospitality

Gifts can be in the form of goods or services, including anything that can be of value to the person receiving it.

- It is important to consider the intent of the gift, hospitality, or entertainment first; that the gift, has no improper motive to obtain or retain any business, or, to obtain some form of benefit or advantage;
- Whether it is for the organisation, or, the individual employee, anyone working for GG, is not allowed to give or accept any gift that may be deemed as a gratification, enticement or to gain an advantage;
- If unsure of the intent behind the gift, hospitality or entertainment offered, employee must disclose the matter to the Manager to obtain advice before proceeding;
- Any gift received, while representing GG, is given to the foundation and not you; and must be disclosed and declared in GG’s official communication platform;
- Any gift given, or received, must always be of moderate and reasonable value and given in public and not in secret;
- Any gift given on behalf of GG, must follow the established control measures and policies (i.e., Purchasing, Signature Authority and Approval Policies)

If GG discovers a supplier or contractor has been used wholly or mainly because of the incentive of a gift and it was not disclosed; as such, employee has not acted in the best interests of GG, this will also constitute a disciplinary offence and will lead to disciplinary action, which may include immediate dismissal.

### 3. Political contributions

GG does not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

### 4. Charitable contributions

Charitable support and donations are acceptable, and indeed are encouraged, whether of in-kind services, knowledge, time, or direct financial contributions. However, employee must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery.

### 5. Facilitation payments

Facilitation payments are a form of bribery made to expedite or facilitate the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage.

Facilitation payments tend to be demanded by low-level officials to obtain a level of service, which one would normally be entitled to. It is a strict policy that facilitation payments must not be paid. It is recognised, however, that our employee may be faced with situations where there is a risk to the personal security of employee or his/her family and where a facilitation payment is unavoidable, in which case the following steps must be taken:

- keep any amount to the minimum;
- create a record concerning the payment; and
- report it to your manager

### 6. Record-Keeping

Employee must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted under our policy.

### 7. Violation of the Policy

Any violation of the Policy by employee will attract serious repercussions and disciplinary action after due inquiry. Where there is strong evidence of bribery and corruption committed by any employee, the employee can be summarily dismissed and will not be allowed to be employed in any other companies of GG.

Employees who are found to have assisted or facilitated the violation of the Policy, whether actively or by way of negligence or omission, will also be deemed to have violated the Policy and committed misconduct that is liable for dismissal from their employment with GG.

### 8. Reporting for Violations of Policy and Whistleblower Rights

Any concerns, questions or reports should be addressed to firstly, their immediate Manager or where that is not possible, to other functions such as to People Operations.

Any reports made for violation of the Policy will be treated very seriously and accordingly, employees are responsible to ensure that they:

- exercise sound judgment that it is a genuine threat and violation of the Policy;
- have evidence to support their allegations of any violations of the Policy;
- are available to provide evidence in any inquiry of such violations; and
- are not frivolous reports and are not made with the intention of causing scandal

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy even if they turn out to be mistaken. Any genuine reports made will be kept strictly confidential and only informed to persons on a need-to-know basis to safeguard the interests of GG and to ensure that any processes undertaken will not be compromised.

## 9. Monitoring and Review

GG and its Board of Directors will be monitoring compliance with the Policy. There is no tolerance or excuse for non-compliance with the Policy.

Where there is any uncertainty for any practices which relate to the Policy, employee must always seek the advice of their Manager. Where there is still uncertainty, they should direct their concerns to People Operations.

The Policy will be reviewed from time-to-time, to ensure that it continues to remain relevant, appropriate, and effective in the enforcement of the principles herein and to ensure continued compliance with the prevailing law.

All Employee of GG are responsible to keep themselves up to date with GG's latest policies and processes, in particular, this Policy and ensure that the highest standards of compliance are followed.