



**Malaysia Venture Capital Management Berhad
(MAVCAP)**

NO GIFT POLICY

Rev: 00
Effective date: XX

1) “NO GIFT” POLICY: THE GENERAL RULE

1.1) Malaysia Venture Capital Management Berhad (MAVCAP) has adopted a “No Gift” Policy whereby, subject only to certain narrow exceptions, all MAVCAP’s employees (inclusive of Executive Director and Non-executive Directors) and business associates (i.e. fund managers/investee companies/agents/supplier/Consultant/Sub-contractor) acting for or on behalf of MAVCAP are prohibited from, directly or indirectly, receiving or providing gifts.

- a) This policy shall be abided by all MAVCAP’s employees to avoid conflict of interest for either party in on-going or potential business dealings between MAVCAP and external parties.
- b) Implication of receiving a gift might be tarnishing MAVCAP’s reputation or be in violation of Malaysia Anti-Corruption Commission (MACC) Act.
- c) As set out in the MAVCAP Code of Conducts, a conflict of interest arises in a situation in which an individual is in a position to take advantage of his or her role in MAVCAP for his or her personal benefit as a result of receiving gift.
- d) It is the responsibility of employees and directors to inform external parties involved in any business dealings with MAVCAP that the Company practices a “No Gift Policy” and to request the external party’s understanding for and adherence with this policy.
- e) MAVCAP’s employees are discouraged from receiving gifts from MAVCAP’s client and must adhere to guidelines stipulated in the code of ethics.
- f) All acceptance of gifts by any receiving employees/department in the prescribed limited circumstances, employees are expected to immediately record the gifts in the Gift Register. The gift register shall be reviewed by Human Resource Department on periodically basis.
- g) MAVCAP’s employee or department shall not accept any gifts or valuable from any external parties if there is a conflict of interest situation (e.g. bidding is in progress and the company that gave the gift is one of the bidders) In this situation, the gift must be politely returned with a note of explanation about the Company’s “No Gift Policy.
- h) In determining the above, Heads of Department/Division, Managers and employees are expected to exercise proper care and judgment in each case and comply with company policies and code of ethics at all time.
- i) Generally, employees are not allowed to provide gifts to third parties, subject to approval from CEO or Senior Management in accordance with company policy.

2) EXCEPTIONS TO THE “NO GIFT” POLICY

2.1) Although MAVCAP practices “No Gift Policy” in the group, there are exceptions for gift acceptance and gift giving for value of not more than RM500.00 as follows:

- a) Business partners/Sub-contractors/Consultants are allowed to donate gifts/hampers for company events for the use of lucky draw;
- b) Customary gift (i.e. festivities gifts/hampers/greeting cards/fruits/flowers) are allowed to be received from business partners and it must be properly recorded and safeguarded by the receiving department;
- c) The gift register shall be reviewed by Human Resource Department on periodically basis;
- d) The exchange of gifts in certain cultures or situations as part of business etiquette is allowable under exception to no gift policy;
- e) Exchange of gifts as part of business courtesy at the company-to-company level. The said gift shall be treated as company assets and shall not owned by any employees from the company;
- f) Gifts from company to external institutions or individuals in relation to the company's official functions, events and celebrations (e.g. commemorative gifts or door gifts offered to all guests attending the event);
- g) Gifts from MAVCAP to employees and directors in relation to a recognised Company function, event or celebration (e.g. recognition of an employee's/director's contributions to the Company). A long service award may be provided to employees will be based on pre-determined criteria determined by senior management. The amount shall be budgeted and approved by the Board;
- h) Token gifts of low value which bearing the MAVCAP or company's logo or (e.g. t-shirts, pens, diaries, calendars and other small promotional items) that are given out to business associates , customers, partners attending events such as conferences, exhibitions, training, trade shows etc. and deemed as part of the company's brand building or promotional activities; and
- i) Gifts to external parties who have no business dealings with MAVCAP (e.g. Monetary gifts or gifts in-kind to charitable organisations).

2.2) In the above exceptional circumstances, MAVCAP's employees and directors are expected to exercise proper judgment in handling gift activities and behave in a manner consistent with the general principles set out in the Code of Conducts.

2.3) When giving or receiving a gift, entertainment, or hospitality, assessment shall be made in consideration of the following:

- i. Bonafide: given clearly as an act of appreciation, with no ill intention to persuade or influence decisions;
- ii. No obligation: gifts, entertainment, or hospitality shall be given without any obligation, return of favour, or expectation from the recipient;
- iii. No undue influence: not be seen as intended for, or capable of, achieving undue influence over a transaction or decision (either business decision or in relation to decisions by public authorities or regulators) or to be able to compromise integrity and objectivity in the performance of one's duties;
- iv. Made openly: the gift, entertainment, or hospitality is not made in secret and undocumented. The purpose, approvals given, and value shall be documented;
- v. Legality: does not contradict to relevant laws governing the giver and the recipient;
- vi. Accords with stakeholder perception: the gift, entertainment, or hospitality given would not be viewed unfavourably by stakeholders where it made known to them;
- vii. Proportionate: the value and nature of the gift, entertainment, or hospitality is not disproportionate to the occasion e.g. the gift for long service awards are of different value to the birthday gift;
- viii. Conforms to the rules governing the giver or the recipient: gift, entertainment, or hospitality made shall be in line with the rules or code of conduct of the recipient's organisation. This means when giving gifts, entertainment, or hospitality, an Executive Director, Non-Executive Director, employee, supplier or business associate of the Company shall understand the counterparty organisation's policies on gifts, entertainment, and hospitality; and
- ix. Infrequent: gifts, entertainment and hospitality are not given overly frequent, i.e. more than once a week.