



**SYMPHONY LIFE BERHAD**

**ANTI-BRIBERY AND ANTI-CORRUPTION  
POLICY**

**1<sup>st</sup> JUNE 2020**

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## **1. INTRODUCTION**

The Anti-Bribery and Anti-Corruption Policy (“ABAC Policy” and/or “the Policy”) has been developed as part of the Symphony Life’s Anti-Bribery and Anti-Corruption Management System (“ABACMS”) which has been designed to align with the requirements set out in the ISO37001:2016. Having a clear and unambiguous policy statement on the Company’s position regarding bribery and corruption forms the cornerstone of an effective integrity management system. The policy should thus be read in conjunction with the ABACMS as well as the Company’s various policies & guidelines. If multiple documents speak on the same subject, then the more stringent provision shall apply.

## **2. ANTI-BRIBERY AND ANTI-CORRUPTION COMMITMENT**

Symphony Life Berhad (“SYMLIFE”) Group is committed to conducting business dealings with integrity. This means avoiding practices of bribery and corruption of all forms in the Company’s daily operations.

SYMLIFE Group adopts a zero-tolerance approach against all forms of bribery and corruption. Employees who refuse to pay bribes or participate in acts of corruption will not be penalised even if such refusal may result in losing business.

The Policy leverages on the values and core principles set out in the Group’s Code of Conduct. Full compliance to both the spirit and the letter of this Policy is mandatory and should be maintained using a principle-based approach.

## **3. OBJECTIVE**

This policy sets out SYMLIFE Group’s overall position on bribery and corruption in all its forms. The objective of the Policy is to provide information and guidance on standards of behaviour that must be adhered to and how to recognise as well as deal with bribery and corruption.

The Policy is not intended to be exhaustive, and there may be additional obligations that Directors and Employees are expected to adhere to or comply with when performing their duties. For all intents and purposes, the Directors and Employees shall always observe and ensure compliance with all applicable laws, rules and regulations to which they are bound to observe in the performance of their duties.

## **4. SCOPE**

This policy is applicable to SYMLIFE, its controlled organisations, business associates acting on SYMLIFE’s behalf, the Board of Directors and all SYMLIFE personnel.

Joint-venture companies in which SYMLIFE is non-controlling or co-venture and associated companies are encouraged to adopt this Policy as the bare minimum or similar principles and standards as part of their anti-corruption framework. External Providers are also expected to comply with this policy in relation to all work conducted with SYMLIFE, or on SYMLIFE’s behalf.

Where appropriate, SYMLIFE’s Associates, partners, agents, vendors, suppliers, contractors, consultants and other third party service providers shall sign a separate agreement in order to undertake to comply with this Policy.

This Policy is intended to supplement all applicable laws, rules, and other internal policies and is not intended to supplant any local or international laws.

## 5. REFERENCES

Anti-bribery and Anti-Corruption Management System  
Group's Delegated Authority Limits  
Code of Conduct  
Group Communication Policy and Guidelines  
Employees Handbook  
Whistleblowing Policy

## 6. DEFINITIONS

**"ABACMS"** means SYMLIFE's Anti-Bribery and Anti-Corruption Management System;

**"Audit Committee"** means the Audit Committee of the Board of Directors of SYMLIFE;

**"Bribery & Corruption"** means any action which would be considered as an offence of giving or receiving 'gratification' under the Malaysian Anti-Corruption Commission Act 2009 (MACCA). In practice, this means offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person who is in a position of trust within an organisation.

Bribery may be 'outbound', where someone acting on behalf of SYMLIFE attempts to influence the actions of someone external, such as a Government official or client decision-maker. It may also be 'inbound', where an external party is attempting to influence someone within the Company such as a senior decision-maker or someone with access to confidential information.

**"Gratification"** is defined in the MACCA to mean the following:

- (a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
- (b) any office, dignity, employment, contract of employment or services, and 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 favour 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).

**"Business Associate"** means an external party with whom SYMLIFE has, or plans to establish, some form of business relationship. This may include clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries, investors and any other third party service providers or persons who perform services for or on behalf of the Group.

**"Conflict of Interest"** means when a person's own interests either influence, have the potential to influence, or are perceived to influence their decision making at SYMLIFE.

**“Controlled organisation”** means an entity where SYMLIFE has the decision-making power over the organisation such that it has the right to appoint and remove the management. This would normally be where SYMLIFE has the controlling interest (>50% of the voting share ownership), but it could be where there is an agreement in place that SYMLIFE has the right to appoint the management, for example a joint venture where SYMLIFE has the largest (but still <50%) allocation of the voting shares;

**“Corporate Gifts”** means something given from one organisation to another, with the appointed representatives of each organisation giving and accepting the gift. Corporate gifts may also be promotional items given out equally to the general public at events, trade shows and exhibitions as a part of building the Company’s brand. The gifts are given transparently and openly, with the implicit or explicit approval of all parties involved. Corporate gifts normally bear the Company name and logo. Examples of corporate gifts include items such as diaries, table calendars, pens, notepads and plaques.

**“Donation & Sponsorship”** means charitable contributions and sponsorship payments made to support the community. Examples include sponsorship of educational events, supporting NGOs, and other social causes;

**“Employees”** means all employees including Directors of the company and its subsidiaries

**“Exposed Position”** means a staff position identified as vulnerable to bribery through a risk assessment. Such positions may include any role involving: procurement or contract management; financial approvals; human resource; relations with government officials or government departments; sales; positions where negotiation with an external party is required; or other positions which the Company has identified as vulnerable to bribery;

**“Entertainment/Hospitality Expenses”** means meals, drinks, lodging, travel or other expenses given to or received from people who have, who may have facilitated the creation of a business relationship with the Group. This include expenses incurred by a prospective client, customer or business partner. Expenses can be a legitimate contribution to achieving a business outcome and also includes attendance at social, cultural or sporting events.

**“Hospitality”** means the considerate care of guests, which may include refreshments, accommodation and entertainment at a restaurant, hotel, club, resort, convention, concert, sporting event or other venue such as Company offices, with or without the personal presence of the host. Provision of travel may also be included, as may other services such as provision of guides, attendants and escorts; use of facilities such as a spa, golf course or ski resort with equipment included;

**“SYMLIFE” or “Company”** means Symphony Life Berhad and its group of companies;

**“Personnel”** means directors and all individuals directly contracted to the Company on an employment basis, including permanent and temporary employees.

## 7. POLICY OWNER

The Corporate Services Department is the owner of this policy.

## **8. ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

- 8.1** Bribery and corruption in all its forms as it relates to SYMLIFE’s activities is prohibited.
- 8.2** Bribery and corruption may take the form of anything of value, such as money, goods, services, property, privilege, employment position or preferential treatment

SYMLIFE personnel and its business associates shall not therefore, whether directly or indirectly, offer, give, receive or solicit any item of value, in the attempt to illicitly influence the decisions or actions of a person in a position of trust within an organisation, either for the intended benefit of SYMLIFE or the persons involved in the transaction.

- 8.3** The Malaysian Anti-Corruption Commission in its official portal ([www.sprm.gov.my](http://www.sprm.gov.my)) describes “corruption” as an 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 function or activity. The example given is where 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.

The MACC Act stipulates four (4) main offences, being:

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

The Malaysia Anti-Corruption Commission (Amendment) Act 2018, which will be in force on 1 June 2020 introduces two (2) more offences, it being:

- Offering / Giving Gratification by commercial organisation (Corporate Liability) – Section 17A MACC Act
- Deemed Parallel Personal Liability for Senior Personnel (Personal Liability) – Section 17A(3) MACC Act

- 8.4** Corruption may include “bribery” which is any offering, promising, giving, requesting agreeing to receive, accepting a gratification, or other advantages with the intention of inducing or rewarding someone to perform their job function or activity improperly. Form of bribery includes kickbacks, inflated commissions, expensive gifts, political donations, excessive or inappropriate entertainment.
- 8.5** The anti-bribery and corruption statement applies equally to its business dealings with commercial (‘private sector’) and Government (‘public sector’) entities, and includes their directors, personnel, agents and other appointed representatives. Even the possible appearance of bribery or corruption is to be avoided, in particular when dealing with Government officials.
- 8.6** The anti-bribery and anti-corruption policy applies to all countries worldwide, without exception and without regard to regional customs, local practices or competitive conditions.
- 8.7** No employee or external party will suffer demotion, penalty or other adverse consequences in retaliation for refusing to pay or receive bribes or participate in other illicit behaviour.
- 8.8** SYMLIFE is also committed to conducting due diligence checks on prospective personnel, particularly as it relates to appointments to positions where a more than minor bribery or corruption risk has been identified.

## **9. RECOGNITION OF LOCAL AND INTERNATIONAL LEGISLATIONS**

SYMLIFE is committed to conducting its business ethically and in compliance with all applicable laws and regulations in the countries where it does business.

These laws include but are not limited to the Malaysian Penal Code (revised 1977) (and its amendments), the Malaysian Anti-Corruption Commission Act 2009 and its amendments, the Companies Act 2016, the US Foreign Corrupt Practices Act 1977 (amended 1998), and the UK Bribery Act 2010. These laws prohibit bribery and acts of corruption, and mandate that companies establish and maintain accurate books and records and sufficient internal controls.

In cases where there is a conflict between mandatory laws and the principles contained in this and other policies, the law shall prevail and overrule the content of the Policy.

## **10. TOP MANAGEMENT COMMITMENT**

The Board of Directors and Top Management of the Group are committed towards ensuring the highest standard of integrity and accountability in conducting its businesses, which includes ensuring conformity of legal requirements in all business activities under the Group. The Top Management and Officers of the Group ensures the effectiveness of the Anti-Bribery and Anti-Corruption System through:

- a) provision of suitable and adequate resources and support;
- b) setting up fundamental requirements to employees from all level and functions;
- c) active participation from the Board of Directors and Top Management in the establishment, implementation, and improvement of the system.

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

SymLife has adopted a “NO GIFT” Policy whereby, subject only to certain narrow exceptions, SYMLIFE employees are prohibited from, directly or indirectly, receiving or providing gifts. SYMLIFE requires employees and directors to abide by this policy to avoid conflict of interest or the appearance of conflict of interest for either party in on-going or potential business dealings between SYMLIFE and external parties as gifts can be seen as a bribes that may tarnish SYMLIFE’s reputation or be in violation of anti-bribery and corruption laws.

However, the Group recognises that the exchange of business courtesies, such as modest gifts, hospitality and entertainment (including meals, invitations to attend promotional events or parties) particularly during festive periods is customary and legitimate to create goodwill, and/or strengthen business and commercial relationships. Such courtesies are allowed if they are not lavish, appropriate and reasonable in the light of accepted business practices of the relevant businesses that the Group operates in and is not intended to improperly influence the decisions of the person involved.

Some examples of acceptable gifts and/or benefits are as follows:-

- (a) token gifts offered in business situations or to all participants and attendees for example, work related seminars, conferences, trade and business events;
- (b) gifts presented at work-related conferences, seminars and/or business events;
- (c) gifts given in gratitude for hosting business events, conferences and/or seminars;
- (d) refreshments or meals during meetings or as participants of work-related conferences and/or seminars; and
- (e) meals for business purposes.

As a general principal, the Directors and Employees should not accept or give a gift to a third party if it is made with the intention of influencing the third party to obtain or retain business, or in exchange for favours or benefits. In addition, lavish or unreasonable gifts or hospitality should not be accepted as such gifts or hospitality may be perceived or interpreted as attempts by the Directors or Employees to obtain or receive favourable business treatment for personal benefits.

The Directors and Employees should be mindful in giving or receiving gifts or hospitality as it could be perceived as a way of improperly influencing the decision making of the recipient. Hence, the intention behind the gifts or hospitality should always be considered.

The basic rules on Gifts, Entertainment and Hospitality expenses are:-

- **Bona fide:** Made for the right reason: if a gift, entertainment or hospitality, it should be given clearly as an act of appreciation, if travel expenses then for a bona fide business purpose.
- **Legitimate:** It will be given as a legitimate, justified business courtesy. Where it is to be provided to a public official, must be in compliance with the applicable governmental policy or guidelines in the jurisdiction where the public official is.
- **No obligation:** The activity will not create any obligation or expectation on the recipient.
- **No undue influence:** The expenditure will not be seen as intended for, or capable of, achieving undue influence in relation to a business transaction or public policy engagement. It should also not be provided to a customer or received from a Third Party who are engaged in a tender or competitive bidding exercise of SYMLIFE; unless it takes a form of basic refreshments provided as a business courtesy.
- **Made openly:** It will not be performed in secret and be undocumented – if it is, then the purpose becomes questionable.
- **Legality:** It is compliant with relevant and applicable laws, rules and regulations.
- **Accords with stakeholder perception:** The activity would not be viewed unfavourably by stakeholders were it made known to them.
- **Proportionate:** The value and nature of the expenditure is not disproportionate to the occasion. It should not be, or give the appearance of being lavish, offensive or inappropriate.
- **Conforms to the recipient's rules:** The gift, hospitality or reimbursement of expenses will meet the rules or code of conduct of the recipient's organisation.
- **Infrequent:** The giving or receiving of gifts, entertainment and hospitality is not overly frequent between the giver and the recipient.
- **Documented:** The expense will be fully documented including purpose, approvals given and value.
- **Reviewed:** The records of entertainment and hospitality expenses and the effectiveness of the policy and procedures are reviewed by management.

When unsure, Employees and Associates should consult his/her Head of Department or the Corporate Services Department or any contact within SYMLIFE.

## **12. SPONSORSHIPS, CHARITABLE CONTRIBUTIONS AND DONATIONS**

Charitable contributions and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. It is however important that all donations and sponsorships are made in accordance with SYMLIFE's policies and receive prior approval and authorization based on the Group's Delegated Authority Limits ("DAL").



However, Directors and Employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery.

Employees of SYMLIFE need to be certain that donations to local or foreign-based charities or beneficiaries are not disguised illegal payments or bribes to government officials, and must ensure that the charity does not act as a conduit to fund illegal activities in violation of international anti-money laundering, anti-terrorism and other applicable laws.

Generally, all sponsorships and donations must comply with the following:

- ensure such contributions are allowed by applicable laws;
- obtain all the necessary internal and external authorisations;
- be made to well established entities having an adequate organisational structure to guarantee proper administration of the funds;
- be accurately stated in the company's accounting books and records;
- not to be used as a means to cover up an illegal payment or bribery;
- not to be used as a means to influence business decisions;

Examples of red flags to look out for are as follows:

- The proposed recipient /organisation has affiliations with a Public Official or their relatives are involved;
- The contribution is made on behalf of a Public Official;
- There is a risk of a perceived improper advantage for SYMLIFE;
- The proposed recipient is based in a high risk country, the request comes from a high risk country or the activity takes place in a high risk country.

SymLife requires employees to use good judgment and common sense in assessing the requests for donations, sponsorships and charitable contributions. When in doubt as to whether a charitable contribution or social benefit is appropriate, employees should seek further advice from Finance Division / Corporate Services Department / Legal Department for assistance.

### **13. FACILITATION PAYMENTS**

SYMLIFE adopts a strict policy of disallowing the use of facilitation payments in its business. Facilitation payments are typically small, unofficial payments made to secure or expedite the performance of a routine or necessary action (such as the issuance of permits and licences, processing visas or work permits, processing government papers, clearing goods through customs, obtaining adequate police protection etc.) to which the payer or company is entitled, legally or otherwise.

SYMLIFE prohibits all its Employees from making or accepting, facilitation payments or "kickbacks" of any kind. Associates must avoid any activity that might lead to a facilitation payment or kickback being made or accepted.

Employees are expected to notify their immediate superior when encountered with any requests for a facilitation payment. In addition, if a payment has been made and Employees are unsure of the nature, their immediate superior must be immediately notified and consulted. They must also ensure that the payment has been recorded transparently.

However, there could arise circumstances in which the Directors or Employees have no alternative but to make a facilitation payment in order to protect themselves from injury, loss of life or liberty.

Where the kickback or facilitation payment is being extorted and/or any employee of SYMLIFE is being coerced to pay and their safety or liberty is under serious threat and they have no alternative but to make the kickback in order to protect their life, limb or liberty, the affected employee must immediately report the matter to the Head of Department and Corporate Services Department. In the case of Directors, please report to the Company Secretary as soon as possible.

#### **14. POLITICAL CONTRIBUTIONS**

As a matter of general policy, SYMLIFE does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office.

If any contribution is made, it must be permissible under applicable laws and must not be made with any promise or expectation of favourable treatment in return and must be accurately reflected in SYMLIFE's accounting records.

Our Personnel and Business Partners must not make donation or funding of any kind to political parties or individual politicians or towards political campaigns or initiatives for or on behalf of SymLife. Any request for political donation or contribution must be pre-approved by the Board of Directors of Symphony Life Berhad and no political contribution may be made unless SymLife has received a satisfactory opinion from qualified local counsel as to its legality under applicable laws.

Our Personnel may participate in political activities in their individual capacity with their own money and at their own time but to make it clear that their individual political views and actions are personal and not reflective or representative of SymLife. Under no circumstances, however, will any employee be compensated or reimbursed in any way by the Company for a personal political contribution.

#### **15. AGENTS, THIRD PARTIES AND OTHER INTERMEDIARIES**

SYMLIFE's dealings with Business Associates and third parties, which include contractors, suppliers, agents, consultants, joint venture partners, introducers, intermediaries etc., must be carried out in compliance with all relevant laws and consistent with the values and principles of SYMLIFE's Code Of Conduct. As part of this commitment, all forms of bribery and corruption are unacceptable and must not be tolerated.

Unless evidence suggests otherwise, all our Business Partners are independent contractors. They are not agent of or representative of SYMLIFE and they are not entitled or must not hold themselves out to have the authority to bind SYMLIFE for any purpose.

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 SYMLIFE.

To further ensure that SYMLIFE does business with third parties that share our standards of integrity, we must do the following:

- Conduct due diligence to assess the integrity of the third parties.
- Do not enter into business dealings with any third party that is suspected of engaging in bribery and improper business practices unless those suspicions are investigated and resolved.
- All third parties must be made aware of SYMLIFE's ABAC Policy, Code of Conduct, Whistleblowing Policy and our expectations of them.
- To periodically monitor third party performance and business practices.

Prior to the engagement or commencement of any business or professional relationship, all third parties must sign a declaration form which states that:-

- They understand and will comply with all laws relating to anti-bribery and anti-corruption.
- They are committed to the ABAC Policy.
- They have not been convicted or subject to any investigations by the relevant authorities for actual or suspected breach of law.
- They undertake to inform SYMLIFE of any breach/infringement of this ABAC Policy.
- They agree that the declaration form shall form part of the terms and conditions of their appointment and/or contract of service.
- They acknowledge that SYMLIFE has the right to terminate or suspend their contract and disqualify them from tendering for future contracts if they are found to be in breach of the ABAC Policy.

SYMLIFE 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 SYMLIFE's behalf where a more than minor bribery risk has been identified.

## **16. RECRUITMENT OF EMPLOYEES**

SYMLIFE provides equal opportunity for any qualified and competent individual to be employed by the company from various multicultural and multiracial background, sourced 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, for all recruitments:

- Where applicable, 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;
- Offers of employment should not be given in exchange for or to reward any benefit received by SYMLIFE. The Company should not offer employment, procure and/or create an opening within the Group in exchange for a personal benefit or seek an unfair advantage in any business negotiation or as an inducement for future business.

## **17. WHISTLEBLOWING POLICY: RAISING A CONCERN OR COMPLAINT**

Our success in combating all forms of bribery and corruption hinges on our personal commitment to adhere to this Policy. Therefore, it is our responsibility to promptly report any suspected contraventions of this Policy.

If you have any suspicions or concerns regarding conduct to which this Policy applies, or if you become aware of any action in conflict with this Policy, you must report those concerns or actions to your immediate manager, Compliance Unit, Internal Audit, Human Resources or Legal Department, or report your concerns, confidentially, by following the procedure set out in the Whistleblowing Policy and Procedures made available via the Company's website [www.symphonylife.my](http://www.symphonylife.my)

Any SYMLIFE Employee who fails to report known or suspected violations may be subject to disciplinary action including termination of employment. In Malaysia, any person who knows and fails

to report an act of giving and offering of bribes is committing an offence under Section 25 (1) and (2) of the MACC Act 2009.

Any report made will be treated with utmost confidentiality. No Employee or Associate acting in good faith will suffer adverse consequences to his employment or retaliation for reporting or for refusing to engage in prohibited conduct, even if such refusal results in loss of business opportunities to the Company or the Group.

If you believe that you have suffered any detrimental treatment as a result of refusing to take part in bribery, or because of reporting concerns under this policy in good faith, you should raise the matter by following the procedure set out in the Whistleblowing Policy and Procedures made available via the Company's website [www.symphonylife.my](http://www.symphonylife.my)

## **18. CONFLICTS OF INTEREST**

Conflicts 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 judgment 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.

In situations where a conflict does occur, personnel are required to declare the matter as per the Employees Handbook.

## **19. STAFF DECLARATION**

All SYMLIFE personnel shall certify in writing that they have read, understood and will abide by this policy. A copy of this declaration shall be documented and retained by the Human Resources Department for the duration of the personnel's employment.

The Corporate Services Department reserves the right to request information regarding an employee's assets in the event that the person is implicated in any bribery and corruption-related accusation or incident.

## **20. ANTI-BRIBERY AND ANTI-CORRUPTION COMPLIANCE FUNCTION**

SYMLIFE shall establish and maintain an Anti-Bribery and Anti-Corruption function to oversee the design, implementation and management of the anti-bribery compliance programme and to be responsible for all anti-bribery and anti-corruption compliance matters.

The Corporate Services Department shall perform functions below within the Company structure, equipped to act effectively against bribery and corruption in the following manner:

- provide advice and guidance on anti-bribery compliance programme and issues relating to bribery and corruption;
- take appropriate steps to ensure that there is adequate monitoring, measurement, analysis and evaluation of the anti-bribery compliance programme; and
- report on the performance of the anti-bribery compliance programme to the management and Audit Committee when the need arises.

Appropriate resources shall be provided for effective operation of the anti-bribery compliance programme and staffed with persons who have the appropriate competence, status, authority and independence.

SYMLIFE shall conduct regular risk assessments to identify the bribery and corruption risks affecting the business, set anti-bribery and anti-corruption objectives, and assess the effectiveness of the controls in achieving those objectives.

## **21. TRAINING, AWARENESS AND COMMUNICATION**

All employee under the Group shall be trained and made aware of the requirements stipulated in this Policy. This Policy along with the Group's Code of Conduct shall be communicated to:

- a) new employees
- b) existing employees whose position is being identified as potentially exposed

Employees are required to keep up-to-date with the Group latest policies and procedures, to ensure that the highest standards of compliance are being adhered.

## **22. ENFORCEMENT FOR NON-COMPLIANCE**

SymLife regards acts of bribery and corruption as serious matters and will take appropriate actions in the event of non-compliance of this Policy. For SYMLIFE Personnel, non-compliance of this Policy may lead to disciplinary action and termination of employment.

For external parties, non-compliance may lead to penalties including termination of contract. Further legal action may also be taken in the event that SYMLIFE's interests have been harmed by the results on non-compliance by individuals and organisations.

Non-compliance as identified by the audit and any risk areas identified through this and other means should be reported to the top management and Audit Committee in a timely manner in accordance with the level of risk identified.

## **23. COMPLIANCE REVIEW AND CONTINUOUS IMPROVEMENT**

The Corporate Services Department is responsible in reviewing the compliance, effectiveness and implementation of the Policy. Any improvements will be made as soon as possible.

All directors, officers, employees and third party/agents are responsible for the success of this policy and should ensure that they use it to disclose any bribery or corruption. All directors, officers and employees are invited to comment on this policy and suggest ways to improve it. Any comments, suggestions or queries should be addressed to the Corporate Services Department.

The Policy will be reviewed from time-to-time to ensure that it continues to remain relevant, appropriate and effective in the enforcement and compliance with the prevailing law; and may be amended at any time. All directors, officers and employees will be notified of any material revisions to this Policy.