BOND PRICING AGENCY MALAYSIA

GIFT, ENTERTAINMENT, HOSPITALITY AND TRAVEL POLICY

EFFECTIVE DATE: 25 SEPTEMBER 2024

1.0 INTRODUCTION

Bond Pricing Agency Malaysia Sdn Bhd (BPAM) has adopted a zero-tolerance policy against any forms of bribery and corruption and has established BPAM's Anti-Bribery and Corruption Policy (hereinafter referred to as "**BPAM's ABAC Policy**").

As a general rule, BPAM employees are discouraged from directly or indirectly, receiving or providing any gift(s), entertainment, hospitality and/or travel allowance from or to any party. This is to avoid conflict of interest or the appearance of conflict of interest between BPAM and any third party.

BPAM has set out the definition and clear guidelines of acceptable and non-acceptable gifts, entertainment, hospitality and travel benefits (hereinafter referred to as the "**GEHT Benefits**") which is stated in this Gifts, Entertainment, Hospitality and Travel Policy (hereinafter referred to as the "**GEHT Policy**"). This GEHT Policy provides guidance on how to recognise and deal with the different forms of gifts and benefits which may lead to bribery and other corrupt activities and issues that may arise in the course of business.

This GEHT Policy shall be read together and is in furtherance of BPAM's ABAC Policy in clarifying what forms of gifting is acceptable and what is not, to avoid any conflict of interest and to ensure that impartial treatment is provided to all individual and organisations including any of BPAM's clients and business partner.

It is also intended to apply to every director (executive and non-executive). BPAM also expects its clients, service providers, vendors, contractors, subcontractors, consultants, agents, representatives and others performing work or services for or on behalf of BPAM to comply with the relevant parts of the GEHT Policy when performing such work or services.

The GEHT Policy is not intended to provide definitive answers to all questions regarding gifts and benefits. Rather, it is intended to provide employees with a basic guidelines and standard operating procedures in handling the receiving and provision of gifts and benefits to and from third parties.

Failure to comply with this GEHT Policy, whether intentional or not, may lead to disciplinary action and criminal liability for the individual(s) involved. If you have any doubt about the scope of applicable laws or the application of this GEHT Policy and/or any other BPAM's policies concerning the fight against bribery and corruption, please contact the Compliance Officer immediately.

2.0 GENERAL

2.1 When giving or receiving GEHT Benefits the following principles shall be adhered to:

(a) **Bona fide**: the GEHT Benefits were given clearly as an act of appreciation, with no ill intention to persuade or influence decisions;

(b) **No obligation**: the GEHT Benefits were given without any obligation, return of favour, or expectation from the recipient;

(c) **No undue influence**: the GEHT Benefits are not to be seen as intended for, or capable of, achieving undue influence over a transaction or decision (either business decision or in relation to decisions by public authorities or regulators) or compromising integrity and objectivity in the performance of the recipient's duties;

(d) **Made openly**: the GEHT Benefits are not made in secret and undocumented. The purpose, approvals given, value and other necessary details shall be documented;

(e) **Legality**: the GEHT Benefits does not contradict to relevant laws governing the giver and the recipient;

(f) **Accords with stakeholder perception**: the GEHT Benefits given would not be viewed unfavourably by stakeholders were it made known to them;

(g) **Proportionate**: the value and nature of the GEHT Benefits are not disproportionate to the occasion, e.g. gift or meals of a certain value given to the CEO of an organisation may be deemed appropriate but one of the same value given to a junior staff may be deemed excessive;

(h) **Conforms to the rules governing the giver or the recipient**: the GEHT Benefits shall be in line with the provision of this GEHT Policy; and

(i) **Infrequent**: the GEHT Benefits are not given overly frequent, and in the case of gifts, all gifts except Allowable Gifts are only allowed to be accepted by employees in accordance with section 3.8 of this GEHT Policy.

2.2 No GEHT Benefits (save for any Allowable Gifts) shall be given to any public body, agent (both as defined in BPAM's ABAC Policy), any ministry, any government entity, government authority, government body, government department, or government agency, regulator, auditor, any of its officers and/or its family/household members (hereinafter collectively referred to "**public official**") in its/his official capacity and in the carrying out of its/his duties.

For further clarification, all forms of gift and hospitality provided for a public official by any party within the course of his official duties is prohibited, save for any provisions of Mementos and/or Corporate Gifts (as defined below) in the event that a public official is invited as BPAM's guest for event hosted by BPAM.

Any exception to the aforementioned must be accompanied with the Chief Executive Officer prior written approval. If approval is obtained, employees must ensure that the GEHT Benefits is provided in accordance with the principles listed in section 2.1 above and the terms and conditions of this GEHT Policy, BPAM's ABAC Policy and Code of Business Conduct Policy.

Definitions

Business Partner	**:**	means any of BPAM's business partners, clients, service providers, vendors, and/or any other third party howsoever engaged by BPAM.
Compliance Officer	**:**	means BPAM's appointed Compliance Officer, for the avoidance of doubt, in the case of surrendering any gift or submission of any forms, such submission can be made to any personnel attached to the Compliance department.
Form I	**:**	Gifts Acceptance Declaration Form – This Form I is to be used in accordance with section 3.4 of this GEHT Policy.
Form II	**:**	Provisions of Gifts Form ("**Form II**") – This Form II is to be used in accordance with section 3.10 of this GEHT Policy.
HOD	**:**	Head of Department.

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3.0 GIFTS

3.1 Allowable and Non-Allowable Gifts

Allowable Gifts

(a)	Festive Gifts	:	includes any and/or all traditional or ceremonial treats or gifts customary to the occasion, for example hampers, food basket, sweets & savouries. Money packets, ang-pows or red packets, any form of electronic cash transfer, any cash and/or any other cash equivalent is not deemed as Festive Gifts and is not allowed to be accepted in any circumstances;
(b)	Corporate Gifts	:	includes any souvenir items, corporate merchandises that are attached with the company name and logo given by representative of one organisation to the other either via delivery or given personally at public or official events; and
(c)	Mementos	:	any plaques (inexpensive), pennants, mementos in any form (excluding money, cash tokens, and/or any other cash equivalents) given by BPAM to any of its guests to appreciate the attendance of such guests at BPAM's events;
(d)	Token of Appreciation	:	any gift excluding money, cash tokens, any form of electronic cash transfer and/or any other cash equivalents given to the employee by any third party to appreciate the employee performing a task for the third party, eg: providing any training, seminars, talk or similar events

Non-Allowable Gifts

Cash and/or Money	:	money, cash tokens, ang-pows or money packets, any form of electronic cash transfer and/or any other cash equivalents in any nature is prohibited and is not allowed to be provided as a gift, or to be accepted as a gift by any employee in any situation whatsoever. In the event that any employee receives any money, cash token, ang-pow or money packet, any form of electronic cash transfer and/or cash equivalents in any nature the employee will have to take action in accordance with section 3.7 of this GEHT Policy.

Other Gifts

Other Gifts	:	Any other gifts (excluding Allowable Gifts and Non-Allowable Gifts), given or gifted to any one of BPAM's employees.

3.2 Any gift declared using Form I in accordance with this GEHT Policy shall upon declaration be surrendered to the Compliance Officer. To avoid any conflict of interest, any gift surrendered to the Compliance Officer, after the deliberation of the Compliance Officer and with the approval of the CEO, may:

(a) be donated to charity;

(b) be sold off to any party where the proceeds from sale will be shared within BPAM; or

(c) otherwise disposed in a manner that the Compliance Officer and the CEO deems fit.

Receiving Gifts

3.3 All gifts including any Allowable Gifts received by any employees regardless of the value whether received at BPAM's premises or outside of BPAM's premises, in any manner whatsoever must be recorded in the Gift Register log book. The Gift Register log book shall at all times be placed at BPAM's reception desk for ease of access to all employees.

3.4 Any Allowable Gifts or Other Gifts received by an employee where the value or the total value of the Allowable Gifts or Other Gifts exceeds RM 300.00 must be declared by filling up Form I within three (3) days from the date of receipt of the gift. The Form I is to be endorsed by the respective HOD and thereafter submitted to the Compliance Officer. The Allowable Gifts or Other Gifts received must be surrendered to the Compliance Officer.

3.5 Any Allowable Gifts or Other Gifts (excluding gift in monetary form) received by an employee where the value of the gift, or the total value of the gift is less than RM 300.00, shall be recorded in the Gift Register log book and notified to the HOD. The employee is allowed to keep the Allowable Gifts or Other Gifts received, however the HOD has the right to instruct the Allowable Gifts or Other Gifts to be shared or disseminated amongst other employees as the HOD deems fit.

3.6 Any gift in monetary form, cash, ang-pows, any form of electronic cash transfer cash vouchers and/or any other cash equivalents received by an employee in any amount must be declared immediately by the employee to his/her HOD via email, the Compliance Officer shall be kept in the loop in any such email. The cash/money shall be surrendered immediately to the Compliance Officer. The employee then shall declare the gift by filling up the Form I within three (3) days from the date of receipt of the gift. The Form I is to be endorsed by the HOD and thereafter submitted to the Compliance Officer.

3.7 Gift is deemed directed to an employee in the event that the gift is given to the hand of the employee personally or delivered to the employee's premises or delivered to BPAM's premises with an indication that the gift is to be directed to the said employee. Excluding Allowable Gifts, each employee is only allowed to accept a maximum of three (3) Other Gifts a year which have been gifted or delivered directly to the said employee, any subsequent Other Gifts received (regardless of value) must be declared in accordance with section 3.4 of this GEHT Policy.

3.8 If any gift delivered to BPAM and are directed to any particular department, not naming any employees, the gift will be deemed to be provided to the HOD of the said department. If the gift is delivered to BPAM without any indication of the receiver, the gift shall be deemed to be delivered to the CEO office.

**Please refer to Appendix 1 for diagram of receiving of gift by employees*

Provisions of Gifts

3.9 If an employee intends to provide any gift to any third party recipient, a request must first be submitted to the CEO by filling up the Form II. Upon obtaining the approval from CEO, the employee should follow through with other internal approvals (eg: finance approval) as may be necessary to facilitate the provisions of gift to third party. The employee in charge has to ensure that all internal approvals are obtained prior to providing gift to any third party recipient.

3.10 All gifts to be gifted by BPAM to any third party (excluding any Corporate Gifts as described in 3.1(b)) shall be recorded in the Provisions of Gifts Register.

3.11 The threshold and value of the gift to be provided must be indicated clearly in Form II and must not exceed the appropriate approvals and limits of authority.

4.0 ENTERTAINMENT AND HOSPITALITY

4.1 BPAM recognises that the exchange of business courtesies, such as meals or social events, particularly during festive periods, is customary and legitimate to create goodwill and strengthen business relationships. Business courtesies are allowed if they are provided in accordance with the principles listed in section 2.1 above.

4.2 Entertainment and hospitality must be unsolicited and not affect, or be perceived as affecting, business judgment. Meals and entertainment should only be offered to and received from BPAM's representative dealing with the Business Partners, is for purposes supported by BPAM and has been duly approved in writing by the respective HOD of the employees. Spouses or other guests of the invitee must not be included.

4.3 Any business meetings or appointment made by any employee with any Business Partners or any other third party must at least be attended by two (2) employees. Employees are not allowed to attend business any meeting alone.

4.4 All entertainment and hospitality benefits shall not exceed RM1000 per meeting or event.

4.5 Employees must ensure that approvals from HOD and any other necessary approvals have been obtained prior to providing any entertainment and hospitality benefits to any Business Partners.

5.0 TRAVEL

5.1 Travelling-related benefits, such as travel tickets, meals, or accommodations, for any of business activities, to be provided by BPAM to any Business Partners are allowed if they are provided in accordance with the principles listed in section 2.1 above and the principles listed below:

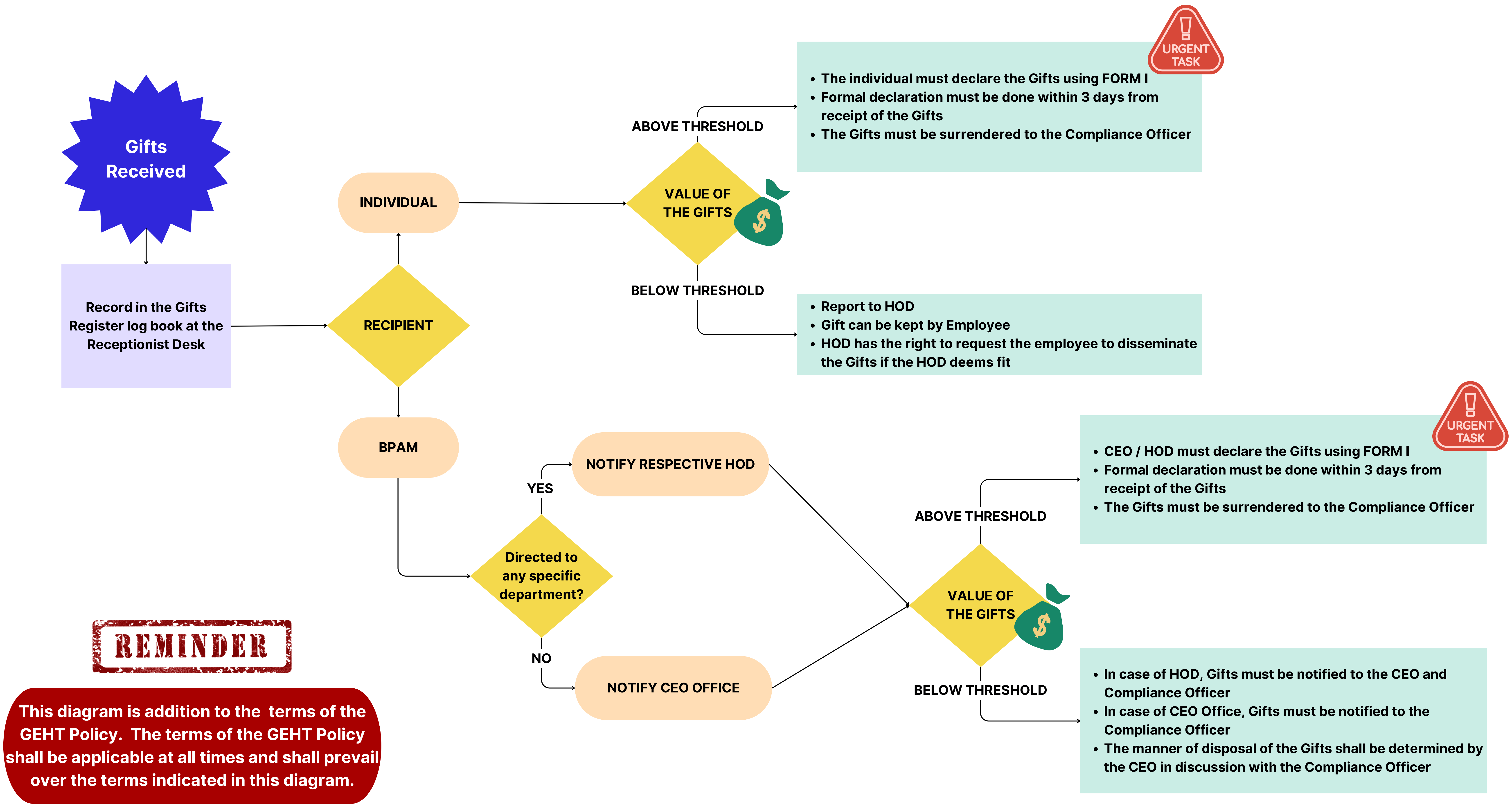
(a) **Relevance**: The travelling expenditures are necessary to perform a legitimate business-related activity. Travelling expenses for personal purposes, such as entertainment off working-hours or extension of travelling period for sightseeing, are not allowed; and

(b) **Budgeted**: The travelling expenditures are within the budget approved specifically for the relevant business-related activities.

5.2 Travelling benefits are not allowed to be provided to any Business Partners where in the agreement entered into between BPAM and any Business Partners, BPAM has agreed to reimburse any out-of-pocket expenses to such Business Partners.

5.3 Employees are allowed to accept any travelling benefits provided to employees by any Business Partner provided that such benefits are given for the purposes of a business-related activity, and must be relevant as detailed in detailed in section 5.1(a) above. Employees must declare such acceptance of travelling benefits by filling up the Form I within three (3) days from the date of receipt of the travelling benefits or upon return from the travel. For the avoidance of doubt, the threshold of RM1000 is not applicable for travelling benefits, all travelling benefits received regardless of the amount must be declared.

BPAM's Receiving Gifts Diagram



BPA
BOND PRICING AGENCY MALAYSIA

GIFT ENTERTAINMENT HOSPITALITY AND TRAVEL (GEHT) POLICY ACCEPTANCE DECLARATION FORM

To be completed within three (3) days from receipt of gifts

SECTION 1: EMPLOYEE DETAILS

a.	Name	
b.	NRIC No.	
c.	Employee No.	
d.	Designation	
e.	Department	
f.	Contact Number	
g.	Email Address	

SECTION 2: GIVER DETAILS

a.	Name or Company Name	
b.	NRIC No. or Company Reg. No.	
c.	Relationship with staff / Company (Business connection or family related)	
d.	Contact Number	
e.	Email Address	

SECTION 3: GIFTS DETAILS

a.	Recipient of GEHT	☐ Individual	☐ BPAM/Department [please specify dept name]
b.	Types ☐ Gift ☐ Entertainment ☐ Hospitality ☐ Travel	Cash: [RM/USD]	[**]
		Other items, please specify	
		Value (approximately)	
c.	Date Receipt		
d.	Gifts Occasion		

SECTION 4: DECLARATION

I, [Name], Employee No.: [**] declare that the information provided above is true.

____

Name: Date:

VERIFIED BY HEAD OF DEPARTMENT/CHIEF EXECUTIVE OFFICER:

I, [Name], confirm that I have verified the declaration as stated above.

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Name: Date:

BOND PRICING AGENCY MALAYSIA

PROVISION OF GIFT ENTERTAINMENT HOSPITALITY AND TRAVEL (GEHT) DECLARATION FORM[1]

SECTION 1: EMPLOYEE DETAILS

a.	Name	
b.	NRIC No.	
c.	Employee No.	
d.	Designation	
e.	Department	
f.	Contact Number	
g.	Email Address	

SECTION 2: RECIPIENT DETAILS

a.	Name or Company Name	
b.	NRIC No. or Company Reg. No.	
c.	Relationship with staff/ Entity (Business connection or family related)	
d.	Contact Number	
e.	Email Address	

SECTION 3: GIFTS DETAILS

a.	Types ☐ Gift ☐ Entertainment ☐ Hospitality ☐ Travel	Cash: [insert currency]	[insert amount]
		Other item, please specify	[**]
		Value (approximately)	[**]
b.	Reason for giving the GEHT		
c.	Date Approved by CEO (Please attach all necessary approvals)		

SECTION 4: DECLARATION

I, [Name], Employee No.: [**] declare that the information provided above is true.

____

Name: Date:

VERIFIED BY HEAD OF DEPARTMENT/CHIEF EXECUTIVE OFFICER:

I, [Name], confirm that I have verified the declaration as stated above.

____

Name: Date:

[1] (Provisions of GEHT Approval must be obtained prior to any expense incurred)