



TERENGGANU INC

TERENGGANU INC GROUP NO GIFT POLICY

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	Document Ref. No.	TI(G)/GCI/0320/PO.NO.GIFT(1.0)
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DISCLAIMER NOTICE

This policy is the sole property of Terengganu Incorporated Sdn Bhd ("Terengganu Inc") and has been prepared for the exclusive use of the management and employees of Terengganu Inc group of companies.

The policy is intended for internal circulation only and disclosure of any information to any third party or unauthorised personnel is considered as an offence.

AMENDMENTS

Amendments to the policy are subject to authority limits outlined in the Limit of Authority of Terengganu Inc.

CONFIDENTIAL

Approved and adopted by the Board of Directors of Terengganu Incorporated Sdn. Bhd.
at the Board of Directors' Meeting No. 52 (1/2020) held on 9 March 2020

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ABBREVIATION

COBE	:	Code of Business Ethics
GCEO	:	Group Chief Executive Officer
HOC	:	Head of Company
MACC	:	Malaysian Anti-Corruption Commission

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1.0 OBJECTIVES

- 1.1 The establishment of this policy is to avoid any actual or perceived conflict of interest in any ongoing or potential business dealings and decision making, and to demonstrate our commitment to the highest standards of ethics and integrity.
- 1.2 This policy provides procedures and general guidelines with reference to Government of Malaysia Service Circular No. 3 of 1998 – *“Garis Panduan Pemberian dan Penerimaan Hadiah di Dalam Perkhidmatan Awam”*; and MACC Act 2009.

2.0 SCOPE

- 2.1 This Policy shall apply to all directors and employees of Terengganu Inc Group.

3.0 DEFINITIONS

- 3.1 The following definitions shall apply throughout the policy unless otherwise expressly stated:
 - (a) “Terengganu Inc” means Terengganu Incorporated Sdn. Bhd;
 - (b) “Terengganu Inc Group” or “the Group” refers to Terengganu Inc and subsidiaries and controlled companies in general;
 - (c) The term “employee” means any person who is in the employment of the Group including but not limited to permanent, contract, executive, non-executive, secondees and individual on direct hire;
 - (d) “Gift” according to the Malaysian Anti-Corruption Commission (MACC), 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”* (Refer to Para 4 - SC 3/1998).
 - (e) Gifts of “Nominal Value” means small enough that they could not be seen as an attempt to induce someone to misuse their position, such as a fruit basket, flowers, a book, or modest desk ornaments.
 - (f) “Policy” refers to the “No Gift Policy”.

4.0 RULES

- 4.1 **“No Gift Policy”** – except as otherwise provided in this Policy, all directors and employees of Terengganu Inc Group, shall not solicit, demand, or accept, directly or indirectly, any gift from any person and/or organisations whether from the

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public or private sector, at any time, on or off the work premises, where such gift is either:

- (a) Given in the course of their official duties or in connection with any transaction which may be affected by the functions of their office;
- (b) Illegal or in violation of laws;
- (c) Part of an attempt or agreement to do anything in return;
- (d) Given to influence the actions of directors or employees: or
- (e) Create the appearance of a conflict of interest.

4.2 **Allowable Gifts** – The following gifts shall be exempted from the prohibition under this Policy:

- (a) Corporate merchandise, certificates, plaques, cards, thank you notes, or other written forms of souvenir or mark of courtesy, recognition, or appreciation;
- (b) Seminar items (e.g. pens, goodies bag, etc.) or any other materials which are uniformly given to all participants in the seminar;
- (c) Books, pamphlets, publications, data and other information or reading materials that are directly useful to the Group in the performance of its mandates, objectives, and are given by individuals or organisations that have no pending business with Group as to create an actual or potential conflict of interest;
- (d) Gifts given on special occasions between and among the directors and employees;
- (e) Gifts given (provide or accept) on special event such as Festive Season, Appreciation, Annual General Meeting (AGM), Extraordinary General Meeting (EGM) and any other corporate event;
- (f) Scholarships or fellowship grants, travel grants or expenses for travel taking place within or outside Malaysia (such as allowances, transportation, food and lodging) if appropriate and consistent with the interest of the State or Government, and with prior approval by the proper authorities in accordance with applicable laws or regulations;
- (g) Honorarium given as speaker or resource person in seminars when such honorarium is authorised under existing laws or rules and regulations and subject to compliance with all the requirements prescribed therein;
- (h) Working lunches or dinners with client or other stakeholders of the Group if such lunches or dinners are inevitable in the course of official transaction;

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- (i) Product samples of nominal value given by clients or potential clients if giving such samples are allowed under the law or part of the standard procedures mandated by law or the rules (e.g. rules of bidding): and
- (j) Unsolicited gifts of nominal or insignificant value provided it is not given in anticipation of or in exchange for a favor from the public official or employee.

- 4.3 **Providing or Accepting Gifts** – Generally employees are not allowed to provide or accept gifts to third parties with the exception of the Board of Directors or President or Group CEO or HOC (at subsidiary level). However, directors or employees should not give or accept gifts or entertainment or any other benefit or privilege that would not in any way influence or appear to influence any business decision or gain an unfair advantage.
- 4.4 **Posting of No Gift Policy** – Notices of this Policy shall be posted in visible areas of the Group.
- 4.5 **Duty of Director and Employee if Gift is Offered or Given** – if any gift prohibited under this Policy is offered or given to any director or employee, the recipient shall politely decline acceptance of such gift and courteously inform the offeror or giver about the Policy.
- 4.6 **Duty of Employee if Gift is Inevitably Received** – in the event that any gift is inevitably received, despite diligent efforts to refuse acceptance because it was sent through modes other than personal delivery or the offeror insisted acceptance, the recipient of the gift shall, within two (2) working days from receipt, report the acceptance thereof and turn-over the gift received for proper documentation and handling of the gift in accordance with the provisions of this Policy.
- 4.7 **Gift Registry** – Except for Section 4.2, any gift received, regardless of value or by the receiver as the case may be, the following information about the gift shall be recorded in the said registry. Although in general the Group practices “No Gift” policy, in a limited number of circumstances, receiving a gift on behalf of the Group is permissible. In this case it may be impractical or may sever the Group business relationship with counterparty if we refuse or return the gifts. In these limited circumstances i.e. to accept the gift, employees are required to record the gift in the “Gift Declaration Form” (See **Appendix II**) for submission to Head of Department or Head GCI who will then decide whether to approve the acceptance of the gift or require it to be returned. If the estimated value is above RM500, then approval from GCEO/HOC is required.
- 4.8 The process flow of receiving gifts is shown under **Appendix I**.

5.0 PENALTIES FOR VIOLATION

- 5.1 Any violation of this “No Gift Policy” may result in disciplinary action, including but not limited to, termination of employment.

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6.0 AMENDMENT

- 6.1 This policy shall be reviewed on a biennial basis; or as and when required or when major changes occur and may be amended by the Board of Directors as often as it may deemed necessary.

7.0 EFFECTIVE DATE

- 7.1 This Policy shall take effect immediately.

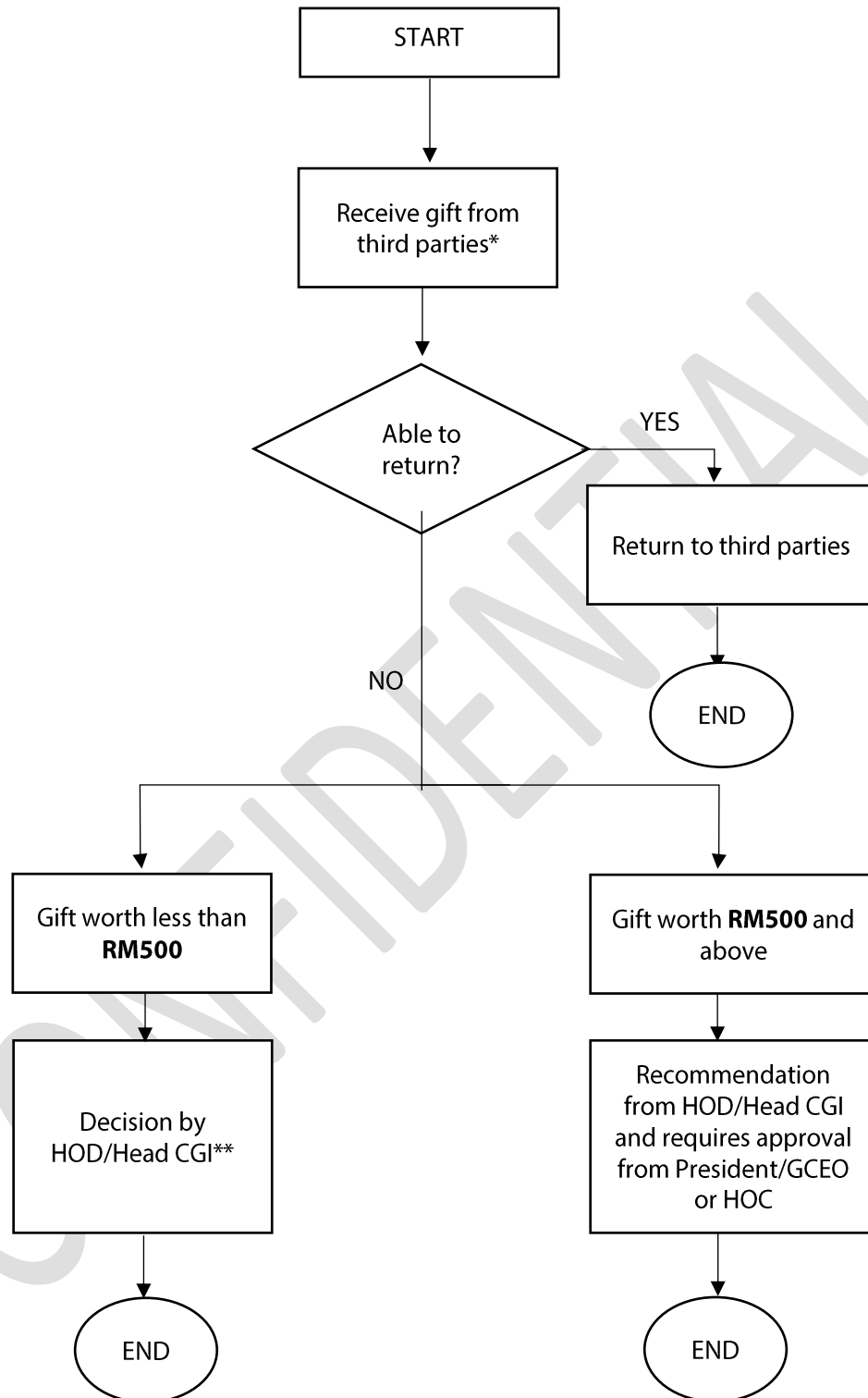
8.0 REFERENCES

- 8.1 This Policy shall be read together with any other applicable existing policies of the Group:
- (a) Group Code of Business Ethics; and
 - (b) Group Rules & Regulations and Disciplinary Procedures Handbook.

- End -

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Appendix I – Process for Accepting Gift from Third Parties



Note(s): * Third parties (e.g. customers, contractors, subcontractors, consultants, agents, suppliers, vendors, joint venture partners, as well as government officials and communities).

** Recommendation or Decision from HOD/Head CGI, this can include (but not limited to) : (1) Donate to charity; (2) Share equally with co-workers; (3) Hold it for departmental display; (4) Permit it to be retained by the employee' and (5) Return to donor.

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Appendix II - GIFT DECLARATION FORM

PLEASE TICK ACCORDINGLY:

☐

GIFT

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ENTERTAINMENT

A. EMPLOYEE'S DETAILS

NAME : _____
 NRIC NO. : _____
 DESIGNATION : _____
 DEPARTMENT : _____
 ADDRESS : _____

B. EXTERNAL PARTY'S DETAILS

NAME : _____
 ADDRESS : _____

 RELATIONSHIP : _____

C. ACTIVITY DETAILS / GIFT

NAME & TYPE : _____
 ESTIMATED AMOUNT : _____
 DATE : _____
 PURPOSE : _____

D. EXTRA DETAILS (if any)

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E. DECLARATION

I _____ hereby declare that the above is true.

Date : _____

(Employee's signature)

FOR OFFICIAL USE

F. OFFICIAL RESULT (RESTRICTED FOR GIFT CASES ONLY)

- I. Donate to charity
- II. Share equally with co-workers
- III. Hold it for departmental display
- IV. Permit it to be retained by the employee
- V. Return to donor

G. OFFICIAL REVIEW BY HEAD OF DEPARTMENT / HEAD, COMPLIANCE & INTEGRITY DEPARTMENT

Date : _____

(Officer's signature)

Name:

Designation:

APPROVED/ NOT APPROVED

President / Group Chief Executive Officer (GCEO) / HOC

Date:

Note(s): Requires an approval, if the estimated value is above RM500.