

YAYASAN HASANAH



A foundation of Khazanah Nasional

YAYASAN HASANAH ANTI-BRIBERY AND CORRUPTION POLICY

1. INTRODUCTION

Yayasan Hasanah (“YH” or “the Foundation”) is committed to conducting business in an ethical and honest manner, acting professionally, fairly, and with integrity in all dealings and relationships.

2. POLICY STATEMENT

- 2.1 The Foundation takes a zero-tolerance approach to bribery and corrupt activities, and is committed to implementing and enforcing mechanism that ensures bribery and corruption are prevented.
- 2.2 The Foundation acknowledges that this policy shall focus on the main business activities of YH i.e grants, scholarships, humanitarian relief, sponsorship and procurement which are the significant risk areas among others.
- 2.3 All employees and Business Partners of the foundation are required to comply fully with this policy.
- 2.4 The Foundation considers a breach of this Policy to be a serious violation that may result in disciplinary measures, including the dismissal of employees or the termination of its business relationship with any third party.

3 OBJECTIVE

The objective of this policy is to reiterate YH’s commitment to full compliance with the Malaysian Anti-Corruption (MACC) Act 2009 (“MACCA”), subsequent amendments to the Act, and all guidelines issued by the relevant authorities pertaining to the same. This

policy is also set to provide information and guidance to the employees and YH's business partners on how to recognise and deal with bribery and corruption issues.

4 SCOPE

This policy applies to all employees (including the senior leadership team, permanent staff, contract staff, temporary staff, short-term staff, secondees or interns) and is also applicable to the members of the Board of Trustees ('collectively refer to as "Employee"). YH also expects that all third parties including grantees, implementation partners, consultants, vendors, and contractors ('Business Partners') who provide goods and/or services to or on behalf of YH in any capacity must comply with this policy or a comparable code of conduct.

5 ABBREVIATIONS

Board	Board of Trustees
MD	Managing Director
CFO	Chief Financial Officer
HLT	Hasanah Leadership Team
IA Heads	Impact Area Heads
HOD	Head of Department

6 ROLES & RESPONSIBILITIES

Authority	Responsibility
Board	Overall responsibility for ensuring this policy complies with YH's legal and ethical obligations and all those in YH comply with this policy
CFO	Responsible for implementation of this policy, monitoring its use and effectiveness, and also dealing with any queries on its interpretation
HLT	Responsible for ensuring those reporting to them are made aware of and understand this policy and given adequate and regular training required for the effectiveness of this policy.

7 POLICY

All definitions of wordings under this policy are subject to interpretation under the MACCA (Act 694).

7.1 Prohibition on Bribery, Corruption and kickbacks

Employee may not directly or indirectly offer, promise, agree to pay, authorise payment of, pay, give, accept or solicit anything of more than a minimal value to or from any third party in order to secure or reward improper benefit or improper performance of a function, activity or to procure an unfair business advantage in connection with business dealing or transaction entered into by the foundation.

7.2 Gifts

7.2.1 Receiving or giving gifts of cash (or cash equivalents such as gift vouchers) is strictly prohibited.

7.2.2 Employees are prohibited from giving or receiving gifts or entertainment directly or indirectly to/from any party that may give rise to the perceptions of unacceptable boundaries of business practices. This is not limited to circumstances involving personal gain but extends to improperly securing or retaining business for YH.

7.2.3 Employee shall not give or offer a gift or accept a gift from anyone with whom the foundation conducts business where the gift would exceed customary courtesies (above nominal value of RM300) associated with accepted ethical commercial practice.

7.2.4 Any appropriate business-related gifts that YH offer, give or receive must be give as a legitimate, justified business courtesy and never in exchange for obtaining an inappropriate advantage or benefit.

7.2.5 Employees of YH are required to promptly declare any gifts they receive in connection with their role at the organization by completing and submitting a Gift Activity Reporting Form. This declaration process ensures transparency, compliance with organizational policies, and helps to avoid potential conflicts of interest. Employees should disclose the nature, estimated value, and origin of each gift, including any personal or professional relationship with the gift giver. This policy applies to all forms of gifts, whether given directly or indirectly, regardless of the gift's value or intent.

7.3 Entertainment and hospitality

7.3.1 Hospitality includes meals, an invitation to events, functions or other social gatherings in connection with matters related to the Foundation. These activities are acceptable provided they fall within reasonable bounds.

7.3.2 Hospitality that is reasonable and proportionate and seeks to improve the image of the foundation and its initiatives (or to establish a cordial relationship) is recognised as an established and important part of doing business. Hospitality must not be intended to induce a person to perform a function improperly.

7.3.3 Individual judgment may be required to determine the acceptability of business entertainment or hospitality where the following questions can be used as a guideline:

- What is the intent – is it to build a relationship or is it something else?
- Apply the ‘newspaper test’ – would a newspaper be likely to report the business entertainment or hospitality, and if it did, what would the public’s perception be?
- Would the individual be comfortable in justifying the entertainment or hospitality to management?
- If one finds it difficult to answer one of these questions, there may be risk involved which could potentially damage the Foundation’s reputation.

7.3.4 Circumstances that are usually acceptable include but are not limited to:

- Meals with someone with whom the Foundation does business that is reasonable in value and frequency:
- Not excessive business courtesies and occasional attendance at a sporting event, theatre, and other cultural events or social gatherings

7.3.5 Circumstances which are not acceptable include:

- Hospitality or entertainment which is offered in return for an inappropriate advantage or benefit, or which could influence the independence of the receiver.
- Entertainment of an inappropriate nature (for example, lavish or offensive entertainment).

7.4 Facilitation of payment

Facilitation Payment is a payment or other provision made personally to an individual in control of a process or decision. It is given to secure or expedite a routine or administrative duty or function.

Facilitation payments are classified as acts of bribery and corruption under MACCA and are illegal. As such, employees of YH are also prohibited from receiving or requesting such payments whether in cash or in kind.

7.5 Political Contribution

The Foundation shall not make any contribution, whether in cash. In-kind or by any other means, to support any political party or candidate.

8 GRANTEES, CONSULTANTS, SERVICE PROVIDERS, VENDORS (“BUSINESS PARTNERS”)

- 8.1 The Foundation will only engage Business Partners of known integrity who will not expose the Foundation to unacceptable reputational or legal risks.
- 8.2 Business Partners may be hired only after the completion of an appropriate level of due diligence. Such due diligence may include a review of the following:
 - Structure of the legal entities including any helpful diagrams or charts.
 - Organizational chart
 - Annual financial statements with notes thereto for the past two fiscal years of the Business Partners
 - Disclosure of all litigation, arbitration, and governmental proceedings relating to the Business Partners
- 8.3 Business Partners may be paid by wire transfer and cheque only and never in cash. All payments will be made pursuant to invoices, receipts, or other valid documentation.
- 8.4 It is the responsibility of the person in charge that interacting with a Business partner to look out for “red flags” and, if any are found, to report these to their line manager.

9 ACCURATE BOOKS AND RECORDS, AND FINANCIAL CONTROLS

- 9.1 The foundation shall maintain books, records, and accounts that in reasonable details accurately reflect the transactions and dispositions of YH.
- 9.2 Employee shall reject and report any requests for false invoices or payment of expenses that are unusual, excessive, or inadequately described.

10 PUBLICATIONS OF THE POLICY

YH's zero-tolerance principle for bribery and corruption must be communicated to all employees and Business Partners.

11 TRAINING

The Foundation shall organise awareness for all employees upon approval of this policy and continuous periodical refresher including during onboarding for new joiners.

12 REPORTING OF POLICY VIOLATIONS

Any employee who is aware of any irregularity, misbehaviour, or non-compliance with this Policy, is duty-bound to lodge an official report to YH's Whistleblowing mechanism as outlined in Whistleblowing Policy.

13 COMPLIANCE

13.1 It is the responsibility of all employees to understand and comply with this policy. Additional guidance and procedures relating to the Policy may be issued from time to time.

13.2 Non-compliance may lead to disciplinary action, up to and including termination of employment.

13.3 Further, legal action may also be taken if the YH's interests have been harmed because of non-compliance.

13.4 YH shall notify the relevant regulatory authority if any identified bribery or corruption incidents have been proven beyond a reasonable doubt

14 WAIVER AND EXCEPTION

In line with YH's zero-tolerance approach, there shall be no exception to this policy unless due to a credible threat to personal safety or safe passage where waiver or exception must be approved by the Board of Trustees.

15 REFERENCES

15.1 Malaysian Anti-Corruption Commission Act 2009 ("MACC Act")(Section 17A)

15.2 Employee Handbook

15.3 Whistleblowing Policy

15.4 Disciplinary & Rule Policy

15.5 Termination Policy

16 POLICY VARIATIONS

The policy is subject to at least every two years review for any changes in its implementation, and any emergence risks that impact YH.

GIFT ACTIVITY REPORTING FORM

This declaration form supports Yayasan Hasanah Gifts, Entertainment, Travel, Donations and Sponsorship ("Gifts") under Anti-Bribery and Corruption Policy. Employees must declare all gifts ("whether accepted, redistributed to the Group or declined) as outlined in the policy and seek written approval from management and the completed form is to be submitted to the Legal & Secretarial. Details below should be completed in the best knowledge:

1. Declaration date	
2. Name/Designation: Employee Number: Division/Department:	
Details of the Gifts, Entertainment, Travel, Donations and Sponsorship	
3. Date Offered	
4. Described the Gifts, Entertainment, Travel, Donations and Sponsorship	
5. Estimated or actual value	
6. Offered by: - Name/ Position: Organisation:	
7. Reason for accepting the offer (sufficient detail required) and the relationship with the provider. Is the offer a festive gift? Provide details if so.	
8. Would accepting the offer: a) create an actual potential or perceived conflict of interest exist (Y/N); or b) bring you, the Company or the Board into disrepute (Y/N)? (If either is answered YES, then the offer must be declined in accordance with the minimum accountabilities)	Details of the conflict of interest:
Decision regarding offer: <input type="checkbox"/> Declined or <input type="checkbox"/> Retained Remarks (if any):	
Signature of recipient: _____ Date: _____ Approval from Management: _____ Approved / Not Approved Comments: _____	