

## Schedule 2

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# Gift, Entertainment and Hospitality Policy

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Updated and Approved by Board of Directors

8<sup>th</sup> April 2021

1. **Receiving Gifts, Hospitality and Entertainment Invitations (“GHE”)**
  - 1.1. Upon receipt of any gift, hospitality and entertainment invitations, Directors and Employees are required to declare promptly by –
    - (a) Completing the GHE clearance form;
    - (b) Submitting the completed GHE clearance form to the Head of Department; and
    - (c) the Head of Department shall submit the said completed GHE clearance form to the Anti-Bribery Compliance Committee
  - 1.2. If the value of the gift is below RM5,000.00, within two (2) days from the date of receipt, Directors and Employees are required to apply for approval by–
    - (i) Completing the GHE clearance form;
    - (ii) Submitting the completed GHE clearance form to the Head of Department; and
    - (iii) the Head of Department must submit the said completed GHE clearance form to the Anti-Bribery Compliance Committee for approval.
  - 1.3. If the value of the gift is above RM5,000.00, the Anti-Bribery Compliance Committee is required to seek approval from the Board of Directors.
  - 1.4. If the Board of Directors’ approval is not required, the Anti-Bribery Compliance Committee will notify the Directors and Employees via email, within three (3) days from the date of receipt of the GHE clearance form, whether the gift may be accepted or must be returned or disposed in some other way.

- 1.5. If the Board of Directors' approval is required, the Anti-Bribery Compliance Committee will notify the Directors and Employees via email, within five (5) days from the date of receipt of the GHE clearance form, whether the gift may be accepted or must be returned or disposed in some other way.
- 1.6. If approval is given for acceptance of the gift, Directors and Employees should send a written acknowledgment to the giver and at the same time, inform the giver of the Company's gift policy. The Anti-Bribery Compliance Committee shall record in the GHE declaration form the justifications for giving the approval.

## **2. Offering Gifts, Hospitality and Entertainment Invitations (“GHE”)**

- 2.1. Prior to offering any gift, hospitality and entertainment, Directors and Employees are required to notify the Anti-Bribery Compliance Committee promptly by –
  - (a) Completing the GHE clearance form;
  - (b) Submitting the completed GHE clearance form to the Head of Department; and
  - (c) the Head of Department must submit the said completed GHE clearance form to the Anti-Bribery Compliance Committee for approval.
- 2.2. If the value of the gift, hospitality and entertainment is below RM5,000.00, the prior approval of the Anti-Bribery Compliance Committee must be obtained by –
  - (a) Completing the GHE clearance form;
  - (b) Submitting the completed GHE clearance form to the Head of Department; and

- (c) the Head of Department must submit the said completed GHE clearance form to the Anti-Bribery Compliance Committee for approval.
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- 2.3. If the value of the GHE is above RM5,000.00, the Anti-Bribery Compliance Committee is required to seek approval from the Board of Directors.
  - 2.4. The Anti-Bribery Compliance Committee will notify the Directors and Employees via email whether the GHE may be offered or provided. If approval were to be given, the Anti-Bribery Compliance Committee shall record in writing the justifications for giving the approval.
  - 2.5. Directors and Employees shall submit the approval by the Anti-Bribery Compliance Committee together with payment receipts to the finance department for their expenses claims.
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- 3. Mode of Submission
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- 3.1 Directors and Employees may submit the GHE declaration form to the Anti-Bribery Compliance Committee via email at [antibriberycommittee@suezcap.com](mailto:antibriberycommittee@suezcap.com) or to the Head of Department.

## GIFT, HOSPITALITY & ENTERTAINMENT CLEARANCE FORM

Are you giving or receiving gift, hospitality and entertainment? Please tick the relevant boxes.

Giving	<input type="checkbox"/>	Receiving	<input type="checkbox"/>
Gift	<input type="checkbox"/>		
Hospitality	<input type="checkbox"/>		
Entertainment	<input type="checkbox"/>		

**A. Name of the giver (including company name and position in the company)**

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**B. Name of the recipient (including company name and position in the company)**

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**C. Purpose of the Gift, Hospitality & Entertainment**

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**D. Value of the Gift, Hospitality & Entertainment**

(i) Less than RM5,000.00  Please state the amount: \_\_\_\_\_

(ii) More than RM5,000.00  Please state the amount: \_\_\_\_\_

**E. Nature of the Gift, Hospitality & Entertainment**

\_\_\_\_\_

**F. Date of receipt of the Gift, Hospitality and Entertainment**

\_\_\_\_\_

**G. Intended Date of Offering the Gift, Hospitality and Entertainment**

\_\_\_\_\_

Submitted by:

\_\_\_\_\_  
Name :  
Designation :  
Date :

The following part shall be filled in by the Anti-Bribery Compliance Committee (“Committee”) –

Approval given  
by the Committee

Please state the reason:

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Approval given  
by the  
Board of Directors

Please attach the written approval and state the reason:

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Approved by:

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For and on behalf of  
Anti-Bribery Compliance Committee

Approved on: