

# **GIFTS & HOSPITALITY POLICY**

**ZPEED SOLUTIONS SDN BHD's** personnel are prohibited from receiving or asking for (soliciting) gifts from external parties. Under no circumstances may our personnel accept gifts in the form of cash or cash equivalent, including gift certificates, loans, commissions, coupons, rebates, or any other related forms.

This policy applies to all ZPEED SOLUTIONS SDN BHD's employees and directors (executive and non-executive), family members or agents acting for or on behalf of ZPEED SOLUTIONS SDN BHD.

ZPEED SOLUTIONS SDN BHD 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 ZPEED SOLUTIONS SDN BHD and external parties as a gift can be seen as a bribe that may tarnish ZPEED SOLUTIONS SDN BHD's reputation or be in violation of anti-bribery and corruption laws.

The only form of gift-giving allowed to external parties is a corporate gift. Any gift-giving or event of hospitality is subject to approval from top management and must fulfil the following conditions:

- a) They are limited, customary and lawful under the circumstances;
- b) They do not have or are perceived to have (by either the giver or the receiver), any effect on actions or decisions;
- c) There must be no expectation of any specific favour or improper advantages from the intended recipients;
- d) The independent business judgment of the intended recipients must not be affected;
- e) There must not be any corrupt / criminal intent involved; and
- f) The giving out of the gift and hospitality must be done in an open and transparent manner.

## Document Information and history

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## Receive a gift

Gifts are only allowed if they are:

- ✓ reasonable;
- ✓ not often;
- ✓ not requested;
- ✓ not cash or cash equivalents; and
- ✓ is not intended to influence business decisions.

You can keep all gifts worth RM300.00 or less, either as a token of recognition, presentation or otherwise.

For gifts exceeding RM300.00, you must register with the Registrar's office for receipt of the gift.

## Receiving hospitality offers (real business reasons)

Offered hospitality is only acceptable where there are direct links to work arrangements and genuine business reasons to be shown, for example:

- ✓ attend or speak at a conference, which provides free awards, travel and accommodation (this does not need to be declared to the Registrar unless the prize is accepted);
- ✓ take free training courses; or
- ✓ Acceptance of a meal to enhance business relationships.

It is acknowledged that, in carrying out your duties, you will need to periodically maintain good relationships with current and future business partners and stakeholders and this may include, for example, lunch and simple dinner reception. This is acceptable where there are genuine business reasons.

## Offer gifts and hospitality (real business reasons)

You must be aware of the value of all the gifts and hospitality offered and obtained from company funding, and expect that such funding will be used for legitimate purposes and to demonstrate value for money. In exceptional circumstances, it may be appropriate for you to give a gift not exceeding RM 300.00, for example:

- ✓ give a bouquet for sick or retired employees;
- ✓ give a token of acceptance to someone speaking at a free conference; and

It is acceptable to provide simple hospitality in the form of lunches and / or dinners to existing contractors and stakeholders and for genuine business reasons.

You can keep all gifts worth RM300.00 or less, either as a token of recognition, presentation or otherwise.

For gifts exceeding RM300.00, you must register with the Registrar's office for receipt of the gift.

## Declaration

You must make a declaration as soon as possible after the offer or receipt of the gift or hospitality. All declarations are in the HR Office in the required format as shown below. The HR will make a declaration on the list. The register is an annual document and will be maintained on a calendar year basis and reported quarterly under the publication scheme.

It is recommended that you make your declaration by email, and keep a copy for your personal records. Your declaration must include the following information:

- 1) the date of the gift or hotel offer, and the date of incident if applicable;
- 2) Name, job title and recipient / provider organization;
- 3) the form and purpose of the gift or hospitality accepted or rejected;
- 4) the name of any other organization involved;
- 5) budget value.

*Example:*

Date of receipt	Receipt Name	Received from	Description of the gift / hospitality	Estimated value	Reason to receive gift

You should consult the HR for any guidance required under this Policy. In general, if you have any doubts about whether an item should or should not be declared, you are advised to declare it.

Monitoring of Registers will be reviewed quarterly by the Anti-Bribery Committee and the results will be brought to the attention of top management during Management Review Meeting.

## Facility Payment

It is prohibited to use facility payments in its business. Facilitation payments are payments or other provisions that are made personally to individuals who handle the process or decision, usually involving public servants. It is provided to guarantee or accelerate the performance of tasks or routine or administrative tasks.

You must reject to make a payment and report to the Registrar immediately if they encounter any request for a facilitation payment. In addition, if payments are made and staff are unsure, the Registrar must be notified immediately, and the payment should be recorded accordingly.

Only if the safety of an employee is threatened, it is allowed to make payments. Employees must report the incident to their Registrars and Managers to record the details and keep a record of what they have paid.

## **Donations and Sponsorships, Including political donations**

As stated, Political Payments or "donations in the form" cannot be made by employees with company funds. The staff cannot participate in party politics.

Political payments classified as "Donations in the form" such as use of company facilities, resources, funds or premises for political activities such as rallies, campaigns, elections or political speeches are not permitted. In the event of a request from the government, political party, organization or their representatives, the Chairman / DIRECTOR must be consulted.

Employees are not allowed to engage in political activities outside of office hours. Employees are free to donate funds to any political party for their own good and the amount contributing to a political party is not allowed by the company.

Employees participating in any political activity outside of office hours are prohibited from wearing company uniforms or related identities (cars, uniforms, etc.). Employees who associate the company with any political movement or activity without the prior written approval of the Director shall consider violations of the code of ethics and be managed under the Decision Management Framework.

Vendors and business partners are also advised not to associate the company with any political donations or activities without the written approval of the Chairman or DIRECTOR.

## **CONFLICT OF INTEREST**

Conflicts of interest arise in situations where there is a personal interest that may be considered to have the potential to interfere with the objectivity of performing the duties on behalf of the Company. All employees should avoid situations where their personal interests may conflict with their professional duties or obligations. Employees may not use their positions, official working hours, resources and assets of the Company, or any information available to them for personal gain.

In the event of a conflict, staffs are required to declare it to the top management or HR Dept. Failure to do so may result in employment / service termination.