



SARAWAK CABLE BERHAD

Registration No.: 199801000274 (456400-V)

ANTI-BRIBERY AND CORRUPTION (ABC) POLICY

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1. INTRODUCTION

SARAWAK CABLE BERHAD AND GROUP OF COMPANIES' POSITION ON BRIBERY AND CORRUPTION

The Board of Directors of Sarawak Cable Berhad (“SCABLE”), and Group of Companies, **practices a zero-tolerance against all forms of bribery and corruption.**

In principle:

1. We are committed to dealing with business associates and government officials in a fair, transparent and ethical manner.
2. We prohibit any receiving, giving or promising of facilitation payments.
3. We do not entertain support letters and requests for special privileges.
4. We shall conduct due diligence on SCABLE business associates or third parties in particular where there is significant exposure to bribery and corruption risk.
5. We shall declare conflicts of interest on a scheduled basis and where actual, potential or perceived conflict arises.
6. We adopt a “**No Gifts Policy**”, subject to certain limited exceptions.
7. We prohibit offering or accepting hospitality subject to certain limited exceptions.
8. We allow charitable donations and sponsorships for legitimate reasons. We do not make political donations.
9. We strongly encourage reporting (whistleblowing) of real or suspected cases of bribery and corruption without fear of retaliation or reprisal.

On 4 May 2018, a new provision in Section 17A was added into the existing Malaysian Anti-Corruption Commission Act 2009 (Act 694) (“MACCA”) to prevent bribery and corruption involving commercial organisations (“the Corporate Liability Provision”). An essential feature of the Corporate Liability Provision is that it criminalises an organisation for corruption-related actions by associated persons done for the benefit of the organisation. Associated persons shall include directors of the company, partners, employees and any person who performs services for or on behalf of the commercial organisation. The legal intention of the Corporate Liability Provision is based on the doctrine of vicarious liability, where the master is made liable for the acts of his/her servant. In reality, this is to ensure that businesses do not engage in any form of corrupt practices.

The Corporate Liability Provision states that a commercial organisation commits an offence if a person associated with it corruptly gives, offers or promises any gratification to any person with an intent to obtain or retain business or a business advantage for the said commercial organisation.

This Anti Bribery Corruption (“ABC Policy”) policy intends to conform with the Corporate Liability Provision and fulfil the requirements set forth in The Guidelines on Adequate Procedures issued on 10 December 2018 by the Prime Minister’s Office pursuant to Section 17A (5) of the MACCA.

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All SCABLE personnel, business associates and parties engaging with SCABLE are expected to **read, understand and comply** with the requirements set out in this ABC Policy. No waivers or exceptions will be granted for practices that deviate from SCABLE’s ABC Policy.

SCABLE Anti-Bribery Task Force (“the Anti-Bribery Task Force”)

The Anti-Bribery Task Force shall act as a body to ensure the compliance, implementation and monitoring of this Policy and the Additional Policies as elaborated hereunder. The Anti-Bribery Task Force comprises of the following members:

- i) Mr. Bobby Mapi (bobbym@sarawakcable.com)
Senior Manager, Risk Management and Compliance;
- ii) Ms. Mary Joycelyn Dahop (maryjd@ucssb.com)
Senior Manager, Human Resources and Administration
- ii) Belle Teoh (belleteoh@sarawakcable.com)
Company Secretary
- iii) Kelly Tan (kellytan@sarawakcable.com)
Legal Manager

If you have any questions or concerns, please consult the SCABLE **Anti-Bribery Task Force** (“the Anti-Bribery Task Force”) which shall be represented by the Senior Manager, Human Resources and/or the Legal Manager.

WHO DOES THIS POLICY APPLY TO?**ALL SCABLE PERSONNEL**

- This ABC Policy applies to both SCABLE Board of Directors (executive and non-executive) and its employees (permanent and on contract) (“**Personnel**”).
- All Personnel are obliged to comply with the ABC Policy, SCABLE’s policies and procedures and all applicable laws in the course of employment.
- Head of Functions (“**HODs**”)/Head of Business Units (“**Managers**”) are responsible to communicate and ensure compliance to this ABC Policy within their respective business functions/units.

SCABLE’S BUSINESS ASSOCIATES OR THIRD PARTIES

- This ABC Policy applies to SCABLE’s business associates or third parties, which includes vendors, contractors, financial institutions, sub-contractors, consultants, agents, representatives, tenants, joint venture partners, introducers (includes third parties who act as intermediary to introduce and promote potential business or transaction)/government intermediaries who are performing work or services, for and on behalf of SCABLE.
- All Personnel, regardless of their position or role, are responsible to communicate this ABC Policy to their business associates.

ALL PARTIES ENGAGING WITH SCABLE

- This ABC Policy applies to all parties that are currently engaged with SCABLE or have intentions to engage with SCABLE in the future.
- SCABLE shall endeavour in good faith to require the parties to understand and implement policies and procedures similar to that of SCABLE’s.

1.3 WHAT ARE MY RESPONSIBILITIES?

READ AND DECLARE

All SCABLE Personnel and business associates must **read, understand, comply** and **declare** their acceptance and compliance with this ABC Policy.

We also expect all parties that are engaging with SCABLE to **read, understand** and **comply** with this ABC Policy.

LEAD BY EXAMPLE

HODs and Managers must communicate this ABC Policy to their team members, business associates and any other parties they engage with.

HODs and Managers must show respect and maintain open, honest and constructive two-way communication with their team members. This means encouraging them to ask questions, make suggestions and report concerns or possible violations of SCABLE's ABC Policy.

We must also encourage our business associates and other parties to report any concerns or possible violations of SCABLE's ABC policies and procedures via the whistleblowing channels.

UNDERSTANDING THE CONSEQUENCES

Failure of SCABLE Personnel to comply with this ABC Policy, including non-completion of trainings relating to anti-bribery and corruption, may result in disciplinary actions, up to and including termination of employment or dismissal.

Since SCABLE's ABC policy is based on legal requirements, violating of this ABC Policy could subject SCABLE and its Personnel to penalties including fines, imprisonment and other criminal or civil sanctions. These violations may also result in high costs, personal reputational damage or loss of professional accreditation and severely damage the reputation of SCABLE.

Failure for business associates to comply with this ABC Policy may result in the termination of the business relationship with SCABLE.

ADDITIONAL POLICIES

Information in this ABC Policy is derived from the SCABLE's policies and procedures, and should be read together with the following:

- SCABLE's Code of Conduct
- SCABLE's Conflict of Interest Policy
- SCABLE's Whistle Blowing Policy

2. ANTI BRIBERY AND CORRUPTION

OUR PRINCIPLE

SCABLE has **zero tolerance position on any forms of bribery and corruption.**

WHAT IS BRIBERY AND CORRUPTION?

In line with Malaysian Anti-Corruption Commission Act 2019 (“MACCA”) and the Guidelines of Adequate Procedures by the Prime Minister’s Office, SCABLE has developed and implemented a comprehensive set of measures to combat bribery and corruption of all forms related to SCABLE’s operations.

BRIBERY

Under the MACCA, “**gratification**” or what most people call “**bribery**” means offering, giving, receiving or soliciting something of value (for example money or information) in an attempt to illicitly influence the decisions or actions of a person with a position of trust within an organisation.

CORRUPTION

According to Transparency International*, “corruption” means the abuse of entrusted power for personal gain.

However, corruption has a broader definition than bribery. This Policy therefore refers to “bribery and corruption” as a standard term to cover all types of gratification.

The act of bribery and corruption may also be in the forms of, including but not limited to, money, services, rewards, bonus, promotion, discount, wages and donations.

DEALING WITH DIFFICULT SITUATION

Dealing with situations that may potentially involve bribery and corruption can be difficult. If you are not sure whether an act can be considered as a bribe, then **ask yourself these following questions:**

1. Am I being requested by my colleagues or clients to perform any acts/omission in exchange of any reward, gifts, money, services, donation, bonus ?
2. Would my acts/omission conflict with my duty to act in the best interest of the company or anybody to personally benefit from my act/omission ?
3. Is this a **bribe**? Are you being **pressured** to provide something that you are not comfortable with?
4. Is this **legal**? Are there any laws/regulations/company policies that address the situation?
5. Will your act have a **negative impact** on SCABLE’s reputation/business?
6. How would you **feel** if your decision(s) were highlighted in the media?

MANAGING FACILITATION PAYMENT REQUESTS

a) SCABLE Personnel:

In the event the answers for one of the above is in the affirmative, you must refuse to accept any request and immediately report the incident to HOD/manager.

Then the HOD/manager shall decide on further actions, whether to report to Malaysian Anti-Corruption Commission (“MACC”) or the relevant authorities.

If you are aware that a SCABLE Personnel has requested a facilitation payment from business associates, you should also report the matter directly to **Anti-Bribery Task Force** or alternatively, through the whistleblowing channels.

b) Business Associates:

Business associates, who receive request for facilitation payments from SCABLE Personnel, must decline to pay and report the issue via the whistleblowing channels or directly to Anti-Bribery Task Force.

OFFENSES

Engaging in bribery and corruption is illegal according to both local and international legislation. You must be aware that under the MACCA, if you participate in bribery and corruption, you may subject to:

- 1. Imprisonment for a term not exceeding 20 years; and**
- 2. A fine of not less than ten times the sum or value of the relevant bribe (gratification) or RM1,000,000.00, whichever is higher.**

3. DEALING WITH BUSINESS ASSOCIATES OR THIRD PARTIES

OUR PRINCIPLE

We are committed to conducting our business in a fair, transparent and ethical manner.

SCABLE'S BUSINESS ASSOCIATES OR THIRD PARTIES

Business associates includes vendors, contractors, financial institutions, sub-contractors, consultants, agents, representatives, tenants, joint venture partners, introducers/government intermediaries who are performing work or services, for and on behalf of SCABLE.

OUR SUCCESS DEPENDS ON BUILDING PRODUCTIVE RELATIONSHIPS

In order to ensure SCABLE's operations remain free of bribery and corruption, we are committed in establishing mutually beneficial relationships with business associates, who apply either the same or higher standards or ethics and integrity.

This means that we expect all our business associates to adhere to our stance on bribery and corruption.

MANAGING BUSINESS ASSOCIATES OR THIRD PARTY REQUESTS

In the event any SCABLE personnel finds himself/herself in a difficult situation as mentioned in this Policy, you must refuse to accept any request and immediately report the incident to HOD/manager.

Then the HOD/manager shall decide on further actions, whether to report to Malaysian Anti-Corruption Commission ("MACC") or the relevant authorities.

If you are aware that a SCABLE Personnel has requested any forms of bribery and corruption from business associates or third parties, you should also report the matter directly to **Anti-Bribery Task Force** or alternatively, through the whistleblowing channels.

Business Associates:

Business associates, who receive request for facilitation payments from SCABLE Personnel, must decline to pay and report the issue via the whistleblowing channels or directly to Anti-Bribery Task Force.

4. DEALING WITH GOVERNMENT OFFICIALS

OUR PRINCIPLE

We are committed to conduct our business with government officials in a fair, transparent and ethical manner.

We do not allow the giving or receiving, directly or indirectly, of any gifts or hospitality (except with limited exceptions), kickbacks or gratuities to government officials.

WHO ARE GOVERNMENT OFFICIALS?

‘**Government official**’ includes a person who works for or is an agent of a government-owned or government-controlled entity. This includes elected and appointed officers or employees of national, municipal or local governments and ministries and government agencies (including individuals holding legislative, administrative and judicial positions).

APPLYING HIGHER STANDARDS OF INTEGRITY

Dealing with government officials requires particular care and consideration. You must exercise more caution when working with government officials due to strict local and international laws that govern the interface between the private and public sectors. Offering a gift or hospitality to a government official is considered a “red flag”** situation in certain countries, and could create grounds for prosecution as well as a negative perception of bribery and corruption.

In any circumstances where you are required to provide gift or hospitality to a government official, you must get prior approval from the **Top Management**** and notify the **Human Resources Department** or the Anti Bribery Task Force in case of a difficult situation as mentioned in this Policy.

GIVING GIFTS AND HOSPITALITY TO GOVERNMENT OFFICIALS

SCABLE practices a “No Gifts” Policy, which means that gifts can only be given or received within very limited exceptions. SCABLE also strictly prohibits the use of hospitality as means for bribery and corruption to influence the duties and decision making of any individual. Hospitality here includes meals, travel or transportation, accommodation, entertainment and recreation (leisure activities) with the intention or expectation for an exchange of any bribery or corrupt practices.

In the event where you are required to give a gift or offer hospitality to a government official, you must exercise proper care and judgement to ensure the gift or hospitality does not create a conflict of interest between you and the official, and is not perceived as being used for corruption.

For giving and receiving gifts, please refer to section on **Managing Gifts or Hospitality**.

**Red flags here includes request for (i) unusual or suspicious payment, (ii) gifts and hospitality or (iii) “off-record” transactions.*

***Top Management refer to SCABLE’s Managing Director and C-Suite personnel.*

5. DEALING WITH FACILITATION PAYMENTS

OUR PRINCIPLE

We prohibit any receiving, giving and promising of facilitation payments.

WHAT IS A FACILITATION PAYMENT?

A “**facilitation payment**” is a payment received or made to a decision maker or an administrative staff (in either public or private sectors) to speed up a process or secure licenses/permits.

Facilitation payments are illegal under the MACCA as it falls within the meaning of gratification or bribery.

DEALING WITH FACILITATION PAYMENTS

Identifying the difference between a legitimate request for payment in exchange for a service, and an illegal request for a bribe can be difficult. If you face this problem, **stop and ask yourself these questions:**

1. Am I able to obtain an **official receipt** for the payment?
2. Am I being **pressured** to make the payment?

If you are unable to obtain an official receipt, or feel pressured into making a payment, the officer or representative may be asking you for a facilitation payment.

MANAGING FACILITATION PAYMENT REQUESTS

a) **SCABLE Personnel:**

If you receive requests for facilitation payment you must refuse to pay and immediately report the incident to HOD/manager.

Then the HOD/manager shall decide whether to report to Malaysian Anti-Corruption Commission (“MACC”) or the relevant authorities.

If you are aware that a SCABLE Personnel has requested a facilitation payment from business associates, you should also report the matter directly to **Anti-Bribery Task Force** or alternatively, through the whistleblowing channels.

b) **Business Associates:**

Business associates, who receive request for facilitation payments from SCABLE Personnel, must decline to pay and report the issue via the whistleblowing channels or directly to Anti-Bribery Task Force.

6. DEALING WITH SUPPORT LETTERS

OUR PRINCIPLE

We do not entertain support letters and requests for special privilege.

We will also prevent external parties from using their position to influence SCABLE's decision-making for personal gain, including for their family and friends.

WHAT IS A SUPPORT LETTER?

A “**support letter**” is a request made by a prominent person (someone who uses his power to influence decision making) requesting for special privileges to be given to an individual, company or either organisation.

Support letters may also come in other forms, including text messages, phone calls and e-mails.

MANAGING SUPPORT LETTERS

a) **SCABLE Personnel:**

If you receive support letter, you should not promise the requestor anything and document the request. You should then immediately report the request to **Anti-Bribery Task Force** for their further action, with your HOD/Manager copied in your report.

b) **Business Associates:**

Business associates who receive a support letter which claims to come from SCABLE should also report the matter through the whistleblowing channels, or contact **Anti-Bribery Task Force** directly.

7. CONDUCTING DUE DILIGENCE

OUR PRINCIPLE

SCABLE's dealings with business associates or third parties, which include vendors, contractors, financial institutions, sub-contractors, consultants, agents, representatives, tenants, joint venture partners, introducers/government intermediaries etc., must be carried out in compliance with all relevant laws and consistent with the values and principles of the Code of Conduct. As part of this commitment, all forms of bribery and corruption are unacceptable and will not be tolerated.

SCABLE expects that all third parties acting for or on its behalf to share the Company's values and ethical standards as their actions can implicate SCABLE legally and tarnish the Company's reputation. Therefore, where we engage third parties, such as contractors, agents, intermediaries or joint venture partners, we are obligated to conduct appropriate counterparty due diligence to understand the business and background of SCABLE's prospective business counterparties before entering into any arrangements with them to ensure that we are dealing with counterparties that subscribe to acceptable standard of integrity in the conduct of their business.

(a) Dealing with third parties

To help ensure that we only do business with third parties that share SCABLE standards of integrity, we must do the following:

- Conduct **yearly** due diligence to assess the integrity of SCABLE's prospective business counterparties. Do not enter into any business dealings with any third party reasonably suspected of engaging in bribery and improper business practices unless those suspicions are investigated and resolved. The due diligence assessment shall be conducted through the **Due Diligence Checklist on Third Party / Business Associate** as attached in **Appendix I** of this Policy.
- All third parties are made aware of the ABC Policy, our expectations of them and are required to make their declaration **annually** vide our **Third Party Declaration Form** (please refer **Appendix II**);
- Continue to be aware of and to periodically monitor third party performance and business practices to ensure ongoing compliance

If at any point during the due diligence exercise or in the dealings with a third party, there are conflicts of interest or "red flags" are raised, these warrant further investigation and must be sufficiently addressed before the engagement of the third party can progress.

Examples of common "red flags" involving third parties include:

- The transaction involves a country known for a high incidence of corrupt payments
- Family, business or other "special" ties with government or public officials
- A reference check reveals a flawed background or a reputation for getting "things done" regardless of the circumstances or suggests that for a certain amount of money, he can fix the problem
- Objection to anti-bribery representations and warranties in commercial agreements or negative response when told of such requirements
- Convoluted payment arrangements such as payment in cash, payment to a third party or to accounts in other countries or requests for upfront payment for expenses or other fees
- The third party requires that his/her identity not be disclosed as part of the business transaction
- Inadequate credentials for the nature of the engagement or lack of an office or an established place of business

SCABLE requires its employees to use good judgment and common sense in assessing the integrity and ethical business practices of third parties and have provided the above as a guideline.

(b) Dealing with contractors and suppliers

In line with the general principles of the Code of Conduct, SCABLE is committed to uphold the highest standard of ethics and integrity in all aspects of its procurement activities.

SCABLE should avoid dealing with any contractors or suppliers known or reasonably suspected of corrupt practices or known or reasonably suspected to pay bribes.

SCABLE must ensure that all procurement activities are in line with the procurement policies and procedures that are applicable in its jurisdiction, which include:

- Due Diligence Of Contractors And Suppliers Are Undertaken Before They Are Registered With SCABLE
- Contractors and suppliers are made aware of and understand the ABC Policy and that they will comply accordingly
- All commercial contracts incorporate the provisions relating to business conduct, conflict of interest and fighting corruption and unethical practices
- All commercial contracts with major contractors and suppliers to incorporate a provision where SCABLE retains the right to audit third party compliance with the ABC Policy provisions

SCABLE must conduct due diligence on prospective contractors and suppliers to confirm whether or not these external parties have in place anti-bribery programmes and that they will not engage in any improper practices.

The scope and extent of the due diligence required will vary depending upon the circumstances of each proposed transaction.

SCABLE should also monitor major contractors and suppliers as part of their regular review of the performance of the third parties. SCABLE has the right to terminate their services in the event that these third parties pay bribes or act in a manner which is inconsistent with the ABC Policy.

If any red flags are raised, these issues must be resolved. If it is not possible then the company must be barred from being on the list of registered contractors /suppliers and/or disqualified from participating in any business dealings with SCABLE.

Due diligence checklist for contractors and suppliers is attached as **Appendix I** of this Policy.

SCABLE in particular, the procurement function must follow the following procedures when dealing with contractors and suppliers:

- Perform a risk assessment using a risk-based approach
- Undertake due diligence on the third party depending on the level established by the risk analysis
- Preparing and maintaining appropriate written documentation of the due diligence and risk assessment performed

(c) Joint Venture partners

In view of the possibility that SCABLE may be held responsible for the illegal activities of its co-venturers, we need to ensure that Joint Ventures in which SCABLE has a controlling interest adopt the ABC Policy.

Where SCABLE neither controls nor operates the Joint Venture (JV) or where SCABLE holds a minority interest, we should:

- Make reasonable efforts to influence the JV Partner to adopt the ABC Policy (or substantially equivalent standards and principles) and to comply with all applicable anti-bribery and corruption laws and to establish controls substantially similar to SCABLE standards to prevent bribery
- Be alert to red flags which may arise in the conduct of the business. Any such red flags must be reported to the **Anti-Bribery Task Force** and appropriate action to be taken; and
- Require (or where this right does not formally exist, request) that the majority partner or JV entity to provide written representation of anti-bribery compliance on an annual basis.

8. DECLARING CONFLICT OF INTEREST

OUR PRINCIPLE

The Company aims to maintain the highest ethical standards in carrying out our business activities. We recognize that this Conflict of Interests Policy (“this Policy”) forms part of our duties and obligations in ensuring the highest level of corporate governance amongst its Employees and externally with its Stakeholders.

WHAT IS CONFLICT OF INTEREST?

Conflict of interest arises whereby an individual or entity’s personal interests conflict with its professional interests owed to their employer or the organization that it is representing. It also arises when an Employee favours personal gain over his duties to his organization or exploits his position to obtain personal gains.

Employees owe a fiduciary duty to the Company, and must not cause himself to be placed in a position where the Employee’s interests conflict with that of the Company.

The fiduciary duty requires the Employee to not derive any secret profit or advantage from a transaction through him by the Company. Employee should further avoid situations where their personal interests could inappropriately influence, alter or appear so in their business judgment or in performing their scope of duties in the Company.

DUTY TO DISCLOSE

Employee has a duty and an obligation to disclose any potential of conflict of interests in performing his duties to the Company. Such disclosure must be made as soon as the Employee becoming aware of such potential conflict. Such duty and obligation shall continue annually for as long as the conflict continues to exist.

Disclosures may be made to the Employee’s immediate manager within seven (7) days after becoming aware of such conflict and submit a **Conflict of Interest Declaration Form** (refer to **Appendix III** of this Policy). The immediate manager must, as soon as practicable, notify the Human Resources Department of the Company. The Human Resources Department shall then report such disclosure to the Senior Management of the Company for deliberation in respect of the action plan.

CONFLICT OF INTEREST FOR DIRECTORS

Directors have a duty to avoid having any conflict of interest in making decisions for the company. A duty to avoid a situation whereby there is a possibility of conflict between the interests of the company and the direct or indirect interests of the director, or between the director’s duties to the company and those to another person. Below are the instances whereby conflict of interest arises among directors:

- (a) when the directors have material interest in the transaction to be entered to by the Company; or
- (b) when a company engages with another company for a transaction and the director in the former is a director/substantial shareholder in the latter.

Managing the conflict of interests among Directors

In the event of a possible conflict of interest, directors shall, as soon as practicable after becoming aware of the relevant facts, declare the nature of the conflict of interests at a formal meeting of directors.

Directors who are interested in a transaction to be entered into by the Company by voting or may influence such transaction shall allowed to be in such meeting to fulfill the quorum but are restrained from participating in discussion or voting during the meeting to decide on the interested matter.

The governance of this Policy adopts the Companies Act 2016 and Bursa Main Market Listing Requirements in respect of conflict of interests among directors.

9. MANAGING GIFTS & HOSPITALITY

OUR PRINCIPLE: GIFTS

We adopt a “**No Gifts**” policy, subject to certain limited exceptions.

This means that SCABLE Personnel, including family members* are prohibited from directly or indirectly, giving and receiving gifts that may influence good judgement and decision making, subject to certain **limited exceptions**.

GIVING GIFTS

Generally, Personnel including their family members* are not allowed to give gifts to business associates and other parties engaging with SCABLE.

RECEIVING GIFTS

If you are offered or receive a gift from an external party, you are required to politely refuse or return the gift, and inform the giver of SCABLE’s “No Gifts” policy.

However, in circumstances where it is not possible to refuse or return a gift, or the refusal is likely to cause serious offence, you should:

1. Record the gift in the **Gifts & Hospitality Received Declaration Form, as attached as Appendix IV of this Policy**.
2. Report the gift to your HOD/Manager who will make note of it in their **Gifts Log** and decide if the gift can be accepted with the limited exceptions.

ACCEPTING GIFTS

If the HOD/Manager decides to accept the gift, he/she must determine the following treatment of the gift:

1. **Allow** Personnel to keep the gift; or
2. **Display** the gift in public; or
3. **Share** the gift among Personnel.

RETURNING GIFTS

If the HOD/Manager decides to return the gift, it must be accompanied with a polite notification of SCABLE’s “No Gifts” Policy.

Upon making the decision, the HOD/Manager shall then notify **Anti-Bribery Task Force** on his/her decision.

WHAT IF GIFTS ARE RECEIVED OFF-SITE?

If you or your family members* receive a gift off-site (e.g. your home) from a business associate or other parties engaged in business with SCABLE, you must refuse and report the incident to your HOD/Manager. If you are unable to refuse, you must then report to **Anti-Bribery Task Force** immediately for their further action, with your HOD/Manager copied in you report.

If you are unsure, you should consult **Anti-Bribery Task Force** for advice or make a declaration.

**“Family members” here include your spouse(s), children (including step-children and adopted children), parents, step-parents, siblings, step-siblings, grandparents, grandchildren, in-laws, uncles, nieces, nephews, and first cousins, as well as other persons who are members of your household.*

***Top Management refers to SCABLE’s Managing Director and C-Suite personnel.*

LIMITED EXCEPTIONS FOR GIVING AND RECEIVING GIFTS

Although, generally SCABLE practices a “No Gifts” Policy, you are allowed to give and receive gifts from business associates and other parties engaged with SCABLE provided they fall within the **following limited exceptions**:

- A gift is worth less than **RM200 per item*****, features company’s logo or brand (e.g diaries, pens, etc.), and is part of a marketing or promotional campaign.
- The gift is exchanged at a company-to-company level (e.g. for official events or launches);
- The gift is a token of appreciation at an official function or public event (e.g. door gifts at conferences, open house);
- The gift is given as part of SCABLE’s Corporate Social Responsibility (“CSR”) programme.

For the limited exceptions of giving gifts to business associates, please refer to **Appendix V** for the **Gifts & Hospitality Requisition Form**.

OUR PRINCIPLE: HOSPITALITY

We prohibit offering or accepting hospitality subject to certain limited exceptions.

WHAT IS HOSPITALITY?

Generally, hospitality comes in many forms, consisting of **meals, travel or transportation, accommodation, entertainment and recreation (leisure activities)**.

Hospitality should not be offered or accepted frequently with the same party, or during specific time periods, such as during tender or contract negotiations.

TRAVEL, TRANSPORTATION AND ACCOMODATION

You are prohibited from offering or accepting hospitality in the form of travel, transportation and accommodation.

Personnel travelling on SCABLE business shall be paid for by SCABLE unless otherwise specified in the relevant work or service contract and any waiver must be made after obtaining prior approval from the Top Management.

ENTERTAINMENT AND RECREATION

You are allowed to offer or accept entertainment and recreation provided there is proper justification and prior approval from the Top Management.

Example of entertainment and recreation include golf sessions and sporting events.

MEALS

You are allowed to offer or accept meals from business associates and other parties engaged with SCABLE provided they fall within the following limited exceptions:

- **It is business-related** (i.e. only for those directly connected to the operations of the SCABLE).
- **It is not for spouses and other non-business guests.**
- The cost of the meal **does not exceed the thresholds below** which provides a guidance on what is deemed to be reasonable:

Job Grade/Position	Per Event: Malaysia	Per Event: Overseas
Executive	Up to RM100 per head	Up to USD100 per head
HODs/Senior Managers	Up to RM200 per head	Up to USD200 per head
Director/MD/C-Suite	Up to RM500 per head	Up to USD500 per head

*

**Please note that bundle of gifts (i.e. hampers) are considered as one item.

Regardless of thresholds, you must seek prior approval from your HOD/Manager prior to offering or accepting meals. You should also refrain from giving and receiving meals from the same party frequently.

10. CHARITABLE DONATIONS AND SPONSORSHIPS

OUR PRINCIPLE

We only allow charitable donations and sponsorships for legitimate reasons and as permitted by existing laws and regulations.

However, these charitable donations and sponsorships may be misused or perceived as vehicles for bribery and corruption.

POLITICAL DONATIONS

We do not make political donations (i.e. donations to politicians and political campaigns) and we do not allow SCABLE's resources to be used for this purpose.

WHAT IS ALLOWED?

Charitable donations and sponsorships can be made to legitimate organisations, such as those:

- Registered with the Registrar of Society (ROS);
- Are in line with SCABLE's CSR Programme; or
- Already approved by the SCABLE's Managing Director, subject to a limit of RM100,000..

All requests for charitable donations and sponsorships must be submitted to the Top Management for approval.

11. WHISTLEBLOWING

OUR PRINCIPLE

The Company is committed to achieve and maintain a high standard of integrity and accountability in the conduct of businesses and operations. The Company aspires to conduct its affairs in an ethical, responsible and transparent manner.

The Company further aims to establish and facilitate a transparent and accountable communication channel for SCABLE employees and stakeholders of the company to channel its concerns in an effective and secured manner of any potential malpractices or malpractices that have occurred which would contravene any laws of Malaysia and the Company's corporate governance.

WHISTLEBLOWING CHANNELS

SCABLE employees shall channel its whistleblowing reports of concerns to the department manager. Alternatively, the employee may also report directly to the Person in Charge ("PIC") as specified in the Whistleblowing Policy via the following channels in strict confidential manner:

- (a) Electronically via email to the appointed PIC; or
- (b) In writing to the appointed PIC.

Below are malpractices that gives rise to whistleblowing:

- Corruption, bribery and fraud;
- Criminal offence or breach of laws in Malaysia or overseas;
- Conflict of interest;
- Abuse of power;
- Theft and misuse of Company's Property;
- Misappropriation of Company's funds;
- Act or omission jeopardising the health and safety of employees;
- Improper or unethical conduct or behaviour;
- Sexual harassment;
- Acts that adversely affect the interests or values of shareholders and Stakeholders
- Unauthorized disclosure or sale of company information; and
- Improper and/or undesirable and/or unbecoming personal behaviour or misdeeds which adversely affects the Company's business or reputation
- Any acts and/or omission to cover the aforesaid.

Whistleblowing reports should include the following disclosures:

- (i) background and history of the concern (giving relevant dates);
- (ii) reason for the concern;
- (iii) (identity of the person(s) committing the alleged Malpractices. Insufficient details in the whistleblowing report may impede the investigation and resolution of the concerns raised.

Disclosure Of Identity

The whistle-blower(s) is required to disclose his/her personal details. However, the whistle-blower(s) may also choose to remain anonymous. In the event the whistle-blower chooses to be anonymous, the identity of the whistle-blower(s) shall legally and eventually be disclosed if any disciplinary inquiry ensues following the report. Therefore, in the event the whistle-blower(s) is an anonymous, any reports thereof shall be considered at the discretion of the PIC.

Protection Accorded To The Whistle-Blowers

A whistle-blower will be accorded with protection under the Policy provided the disclosure is made in good faith. The Company assures any whistle-blower that no action shall be taken against him/her for reporting such malpractices, provided the whistle-blower acts in good faith at all times. Such protection is accorded even if the investigation reveals that the whistle-blower has mistaken as to the facts and the rules and procedures involved.

However, the Company reserves the right to revoke protection under the following circumstances:

- the whistle-blower participated in improper conduct;
- the whistle-blower wilfully discloses a false statement; or
- the disclosure is made with malicious intent.

Confidentiality

Whistleblowing reports will be treated as confidential to the extent reasonably practicable. The whistle-blower's identity shall be kept confidential so long as it does not impede or frustrate investigation. The investigation process may also reveal the source of the information and the whistle-blower may be required to provide a statement as part of the evidence.



SARAWAK CABLE BERHAD
Registration No. 199801000274 (456400-V)

DUE DILIGENCE CHECKLIST ON THIRD PARTY / BUSINESS ASSOCIATE

Tick (√) whether **YES** or **NO** on the Due Diligence Checklist below. If you have answered **YES** to any of the statements, you have to be satisfied that the relevant information/ explanation/ justification is available/ procured/ documented prior to your engagement with the third parties.

No.	Due Diligence Checklist	Yes	No
Relationship with the Third Party / Business Associate			
1	There has been difficulty in obtaining the required information from the third party		
2	There are concerns or evidence of corruption (convictions) in respect of the third party		
3	There are allegations of corruption activity against the third party or any of its employees		
4	The third party does not have its own anti-corruption/ code of conduct/ anti-fraud/ compliance programme		
5	The third party does not have its own due diligence procedure in place for the sourcing of customers and procurement of vendors, subcontractors etc.		
6	The value of the contract secured by the third party is unreasonable		
7	There is evidence of adverse news related to the third party		
8	The third party does not have the necessary skills and experience to provide the services for which they will be contracted		
9	The third party is not charging a fair market price for their services (<i>a company paying bribes may often charge more for its services in order to create a slush fund to pay bribes</i>)		
10	The third party is being associated with disreputable suppliers/ subcontractors etc.		
11	The third party is not readily and efficiently able to deal with the due diligence requirements of SCABLE		
12	The third party ever requested urgent payments or unusually high commissions		

Tick (√) whether YES or NO on the Due Diligence Checklist below. For any third party with positive government officials trace i.e. with YES answer any of the following due diligence set, and the division/ department has decided to commence the relationship with whereby the interests are also not prohibited by SCABLE’s Code of Conduct Policy, the disclosure in the financing requisition is a mandatory.

No.	Due Diligence Checklist	Yes	No
Third Party as a Government Official			
13	The third party is a government official (as defined in the Anti-Bribery and Corruption Policy)		
14	The owners, directors, shareholders, officers or any employees of the third party being current or former government officials		
Third Party’s Dealing with Government Official			
15	The third party is recommended by a government official		
16	The third party will be interacting/ has any affiliations with government officials in order to perform the contract		
17	The owners, directors, shareholders, officers or any employees of the third party have personal, familial or any associations with government officials		
18	The third party has connections with government officials or government agencies		
19	The third party’s employees (including immediate family members of the employees) have connections with government officials		

This section is only applicable to Business Division. Tick (√) whether **YES** or **NO** on the Due Diligence Checklist below. In the event the answer to any of the checklist below is **YES** then the respective divisions have to be satisfied that all of the red flags are sufficiently mitigated.

No.	Due Diligence Checklist	Yes	No
Financial Background			
20	Any identified issue on repeated payments made to an unidentified third party, or an identified third party but for unclear reasons?		

No.	Due Diligence Checklist	Yes	No
Financial Background			
21	Any identified issue on significant payment to an unidentified third party, or an identified third party but for unclear reasons?		
22	Are there any payments with non-transparent recipient or reason for payment (for instance, consulting expenses)?		
23	Is there any unusual frequency of payments made by the customer to its suppliers/ vendors/ contractors etc. or made by the customer's customer to the customer?		
24	Is there any unusual value of payments made by the customer to its suppliers/ vendors/ contractors or made by the customer's customer to the customer?		
25	Is there any excessive expenses which could be an indication of bribes?		

Evaluated by: _____ Designation: _____
(Print name)

Witness by: _____ Designation: _____
(Print name)

Date: _____



SARAWAK CABLE BERHAD
Registration No. 199801000274 (456400-V)

THIRD PARTY DECLARATION FORM

1. We are the vendors / contractors / financial institutions / sub-contractors / consultants / agents / representatives / tenants / joint venture partners / introducers / government intermediaries of Sarawak Cable Berhad (“SCABLE”) and Group of Companies.
2. We hereby declare that we will comply with:
 - (i) All applicable laws and regulations relating to SCABLE’s Anti-Bribery and Corruption Policy, Conflict of Interest Policy, and Whistleblowing Policy.
 - (ii) The following anti-corruption principles:
 - a) Committing to promote values of integrity, transparency, accountability and good corporate governance.
 - b) Prevention of corruption and fighting of any form of corrupt practice.
 - c) Supporting anti-corruption initiatives led by the government and the authorities.

(hereinafter collectively referred to as “the requirements”)
3. We have not been convicted nor are we subject to any investigation, inquiry or enforcement proceedings by the relevant authorities of any actual or suspected breach and will report any actual or suspected breach as soon as reasonably practicable and to the extent permitted by the law, to SCABLE.
4. We undertake to promptly inform SCABLE of any breach and/ or alleged/ suspected breach of the requirements and cooperate with SCABLE in any investigation of such breach involving SCABLE’s staff.
5. We acknowledge that the provisions set out in this declaration form shall form part of the terms and conditions of our appointment and/or contract of service.

6. We further acknowledge that SCABLE has the right to suspend or terminate the contract/ agreement/job and disqualify us from tendering for future contracts/jobs if we were found to have breached the requirements or any other terms and conditions implemented by SCABLE pursuant to the contract/ agreement/job.

Signature of Authorized Person : _____

Name of Company's Authorized Person : _____

Company's Name : _____

Company's Stamp : _____

Date : _____



SARAWAK CABLE BERHAD
Registration No. 199801000274 (456400-V)

CONFLICT OF INTEREST DECLARATION FORM (For Internal Use Only)

Explanatory Note:

Conflict of interest arises whereby in a particular transaction/contract/tender/approval (“Course of Dealings (CoD)”), an employee’s personal interests conflict with its professional interests owed to their employer in his employment or the organization that he/she is representing. In the event that in the process of the CoD, an employee has personal knowledge and/or is personally affiliated with a beneficial information of the CoD and has the potential to personally benefit or gains interest from the CoD, the same amounts to a Conflict of Interest. Therefore, every employee in that situation is required to fill out the Form below.

Upon completion of this Form, kindly submit this Form to your immediate Human Resources Department (HRD).

I hereby declare an actual/potential Conflict of Interest as follows*:

Dealings with Suppliers, Customers, Agents and Competitors

Board Membership

Personal Dealings with Suppliers and Customers

Family Members and Close Personal Relationship

Outside Employment and Activities Outside the Group

Investment Activities

Any Employee who is in a situation of actual or potential conflict must complete this Conflict of Interest (COI) Declaration Form within seven (7) days as soon as the situation arises. Upon submission of this Form to the HRD, the HRD shall engage with the management of the Company to facilitate deliberation and approval, depending on the nature of the conflict. All parties involved in this Declaration shall then take such action as is considered necessary to safeguard the interests of the Company and/or provide dispensation under allowable circumstances. Where the conflict involves an award of contract or proposed contract with the Group, the terms of the contract are to be deliberated and decided independently. You are also to refrain from participating in any of the tender process and approvals.

Upon consultation and approval, you are required to comply with all the requirements and agreed action plan to resolve the conflict. In the event that the conflict persists or remains unresolved, you are expected to continue disclosing the conflict of interest and submit the form annually or any period prescribed by the Company.

Please state details of your Declaration herein:

*the above details shall consist of, including but not limited to the following:

- how an employee is personally/in his employment, related to the above transaction;
- details of the transaction which the employee has knowledge of and affiliated to;
- whether the employee has the potential to benefit or gain interest from the transaction

Name:

Signature:

Date:

 SARAWAK CABLE BERHAD Registration No. 199801000274 (456400-V)	GIFTS AND HOSPITALITY RECEIVED DECLARATION FORM		Reference No.
	Staff must declare all offered gifts and hospitality received in accordance with the SCABLE Anti Bribery and Corruption Policy		
DECLARANT (PERSON MAKING DECLARATION)			
Full Name			
Company			
Position			
Department			Contact No.
1. I declare that I have been offered the following gift (including any benefit or hospitality):			
Donor details			
Donor relationship with SCABLE <i>Describe all current (within the last 2 years) and any pending activities between SCABLE and the donor</i>			
Donor relationship with Declarant <i>Describe your role in the aforementioned relationship between SCABLE and the donor and any other professional or personal relationships you may have with the donor</i>			
Descriptions of gift/meals/travel/accommodation/entertainment/recreation ("Gifts and hospitality") offered			
Reason for the Gifts and Hospitality			
Estimated Value	Date of Gift and Hospitality received		
Signature of Declarant	Date		
Head of Department / Manager			
I have reviewed this declaration form and make the following decision:			
Ownership of the gift	<input type="checkbox"/> Decline	<input type="checkbox"/> SCABLE	<input type="checkbox"/> Declarant
Comments			
Full name of supervisor			
Position of supervisor			
Signature of Supervisor	Date		
ADMINISTRATIVE USE ONLY			
Received By	Date	Signature	



SARAWAK CABLE BERHAD
 Registration No. 199801000274 (456400-V)

GIFTS & HOSPITALITY REQUISITION FORM

Details of Gifts/meals/travel/accommodation/entertainment/recreation (“Gifts & Hospitality):		
1.		
2.		
1. Date Offered		
2. Descriptions		
3. Estimated Value (RM)		
4. Offered party	<u>Business associate:</u> Company Name:	<u>Government Official:</u> Organisation Name:
	Person receiving:	Person receiving:
5. Purpose and justification of Offer		

Requested By:

Checked By Human Resources Dept:

 Name: _____
 Designation: _____
 Date: _____

 Name: _____
 Designation: _____
 Date: _____

Approved/Not Approved By:

Approved/Not Approved By MD/GCOO/COO:
 (only applicable for giving to Government Official)

 Name: _____
 Designation: _____
 Date: _____

 Name: _____
 Designation: _____
 Date: _____

