

ZUL RAFIQUE & *partners*

**ANTI-BRIBERY & CORRUPTION
POLICY**

*If corruption is a disease, then transparency is an essential part of its treatment
– Kofi Annan, former United Nations Secretary General and Nobel Peace Prize Laureate*

Message from the Executive Committee

Zul Rafique & Partners (“ZRp” or “the Firm”) subscribes to Anti-Corruption Principles for Corporations in Malaysia and is committed towards eradicating corruption in business and community interactions. On our part, this Anti-Bribery and Corruption Policy (the “Policy”) aims to affirm ZRp’s stance on anti- corruption and is implemented as part of our internal procedures to prevent corruption. We will extend reciprocity in complying with our business partners’ anti-corruption policies in order that we can all move towards eradicating corruption.

In the event of any uncertainties or ambiguities arising, enquiries may be made to our Anti-Bribery and Corruption Committee at ethics@zulrafique.com.my. An e-copy of this Policy is also available on our website at <https://www.zulrafique.com.my/our-policies.php>.

We invite you to join in our efforts against bribery and corruption and thank you all for your support.

Dato’ Zulkifly bin Rafique

Chairman

Executive Committee

1.0 INTRODUCTION

1.1 *Our Business Conduct*

- 1.1.1 This Policy sets out ZRp's general principles and standards on anti-bribery and corruption and the maintenance of business documentation and financial records. It reinforces our zero tolerance stance towards all forms of corruption and our commitment to maintaining accurate records of our business dealings.
- 1.1.2 This Policy does not stop us from doing legitimate business in the context of promoting our professional practice.
- 1.1.3 This Policy shall be read together with ZRp's other internal policies/procedures/guidelines/manuals including but not limited to the Firm's employee handbook.

1.2 *Purpose*

- 1.2.1 ZRp's employees and third parties acting on our behalf are required to understand and comply with our principles and standards, as well as with all relevant laws on anti-bribery and corruption. All of us are responsible for preventing any instance of bribery or corruption and for reporting any concern or suspicion so we can identify the risks and conduct any required investigations.
- 1.2.2 If you breach this Policy you may also be breaking the law and could face disciplinary action that could lead to you losing your job, being fined and/or sentenced to prison.
- 1.2.3 This Policy sets out our responsibilities and the responsibilities of all our employees and contractors, sub-contractors, consultants, agents and/or representatives performing work or services on behalf of ZRp ("**Persons Associated**") to observe and uphold ZRp's stance on anti-bribery and corruption.

- 1.2.4 This Policy provides information and guidance on how we expect our employees and Persons Associated to conduct themselves.
- 1.2.5 This Policy provides guidance on how to recognise bribery and corruption and how each employee or Person Associated may raise concerns on breaches of this Policy or of applicable laws without fear of reprisal. In fact, we assure you that all complaints or reports will be treated in confidence and used for the purpose of improving ZRp's culture and compliance with laws.
- 1.2.6 With your co-operation above, ZRp will have in place adequate procedures to prevent and detect bribery and corruption.

1.3 Coverage and Scope of the Policy

- 1.3.1 This Policy shall apply to every partner and employee of ZRp, whether full time, part-time or contractual and irrespective of position ("**ZRp Employee**") as well as to any Persons Associated.
- 1.3.2 We will also require all our business partners, clients and stakeholders to understand, acknowledge and comply with our anti-bribery rules, policies and procedures as well as all other relevant and applicable laws as may be in force from time to time.
- 1.3.3 This Policy is intended as a guide for ZRp Employees and Persons Associated to live up to the highest ethical and behavioral standards required by ZRp. You are expected to read, understand and comply with this Policy and strictly adhere to the provisions set out herein whenever in the conduct of the Firm's business activities.
- 1.3.4 All ZRp Employees must attend any training events conducted on this Policy, including any updates and reviews as may be instructed by the Firm from time to time.
- 1.3.5 If any clarification is needed or in the event of uncertainties arising, queries may be made to your immediate superior or to the Anti-Bribery and Corruption Committee at ethics@zulrafique.com.my.

1.4 Non-Compliance with this Policy

- 1.4.1 Compliance with this Policy is mandatory. Failure to do so will amount to a serious misconduct or breach of an employee's terms of employment with ZRp, warranting disciplinary or other appropriate action being taken.
- 1.4.2 Persons Associated or other business partners who fail to comply with any relevant provisions of this Policy will be subject to sanctions, penalties or other legal action that may properly and lawfully be taken by ZRp.

1.5 Reporting Obligations

- 1.5.1 All persons are required to report to ZRp any incidences or suspected incidences of corruption *via* the whistleblowing channel provided by ZRp. Details and further information on reporting can be found at **Section 8** of this Policy.

2.0 BRIBERY AND CORRUPTION

2.1 What is Bribery and Corruption?

- 2.1.1 The general definition for "corruption" is the abuse of an office or position for personal gain.
- 2.1.2 Bribery is a subset of corruption and is described as the offering, promising, giving, soliciting, receiving and/or accepting or agreeing to receive and accept, any gratification, benefit, personal gain or advantage (whether commercial, contractual or personal):

- (a) with the intention of influencing behavior and to induce a person to act in a dishonest or unethical way; or
- (b) as an inducement or reward for doing an act or performing a task in relation to one's job description,

in return for a commercial or personal benefit or advantage. We wish to emphasize that a bribe need not be accepted for an offence to be deemed committed for the purposes of the Malaysian Anti-Corruption Commission Act 2009 (“**Act**”).

2.1.3 The 4 main offences of corruption and bribery as specified in the Act are:

- (a) Soliciting or receiving gratification;
- (b) Offering or giving gratification;
- (c) Intending to deceive (false claim); and
- (d) Using your office or position for gratification.

2.1.4 ZRp does not tolerate and strictly prohibits all forms of bribery and corruption, regardless of whether it takes place in the public or private sectors, and whether conducted by ZRp Employees, Persons Associated or by any of our other business partners. All ZRp Employees, Persons Associated and our business partners are reminded that the commission of the above acts will amount to an offence punishable under the Act.

2.2 ***What is Gratification?***

2.2.1 Instances of *gratification* may not always seem apparent, and can take various forms, including:

- (a) money, donation, gift, loan, fee, reward, valuable security, property or interest in any property, benefit, or any other similar advantage;
- (b) any office, employment, contract of employment or services and agreement of employment or render services in any capacity;
- (c) any payment, release, discharge or liquidation of any loan, obligation or other liability;
- (d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- (e) any other service or favour of any kind; and
- (f) any offer, undertaking or promise of any gratification.

2.2.2 As such, you are required to exercise a level of prudent discretion in every situation to assess if there is a risk or suspicion of a gratification being offered or received, especially in situations which could influence or be perceived to influence the outcome of any business decision. If you are in any doubt whether or not any action will amount to a breach of this Policy and of anti-corruption laws, you are required to seek immediate advice and guidance from the Anti-Bribery and Corruption Committee.

2.3 *Obligation to Report*

2.3.1 You are under an obligation to make a report in the event you know of or are aware of someone in the Firm who is giving or receiving any form of gratification, or if you suspect that there is an incident or suspected incident of bribery or corruption occurring in the course of the Firm's activities.

2.3.2 A report must be made at the earliest opportunity to your immediate superior or *via* ZRp's dedicated whistleblowing channel, and depending on the seriousness of the offence, ZRp may be obligated to file a report to the Malaysian Anti-Corruption Commission.

3.0 GIFTS, HOSPITALITY & ENTERTAINMENT

- 3.1 As a rule of thumb, ZRp Employees are prohibited from directly or indirectly giving and receiving gifts, or engaging in hospitality and entertainment with third parties, as these acts may influence good judgment and impede independent decision making abilities.
- 3.2 However, the Firm recognizes that gifts, hospitality and entertainment are part of accepted business and cultural practices, and therefore permits these activities SUBJECT TO the restrictions set out in this Policy.

3.3 *Giving Gifts*

- 3.3.1 The giving of gifts is permitted only for the purposes of establishing and maintaining good business relations, or for the purposes of better presenting the Firm's products and services. These corporate gifts therefore typically bear ZRp's logo and includes ZRp's corporate goody bags which are presented as a business courtesy for the purposes of branding only. Gifts from the Firm to ZRp Employees or their family members which are given in recognition of their services to the Firm, or in conjunction with an event or celebration organized by ZRp is also permitted. In addition, the firm recognizes that culturally gifts may be given as a token of appreciation to valued business partners, and permits the giving of festive gifts consisting of food, fruit or flower products/hampers of appropriate and pre-determined value.
- 3.3.2 All gifts must be carried out within pre-approved budgetary limits and in compliance with the guidelines and procedures laid out by the Executive Committee. Gifts which are not in the form set out above must first be proposed to and approved by the Executive Committee. Documents and reports relating to such gifts must be recorded and filed accordingly.
- 3.3.3 ZRp Employees must also adhere to the following gift giving guidelines:

- (a) Save only in the case of ZRp's corporate gifts, gifts to Public Officials are strictly prohibited Please refer to **Paragraph 6.2** below of this Policy to ascertain who falls within the category of "Public Official";
- (b) All gifts must be given in an open and transparent manner, and there should not be any hint or suggestion of an expectation that the giver or ZRp will receive a favour, benefit or advantage in return;
- (c) All gifts should not have the effect or be perceived as having the effect of influencing the receiver's independence or decision making authority in any way;
- (d) Cash or cash value gifts (eg vouchers, coupons, commissions) are strictly prohibited;
- (e) All gifts must be modest and of an appropriate and reasonable value, taking into account all surrounding circumstances, and should not be frequently given to the same recipient;
- (f) All gifts must be subject to budgetary approvals and limits;
- (g) Any type of gift which is excessive, extravagant, illegal or inappropriate in any way is strictly prohibited;
- (h) Gifts to family members, spouses or partners of any intended recipient is prohibited.

3.4 *Accepting Gifts*

- 3.4.1 ZRp adopts a "No Gift" policy whereby all ZRp employees shall not solicit or accept any gifts (with the exception of corporate gifts) from any third party that have direct or indirect business dealings with ZRp. Such acts may be perceived as bribes and tarnish the reputation of the Firm.

3.4.2 It is the duty of all ZRp Employees to inform all third parties about ZRp's No Gift Policy.

3.4.3 However, ZRp is aware and recognizes that gift giving is accepted in some businesses as a legitimate form of networking. The refusal to accept such gifts may appear disrespectful and may in some instances harm the Firm's business relationship with the giver. In such situation, ZRp Employees are required to adhere to the following guidelines:

- (a) thanking the third party for the gift but explaining politely about ZRp's "No Gift Policy";
- (b) if despite the above, the third party is still insistent on giving the gift, then the ZRp Employee(s) receiving such gift is to immediately inform and seek directions from his immediate superior;
- (c) if the acceptance of the gift may give rise to a conflict of interest, or if the gift is of a value or nature that may be deemed extravagant, illegal, excessive or inappropriate the immediate superior shall not approve the acceptance of the gift;
- (d) for gifts which are accepted, a decision will be made as to the treatment of the gifts, namely whether to:
 - (i) donate the gift to charity;
 - (ii) share it with other ZRp Employees;
 - (iii) designate it as a display item;
 - (iv) permit it to be retained by the intended recipient; or
 - (v) be dealt with in such manner as may be deemed appropriate considering the circumstances.

- 3.4.4 All gifts received must also be reported to the Anti-Bribery and Corruption Committee and a register kept recording the details of the same.
- 3.4.5 If you are in doubt as to whether or not the giving or receiving of any gift is permissible, you are required to seek clarification and guidance from your immediate superior.

3.5 *Providing Corporate Hospitality & Entertainment*

- 3.5.1 Providing or offering to provide entertainment with the intention of or which may be perceived to be improperly causing undue influence on any party in exchange for some future benefit is strictly prohibited. Such acts may be easily construed as acts of bribery and therefore contrary to the principles laid out in this Policy.
- 3.5.2 Notwithstanding the above, ZRp acknowledges that providing modest hospitality and entertainment is a legitimate way of building and fostering good business relationships with third parties. As such, ZRp Employees are allowed to entertain third parties through a *reasonable act of hospitality* but only as part of legitimate and accepted business networking. Hence, only reasonable and proportionate hospitality and entertainment expenses under appropriate circumstances and which amount to measured acts of commercial goodwill towards the recipients will be permitted.
- 3.5.3 ZRp Employees should understand that there is a fine line between what is considered legitimate vs. illegitimate forms of corporate entertainment and hospitality. Corporate hospitality would be illegitimate if offered or given with the intention of inducing the recipient to perform a function in an improper or irregular manner in favour of the giver.
- 3.5.4 Further the Firm wishes to emphasize the importance of perception, which often has a greater impact than facts. ZRp therefore urges all employees to always exercise proper care and judgment when engaging in entertainment and hospitality, particularly when Public Officials are involved. As corporate entertainment and hospitality can form a reflection of the Firm's reputation, all ZRp Employees and Persons Associated must at

all times give serious consideration as to how their actions may be perceived, and accordingly exercise proper care to prevent unnecessary and damaging allegations being made against it.

3.5.5 All entertainment and hospitality expenses must be carried out within pre-approved budgetary limits and in compliance with the guidelines and procedures laid out by *the Executive Committee*. Documents and reports relating to all entertainments carried out must be carefully and properly recorded and filed.

3.5.6 Examples of hospitality and entertainment activities are meals, golf events or other reasonable and appropriate recreation and leisure activities.

3.6 *Accepting Corporate Hospitality & Entertainment*

3.6.1 ZRp strictly prohibits all ZRp Employees from soliciting or accepting entertainment and corporate hospitality in anticipation of obtaining business, or to influence favourable business decisions.

3.6.2 ZRp Employees are permitted to accept meals at business related events and provided it is of an appropriate value.

3.6.3 ZRp acknowledges that the occasional acceptance of reasonable level of entertainment provided by external parties is a legitimate way of building good relationships. However, ZRp Employees must exercise proper care and judgment before accepting any entertainment offered by external parties. This is not only to safeguard the interest of ZRp but also to protect the relevant ZRp Employees from allegations of impropriety or undue influence.

3.6.4 ZRp Employees are also required to conduct themselves with integrity at all times when accepting any corporate hospitality or entertainment. If there is any doubt at all on the legitimacy of the offered hospitality, it should be refused and a report made to his immediate superior.

3.6.5 The frequent acceptance of hospitality and entertainment from the same party is prohibited.

3.6.6 If you are in doubt as to what amounts to acceptable corporate hospitality or entertainment, please consult your immediate superior for further clarification.

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4.0 CORPORATE SOCIAL RESPONSIBILITY, SPONSORSHIPS & DONATIONS

- 4.1 ZRp lauds philanthropic activities and efforts that contribute to the betterment of society.
- 4.2 Any CSR contributions, sponsorships and donations (“**CSR Activities**”) must be carried out within pre-approved budgetary limits and in compliance with the following guidelines and procedures:
- (a) the proposed recipient must be a legitimate organization and lawfully incorporated, such as those registered with the Registrar of Society or the Companies Commission of Malaysia;
 - (b) the proposed recipient must have fundamentals or objectives that are in line with ZRp’s own CSR objectives;
 - (c) all proposed CSR Activities must be carefully assessed before a proposal is submitted to the Executive Committee for approval. The appropriate and necessary due diligence must be conducted prior to making any proposal, to ascertain the legitimacy of the recipient organization and to ensure that the benefits of the proposed CSR Activities will reach the intended objectives and recipients;
 - (d) all documents and reports relating to any CSR Activities approved and carried out must be recorded and filed accordingly.
- 4.3 All ZRp Employees are required to politely decline any third party’s request for CSR Activities which do not meet the aforementioned pre-requisites or which do not garner the necessary approvals.

- 4.4 CSR Activities with any external parties who is associated with, controlled or influenced by any Public Official is prohibited.
- 4.5 ZRp Employees are reminded that CSR contributions, sponsorships and donations (“**CSR Activities**”) conducted must not:
- (a) be used as a conduit to circumvent the law;
 - (b) be used to facilitate corruption, illegal and money laundering activities; or
 - (c) be driven by any intent to improperly influence a business outcome.
- 4.6 Political donations and/or funding of any kind is strictly prohibited, except with the prior approval of the Executive Committee. Any request for such donation or funding must be immediately reported to your immediate superior.

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5.0 FACILITATION PAYMENTS

- 5.1 A facilitation payment is a payment made personally to an individual in order to obtain or expedite the performance of a routine or administrative function. An example of a facilitation payment is where a payment is made to an administrative staff in a government agency to speed up a process to secure a license or permit or approval from that agency.
- 5.2 ZRp strictly prohibits any receiving, giving and promising of facilitation payments as it falls within the meanings of gratification and bribery provided under the Act.
- 5.3 If any ZRp employee receives a request for a facilitation payment, a report must be immediately made to his immediate superior for further directions. Please also seek advice or clarification from your immediate superior should you be in any doubt as to whether any request for payment amounts to a facilitation payment or act of corruption.

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6.0 DEALING WITH PUBLIC OFFICIALS

- 6.1 Payments or gratification given to Public Officials with the intention of influencing a favourable decision or advantage for ZRp is strictly prohibited.
- 6.2 A Public Official for the purposes of this Policy will include:
- (i) a member, an officer, an employee or a servant of any of the Government of Malaysia or the governments of any State, including any department, service and undertaking thereof;
 - (ii) a member, an officer, an employee or a servant of any local authority or any statutory body;
 - (iii) an elected political representative, or member of any political party;
 - (iv) a judge, member, officer, employee or servant of the judiciary;
 - (v) a member of the police force, military and immigration;
 - (vi) any person receiving remuneration from public funds; and
 - (vii) family member of any of the above.
- 6.3 ZRp Employees, Persons Associated and business partners of ZRp are to conduct themselves with the levels of professionalism and integrity required under this Policy at all times when dealing with Public Officials. Any payments, contributions or gratification in any form whatsoever must be made in accordance with documented and established rules and guidelines of the public body to which the Public Official is attached and must be made only for specific and legitimate purposes.

- 6.4 ZRp Employees are further required to obtain the approval of their immediate superior prior to making any payments to the Public Officials. Applications for approvals shall be accompanied at the minimum with:
- (a) Purpose of payment;
 - (b) Type and amount of payment;
 - (c) Recipient of the payment; and
 - (d) The relevant documented rule or guideline providing the basis of the payment.
- 6.5 ZRp Employees are further required to immediately report any requests made by Public Officials which are not in line with documented rules, guidelines or procedures, or which the ZRp Employee has reason to believe is a request for gratification.

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7.0 DEALING WITH THIRD PARTIES

7.1 *Due Diligence*

7.1.1 All ZRp Employees are required to conduct a due diligence on Persons Associated and business partners prior to crystalizing any business relationships, to ensure that all parties engaged by ZRp in the course of its business and operations share ZRp's stance and commitment on anti-bribery and corruption.

7.1.2 In furtherance of the above, ZRp Employees must exercise the following:

- (a) conduct due diligence to assess the integrity of its clients and all third party business associates. Certain considerations include the legitimacy of the entity, necessary licenses, qualifications required, any history of bribery, fraud, dishonesty or similar misconduct;
- (b) 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;
- (c) ensure all third parties are aware of this Policy;
- (d) require third parties to sign a declaration in the form set out in **Appendix 1** of this Policy;
- (e) if at any point during the due diligence exercise is conducted, there are conflicts of interest or "red flags" being raised, further investigation is required to be addressed before the any business can progress. Examples of common "red flags" involving third parties include:
 - (i) family, business or other "special ties" with government or special officials;

- (ii) a check on the background of the external third party is flawed;
- (iii) the transaction involves a jurisdiction or industry known for a high incidence of corrupt payments; and/or
- (iv) inadequate credentials for the nature of the engagement or lack of an office or an established place of business.

7.1.3 All ZRp Employees are required to use good judgment and common sense at all times in assessing the ethical business practices of a third party.

7.1.4 All Persons Associated and business partners are expected to comply with this Policy and all applicable laws.

7.1.5 All records, particularly financial records, pertaining to third parties must be maintained with strict accuracy.

7.2 *Conflicts of Interest*

7.2.1 Conflicts of interest arise where a personal interest of a ZRp Employee conflicts with or may potentially interfere with his independence or objectivity in performing services or exercising judgment for the Firm. In a conflict of interest situation, a ZRp Employee will be placed in a position where he is able to take advantage of his role in the Firm to act in a manner that personally benefits himself or a person closely related to him.

7.2.2 All ZRp Employees are required to declare any actual or potential conflict of interest to his immediate superior. Intentional withholding of information pertaining to any conflict of interest could warrant disciplinary action being taken.

7.2.3 Conflict of interest declarations are also required to be obtained from potential third party business associates prior to formalizing relations.

7.2.4 If you have any doubts or are unsure if there is any actual, potential or even perceived conflict of interest you are required to immediately consult your immediate superior for clarification.

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8.0 WHISTLEBLOWING POLICY

- 8.1 It is ZRp's intention to inculcate a culture of integrity and accountability within the Firm. Part of this objective recognizes the need for prompt action being taken to address and mitigate any potential commercial or reputation loss that may be suffered by ZRp as a result of bribery and corruption. ZRp affirms the right and protection of a whistleblower under the Whistleblower Protection Act 2020.
- 8.2 ZRp is committed to providing a secure whistleblowing medium that is accessible to all ZRp Employees and also third parties, to report incidences of bribery, corruption or other misconduct. All reports or concerns raised will be protected by absolute confidentiality, so reporting in good faith can be made without fear of reprisal or retaliation.
- 8.3 It is all ZRp Employee's duty to raise concerns, highlight issues and report any incidences of bribery and corruption, when they become aware of or suspect the occurrence of any such incidences. You are reminded therefore that reporting of the following is mandatory:
- (a) if you are offered a bribe;
 - (b) if you are asked to give a bribe; and
 - (c) if you know of any incidence where a ZRp Employee, Persons Associated or other business partner is offered or is asked to give a bribe.

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8.4 The secure whistleblowing channels are:-

- e-mail to ethics@zulrafique.com.my; or
- Anonymous reporting via:

Link: <https://form.jotform.com/202812346303445>

QR Code:



8.5 All reports will be taken seriously and investigated immediately.

8.6 Reports may be made anonymously and will be protected, unless disclosure is mandatory under applicable law.

8.7 Sufficient information must be provided in order to enable investigations to be carried out. Hence the following information should, wherever possible, be provided:-

- (i) identity of the persons involved;
- (ii) type of the wrongdoing with detailed and factual particulars, e.g. type and value of gratification, benefit or reward expected;
- (iii) date, time and place of the incident;
- (iv) any further and relevant information if known.

8.8 All reports made must be made in good faith. ZRp Employees who deliberately make untrue and vexatious reports may be subject to disciplinary action.

9.0 ZRP INTEGRITY/RISK MANAGEMENT

The Anti-Bribery and Corruption Committee consists of three persons comprising of:

ANTI-BRIBERY AND CORRUPTION COMMITTEE



P. JAYASINGAM



LUKMAN
SHERIFF ALIAS

And any of the following:

ADDITIONAL COMMITTEE



FARAH
MOHAMED SAID



HAMDI
ABDULLAH



IDZA HAJAR
AHMAD IDZAM

Amongst the functions would be:

- (a) provide advice and guidance on all anti-bribery and corruption matters;
- (b) monitoring, review and assessment of implemented safeguards;
- (c) training and communication;
- (d) determine policies, procedures and limits;
- (e) reporting channel;
- (f) overseeing any Corruption Risk Management (CRM) program.
- (g) managing and improving upon any inadequacies in the CRM program;
- (h) advising on financial controls, such as separation of duties and approving powers or multiple signatories for transactions;
- (i) advising on non-financial controls, such as a separation of duties and approving powers or a pre-tendering process;
- (j) advising on adequate record keeping for managing documentation in support of adequate procedures.

APPENDIX 1

Form of Declaration

General Declaration

1. We, the contractors / vendors / suppliers / agents / consultants / business partners of Zul Rafique & Partners (“**ZRp**”) declare that we have read and understood Zul Rafique & Partner’s Anti-Bribery and Corruption Policy (“**Policy**”) and will comply with the provisions of the Policy, any procedures issued thereunder, as well as all applicable laws and regulations relating to anti-bribery, fraud, and corruption.
2. We undertake to discharge our duties and obligations in an ethical manner and shall not offer, give, agree to offer or give, to any ZRp employee any bribe, gift and/or all forms of gratification to influence the decision of ZRp in favor of my company.
3. We further undertake that we will not, where we perform service for and on behalf of ZRp, offer, give, agree to offer or give to any other person any bribe and/or any form of gratification in return for a benefit or advantage to ZRp.
4. We will ensure that our subsidiaries, affiliates, employees, agents and persons performing services for an on our behalf (“**Persons Associated**”) will also comply with the Policy, any procedures issued thereunder as well all applicable laws pertaining to corruption.
5. We hereby confirm that we have not been convicted nor are we subject to any current or anticipated investigation, inquiry, or enforcement proceedings by the relevant authorities of any actual or suspected breach of anti-corruption laws.
6. We undertake to promptly inform ZRp of any breach or suspected breach of any provision in the Policy or of any applicable laws, and will thereafter provide all necessary information and assistance as may be reasonable requested by ZRp pertaining to the same.

7. We agree and acknowledge that in the event it is found that we have breached any provision in the Policy or its procedures and/or has committed an act of corruption in contravention of applicable laws, rules and regulations, ZRp will be entitled to take such actions as it may deem necessary, including to suspend, revoke or terminate the business transaction or arrangement entered into with us and/or report the corrupt activity to the relevant authorities. We further acknowledge that in such event ZRp also has the right to immediately suspend, revoke, terminate any contract / agreement / employment entered into with you without any liability whatsoever on the part of ZRp.
8. We agree to indemnify and hold ZRp harmless for all losses and damage suffered as a result of a failure to comply with any provision of the Policy, the procedures issued thereto or of any applicable laws, rules or regulations.
9. We agree that the terms set out in this form shall form part of the terms and conditions or my / our appointment and / contract of service.

[Name]

[Designation]

[Company Name]

[Date]

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Conflict of Interest Declaration

We acknowledge that we and/or our Business Associates are required to disclose any conflict of interest with ZRp or any ZRp employee or their immediate family members.

Note:

“Business Associate” here shall include your contractors, sub-contractors, distributors, agents, representatives or any persons performing such task or work on behalf of you or your Company, joint venture and joint-venture partners.

For the purposes of this section, please describe and disclose any areas or circumstances in which you may be involve that may contribute to a Conflict of Interest.

	Name of Conflicted Party (actual potential, and perceived)	Relationship with Conflicted Party	Description of a Conflict of Interest
1.			
2.			
3.			

If this section does not apply to you, please state [no].

We hereby declare that the above information provided herein is complete, true and accurate. ZRp reserves the right to suspend, revoke or terminate our contract / agreement / employment entered into with you without any liability whatsoever on the part of ZRp in the event it is found that any information given herein is untrue, incomplete or inaccurate.

[Name]

[Designation]

[Company Name]

[Date]

Staff Declaration Form

I, _____ (NRIC: _____), hereby declare and undertake that:

- (a) I have read and understood the ZRp Anti-Bribery and Corruption Policy (the “Policy”);
- (b) I am in compliance to the requirements and obligations as set out in the Policy;
- (c) I have not been involved with any corrupt practices as prescribed in the Policy;
- (d) I will promptly report to my immediate superior or the Anti-Bribery and Corruption Committee if I have reasonable grounds to suspect any actual or suspected breach to the Policy;
- (e) I acknowledge that failure to abide by any provision in the Policy will warrant disciplinary action being taken against me in accordance to my terms of engagement with ZRp or ZRp’s code of conduct.

I declare that all information provided herein is, to the best knowledge and belief, true, complete and accurate.

[Name]

[NRIC]

[Department Name]

[Date]