



# **Anti-Corruption & Bribery Policy**

# Table of Contents

No	Description	Page
1	Introduction	2
2	Objective	2
3	Coverage	2
4	Definition	2
5	Compliance to the law	3
6	Responsibility of this policy	3
7	Validity and Review	3
<b>8</b>	<b>Adequate Procedure Principles</b>	
8.1	Principle 1: Top Level Commitment	4
8.2	Principle 2: Risk Assessment	5
8.3	Principle 3: Undertake Control Measure	6
8.4	Principle 4: Training and Communication	7

## 1. Introduction

FA Advisory Sdn Bhd (“**FA Advisory**”) is committed to conduct its business ethically and in compliance with all applicable laws and regulations, including the Malaysian Anti-Corruption Commission Act 2009 (revised 2018) (“**MACC Act**”). This document is issued to prevent the occurrence of corruption and bribery practice, and to ensure FA Advisory do not participate in corruption activity for its advantage.

## 2. Objective

The objectives of this Policy are:

- a. To set out FA Advisory’s overall position on bribery and corruption.
- b. To ensure FA Advisory has proper record on the Guidelines on Adequate Procedures pursuant to Subsection (5) of Section 17A under the MACC Act, for reference and application.

## 3. Scope

This policy is applicable to all Board of Directors (“**BOD**”), Management and employee (either permanent, contract or temporary) of FA Advisory. It is also applicable to all representatives or agents performing work or services on behalf of FA Advisory.

## 4. Definition

Corruption	the 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 description.
Bribery	A form of corruption and is described as offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person, in a position of trust within an organisation.
Gratification	Means (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).

## **5. Compliance to the law**

This policy is applicable at all times and subject to the laws and regulations of Malaysia. In the event of conflict or inconsistency between this policy and the laws and regulations of Malaysia, the latter shall prevail.

FA Advisory encourage Whistleblowing from internal and external parties on any suspicions on breaches of the policy. A whistle blower may report any suspected and/or real corruption incidents via a secured reporting email: [compliance@fa.my](mailto:compliance@fa.my)

Investigation will be carried out by the Whistleblowing Committee, and will warrant disciplinary action (including termination) or reporting to the relevant enforcement authority upon actual conviction depending on the seriousness of the offence.

## **6. Responsibility of this policy**

The General Manager (“**GM**”) and Compliance Officer(s) (“**CO**”) shall be the custodian of this Policy and will be responsible of reviewing, developing and recommending amendments to this policy.

Any changes to the Policy shall be approved by the BOD unless it is delegated to the General Manager or CO.

## **7. Validity and Review**

This Policy shall be reviewed every three years or as when deemed necessary by the BOD, GM, or CO.

This policy is valid immediately upon approval by the BOD.

## **8. Adequate Procedure Principles**

### **8.1 Principle 1: Top Level Commitment**

- (a) The BOD, GM and CO are primarily responsible for ensuring that FA Advisory:
  - (i) practices the highest level of integrity and ethics;
  - (ii) complies fully with the applicable laws and regulatory requirements on anti-corruption; and
  - (iii) effectively manages the key corruption risks of the Company.
  
- (b) The BOD, GM, and CO must be able to provide assurance to its internal and external stakeholders that the FA Advisory is operating in compliance with its policies and any applicable regulatory requirements.
  
- (c) Thus, for this purpose, FA Advisory should carry out the following:
  - (i) periodically review of this policy and conduct anti-corruption compliance programme to address any potential corruption risks;
  - (ii) promote a culture of integrity within the organisation;
  - (iii) inform and encourage internal and external parties the use of whistleblowing in relation to any suspected and/or real corruption incidents or inadequacies in this policy or any Standard Operating Procedures by FA Advisory
  - (iv) assign and adequately resource the Compliance Officer (which may be external to the organisation) to be responsible for all anti-corruption compliance matters, including provision of advice and guidance to personnel and business associates in relation to the corruption programme;
  - (v) ensure that the results of any audit, reviews of risk assessment, control measures and performance are reported to the BOD, and acted upon.

## **8.2 Principal 2: Risk Assessment**

- (a) FA Advisory shall conduct corruption risk assessments periodically and when there is a change in law or circumstance of the business to identify, analyse, assess and prioritise the internal and external corruption risks of the Company. This risk assessment shall be used to establish appropriate processes, systems and controls approved by the BOD to mitigate any specific corruption risks BOD is exposed to.
  
- (b) For this purpose, a comprehensive risk assessment is done every three (3) years, with intermittent assessments conducted when necessary. The assessment may include the following:
  - (i) opportunities for corruption and fraud activities resulting from weaknesses in the Company's governance framework and internal systems/procedures;
  - (ii) financial transactions that may disguise corrupt payments;
  - (iii) business activities that pose a higher corruption risk;
  - (iv) relationships with external parties which are likely to expose FA Advisory to corruption.

### 8.3 Undertake Control Measure

(a) FA Advisory shall place appropriate controls in order to address any corruption risks arising from the Company's governance framework, processes and procedures. These include the following items:

(i) Due diligence

Prior to entering into any formal relationships with relevant parties, due diligence methods will be carried out, including include background checks on the person or entity, document verification process, or conducting interviews with the person to be appointed to a key role where corruption risk has been identified.

(ii) Reporting channel

Encourage and inform Internal and external parties to report suspected and/or real corruption incidents via a secured dedicated reporting email at [compliance@fa.my](mailto:compliance@fa.my). Whistleblower's identity is remain confidential.

(iii) Gift, entertainment and corporate hospitality

All personnel of FA Advisory adopt a no-gift (in whatever form) from all Business Partners. However, FA Advisory recognises that gift, entertainment and corporate hospitality may be a form of business courtesies. Personnel can only give/accept business courtesies if it does not create a conflict of interest, impropriety, or cause prejudice in the business's operation or dealings.

Shall any personnel received gift of valued more than RM300, the receiving party must immediately fill up the form (refer to appendix 1) and send to [compliance@fa.my](mailto:compliance@fa.my).

#### **8.4 Training and Communication**

- (a) All FA Advisory's employees shall be informed of its anti-corruption process, covering the following areas: policy, training, reporting channel, and consequences of non-compliances.
- (b) Training shall also be conducted to all FA Advisory's staffs to ensure understanding of FA Advisory's anti-corruption position. These may include, but not limited to: induction program, role-specific training, which is tailored to corruption risks the position is exposed to, and training programs (via online or offline).
- (c) Annual declaration is conducting to ensure all FA Advisory's personnel are aware of the company's position on anti-bribery and corruption.

END OF POLICY



<b>Declaration of Gifts and/or Hospitality</b>			
I, (Name) _____ declare that I have received the following gift and/or hospitality from an external party/ies:			
Date, Place and Time	Description of Gift/Hospitality and its Estimated Value	Giver/Sending Party	Relationship with Giver/sending party
Please explain the reason for accepting the gift:			

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)