



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

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1. **INTRODUCTION**

FIBRECOMM NETWORK (M) SDN BHD (Company No. 199201009356) (“FIBRECOMM”) is a joint venture company of Telekom Malaysia Berhad (“TM”) and Tenaga Nasional Berhad (“TNB”) whereby TM holds more than half of the issued share capital of FIBRECOMM i.e. fifty-one percent (51%).

FIBRECOMM adopts zero-tolerance approach against all forms of bribery and corruption and is committed to maintain and preserve the highest standard of governance, integrity, accountability and transparency in all its operational and business activities. FIBRECOMM is also fully committed to comply with all laws and regulations which govern its operations and business.

FIBRECOMM have been guided and governed by TM’s KRISTAL Core Values, namely Total Commitment to Customers, Uncompromising Integrity, Respect & Care. This Anti-Bribery and Anti-Corruption Policy sets out the values and principles along with the main policies on Conflict of Interest, Whistle-Blowing Policy & Reporting, Understanding the Rules About Gifts, Entertainment & Corporate Hospitality as well as the Anti-Bribery/Anti-Corruption Policy which reflects our zero-tolerance policy against all forms of corruption. It shall act as the guiding principle in inculcating a business ethics mind-set in FIBRECOMM.

This Policy shall also be read in conjunction with TM Code of Conduct & Business Ethics (“TM CBE”), the Malaysian Anti-Corruption Commission Act 2009 (“MACC Act 2009”), the Penal Code (Act 574) (“Penal Code”), the Anti-Money Laundering and Anti-Terrorism Financing Act 2001 (“AMLATFA”) and any applicable bribery and corruption laws in countries or territories or jurisdictions where FIBRECOMM operates.

2. **OBJECTIVE**

This Policy sets out FIBRECOMM’s position on bribery in all its forms and matters of corruption that FIBRECOMM might confront in its day-to-day operations.

3. **SCOPE**

- 3.1 The Policy applies to the Board of Directors, Management, Employees and all Business Partners of FIBRECOMM.
- 3.2 If any Applicable Laws conflict with this Policy, one must comply with such Applicable Laws. If a local custom or practice conflicts with this Policy, one must comply with this Policy.

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- 3.3 This Policy serves as a general policy and does not contain specific details on the processes which may be covered under specific procedures/guidelines, etc. This Policy is not intended to replace any provision of any written laws and if there is any inconsistency between the provisions in this Policy and any written laws, such written laws shall prevail to the extent of the inconsistency and the wordings or the paragraphs which contain such inconsistency shall be deemed severed from this Policy and the remaining provisions of this Policy.
- 3.4 FIBRECOMM, being a subsidiary of TM, is also required to comply with other applicable policies, procedures, guidelines, directives, rules and practices issued by TM.
- 3.5 This Policy may be reviewed, changed and updated from time to time which we are expected to comply and be bound by it.

4 **DEFINITIONS**

In this Policy, unless the context otherwise requires the following terms shall have the meanings hereby respectively assigned to them:

“Applicable Laws”	shall mean with respect to a person, any laws, regulations, rules, measures, guidelines, treaties, judgments, determination, orders or notices of any Governmental Authority or stock exchange that is applicable to such person.
“Bribery”	shall mean any action which would be considered as an offence of giving or receiving ‘Gratification’ for a favour in return under MACC Act 2009. In practice, this means offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person a position of trust within an organisation.
“Board of Directors” or “Directors”	shall mean all Directors of FIBRECOMM be it, independent and non-independent executive directors and non-executive directors and, includes the alternate director. The term “Board of Directors” or “Board” shall have the same meaning and may be used interchangeably.
“Business Partners”	for the purpose of this Policy shall mean individual or entity who has some degree of involvement with another individual or entity’s business (as defined under the Malaysian Anti-Corruption Commission Act 2009 (“MACC Act 2009”)) dealings. A Business Partner may include but not limited to suppliers/vendors, service providers,

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Customers, Competitors, agents (as defined under the MACC Act 2009) and/or resellers, contractors (including sub-contractors) joint venture partners or others acting for or on behalf of FIBRECOMM.

Commission	shall mean the Malaysian Anti-Corruption Commission.
“Conflict of Interest”	shall mean any personal interest or material interest that a Director or an Employee may have and could be seen to have the potential to interfere with their objectivity in performing their duties or exercising their judgment on behalf of FIBRECOMM.
“Corruption”	For the purpose of this policy, corruption includes but not limited to bribery, acts of extortion, collusion/bid-rigging, breach of trust, abuse of power/ position, trading under influence, embezzlement, fraud, false claim, unauthorized disclosure of confidential information, conflict of interest or money laundering.
“Customer”	shall mean any persons or entities to which FIBRECOMM provides its products and render its services, which may include potential customers, Business Partners or competitors.
“Employees”	For the purpose of this Policy, it shall mean all personnel including the senior and top management, managers, assistant managers, executives and non-executives under the employment of FIBRECOMM which comprise permanent, contract, leasing, trainees and interns. The term “Employee” or “Employees” shall have the same meaning and may be used interchangeably.
“Facilitation payments”	Commonly known as “facilitating”, “speed” or “grease” payments are payments made to an individual in control of a process or decision with the intention of expediting the administrative process and performance. Facilitation payments fall within the interpretation of Gratification under the MACC Act 2009 and therefore prohibited in Malaysia.
“Family” or “Relative”	Shall mean relationship between Director or Employee with such person who may include but not limited to any one of the categories: (i) Spouse; (ii) Parents including Parents In-Law; (iii) Child including an adopted child and step child; (iv) Brother or sister; (v) Spouse of the person referred to in sub-paragraphs (iii) and (iv) above; and

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- (vi) Relative of the person referred to above as defined as “relative” under the MACC Act 2009.

“Gratification”

shall have the meaning as defined under Section 3 of MACC Act 2009.

Instead of the word “bribe,” or “corruption”, the MACC Act 2009 defines the word “Gratification,” which includes both pecuniary and non-pecuniary bribes, which includes money, donation, gift, any valuable thing of any kind, any forbearance to demand any money or money’s worth or valuable thing, any other service or favour of any kind, or any offer, undertaking or promise of any such Gratifications. Under the MACC Act 2009, offering and accepting gifts, services and hospitality will be a corruption offense if there is the requisite intention for such an offer/acceptance to be a bribe. The MACC Act 2009 does not contain any provision for a de minimis threshold. The MACC Act 2009 deems a corrupt intent in the giving or receiving of Gratification unless the contrary is proven.

There is an additional offense under the MACC Act 2009 for any person to offer to an Officer of any Public Body, or being an Officer of any Public Body, to solicit or accept any Gratification as an inducement or a reward for certain situations. An offense would be committed even if the officer did not have the power, right or opportunity to do so, show or forbear, or accepted the Gratification without intending to do so, show or forbear, or did not in fact so do, show or forbear, or that the inducement or reward was not in relation to the affairs of the public body. A public body here includes the federal Government, state Government, local authorities, and their departments, services and undertakings. Also included are companies or subsidiaries over which a public body has controlling power or interest, and various registered societies and trade unions.

“Management”

consists of Chief Executive Officer, Chief Technical Officer, Chief Financial Officer, Chief Marketing Officer and Chief Corporate Officer.

“Officer of a Public Body”

means any person who is a Member, an Officer, an Employee or a servant of a Public Body.

“Public Body”

includes Government of Malaysia, the Government of a State, any local authority and any other statutory authority and which have the same meaning as defined under Section 3 of the MACC Act 2009 and shall include FIBRECOMM.

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“Subsidiary”

A subsidiary is an entity that is controlled either directly or indirectly by another entity (the investor). An investor controls an entity when the investor:

- a. is exposed, or has rights, to variable returns (risk and rewards), arising from its involvement with that entity; and
- b. has the ability to affect those returns through its power over the investee.
- c. Whilst typically, control is secured through a majority shareholding in the investee, this is not necessary when the investor has the abilities in (a) and (b) above or to appoint or control a majority of the investee’s board members, as well as a right to direct relevant activities of the investee.

“TM”

shall mean Telekom Malaysia Berhad [Company No.: 198401016183 (128740-P)]

5 **COMPLIANCE TO LAWS**

- 5.1 Employees and Business Partners are committed to comply with the MACC Act 2009 including the provision on Corporate Liability under Section 17A, and all Applicable Laws.
- 5.2 Being an Officer of a Public Body, any Employee of FIBRECOMM who uses his/her office or position for Gratification as provided for under Section 23 of the MACC Act 2009, commits an offence and will be dealt with under the MACC Act 2009.

6 **BRIBERY AND CORRUPTION**

- 6.1 We are prohibited from accepting or soliciting, giving or offering any form of Gratification as an inducement or reward to do or forbear any act in relation to any matter in which any Business Partners, friends or Families has an interest whether directly or indirectly which becomes an offence under Section 16 or 17 of MACC Act 2009.
- 6.2 Our Business Partners are also prohibited from offering and/or giving any form of Gratification to us as an inducement or reward for us to use our office or position when making any decision, or take any actions in relation to any matter in which the Business Partners, friends or Families have an interest whether directly or indirectly.
- 6.3 Employees and Business Partners are prohibited from corruptly give, agree to give, promise or offer to any third party, any Gratification whether for the benefit of that party or another party with intent to obtain or retain business for FIBRECOMM; or to obtain or retain an advantage in the conduct of business for FIBRECOMM which becomes an offence under Section 17A of MACC Act 2009.

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- 6.4 FIBRECOMM encourages all Employees and Business Partners to immediately report any corrupt practices within FIBRECOMM to MACC or the nearest police officer as required by the law under Section 25 of MACC Act 2009 failing which the relevant Employees and Business Partner who commits an offence will be dealt with the law.
- 6.5 Any offence of accepting, soliciting, giving or offering of any form of Gratification including attempts, preparations, abetments and criminal conspiracies punishable as offence under Section 28 of the MACC ACT 2009, will be dealt with the MACC Act 2009 or any other Applicable Laws.
- 6.6 Employees and Business Partners are required to observe this Policy and the Anti-Corruption Guide as well as to uphold FIBRECOMM's zero tolerance policy towards bribery and corruption.
- 6.7 Pursuant to Section 24 of MACC Act 2009, any person who commits an offence under Sections 16, 17, 20, 21, 22 and 23 shall on conviction be liable to:
- (i) Maximum 20 years imprisonment; and
 - (ii) A minimum fine of RM10,000 or 5 times the value of the bribe (whichever is higher).
- 6.8 We have the rights to take appropriate action against FIBRECOMM's Board of Directors, Management, Employees, Business Partners or individuals acting for or on behalf of FIBRECOMM who is investigated for criminal allegation by any enforcement agencies ("Party Under Investigation"). Party Under Investigation should not include any person assisting such investigation.

7 TOP LEVEL COMMITMENT

- 7.1 FIBRECOMM's Board of Directors are committed to:
- (a) oversee the establishment, implementation and enforcement of effective policies and procedures to adequately address corruption risks in FIBRECOMM; and
 - (b) review the adequacy and integrity of such internal control system and compliance with all Applicable Laws;
- 7.2 FIBRECOMM's Management are committed to:
- (a) ensure that the results of any audit, reviews of risk assessment, control measures and performance related to corruption risks are reported to Board of Directors, and acted upon;
 - (b) effectively manages the key corruption risks of the organisation including the implementation of Anti-Bribery Management System and continual improvement of anti-bribery compliance in FIBRECOMM; and
 - (c) ensure proper and adequate communication on FIBRECOMM's policies and commitments on anti- corruption to both internal and external parties;

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- 7.3 The Integrity, Governance and Risk Management Department, led by Integrity & Governance Officer, (“IGO”) is responsible for monitoring compliance on anti-corruption initiatives based on Ministerial Guidelines on Adequate Procedures (TRUST principles) as well as FIBRECOMM Anti-Bribery Management System and reporting to the Board of Directors and Top Management for issues relating to bribery and corruption.

8 COMPLIANCE TO THE ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

- 8.1 Employees and Business Partners must comply with this Policy. Non-compliance with or violation to this Policy by any Employees may result in disciplinary action by FIBRECOMM in accordance with its policies, procedures and guidelines and/or initiation of legal proceeding against those involved.
- 8.2 Business Partners shall also comply with this Policy. Non-compliance or violation to this Policy may result to actions taken by FIBRECOMM.
- 8.3 TM Anti-Corruption Guide (“ACG”)
- TM ACG has set out the guidelines in relation to improper solicitation, bribery, and corruption that may arise in the course of TM and its subsidiaries’ businesses including FIBRECOMM. FIBRECOMM adheres to TM ACG.

9. UNDERSTANDING THE RULES ABOUT GIFTS, ENTERTAINMENT AND CORPORATE HOSPITALITY

- 9.1 General Provision
- 9.1.1 FIBRECOMM prohibits the use of gifts, entertainment and corporate hospitality to influence business decisions unethically. FIBRECOMM adopts a “no-gift” policy to prevent Bribery and Corruption. We must comply with the Applicable Laws including but not limited to the MACC Act 2009, which amongst others imposes strict and corporate liability against FIBRECOMM for corrupt practices of its Directors and/or Employees.
- 9.1.2 “Gifts, entertainment and corporate hospitality” means anything of value. It can include the following (a non-exhaustive list):
- meals
 - travel and lodging
 - discounts
 - loans
 - cash
 - services
 - prizes
 - transportation
 - use of vehicles or vacation facilities
 - home improvements
 - tickets to entertainment/sport events
 - gift cards or certificates
 - stocks
 - products
 - favourable terms on a product or service

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9.2 Gifts

9.2.1 We or our Family are prohibited from, directly or indirectly soliciting, requesting, receiving gifts (cash or otherwise) from Business Partners or any third parties that has dealings with FIBRECOMM.

9.2.2 We must inform Business Partners or any third parties involved in business dealings with FIBRECOMM on this Gift Policy and they must respect and adhere to FIBRECOMM's policy.

9.2.3 Receiving / Accepting - We are not allowed to receive or accept a gift for ourselves or a third party.

9.2.4 Giving / Offering

- (a) We are not allowed to provide gifts to third parties unless it is in accordance with the Guidelines on Gift, Corporate Hospitality and Similar Benefits and Premium Items Management.
- (b) We are prohibited to give / offer gifts if it would violate the recipient's policies or could, in any way, be perceived as a kickback or bribe.

9.2.5 Exceptions to Gift Policy

- (a) There are certain circumstances where the provisions of gifts are permitted which are as follows:
 - (i) Exchange of gifts on a company-to-company level.
 - (ii) Gifts from companies to external institutions or individuals in relation to the company's official functions, events and celebrations which is limited to door gift.
 - (iii) Gifts from FIBRECOMM to Employees and Directors and/or their Family members in relation to an internal or externally recognised Company function, event and celebration.
 - (iv) Token gifts of nominal value normally bearing FIBRECOMM company's name or logo or that are given out equally to members of the public, delegates, Customers, exhibitions, training, trade shows, etc and deemed as part of FIBRECOMM's brand building or promotional activities.
 - (v) Gifts to external parties who have no business dealings with FIBRECOMM (e.g. monetary gifts or gifts in kind to charitable organizations).

9.3 Entertainment & Corporate Hospitality

9.3.1 Any business travel-related sponsorship by Business Partner is strictly not allowed unless the trip is stipulated, pre-agreed and detailed in a contract between FIBRECOMM and the Business Partner.

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- 9.3.2 FIBRECOMM shall not pay any transportation and lodging expenses for or incurred by the Customers or Business Partners and the visit must be for legitimate business purpose, for example, onsite examination of equipment, contract negotiations, or training unless stated in the contract.
- 9.3.3 Any travel provided by FIBRECOMM or Business Partners must be supported by a detailed program.
- 9.3.4 Offering entertainment or corporate hospitality in order to win or keep business is strictly prohibited.
- 9.3.5 We are prohibited to give or accept entertainment or corporate hospitality that are illegal, inappropriate or would violate our commitment to FIBRECOMM. We should politely decline entertainment or corporate hospitality that does not comply with this Policy or any Applicable Laws. (Refer to Guideline on Gift, Corporate Hospitality and Similar Benefits).
- 9.4 Providing Gifts and Entertainment to Government Officials
- 9.4.1 We are prohibited from offering gifts, entertainment and corporate hospitality to Government Officials. The Government prohibits giving anything of value to Government Officials in order to obtain or retain business or to secure any other improper advantage.
- 9.4.2 Providing gift, entertainment and corporate hospitality to Government Officials or their Family/household members is generally considered a red flag situation.
- 9.5 Charitable Donations, Sponsorships and Corporate Social Responsibility
- 9.5.1 All donations, sponsorships and Corporate Social Responsibility (CSR) are made in accordance with TM Sponsorship Management Guidelines.
- 9.5.2 We are prohibited from making any contributions intended to influence or could be perceived to influence a tender or other decision in favour to FIBRECOMM.
- 9.5.3 Due diligence must be conducted on the recipients to determine whether they are a legitimate body or organisation.
- 9.6 Facilitation Payment
- 9.6.1 FIBRECOMM prohibits any form of facilitation payments.
- 9.6.2 Employees who have knowledge of such practice of facilitation payment in FIBRECOMM should report to FIBRECOMM Ethics Line on immediate basis.

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10. **CONFLICT OF INTEREST**

We operate and make business decisions based on FIBRECOMM's best interest rather than personal considerations or relationships. FIBRECOMM expects us to avoid situations in which our personal interest may conflict with or perceived to conflict with FIBRECOMM's interest. For the avoidance of doubt, a Conflict of Interest exists where the Board of Directors, Management and Employees could abuse their position for private gain. We owe a fiduciary duty to FIBRECOMM and must not put ourselves in a position where our personal interest conflict with FIBRECOMM. Fiduciary relationship means that the Employees must act with the utmost good faith and not abuse their confidence.

10.1 **General Considerations**

10.1.1 Business decisions and actions must not be motivated by personal interest, considerations or relationships. Relationships with prospective or existing Business Partners, Customers, competitors or regulators must not affect your independent and sound judgment on behalf of FIBRECOMM.

10.1.2 Conflict of Interest will arise where our ability to perform our duties effectively and impartially is potentially impaired by an outside appointment, relationship or activity. We should not take improper advantage of our positions or of information obtained in the course of our employment.

10.1.3 We are expected to exercise the best judgement in avoiding any Conflict of Interest and to act in a manner consistent by giving our full-time services to FIBRECOMM. On occasions, however, the question of whether or not Conflict of Interest exists may be less clear and open to interpretation. Whenever such a case arises, we should consult our respective superior or the Chief Corporate Officer ("CCO")/ Legal Division.

10.2 **Outside Business Appointments, Directorships/Undertakings**

10.2.1 General rule

10.2.1.1 The general rule is that we may not accept employment or undertake work for any other company, firm or organization.

10.2.1.2 However, we may be allowed to:

- (a) Help the community by being an ordinary member or by holding leadership positions such as serving on boards of non-profit or community organisations, as long as the activities are not to the disadvantage of FIBRECOMM and our involvement shall not affect our job performance. However, in the event where such organisation has any relationship with FIBRECOMM or receives and/or solicits any form of financial aid or other support from FIBRECOMM, prior approval from the CCO must be obtained before participating and/or accepting such positions or membership;

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- (b) Receive honorariums for lectures/speeches delivered or expert advice rendered in our capacity as experts in certain fields or as Employee of FIBRECOMM. All invitations for our services must be approved by the respective line managers. Honorarium received must be declared to the approving line manager and to the CCO shall have full discretion to seek clarification on the amount of honorariums received and/or to decide whether we may or may not retain the honorarium whether partially or in full.
- (c) Serve on FIBRECOMM's behalf as an officer or Board of Directors member of a company that represents and reflects the interest of FIBRECOMM.

10.2.1.3 Any outside activity must be strictly separated from our employment of FIBRECOMM and should not harm our job performance. We must ensure that our skills are not used in such a way that could adversely affect FIBRECOMM.

10.2.1.4 We are not allowed to accept outside directorships or become partners in entities, which are either listed on FIBRECOMM's list of authorised Business Partners of any tier that have any form of business dealings with FIBRECOMM directly or indirectly. Under certain circumstances, permission to participate in such entities may be granted subject to the discretion of the CCO. The CCO shall have full discretion to seek clarification on our involvement in this matter.

10.3 Involvement in Other Activities Outside Employment & Other Types of Employment

10.3.1 FIBRECOMM recognizes that Employees may want to engage in activities outside of their employment, which are private in nature and unrelated to FIBRECOMM's business.

10.3.2 The engagement may be related but not confined to any form of non-binding temporary jobs such as freelancing and micro business-related activities, whether such participation involves working as an independent agent for a short-term, flexible or temporary commitment. This includes any form of engagement in any form of media such as master of ceremonies, photographer, social influencer, webmaster etc.

10.3.3 However, involvement in situations where Employee is being bound by two or more contracts of employment with two or more entities is prohibited. e.g. Part-Time Worker.

10.3.4 In such situations, Employees must be responsible to use their best judgment to objectively evaluate these activities to ensure that such activities do not interfere in any form or manner and/or place us in a position which may conflict with our primary duties and responsibilities with FIBRECOMM.

10.3.5 Employees are reminded of the Guiding Principles which must be applied:

- (a) Involvement must not affect FIBRECOMM's reputation negatively. We have a duty to FIBRECOMM to devote our best efforts to the interest of FIBRECOMM at all times.

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- (b) We shall not engage with any form of activities, firm or organization that may directly or indirectly in competition with our company's business, products and services presently and in the future.
- (c) We are not allowed to use any form of FIBRECOMM's asset, resources, systems, supplies, information, premises or working time, to promote the interest of our gig engagement.
- (d) We shall not disclose, reveal, transmit or share in any form or manner any FIBRECOMM's policies, programs, information to any individual, entity, firm or organisation without expressed permission from our superior, regardless of whether these individuals or entities are competitors or otherwise.

10.3.6 We shall declare our involvement in the Declaration of Asset ("DOA") form. However, if at any point of time the involvement in the activity may pose a potential or actual Conflict of Interest, we are obliged to disclose and obtain a written approval promptly from CCO.

10.4 Ownership of Equity in Entities Having a Business Relationship with FIBRECOMM

10.4.1 We are not allowed, either directly or indirectly, e.g., through our Family as proxy, holding shares or other forms of beneficial interest in:

- (a) Privately owned entities which derive the major part of their income from contractual or other business arrangements with FIBRECOMM.
- (b) Privately owned entities which are listed in FIBRECOMM's list of authorised Business Partners of any tier, even if the entities concerned do not derive most of their income directly or indirectly from contractual or other business arrangements with FIBRECOMM.
- (c) Privately owned entities supplying materials, equipment, property and/or services to FIBRECOMM whether directly or indirectly.

10.4.2 In the event FIBRECOMM has a reasonable cause to believe that such involvement may cause conflict with our duty as an Employee, we shall expressly declare such interest following the required and recognised procedure (e.g. via DOA or other methods) and we shall bring the matter to the immediate attention of the CCO. Thereafter, we are to abstain ourselves from any involvement in the business dealings. We acknowledge that FIBRECOM has the rights to take any reasonable steps to ensure such situations would no longer pose a conflict to FIBRECOMM.

10.4.3 As an Employee we have to also take note of Section 3 of MACC Act 2009 which provides a wider definition of the word Family; and Employee may be charged under Section 23 of MACC Act 2009 if it is proven that the Employee has used his office or position for any Gratification for himself or his relative.

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10.5 Personal Relationship

10.5.1 The potential for Conflict of Interest also exists if any person with whom we have a Relative also works at FIBRECOMM or is in a reporting relationship to us. This may also create opportunities for favouritism or bias. Such relationships can also undermine core values such as respect and trust amongst Employees and Business Partners.

10.5.2 Accordingly, we are not allowed to be in the same Division and/or should not directly or indirectly supervise or be in a position to influence the hiring, work assignments or assessments of such persons that we have relationship. Any relocation of such person must have written permission from the CCO.

10.6 Business Dealings with Employees

10.6.1 FIBRECOMM shall not purchase or lease property, equipment or materials from or enter into business dealings (other than employment contracts) with Employees, except in exceptional circumstances and authorised in writing by the CCO.

10.6.2 As a further exception, FIBRECOMM has no objection to renting houses or buildings owned by Employees or their Family provided such interest has been declared to the CCO.

10.7 Investment Activities

10.7.1 We must not allow our investment activities to influence, or appear to influence, our independent judgment on behalf of FIBRECOMM. The situation that is most likely to create the appearance of a Conflict of Interest is when we have an investment in a competitor, Business Partners, or Customers and our decisions may have a business impact on this outside party. If there is any doubt about how an investment might be perceived, it should be disclosed to our superior.

10.7.2 We are also prohibited from directly or indirectly buying, or otherwise acquiring rights to any property or materials, when we know that FIBRECOMM may be interested in pursuing such an opportunity and the information is not public.

10.8 Political Activities and Donations

10.8.1 Political Donation

10.8.1.1 We must not make any political contribution or payments on behalf of FIBRECOMM.

10.8.2 Political Activities

10.8.2.1 FIBRECOMM recognises that Employees in their role of citizen has the right to participate in legitimate political activities. However, we must disclose and obtain prior written approval from the CCO if we want to stand for election or wish to hold any

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elected position as office bearer in any political party at the Branch, Division, State or National level of the political party.

10.8.2.2 We must first resign from the employment of FIBRECOMM if we wish to actively participate full time in politics or be nominated as a candidate in any election or elected as representative in Federal or State Legislative Body.

10.8.2.3 We should not be seen to be supporting or giving any preference to any political party. Do not express our political views in such a way that others think we are speaking on behalf of FIBRECOMM.

10.8.2.4 We must ensure that any participation in political campaigns is conducted on our own time, with our own resources and in accordance to FIBRECOMM's procedures applicable. Our involvement is to be kept separate from our role and responsibilities as an Employee of FIBRECOMM.

10.9 Personal Finances

10.9.1 We and our Family may not borrow money from or lend money to Customers, Business Partners or independent contractors. We should not in any manner place ourselves under any serious obligation to any person who is directly or indirectly subject to our official authority or with whom we have or likely to have official dealings.

10.9.2 However, we may borrow money or purchase items on credit from a Customer or Business Partners that is in the financial services business, as long as we do not receive preferential treatment.

10.9.3 This Policy however does not prevent us from borrowing from or lending money to Family members or friends in a personal capacity and not in contravention of business ethics.

10.9.4 In any event we must not put FIBRECOMM in a pecuniary embarrassment that might tarnish the good name of FIBRECOMM.

10.10 Money Laundering

10.10.1 We must understand the business and background of any prospective third party who wants to do business with FIBRECOMM. Due diligence needs to be carried out in order to understand the business and background of such party to determine the services and the origin and destination of money and property of such party.

10.10.2 Any suspicious incidents of money laundering transactions must be reported to TM Ethics Line.

10.10.3 For the purpose of this provision "money laundering" occurs when the criminal origin or nature of money or Assets is hidden in legitimate business dealings when legitimate funds are used to support criminal activities and terrorism.

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10.10.4 In Malaysia, the offences of money laundering falls under AMLATFA.

10.11 Public Services, Recreational, Sporting and Community Activities

10.11.1 We are encouraged to participate in any outside working hours of unpaid voluntary public service, recreational, sporting and other community activities of such nature for any statutory/ public body. We must be able to discharge our dual responsibilities satisfactorily both in respect of the time taken up by the outside activity and our full-time employment in FIBRECOMM. If any Employees are interested to participate in such activity(ies), we must obtain written permission from the CCO.

10.11.2 If Employees are interested to participate in activities which are not related to the business of Fibrecomm during working hours, we must obtain written permission from our immediate supervisor if we consider it sufficiently important to take time off during working hours.

10.12 Disclosures and Declarations

10.12.1 Declaration on Conflict of Interest shall be made upon the conflict arises, and shall be made at the earliest opportunity, as soon as the Employee becomes aware of the conflict.

10.12.2 All Management and Employees are responsible to disclose and/or declare the following:

No	Type of Declaration	To Who	Frequency
1.	Declaration of Assets and Interest of the Employees and their spouses	Through DOA specified by FIBRECOMM	Annually / As and When Required
2.	Family working or provides any kind of services to competitors (direct or indirect)	Through DOA specified by FIBRECOMM	
3.	Conflict of Interest (i) Outside Business Appointments, Directorships/Undertakings (ii) Involvement in other activities outside employment (iii) Ownership of Equity in Entities Having a Business Relationship with FIBRECOMM (iv) Personal Relationship (v) Contractual Dealing with Employees (vi) Political Activities	(i) Through DOA specified by FIBRECOMM (ii) CCO, if at any time the activities/ engagement / involvement may imposed potential or actual Conflict of Interest	(i) Annually (ii) As and When Required
4.	Conflict of Interest – Investment Activities (11.6)	Head of Division	As and When Required

*Note: **

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The Head of Division must make immediate disclosure to the CCO upon becoming aware of such relationship.

10.12.3 With reference to the Conflict of Interest mentioned in table 10.12.2 (Item 3), Management is to disclose any conflict to the following authority:

No	Type of Declaration	To Who	Frequency
1.	Board of Directors	The Board (through the Chairman and/or Company Secretary)	As and when the conflict arises (and be recorded by the Company Secretary)
2	Direct report to CEO (administratively or operationally)	CEO	Upon appointment/ As and When Required (and be recorded by CCO).
3	Non-Direct report to CEO	CCO	

11. **WHISTLE-BLOWING POLICY & REPORTING**

- 11.1 FIBRECOMM and its Board of Directors are committed to internal whistle-blowing program by introducing a safe and acceptable platform for Employees and Business Partners to channel concern about improper conduct not limited to illegal, unethical, improper business conduct affecting FIBRECOMM and about business improvement opportunities.
- 11.2 The internal whistle-blowing program allows us to take appropriate preventive and corrective actions inside FIBRECOMM without the negative effects that come with public disclosure, such as loss of FIBRECOMM image and reputation, financial distress, loss of investor confidence or drop in value of share prices.
- 11.3 Employees and Business Partners are encouraged to discreetly disclose concerns about improper business conduct within FIBRECOMM. In this manner, the Employees and Business Partners can help FIBRECOMM to monitor and keep track of such illegal, unethical or improper business conduct within FIBRECOMM which otherwise may not be easily detected through normal process or transaction. If we have reasonable grounds to believe that an offence could have been committed, FIBRECOMM may accept anonymous disclosure for investigation.
- 11.4 This Whistle-Blowing Policy is aimed for Employees and Business Partners to raise the matters in an independent and unbiased manner.
- 11.5 Employees and Business Partners may make a disclosure of improper conduct based on his or her reasonable belief that any person is engaged, is engaging or is preparing to engage in improper conduct. The disclosure of improper conduct does not necessary lead to any disciplinary action or prosecution against the person whom the disclosure is made. Employees and Business Partners are just required to provide sufficient information for management to take appropriate steps.

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11.6 The whistle-blower protection conferred on a whistle-blower will be:

- (a) Protection of confidential information;
- (b) Protection against detrimental action; and
- (c) Protection of the identity of whistle-blower.

11.7 We give assurance that Employees and Business Partners will not be at risks to any form of employer's harassment which is not limited to threats, victimization, retribution or retaliation from their superiors or from any of the Management. However, the protection conferred under this program will be revoked if the whistle-blower:

- (a) participated in the improper conduct disclosed;
- (b) wilfully made the disclosure which you knew or believed to be false;
- (c) the disclosure of improper conduct is frivolous or vexatious; and
- (d) the disclosure of improper conduct is made with the motive of avoiding dismissal or other disciplinary action.

11.8 Any attempt to retaliate, victimise or intimidate against anyone (whistle-blower) making a report in good faith is a serious violation of this Policy and shall be dealt with serious disciplinary actions and procedures.

11.9 All concerns received will be duly investigated and deliberated by TM Group Integrity & Governance.

11.10 If Employees and Business Partners have concerns about illegal or unethical conducts in the workplace or in the business dealings with FIBRECOMM, and feel uncomfortable discussing the problems through normal channels, they are strongly urged to use the Ethics Line with the identity only known to specific persons. These services are not a substitute for speaking directly to us, but as an encouragement and to facilitate disclosure of improper conduct and to protect Employees and Business Partners from detrimental action and for the matters to be disclosed further.

11.11 As provided by the law, Employees and Business Partners may also report illegal or unethical practices directly to the enforcement bodies such as the Malaysian Anti-Corruption Commission, the Royal Malaysian Police or other similar Government agencies. In such event, protection of the confidential information is also provided for under the respective law such as the Evidence Act 1950, MACC Act 2009, Companies Act 1965 and the Witness Protection Act 2009.

11.12 All Employees and Business Partners should be alert and sensitive to situations that could result in actions by themselves, or others, which might violate this Policy.

11.13 It is the duty of every Employee and Business Partners to report corruption transactions pursuant to the following section:

- a) Section 25 (1) of the MACC Act 2009 states that any person who is given, promised or offered any bribe to violate the provisions of the Act shall report such gift, promise or offer. Failure to comply with this section is an offense under section 25 2) of the

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same Act and upon conviction shall be liable to a fine not exceeding RM100,000 or an imprisonment not exceeding ten (10) years or both.

- b) Section 25 (3) of the MACC Act 2009 states that any person of gratification has been solicited or obtained or attempted to obtain the feed should be made as early as possible to report the matter. Failure to comply with this section is an offence under section 25 (4) of the same Act and on conviction be liable to a fine not exceeding RM10, 000 or imprisonment not exceeding two (2) years or to both.

- 11.14 It is the duty of every Employee and Business Partners to report any breaches or suspected breaches of any behavioural or business conducts and ethics commitments of which he/she is aware of or has knowledge, whether these relate to the Employee or the Business Partners, direct reports or others to the following channels:

Fibrecomm Ethics Line

Toll Free Number : 1800-88-2262 (Malaysia Only)
Email : ethic@fibrecomm.net.my

- 11.15 The IGO has the authority to report directly to TM Chief Integrity & Governance Officer (CIGO) or nearest officer of the Malaysian Anti-Corruption Commission or police officer in the event of any attempt to soliciting, offering and promising of any form of gratification

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