



## TECH3 SOLUTIONS SDN BHD (587034-U)

### ANTI-BRIBERY AND CORRUPTION POLICY

#### 1. POLICY STATEMENT

- 1.1. Tech3 Solutions Sdn Bhd (“**Tech3**”) is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented.
- 1.2. Tech3 has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships.
- 1.3. Tech3 will constantly uphold the laws of Malaysia, including the laws relating to anti-bribery and corruption specified in the Malaysian Anti-Corruption Commission Act 2009 (“**MACC Act 2009**”) (Act 694).
- 1.4. Tech3 recognises that Section 17A of the MACC Act 2009 is a corporate liability provision that provides that a commercial organization commits an offence if any person associated with the commercial organization commits a corrupt act for the commercial organization. However, as a defence, the corporate organization can demonstrate that they have put in place ‘Adequate Procedures’ to deter persons associated with the commercial organization from committing corrupt acts of gratification.
- 1.5. Further, Section 17A(2) provides that the penalty for an offence under Section 17A shall be a fine of not less than ten times the value of the gratification in question or RM 1 million, whichever is higher, or imprisonment for not more than 20 years, or both.
- 1.6. Section 17A(6) of the MACC Act stipulates that persons considered to be “associated” with a commercial organization include directors, partners and employees of the commercial organization, as well as any person “who performs services for or on behalf of the commercial organization.” The question as to whether a person is found to be associated with a commercial organization is determined by reference to all the relevant circumstances and not merely by reference to the nature of the relationship between the person and the organization. Thus, a commercial organization will not only be liable for bribery by its director or partner, but also its employee – regardless of status or function. It could also be liable for bribery by its agents or distributors and potentially, joint venture partners.
- 1.7. Tech3 recognises if we are discovered to have taken part in corrupt activities, we may be subjected to fines, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to prevent bribery and corruption in our business, and take our legal responsibilities seriously.
- 1.8. Tech3 has adopted the Guidelines issued by MACC on Adequate Procedures Principles, that is T.R.U.S.T –
  - 1.8.1. Principle I: **T**op Level Commitment
  - 1.8.2. Principle II: **R**isk Assessment
  - 1.8.3. Principle III: **U**ndertake Control Measures
  - 1.8.4. Principle IV: **S**ystematic Review, Monitoring and Enforcement
  - 1.8.5. Principle V: **T**raining and Communication

#### 2. SCOPE



- 2.1. This Anti-Bribery & Corruption (“**ABC**”) Policy is to ensure that associates understand their responsibilities in compliance with Tech3’s zero tolerance for bribery and corruption within the organization.

### 3. REFERENCES

- 3.1. Malaysian Anti-Corruption Act 2009 (MACC Act 2009) (Act 694), specifically:
  - 3.1.1. Soliciting/Receiving Gratification (Bribe) [Section 16 and 17A MACC Act 2009]
  - 3.1.2. Offering/Giving Gratification (Bribe) [Section 17(b) MACC Act 2009]
  - 3.1.3. Intending to Deceive (False Claim) [Section 18 MACC Act 2009]
  - 3.1.4. Using Office or Position for Gratification (Bribe) (Abuse of Power/Position) [Section 23 MACC Act 2009]

### 4. ROLES & RESPONSIBILITIES

- 4.1. Section 17A(6) of the MACC Act stipulates that persons considered to be “associated” with a commercial organization include directors, partners and employees of the commercial organization, as well as any person “who performs services for or on behalf of the commercial organization.”
  - 4.1.1. The question as to whether a person is found to be associated with a commercial organization is determined by reference to all the relevant circumstances and not merely by reference to the nature of the relationship between the person and the organization.
  - 4.1.2. Thus, a commercial organization will not only be liable for bribery by its director or partner, but also its employee – regardless of status or function. It could also be liable for bribery by its agents or distributors and potentially, joint venture partners.
  - 4.1.3. This ABC Policy shall apply to all associates of Tech3 (e.g. directors, managers, permanent employees, contract employees and interns) in dealing with external parties in the commercial context.
  - 4.1.4. Directors, managers and supervisors of all levels have additional responsibilities under the ABC Policy and are held to a higher standard of compliance. They are required to create and maintain an open environment that is comfortable for associates to ask questions, raise concerns and report misconduct.
  - 4.1.5. All associates of Tech3 must refrain from any acts of bribery which takes the form of offering, promising, giving, demanding or receiving anything of value to anyone in the form of bribes, kickbacks and/or any other improper gratification (including gifts, hospitality and entertainment) to improperly influence the outcome of any transaction, whether it is for their own personal benefit or for the benefit of Tech3.
  - 4.1.6. Tech3 strictly does not tolerate any bribes given for purposes of obtaining or retaining business for Tech3 or provides an advantage to the businesses of Tech3. We do not tolerate any such acts of bribery even in a personal capacity.
  - 4.1.7. Any associates of Tech3 that breaches any of the ABC Policy may fall within the scope of serious misconduct and may be subjected to disciplinary action, up to and including dismissal, depending on the facts and circumstances of each case.

### 5. DEFINITIONS

- 5.1. “Corruption” is the act of giving or receiving of any gratification or reward in the form of cash or in-kind of high value for performing a task in relation to his/her job description. For

example, a contractor rewards a gift in the form of an expensive watch to a Government official for awarding a project to the company belonging to the contractor.

- 5.2. “Gratification” shall have the meaning defined in the Malaysian Anti-Corruption Commission Act 2009 which includes but is not limited to anything of monetary and non-monetary value or benefit to the person. Gratification does not have to be directly given or received by an associate, but it can also be given or received by anyone related to the associate that is beneficial, of value or advantageous to the associate.
- 5.3. “Gifts” can be in the form of goods or services, including anything that can be of value to the person receiving it. Examples of these can be free travel trips, tickets for any cultural, entertainment or sporting events, and payment of loan, school fees or medical expenses.
- 5.4. “Hospitality” includes providing meals, refreshment, travel, transportation, lodging, as well as entertainment in the context of conventional, cultural and sporting events.
- 5.5. “Public officials” are defined as any person who is a member, an officer, an employee or a servant of a public body. (GLC is not a public body).

## **6. PUBLIC OFFICIALS & GOVERNMENT DEALINGS**

- 6.1. When dealing with public officials, associates of Tech3 should ensure that any giving or receiving of gifts do not relate to, in any form whatsoever, the public official's official dealings or public duty. At all material times, associates of Tech3 are to ensure compliance with the Malaysian laws, and the higher standard will be applicable to all associates to avoid non-compliance of the laws on anti-bribery which may be applicable to Tech3 as a whole.
- 6.2. Any hospitality of public officials, subject to the approval of a director, are for circumstances where it is to reasonably facilitate genuine promotional, business or educational meetings. Any hospitality provided must be without expectation of any influence exerted on the public official in exchange for any commercial outcome, and should always be at a reasonable and modest value.

## **7. GIFTS, HOSPITALITY AND ENTERTAINMENT**

- 7.1. In respect of any gifts, hospitality and entertainment in the commercial context:
  - 7.1.1. The intention behind giving or receiving any gifts, hospitality or entertainment must always be considered first. It should never be for an improper motive to obtain or retain a business, or to obtain some form of benefit or advantage, whether it is for the business or for the individual employee;
  - 7.1.2. If an associate is unsure of how to consider the intention behind any gifts, hospitality or entertainment offered, the associate must always disclose and refer the matter to the immediate supervisor or head of department to obtain advice and also approval before proceeding;
  - 7.1.3. All associates of Tech3 are not allowed to give or receive any gratification, gifts, hospitality or entertainment where it is for an improper purpose and can be deemed as a gratification, regardless of whether it is to benefit the associate individually or to benefit the business of Tech3;
  - 7.1.4. An associate must obtain prior clearance and approval from the immediate supervisor and/or head of department before giving or receiving any gifts, hospitality or entertainment to or from any person which is not of any improper motive. The Gift & Entertainment (G&E) Register must be updated using the threshold as a guide;



- 7.1.5. Where any gifts, hospitality or entertainment is not improper and received before prior approval can be obtained, an employee must always disclose such gifts to the immediate supervisor and/or head of department, regardless of its value;
- 7.1.6. Where it is difficult or inappropriate to decline the offer of a gift, hospitality or entertainment (i.e. when meeting with an individual of a certain religion/culture who may take offence), it may be accepted but it must be declared and/or surrendered to the associate's immediate supervisor and/or head of department, who will assess the relevant circumstances and take the necessary steps, including returning the gift on the associate's behalf, where appropriate or required to do so.
- 7.2. Any gifts, hospitality or entertainment provided by Tech3 must always be of moderate and reasonable value and should never be given:
  - 7.2.1. With an intention to exert improper influence or create a perception of expectation for certain outcomes beneficial to the business of Tech3; or
  - 7.2.2. Where it causes a conflict of interest.
- 7.3. All associates of Tech3 should not give any gratification, gifts, hospitality or entertainment to persons for improper purposes related with Tech3's business in their personal capacity.

## **8. FACILITATION PAYMENTS**

- 8.1. Facilitation payments (also known as grease payments) are payments made for certain government services or to accelerate certain government processes that is otherwise legally entitled by the person without making any payments. Employees should ensure that these facilitation payments are not paid.

## **9. DONATIONS, SPONSORSHIPS & CHARITABLE CONTRIBUTIONS**

- 9.1. Any donations, sponsorships and charitable contributions by Tech3 must be done with the approval of the director(s) and it must be done in a transparent manner for social and moral responsibility.
- 9.2. It should never be paid in exchange for any business implications to Tech3, whether it is to obtain a business, or to obtain some form of advantage of the business of Tech3.
- 9.3. Associates are encouraged to make donations and charitable contributions in their personal capacity, but it should never be in exchange for any improper purposes that affects the business of Tech3.
- 9.4. All associates of Tech3 should not agree or promise to provide any form of political donation or support particularly where it is to obtain any business or advantage to Tech3. Any requests for political donations should be brought to the attention of the director(s) immediately.

## **10. TENDER PROCESS**

- 10.1. Any tender processes participated by Tech3 or any company under Tech3 should be done in a transparent manner in the bidding process.

## **11. RECORD KEEPING & TRAINING**



- 11.1. All associates of Tech3 are required to complete and undertake all relevant documentations and processes particularly where it relates to anti-bribery and corruption initiatives.
- 11.2. Any failure to do so will impact the individual associate's performance review and, where it is a severe non-compliance, an associate may be subject to further disciplinary action(s). Where the facts and circumstances require, repeated failure to undertake proper record keeping or undergoing compulsory trainings may warrant the dismissal of an associate from Tech3.

## 12. COMPLIANCE WITH THE LAW

- 12.1. All employees of Tech3 are responsible in ensuring that they always comply with all laws and regulations, in particular, to the Malaysian Anti-Corruption Commission Act 2009. No excuses or exceptions will be acceptable for non-compliance of any domiciled laws and regulations where Tech3 conducts its businesses.

## 13. THIRD PARTIES & AGENCIES

- 13.1. Tech3 requires that all associates to conduct the requisite due diligence of third parties that Tech3 contracts with or hires to carry out any external functions on behalf of Tech3, which includes without limitation to agents, consultants, contractors, subcontractors, resellers, customs brokers, business contacts, professional advisors, joint venture partners and any other parties supplying goods and services to Tech3 (collectively referred to as "**Other Applicable Persons**").
- 13.2. Where reimbursements are paid to Other Applicable Persons, associates of Tech3 are to ensure that such payments made are for proper reimbursements and not for reimbursements that can be tied to giving any form of gratification for improper purposes.
- 13.3. Tech3 expects all Other Applicable Persons to have anti-bribery and corruption policies in place within their organization or part of their work ethos which are consistent with this ABC Policy.
- 13.4. Tech3 has zero tolerance of Other Applicable Persons who do not conduct themselves in accordance to the principles of the ABC Policy where it brings disrepute or legal implications to Tech3. Any non-compliance with the principles of the ABC Policy by Other Applicable Persons may lead to the review and/or termination of any agreement with such parties.

## 14. VIOLATION OF THE ABC POLICY

- 14.1. Any violation of the ABC Policy by associates of Tech3 will attract serious repercussions and disciplinary action after due inquiry. Where there is strong evidence of bribery and corruption committed by any associate of Tech3, the associate can be summarily dismissed.
- 14.2. Associates who are found to have assisted or facilitated the violation of the ABC Policy, whether actively or by way of negligence or omission, will also be deemed to have violated the ABC Policy and committed a misconduct that is liable for dismissal from their employment with Tech3.

## 15. REPORTING FOR VIOLATIONS OF POLICY & WHISTLEBLOWER RIGHTS

- 15.1. Where there are reasonable grounds and genuine reasons to suspect that there is a violation of the ABC policy, associates of Tech3 and Other Applicable Persons are required



to report the particulars of such suspicions to Tech3's dedicated channel for reporting. Any such reports will be read and addressed by a dedicated compliance team in Tech3.

- 15.2. Any concerns, questions or reports should be addressed to firstly, their immediate supervisor or Head of Department, or where that is not possible, to other functions such as the Human Resource Department and Finance Department.
- 15.3. Any reports made for violation of the ABC Policy will be treated very seriously and accordingly, associates are responsible to ensure that:
  - 15.3.1. They exercise sound judgment that it is a genuine threat and violation of the ABC Policy;
  - 15.3.2. They have evidence to support their allegations of any violations of the ABC Policy;
  - 15.3.3. They are available to provide evidence in any inquiry of such violations; and
  - 15.3.4. They are not frivolous reports with the motive to scandalise.
- 15.4. Tech3 ensures that there will be no retaliation or repercussions on the associate for making genuine reports on violation of the ABC Policy. 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 Tech3 and also to ensure that any processes undertaken will not be compromised.

## **16. COMPLIANCE AND REVIEW OF THE POLICY**

- 16.1. Tech3 and its Board of Directors will be monitoring compliance with the ABC Policy. There is no tolerance or excuse for non-compliance with the ABC Policy.
- 16.2. Where there is any uncertainty for any practices which relate to the ABC Policy, employees must always seek the advice of their supervisor or Head of Department. Where there is still uncertainty, they should direct their concerns to Human Resource Department and Finance Department.
- 16.3. The ABC Policy will be reviewed from time-to-time, and at least once every three years 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.
- 16.4. All associates of Tech3 are responsible to complete all training modules of the ABC Policy and keep themselves up-to-date with Tech3 and latest policies and processes, in particular, this ABC Policy and ensure that the highest standards of compliance are followed.

Authorised by,

Jonathan Cheah  
CEO  
Tech3 Solutions Sdn Bhd  
Date: 7 May 2021

Alistair Wong Mun Thye  
COO  
Tech3 Solutions Sdn Bhd  
Date: 7 May 2021

## APPENDIX

The following are explanatory notes extracted from the MACC website for general understanding:

### What is the Malaysian Anti-Corruption Commission?

- The Malaysian Anti-Corruption Commission or MACC, is an independent and sole body that manages cases related to corruption as well as a front runner in anti-corruption initiatives in Malaysia.
- The MACC was established in January 2009, replacing its predecessor – the Anti Corruption Agency (ACA) in accordance to the newly enacted Malaysian Anti-Corruption Commission Act 2009.
- The role of the MACC is to eradicate corruption, abuse of power and malpractice in Malaysia with its functions deeply rooted to the principles of being Independent, Transparent and Professional in fulfilling its duties.

### What is Corruption?

- Corruption is the act of giving or receiving of any gratification or reward in the form of cash or in-kind of high value for performing a task in relation to his/her job description.
- An example, a contractor rewards a gift in the form of an expensive watch to a Government official for awarding a project to the company belonging to the contractor.

### Types of Offences of Corruption according to the MACC Act 2009

There are four (4) main offences stipulated in the MACC Act 2009 (Act 694) which are as follows:

- Soliciting/Receiving Gratification (Bribe) [Section 16 & 17A MACC Act 2009]
- Offering/Giving Gratification (Bribe) [Section 17(b) MACC Act 2009]
- Intending to Deceive (False Claim) [Section 18 MACC Act 2009]
- Using Office or Position for Gratification (Bribe) (Abuse of Power/Position) [Section 23 MACC Act 2009]

### What are the offences of Requesting/Receiving Gratification (Bribe)? [Section 16 & 17A MACC Act 2009]

- Any person or agent soliciting/receiving any form of gratification/bribe as an inducement for performing/not performing a task.
- Example: Baharudin bin Ahmad, YDP of Kangar Municipal Council, was accused of soliciting and receiving a bribe from a contractor of a housing development project spanning approximately 10 acres in Padang Besar, Perlis. In return, he promised to approve as well as ensure a smooth running of the project. The bribe received from the contractor was in the form of RM30,000 in-cash, RM30,000 in-cheque (cash cheque) and a Mizuno golf set worth RM2,500. The courts handed down a sentence of 4 years imprisonment and a fine of RM1.925 million.

### What is the offence of Offering/Giving Gratification Bribe? [Section 17(b) MACC Act 2009]

- Any person or agent offering/giving any form of gratification/bribe as an inducement for performing/not performing a task in relation to the official duty of a civil service officer.
- Example: Sibü – A contractor was sentenced to 8 months imprisonment and fined RM25,000 for giving a bribe of RM1,500 to one Sandum Hitam, a Forestry Management Officer. The bribe

was to expedite the application process for the 'Permit to Enter Coupe'. The offence took place at the Sibul District Forestry Office.

### **What is the offence of providing false claims? (Section 18 MACC Act 2009)**

- Any person providing documents such as receipts / invoices that are false or contains false details with the intention to deceive the principle (office).
- Example: SHAH ALAM – Datuk Md. Saberi Md., ex-Dean of the Faculty of Sports Science and Recreation of Mara Technology University (UiTM), was sentenced to 3 years imprisonment and fined RM10,000 by the Sessions Court on the count of acknowledging a false invoice for the supply of sports equipment worth RM138,600 in 1999.
- Md. Saberi was accused of acknowledging receipt of Multi Joint 2 AP, worth RM138,600, in good condition on 24 March 1999 which was not delivered in reality.
- The Judge also sentenced the same on the owner of the sports equipment supplier, one Zaleha Abdul Rahman aged 48 years, for the offence of colluding in producing the said invoice.

### **What is the offence of Abuse of Power? (Section 23 MACC Act 2009)**

- The abuse of power takes place when a person who is a member of a public or government body uses his position or the office in making a decision or taking action for the benefit of himself, his relative or associate.

### **What is the penalty for corruption related offences?**

The general penalty for any corruption related offences is:

- Maximum 20 years imprisonment; and
- A minimum fine of RM10,000 or 5 times the value of the bribe (whichever is higher)
- Example: If 'A' receives a bribe amounting to RM5,000, therefore, the penalty will be imprisonment and a fine of RM25,000 (RM5,000 x 5).
- If 'B' receives a bribe amounting to RM1,000, therefore, 'B' will be sentenced to an imprisonment term and fined RM10,000 (the minimum fine takes precedence as the penalty charge on the value of the bribe amounts to less than RM10,000 i.e. RM1000 x 5 = RM5,000).

The penalty for breach of S.17A is:

- Maximum 20 years imprisonment; and
- A fine of 10 times the value of the gratification or RM1,000,000 (whichever is higher)

### **Is bribery only in the form of monetary cash?**

- No. Bribery can also take shape in the form of gifts in-kind, discount offers, votes, services (including sex), job position/placement, loan and many other forms of payment for payments and purchases.

### **Does the tender selection process requires the declaration of any person of a selecting committee who has a direct/indirect interest in the project or is linked to any tender, required to declare his interest/link and to exclude himself from the selection?**

- Yes. The principle of declaring and exclusion of any person from the selection process /committee of any tender or quotation that has a direct/indirect interest/link with any tender/quotation submitted for a project/purchase and to allow the decision process to be conducted by a completely neutral committee.



## **What is the main cause of public service officers accepting a bribe? Is it due to low-income levels or otherwise?**

Based on a research conducted by the Malaysian Anti-Corruption Commission on the cause of corruption among public service officers, low levels of income is not the main reason for public services officers to engage in acts of corruption. The study revealed that the following were the main reasons for public service officers engaging in acts of corruption:

- Lifestyle beyond their means,
- Attitude of Greed,
- Conducive opportunities in engaging in acts of corruption,
- Low levels of integrity among the officers.

## **What is the definition of a gift?**

- According to the Service Circular No. 3 of 1998 (SC 3/1998), a gift comprises of cash money, free fares, shares, lottery tickets, travelling facilities, entertainment expenses, services, club membership, any form of commission, hampers, jewellery, decorative items and any item of high value that is given to a public official.

## **Is the giving of a hamper of small value perceived as a bribe?**

- Accepting or giving of gifts of any amount or value amounts to a corruption offence in the situation that an individual receives or gives such gifts from a supplier that the individual has an official dealing.
- Note: Individuals include civil servants, private sector employees as well as the general public.

## **Can a civil servant receive gifts during festive seasons?**

- Public officials are prohibited from accepting any gift in any form such as hampers, Mandarin oranges, Ang Pow packets and other forms of gifts from any person that is associated with the official duties of the officer.

## **Can a civil servant receive gifts from any party in an unofficial capacity?**

- Civil servants are allowed to receive gifts provided the value of the item is  $\frac{1}{4}$  of the emoluments or less than RM500. In the case that the item is valued more than the allowable value, the officer is required to report the item to the Head of Department for approval.
- However, there are exceptions for gifts exceeding RM500 under certain circumstances such as gifts received from friends due to retirement, transfer, engagement and marriage. Should there be any doubt on the receipt of such gifts, the official can report it to the Head of Department for further action and clarification.

## **What should be done if gifts such as hampers or flower bouquets from an unknown giver are placed on official's table or that are sent to the premises?**

- For such instances, officers are advised to report the item(s) to the Head of Department for further action/decision in order to avoid allegations on the officer by other parties.

## **Are civil servants permitted to receive Ang Pows or money packets at official functions?**

- According to the Regulations for Civil Servants (Conduct and Discipline) 1993 Regulation No.8 (1), public officials are not permitted to receive or give any gifts including through other parties associated in his/her official duties.
- However, in any unavoidable situations to decline or in any doubt, the officer is advised to immediately submit a written report of the gift to the Head of Department for approval.

### **What if the value of the gift received is less than RM100.00?**

- Gifts received of a value less than RM100.00 should be reported (without permission).

### **A private company has been awarded a tender to supply office equipments to Government departments. Can the department be allowed to receive donations in the form of gifts for the department's Family Day celebration?**

- Heads of Departments have to comply with the terms and conditions in granting permission. The receiving officer must submit a written report to the Head of Department for approval for the receipt of such gifts or donations. Top management's approval must be obtained in the case that the Head of Department is aware of such gifts/donations.
- If the value is less than RM10,000, permission from the Chief Secretary or the Controlling Officer is required.
- However, gifts valued more than RM10,000 must obtain the approval of the Treasury and subjected to Appendix D of the SC 3/1998.

### **Can a public officer accept a Breaking of Fast invitation from a hotel?**

- Such invitations are permitted provided they are not related to any official dealings or duties of the officer.
- However, invitations from parties having official dealings with the officer or the department must be referred to the Head of Department for approval in order to avoid allegations. In this case, such invitations are considered as an entertainment and not a gift.

### **Are Department Sports and Welfare Clubs allowed to appeal or receive any form of donation or money from parties with no official dealings?**

- Department Sports and Welfare Clubs are not allowed to directly appeal nor accept any contribution from either individuals or from private sector organizations.
- Such appeals will have to be sourced through the National Sports and Welfare Council (MAKSAK), whereby the council will provide allocations and distribute the donations accordingly to the respective party.

### **Can souvenirs or gifts be given to civil servants who deliver public talks?**

- Yes, it is allowable but not recommended. Items such as plaques (inexpensive), pennants, department handicraft items or print materials can be given to such officers.

### **A government official has received cash amounting to RM500 during the Festive Season from individuals who regularly deal with the department and difficult to refuse. The officer reports this to the Head of Department. What is the Head of Department's next course of action?**

- The Head of Department has to comply with the provisions of SC 3/1998. In such cases, the interest of the department should be considered in a holistic manner.

- Since the value of the gift is not commensurable as well as associated with official dealings/duties, the Head of the Department may instruct the officer to return the gift.

**Can an officer of a Statutory Body be allowed to accept gifts in the form of hampers from individuals associated in an official capacity?**

- Members of Statutory Bodies are also subjected to the SC 3/1998. Gifts are not permitted to be accepted in an official capacity and receipt of such gifts must be reported to the respective Head of Department.

**Are public officials allowed to receive free airlines tickets from any person under an official capacity?**

- No. This leads to a corruption offence deemed as a gratification in return for a service rendered.

**Are Government departments allowed to present souvenirs or gifts to politicians?**

- Yes. The souvenirs or presents should be in the form of a plaque that is inexpensive, pennant, department handicraft items or printed materials.

**Can Government Linked Companies (GLC's) donate hampers to Government departments during festive seasons in order to forge close ties with its clients?**

- GLC's may have their own policies on giving or receiving of gifts. However, the exchange of gifts in the pretext of acquiring a government tender amounts to a corruption offence.

**Are GLC's allowed to present hampers to private sector counterparts in order to strengthen the business relationship?**

**Can GLC's receive gifts from individuals or from private companies?**

**Can GLC's donate or sponsor Government departments to promote their products and services?**

- It depends on the policy of the GLC but if the intention is to bribe, then it is considered as an offence under the Malaysian Anti-Corruption Commission (MACC) Act 2009.