



Funding Innovation

Malaysia Venture Capital Management Berhad (MAVCAP)

NO GIFT POLICY

Initiated by	GRCCS
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1 st Revision by	
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New Effective date	

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) Employees are expected to immediately record the gifts in the gift register for any acceptance of gifts. The gift register shall be maintained Human Resource Department and reviewed by Risk and Governance Department on periodically basis.
- f) MAVCAP’s employees or departments 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”.
- g) 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.
- h) Generally employees are not allowed to receive any gifts from third parties. Employees are only allowed to accept gifts under the exception situation mentioned below. Employees must obtained approval from CEO when accepting gifts in a situation that is beyond the exception mentioned below.

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) Customary gift (i.e. festivities gifts/hampers/fruits/flowers) are allowed to be received from business partners and it must be properly recorded and safeguarded by the receiving department;
- b) The exchange of gifts in certain cultures or situations as part of business etiquette is allowable under exception to no gift policy;
- c) 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;
- d) 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); and
- e) 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.

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.