



ANTI - CORRUPTION POLICY

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Abbreviation & Term Definitions

Abbreviation / Terms	Definitions
Bribery or Corruption	refers to the offering, promising, giving, accepting or soliciting of an undue advantage or gratification of any value which can be financial or non-financial, directly or indirectly, and irrespective of location, in violation of applicable laws as an inducement or reward for a person acting or refraining from acting in relation to the performance of the person's duties;
Business Partners	refers to suppliers, vendors, contractors, consultants, distributors, dealers and their respective agents, representatives and sub-contractors and service providers of any kind performing work or services, for or on behalf of the U Mobile Group;
Conflicts of interest	arises in situations where a person has an involvement such as a family relationship, company shareholding or employment position which brings their personal interests into conflict with the best interests of U Mobile Group;
CxO	refers to the (-levels (Head of Division));
Employee	refers to full time, part time, contract and temporary employees, as well as agency employees, interns and volunteers retained by U Mobile Group whether on a temporary basis or otherwise;
Facilitation Payment	refers to "Duit Kopi", an illegal payment made to a public official in order to secure or expedite an administrative or approval process. While facilitation payments are often made in cash, they may also be in the form of any advantage with the intention to influence a decision or an outcome;

MACCA	refers to Malaysian Anti-Corruption Commission Act 2009;
Third Parties	refers to Business Partners any other person associated with the U Mobile Group including sponsors and public officials;
U Mobile	refers to U Mobile Sdn. Bhd;
U Mobile Group	refers to U Mobile Sdn. Bhd. and its subsidiaries.

ANTI- CORRUPTION POLICY

1. POLICY STATEMENT

- 1.1 The U Mobile Group is committed to conducting business with the highest integrity and practices a zero-tolerance approach towards all forms of Bribery and Corruption. The U Mobile Group upholds all applicable laws including all anti-corruption laws, regulations and guidelines.

2. SCOPE AND APPLICABILITY

- 2.1 This Anti-Corruption Policy ("**AC Policy**") applies to any persons working for or on behalf of the U Mobile Group in any capacity, such as Employees at all levels, directors, Business Partners, sponsors, or any other person associated with the U Mobile Group, wherever located.
- 2.2 For purposes of this AC Policy, unless stated otherwise or where the context requires otherwise, all references to Employee in this AC Policy includes directors and Third Parties.

3. LEGAL PROVISIONS

- 3.1 This AC Policy is subject to all applicable laws including the MACCA (as may be amended from time to time) and its instruments.
- 3.2 Under the MACCA, it is a criminal offence to corruptly give, promise to give, receive or promise to receive any gratification as an inducement or reward to doing or refraining from doing anything.

4. GIFTS AND ENTERTAINMENT

- 4.1 The U Mobile Group recognises that gifts and entertainment may be used as a disguise for Bribery and may be deemed to be acts of Corruption. As such, the U Mobile Group generally practises a "**No Gift Policy**" when dealing with gifts and entertainment.

Offering Gifts and Entertainment

- 4.2 Except under very limited circumstances, no Employee shall, whether directly or indirectly,

offer or promise to offer any tangible or intangible gratification in the form of gifts, services, cash or cash equivalents, vouchers or voucher codes, game sponsors, property, holiday packages, drinking invitations, karaoke invitations, expensive dining, trips, conference or any other forms of entertainment to Third Parties.

- 4.3 Only under the limited circumstance stated below, corporate merchandise or souvenirs of nominal value are allowed:
- a. gifts extended to all participants of an official or public event organized by any company within the U Mobile Group which is not exclusive to such company and without any discrimination; or
 - b. gifts extended to guests or speakers invited to an official or public event organized by any company within the U Mobile Group, such as trade shows, conference forums, industry meetings, etc. without any discrimination.

Receiving Gifts and Entertainment

- 4.4 No Employee shall, whether for personal benefit or otherwise, directly or indirectly, solicit and accept or receive tangible or intangible gratification in the form of gifts, services, cash or cash equivalents, vouchers or voucher codes, game sponsors, property, holiday packages, drinking invitations, karaoke invitations, expensive dining, trips, conference or any other forms of entertainment, in relation to the performance of his/her duties from Third Parties.
- 4.5 For the avoidance of doubt, all Employees are **strictly prohibited** from receiving and offering the following, whether directly or indirectly:-
- any gift of cash or cash equivalent, including vouchers, discounts, coupons, shares and commission;
 - any gift or entertainment involving parties engaged in a tender or competitive bidding exercise;
 - any gift or entertainment that comes with a direct/indirect suggestion, hint, understanding or implication that some expected or desirable outcome is required in return for the gift;
 - any gift or entertainment that would be illegal or in breach of applicable laws on Bribery and Corruption;
 - any gift or entertainment which is lavish and/or excessive or may adversely tarnish the reputation of the U Mobile Group.

Please refer to the U Mobile Group's Gifts and Entertainment Policy which sets out in detail the

policy and procedures for receiving and offering gifts.

5. SPONSORSHIP AND DONATIONS

5.1 The U Mobile Group recognises that sponsorships and donations may pose a Bribery risk as it involves payments to Third Parties without any tangible returns and may be perceived and deemed to be acts of Corruption.

5.2 To ensure that sponsorships and donations are not used as a disguise for Bribery, all requests for donations and sponsorships must comply with the following:

- be allowed by applicable laws;
- all necessary approvals from the CxO and authorizations in accordance with the U Mobile Group's policies are obtained;
- appropriate due diligence are conducted to ensure requests are legitimate and made to legitimate entities having an adequate organisational structure for proper administration of the funds;
- be accurately recorded and kept in the U Mobile Group's accounting books and records;
- not made directly or indirectly to a recipient as a way of influencing, reasonably perceived as influencing or obtaining an advantage in business transactions; and
- not be used as a means to cover up Bribery.

5.3 All sponsorships and donations provided must be made with transparency and be accurately recorded (documentation must include recipient identity, purpose, reasons for sponsorship/donation).

5.4 Sponsorships and donations are **strictly prohibited** in the following situations:-

- request that comes with a direct or indirect suggestion, hint, understanding or implication that some expected or desirable outcome is required in return;
- any sponsorship or donation that is illegal or in breach of any applicable laws;
- any sponsorship or donation that may otherwise tarnish the reputation of the U Mobile Group;
- payments made into private bank accounts.

6. POLITICAL DONATIONS AND CONTRIBUTIONS

- 6.1 The U Mobile Group does not make any political donations or contributions, whether in the form of direct or indirect financial support, pledges or through the use of its assets to support any political candidate, incumbent or party.
- 6.2 Under no circumstances will any Employee be compensated or reimbursed in any way by the U Mobile Group for any political donation or contribution.
- 6.3 If any Employee receives a request for political donation or contribution, such request must be escalated to the Compliance Officer and CEO for notification.

7. FACILITATION PAYMENTS

- 7.1 All Facilitation Payments, whether made or received directly or indirectly, are **strictly prohibited**.
- 7.1 If any Employee receives a request for Facilitation Payment, such request must be reported immediately to the Compliance Officer and CEO.

8. DEALING WITH EMPLOYEES

- 8.1 Appropriate and adequate due diligence must be conducted on all prospective Employees and the recruitment of Employees shall be done in accordance with the U Mobile Group's Recruitment Policy.
- 8.2 All Employees and directors are required to:
- comply with this AC Policy and all other relevant policies, procedures and guidelines;
 - attend training on anti-bribery and corruption, including a yearly refresher training;
 - declare any actual or potential conflict of interest through the Conflict of Interest Declaration (which may be found in the Code of Conduct Policy); and
 - undertake the annual Integrity Pledge.

9. DEALING WITH THIRD PARTIES

- 9.1 The U Mobile Group expects all Third Parties dealing with the U Mobile Group to share and comply with the U Mobile Group's commitment to conducting business with the highest integrity and zero tolerance approach towards all forms of Bribery and Corruption.
- 9.2 As such, U Mobile Group expects all Third Parties to comply with this AC Policy and the Business Partner Code of Conduct. Where appropriate, all Third Parties are also expected to sign an annual Integrity Pledge to commit to sharing and complying with the U Mobile Group's commitment to conducting business with the highest integrity and practices a zero-tolerance approach towards all forms of Bribery and Corruption.

Please refer to the Business Partner Code of Conduct for details on the business standards and obligations applicable to Third Parties.

10. WHISTLEBLOWING

- 10.1 The U Mobile Group encourages all its Employees, Third Parties and customers to report any real or suspected incidents of Bribery or Corruption.
- 10.2 Any Employee who suspects or becomes aware of any non-compliance of this AC Policy or any other relevant policies, procedures and guidelines is obliged to report such incidents through the whistleblowing channels. Employees who knowingly fail to report such violations may be subject to disciplinary action.
- 10.3 The U Mobile Group gives anyone who makes a report, complaint or disclosure about any real and/or suspected Bribery or Corruption the protection of confidentiality to the extent reasonable, and protection against detrimental action for making the report. This is provided that the report, complaint or disclosure is made in good faith. Reports can also be made anonymously through the whistleblowing channels.
- 10.4 Reports can be made through the whistleblowing channels as stated in the Whistleblower Policy.

Further details are set out in the U Mobile Group's Whistleblower Policy.

11. NON-COMPLIANCE AND INVESTIGATION

- 11.1 The U Mobile Group takes non-compliance of this AC Policy and other related policies, procedures and guidelines seriously. For the Employees, non-compliance of this AC Policy and other related policies, procedures and guidelines may be subject to among others, disciplinary action, including termination of employment. For the Business Partners, non-compliance of this AC Policy may result in termination of the business arrangement and claim for damages.
- 11.2 Where any non-compliance of this AC Policy or other related policies, procedures and guidelines are detected or reported, the U Mobile Group will endeavor to conduct appropriate investigations in the most objective and professional manner.

12. REVIEW AND AMENDMENTS

- 12.1 This AC Policy shall be reviewed and kept updated from time to time.
- 12.2 Any queries relating to this AC Policy should be directed to the Compliance Officer or the Legal and Corporate Governance Department.
- 12.3 The U Mobile Group reserves the right to amend, update or replace this AC Policy or any part of it from time to time based on legislative requirements and other circumstances. Such amendments or replacement shall be binding on all Employees, directors and Third Parties where applicable.