



A Member of  MMC Group

MEMO

To : All Employees

From : Jaizal Kamar Jalaludin
Head of Human Resources

Through : Marco Neelsen
Chief Executive Officer

Ref : PTP/PM/UPDATEMEMO/1207/2017

Date : 20 June 2017

Subject : **REVISION OF THE CODE OF ETHICS AND BUSINESS CONDUCT
FOR MANAGEMENT (AUGUST 2003 RELEASE) SPECIFICALLY ON
THE GIFTS POLICY**

In line with the allowable provisions under Anti-Bribery Legislations, Management has reviewed the Company's Code of Ethics and Business Conduct for Management (August 2003 release) as per attached in Appendix 1 and 2.

Sejajar dengan peruntukkan yang dibenarkan di bawah undang-undang pencegahan rasuah, pihak Pengurusan telah membuat semakan semula ke atas "Code of Ethics And Business Conduct For Management" Syarikat keluaran Ogos 2003 seperti di dalam Lampiran 1 dan 2.

The review made refers to the Gifts Policy which clarifies further on the definition of gifts, receiving or giving gifts and also introducing Gift Log book for recording purposes. It serves as a guideline on what constitutes appropriate gifts or token that can be received by an employee on instances when gifts received is more than the nominal values defined by Management.

Semakan yang dibuat merujuk kepada Polisi Hadiah yang menjelaskan lebih lanjut tentang takrifan hadiah, menerima atau memberi hadiah dan memperkenalkan buku Log Hadiah untuk tujuan rekod. Ia bertujuan sebagai panduan mengenai apa itu hadiah ataupun bentuk barangan yang boleh diterima oleh pekerja sekiranya hadiah yang diterima itu lebih daripada nilai nominal yang ditetapkan oleh Pengurusan.

Please note and comply the above accordingly. This Gifts Policy shall be enforced as per date of issuance of this memo.

Sila ambil perhatian dan patuhi sewajarnya perkara di atas. Polisi Hadiah ini akan berkuatkuasa mulai tarikh memo ini dikeluarkan.

Thank you.

Sekian, terima kasih



JAIZAL KAMAR JALALUDIN
Head
Human Capital Management

APPENDIX 1

GIFTS POLICY

14.0 Gifts

- (a) For the purpose of this Code, gifts are defined as objects, merchandise, products or hospitality as well as personal services or favours given without the expectation of payment such as hampers, souvenirs, diary, tickets, travel or promotional discounts. Hospitality includes invitations to attend an event (including sporting, cultural / business events and conferences), meals or other similar occasion.
- (b) The acceptance of a gift by an employee must always be subject to the provisions allowable under the relevant anti-bribery legislations currently in force or any integrity obligations taken up by the Company. The following provision serves as a guideline on what constitute appropriate gifts or token that can be received by an employee.
- (c) Employees shall not accept or offer gifts, gratuities, or favours, except those associated with common business courtesies of a nominal value of RM500 or less. Gifts exceeding this amount may be accepted or made to customers or other persons subject to the Chief Executive Officer's approval using the prescribed form and when the amount is divided among the team, the value shall not exceed RM 500 per person.
- (d) Upon approval of the CEO, gifts exceeding the RM500 value shall be registered in Gifts Register located at the reception, Block A, Wisma PTP by the respective department's representative. All gifts shall be delivered to the office address only and during working hours.
- (e) An employee shall not solicit or accept gifts of any kind, intended to create an improper advantage or that which may create the appearance of impropriety, either directly or indirectly from third parties or from any other employee of the Company.

- (f) An employee shall not offer, give or promise any benefit, reward or gift of any kind (which is of substantial value), intended to create an improper advantage or that which may create the appearance of impropriety, either directly or indirectly to any employee or agent of any organization that has business dealings with the Company.
- (g) The provisions above shall extend to inter-Company business transactions and to any governmental body / officials. The onus to report / declare the receipt or giving of rewards or gifts above is placed on the employee concerned.
- (h) The above provisions do not prohibit lawful reimbursement for reasonable and bona fide expenditures incurred by an employee who is directly related to the promotion of the Company's products and / or services.



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APPENDIX 2

GIFT POLICY

