

INTERNAL MEMO

2020/0010

Date : 27<sup>th</sup> May 2020  
To : All Staff  
From : The Management  
Re : **Anti-Corruption, Gifts and Entertainment Guidelines ( For Customers & Suppliers)**

---

Kindly be informed that in compliance with the obligation of Malaysian Anti-Corruption Act, we are urged to strictly follow the policy as per attached. The Act take effective from **1<sup>st</sup> June 2020**.

All parties shall ensure that they adhere to the following as per policy :

1. Gifts.
2. Hospitality (meals and entertainment).
3. Scholarships, grants, charitable contributions and non-commercial sponsorships.
4. Facilitation Payments
5. Political Contributions

In the absent of doing so, you will be fully responsible for any disciplinary action may be taken against you.

**This Memo shall form part of the policy document and remain enforce until the Management inform otherwise.**

Thank you.

Warmest regards,



---

Dato' Donald Lim  
Executive Chairman

# Jiankun International Berhad

## Anti-Corruption, Gifts and Entertainment Guidelines (For Customers & Suppliers)

### JIB<sup>a</sup> is committed to conduct its business with integrity

In line with that commitment, JIB has developed its Anti-Corruption, Gifts and Entertainment Guidelines ("ACG"). As a contractor, service provider or customer of JIB, you must comply with the terms of this document for your activities involving JIB.

1. JIB condemns any form of bribery or corruption. Customers and service providers shall take all measures to prevent corrupt practices in its dealings with JIB.
2. In addition, customers and suppliers shall not-
  - (a) offer or provide, directly or through any intermediaries, any bribe, gift, reward, consideration, favour or any other advantage, whether material or immaterial ("**Advantages**") to any representative of JIB for the purpose of-
    - (i) influencing them to act contrary to JIB's interest; or
    - (ii) obtaining or rewarding favourable treatment by JIB with respect to the terms, conditions, price or performance of a contract;
  - (b) offer or provide Advantages which might be considered a bribe under international legislation, to a government official, either in Malaysia or any other country;
  - (c) collude with other parties to preclude or compromise dealings with JIB. The customers and suppliers also undertake to report to JIB, through its official reporting channels stipulated below, any such attempts made by others to involve the customers and suppliers in acts of collusion against JIB; or
  - (d) instigate third parties to perform actions pertaining to the above.
3. Customers and suppliers will ensure that all their employees, sub-contractors or agents are aware of and comply with the provisions in this document.
4. Customers and suppliers shall ensure that they adhere to the following-

#### **Gifts<sup>b</sup>**

- (a) Any gift must be unsolicited and not affect, or be perceived as affecting, business judgment. Gifts should only be offered to and received in connection with a customary business or cultural occasion. Cash, loans, kickbacks or the equivalent advantages are absolutely prohibited.
- (b) Gifts **must not exceed RM300** and in any event, must **not occur more than 3 times a year** with the same person.
- (c) No gift must be given to government officials on JIB's behalf.

#### **Hospitality (meals and entertainment)<sup>c</sup>**

- (a) Hospitality must be unsolicited and not affect, or be perceived as affecting, business judgment. Meals and entertainment should only be offered to and received from the JIB representative dealing with the customer or service provider in their role in JIB, is for purposes supported by JIB and may only be offered in conjunction with legitimate business meetings, conferences or events hosted, supported or sponsored by JIB. They may never be provided on a stand-alone basis.
- (b) Hospitality must **not exceed RM150** (for non-management), **RM250** (for managers and executives) and **RM350** (for senior managers and above) and in any event, must **not occur more than 3 times a year** with the same person. Spouses or other guests of the invitee must not be included.

#### **Scholarships, grants, charitable contributions and non-commercial sponsorships**

- (a) JIB may offer this to support the advancement of knowledge in science, nutrition, healthcare, or to support other socially beneficial purposes. This shall be in the form of JIB products. Cash donations are not permitted unless in exceptional circumstances.
- (b) All requests must be made by well-established organisations on their official letterhead to JIB's Group Corporate Affairs, regardless of value.

#### **Facilitation Payments**

- (a) Must never make or use third parties to make an unofficial payment in order to secure or expedite routine administrative actions, such as customs clearances, visas, permits or licenses.
- (b) If you receive a request for a facilitation payment, you must immediately report such request to JIB.

#### **Political Contributions**

Please note that JIB has adopted a global policy prohibiting JIB from making political contributions to political parties or candidates.

- 5. JIB will review and revised ACG in line with the Group policies and Malaysian Anti Corruption Commission Act and its amendments.

<sup>a</sup> **JIB** means its holding, subsidiary companies or associate companies located in Malaysia or Overseas.

<sup>b</sup> **Gifts** means any gifts received from and given to customers or suppliers.

<sup>c</sup> **Hospitality** means meals and entertainment received from and given to customers or suppliers.

**Please report any suspected instances of corruption or attempted corruption in matters or dealings relating to JIB and its employees so that JIB may take steps to address this urgently**

Call: 03-7932 3666 ext. 119

or

email: [kelly@jki.com.my](mailto:kelly@jki.com.my)