



GIFT & HOSPITALITY GUIDELINE

Revision 3 / 26 February 2026

Prepared by: Risk, Integrity and Compliance Department (RICD)

CONTROL SHEET

DOCUMENT CONTROL LOG	
Document Name	Gift & Hospitality Guideline
Document No	UEMEd/MSP/RICD/03(GHG)G01
Initial Effective Date	17 May 2019
Version No/Date	Revision 3 / 26 February 2026
Approving Authority	Board of Directors
Approval Date	26 February 2026

Note:

1. The Control Sheet must be duly updated whenever any changes to the procedures are made and approved.
2. The document shall be reviewed and updated regularly to ensure that all information remains accurate, current and up to date.

REVISION HISTORY				
Rev. No.	Affected Page (S)	Description	Request Form Ref. No.	Date
3	5	New paragraph added under <i>Introduction</i> to provide a general overview of the Gift & Hospitality Guideline.		
	5	Revised the <i>Purpose</i> clause to explicitly reflect the objective of the Gift & Hospitality Guideline.		
	5	Rewritten the <i>Scope</i> to clarify the intent of the Guideline in guiding employees on the appropriate giving and receiving of Gifts and Hospitality.		
	5	Replaced the <i>Requirement</i> clause with <i>Applicability</i> to clearly define the parties subject to the Guideline.		
	5	Removed <i>Disciplinary Action</i> clause and merged under the <i>Applicability</i> clause for better clarity.		
	6	Revised and updated <i>Definition and Abbreviation</i> clauses to include new terms and definitions.		
	7	Revised and updated the <i>Gift and Hospitality</i> clause to incorporate general		

REVISION HISTORY				
Rev. No.	Affected Page (S)	Description	Request Form Ref. No.	Date
		principles for appropriately guiding the giving and receiving of Gifts and Hospitality.		
	10	Updated Table 1 under <i>Giving Gifts</i> to include a column specifying the occasion or purpose for giving a Gift.		
	11	Updated Table 2 under <i>Receiving Gifts</i> to include a column indicating the occasion or purpose for receiving a Gift, along with applicable conditions.		
	12	Updated Table 3 under the <i>Giving Hospitality</i> to include a column outlining the occasion or purpose for providing Hospitality, along with the relevant conditions.		
	13	Introduced Table 4 under <i>Receiving Hospitality</i> to outline the types of Hospitality allowed to be received and the applicable conditions.		
	14	Introduced Table 5 under <i>Entertainment</i> to outline the types of Entertainment allowed to be received and the applicable conditions.		
	15	Introduced new clause on <i>Honorarium</i> , providing guidance on the receipt of honoraria, tokens of appreciation, payments, or fees in connection with the external engagements.		
	15	Removed clause on facilitation fees as this is now covered under the Code of Conduct (COC).		
	15	Removed clause on <i>Contributions (Donations and Sponsorships)</i> , the scope of such matters is now addressed under the <i>Scope</i> clause.		
	15	Reclassified clause on <i>Golf Activities</i> and integrated under the <i>Entertainment</i> clause.		

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1.0 Introduction

UEM Edgenta Berhad and its group of companies (hereinafter referred to as the “Edgenta Group” or the “Group”), are committed to the highest standards of integrity, professionalism, and ethical conduct in all business dealings. The Group adopts a zero-tolerance approach towards bribery and Corruption and upholds transparency, accountability and ethical business practices in all business dealings and relationships.

1.1 Purpose

The Gift & Hospitality Guideline (“the Guideline”) provides clear guidance on the giving and receiving of Gifts, Hospitality, and Entertainment. It establishes strict controls to prevent actual, potential, or perceived conflicts of interest, bribery, or undue influence in the Group’s operations.

1.2 Scope

- a) The Guideline covers the giving and receiving of Gifts and Hospitality and sets the standards to ensure that such activities are conducted ethically and in line with the Group’s values of integrity, transparency, and commitment to anti-bribery and anti-corruption principles.
- b) Donation and Sponsorship activities are not covered under the Guideline and are governed separately under the *Donation and Sponsorship Guide (ref no.: UEMEd/MSP/CC(DN)G08)* managed by the Corporate Communications Department (CCD).
- c) The Guideline is not exhaustive and shall be read alongside the *Code of Conduct (COC) (ref no.: UEMEd/MSP/RICD/01(COC)G01)* and the *Gift & Hospitality Policy Statement (ref no.: UEMEd/POL/RICD(GHP))*. Employees should refer to these documents where applicable.

1.3 Applicability

- a) The Guideline applies to all directors, officers, employees, intermediaries and any Person Associated with the Group (collectively referred to as “we” in the Guideline).
- b) All individuals covered by the Guideline must adhere to its provisions when giving or receiving Gifts and Hospitality in the course of carrying out business activities.
- c) Non-compliance with the Guideline may result in consequence management, including disciplinary action and, where applicable, legal action in accordance with the *Industrial Relation Policy (ref no.: UEMEd/MSP/HR/07(IR))* managed by Human Resource Department.

1.4 Abbreviations and Definition

The following definitions apply unless otherwise expressly stated:

ABBREVIATIONS

CCD	Corporate Communications Department
CSR	Corporate Social Responsibility
DAL	Discretionary Authority Limits
HOD	Head of Business Division/Department
MACC	Malaysian Anti-Corruption Commission
MD/CEO	Managing Director / Chief Executive Officer
NTD	New Taiwan Dollar
RICD	Risk, Integrity & Compliance Department
SGD	Singapore Dollar
SOP	Standard Operating Procedure
USD	US Dollar

DEFINITIONS

Bribe	Any form of Gratification offered, promised, given, received, or solicited with the intent to influence the actions of an individual in the discharge of their duties or to obtain or retain business.
Complimentary Benefit	Any item, service, privilege, or advantage provided free of charge or at a discounted rate, including but not limited to goods or services, meals, travel, accommodation, or event tickets.
Corruption	The abuse of entrusted power for personal gain or benefit, including any act of offering, giving, receiving, or soliciting something of value with the intent to influence the actions of an individual in a position of trust.
Corporate Gift	A token, commemorative item or item of nominal value given in a business context as a gesture of goodwill, appreciation, or for promotion. Usually branded with the company's logo and not intended to influence business decisions or secure an unfair advantage.
Entertainment	Hospitality involving leisure or recreational activities, including sporting events, cultural performances, or social gatherings typically attended by both the giver and recipient.

External Parties	Individuals or entities outside of the Edgenta Group, including but not limited to business partners (such as vendors, suppliers, consultants, contractors, agents, distributors, and joint venture partners), clients, government officials, professional or industry bodies, media representatives, academic institutions, and other third parties with whom employees interact in the course of business.
Festive Gift	A token or item given or received in conjunction with cultural, religious, or national celebrations (e.g., Hari Raya, Chinese New Year, Deepavali, Christmas). Such Gifts are typically exchanged as customary goodwill and are not intended to influence business decisions or gain an unfair advantage.
Gift	Any item of value given or received, including but not limited to cash, free fares, shares, lottery tickets, travel or holiday packages, Entertainment expenses, services, club membership, commissions, hampers, jewellery or decorative items.
Gratification	Includes money, donations, Gifts, loans, fees, positions, discharge of loans, any valuable thing of any kind, forbearance to demand money or items of value, or any other service or favour, as well as any offer, undertaking, or promise of such. This definition shall be read in conjunction with and not in derogation of Section 3 of the Malaysian Anti-Corruption Commission Act 2009 (MACC Act 2009).
Head of Business Division/Department	Refers to the head of a business division / department (e.g. Healthcare Support, Infrastructure Services, Asset Consultancy, Property & Facility Solutions, Corporate Support).
Honorarium	A monetary payment offered in recognition of an individual's participation in a formal external engagement such as serving as a speaker, panellist, facilitator, trainer, or judge.
Hospitality	The provision or acceptance of meals, refreshments, Entertainment, travel, or accommodation offered in the context of fostering or maintaining business relationships.
Intermediaries	Refer to any individual or entity engaged by, acting for, or representing the Group to facilitate, influence, or secure business, commercial, contractual, or governmental dealings on behalf of the Group. This includes but is not limited to agents, brokers, consultants, and introducers.
Luxury	Any Gift or Hospitality that exceeds the monetary thresholds set in the Guideline.
Modest	Gifts, Hospitality, or Entertainment that fall within the prescribed monetary thresholds set out in the Guideline.

Person Associated Any director, partner or employee of the Group or any person performing services for or on behalf of the Group. This includes agents, consultants, contractors, vendors, joint ventures, business partners, Intermediaries, and any third party representing or acting on behalf of the Group. This definition shall be read in conjunction with and not in derogation of Section 3 and 17A (6) of the MACC Act 2009.

2.0 General Principles on Gifts and Hospitality

- 2.1 The Group does not encourage the giving or receiving of Gifts and Hospitality in the course of business dealings. All business decisions must be based solely on merit, transparency, and legitimate business objectives or interests, and must not be influenced, or be perceived to be influenced, by any form of Gift, Hospitality, or Entertainment.
- 2.2 Notwithstanding the above, and subject to strict controls, modest Gifts, Hospitality or Entertainment may be permitted in limited circumstances, provided that they are proportionate to the business context, linked to legitimate business purposes, transparent and managed in accordance with the Guideline.
- 2.3 We must uphold the highest standards of integrity and act in the best interests of the Edgenta Group. This includes exercising sound judgment and discretion when offering or receiving Gifts or Hospitality, ensuring timely declaration and obtaining the necessary approvals where required.
- 2.4 We must not, whether directly or indirectly, solicit, offer, promise, give, demand, arrange, or receive any Gifts, Hospitality, Entertainment, or complimentary benefits, whether monetary or non-monetary, that may, or may be perceived to:
 - a) Secure or retain business, or obtain an unfair advantage for the Group;
 - b) Influence any business decision or the actions of government officials or any External Party, Intermediaries or Person Associated;
 - c) Compromise, or appear to compromise, the independence, impartiality or objectivity of an individual's professional judgment;
 - d) Create an actual or perceived conflict of interest or obligation;
 - e) Create an obligation, or compromise with our official duties; or
 - f) Serve as a reward or inducement for the improper performance of any duty or function.

2.5 Prohibited Gifts and Hospitality

The following are strictly prohibited under all circumstances, whether requested, given or received:

- a) Cash or cash equivalents (e.g. gift cards, vouchers, coupons, discounts, commissions, loans, shares, or other monetary instruments);
- b) Electronics or IT equipment (e.g. laptops, computers, mobile phones, smartphones);
- c) Event tickets (e.g. concerts, musical or theatre performances);
- d) Paid holidays or luxury travel, including transportation and accommodation;
- e) Luxury apparel (e.g. jewellery, watches, bags, handbags, footwear, clothing or sunglasses);
- f) Non-business-related Entertainment (e.g. gambling, adult entertainment, karaoke, spa treatments, or any activity inconsistent with the Group's values and Code of Conduct);
- g) Personal sponsorships (e.g. birthdays, weddings or personal celebrations);
- h) Paid club memberships (e.g. sports, recreational, social or private clubs).
- i) Gifts received or requested in the form of sponsorship from business partner with existing or potential official business dealings with the Group.
- j) Gifts or Hospitality offered or received during sensitive periods (e.g. contract negotiations, tenders, bidding processes, or employee performance evaluations);
- k) Hampers addressed to individual employees and received in the course of official duties; and
- l) Any Gifts or Hospitality intended to influence government procurement or tender outcomes.

2.6 Handling Prohibited Gifts or Hospitality

- a) Where prohibited Gifts or Hospitality are received, we must:
 - i) Politely decline and explain the Group's Gift and Hospitality Policy; and
 - ii) Return the item promptly to the sender at the earliest practicable time.
- b) Where returning a Gift is impractical or may cause offence, the Head of Business Division / Department (HOD) shall determine the appropriate course of action, which may include:
 - i) Retain for communal use or display within the division / department;
 - ii) Share among members of the team or department;
 - iii) Donate to a charitable organisation; or
 - iv) Allow the employee to retain the Gift, where deemed appropriate.
- c) All such instances must be declared via the e-Declaration Portal.

2.7 Permissible Situations

The following may be permissible, subject to compliance with the Guideline:

- a) Hampers received as legitimate prizes or tokens during Group-organised events (e.g. sports events, staff appreciation functions, CSR activities);
- b) Festive Gifts exchanged within the Group during cultural or religious celebrations (e.g. Hari Raya, Deepavali, Chinese New Year, Christmas);
- c) Modest souvenirs or commemorative items given or received during official Group functions; and
- d) Complimentary benefits from External Parties, Intermediaries or Person Associated directly related to legitimate business activities, professional development, or official engagements.

2.8 Regardless of category or exception, we must always:

- a) Act honestly, professionally and ethically;
- b) Exercise discretion and sound judgement;
- c) Not misuse our position to secure personal benefit;
- d) Comply with all applicable laws and internal policies;
- e) Avoid any conduct that may be perceived as improper or corrupt;
- f) Ensure Gifts or Hospitality are proportionate, transparent and approved in line with the Group's Discretionary Authority Limits (DAL); and
- g) Seek guidance from an immediate supervisor or RICD where there is any doubt.

3.0 Giving Gifts

3.1 The Group discourages the giving of Gifts to External Parties, Intermediaries or Person Associated. However, Modest Corporate Gifts may be permitted in limited circumstances, provided that they are within the limits set out in Table 1:

No.	Type of Gift	Occasion / Purpose	Conditions
a)	<ul style="list-style-type: none"> • Wreath. • Fruit basket. • Bouquets of flowers. • Wellness baskets. 	<ul style="list-style-type: none"> • Condolence or bereavement. • Hospitalisation or serious illness. • Congratulatory gestures. 	<ul style="list-style-type: none"> • Permissible up to RM300 / SGD 150 / NTD 5,000 / USD 150 per person

3.0 Giving Gifts (cont'd)

No.	Type of Gift	Occasion / Purpose	Conditions
b)	<ul style="list-style-type: none"> • Items bearing the Edgenta Group's logo (e.g. T-shirts, tumblers, caps, goodie bags). • Stationery (e.g. notebooks, pens). 	<ul style="list-style-type: none"> • Official meetings or business discussions. • Event door gifts. • Awareness or training. • Conferences, exhibitions, or trade shows. 	<ul style="list-style-type: none"> • Permissible up to RM100 / SGD 100 / NTD 1,800 / USD 100 per person
c)	<ul style="list-style-type: none"> • Commemorative plaques. • Mementos. 	<ul style="list-style-type: none"> • Official events and ceremonies. • Recognition and appreciation. • Special delegations or courtesy visits. • Awards and competitions. 	<ul style="list-style-type: none"> • Permissible up to RM500 / SGD 300 / NTD 4,800 / USD 150 per person
d)	<ul style="list-style-type: none"> • Souvenirs. • Pennants. • Handicrafts. • Printed materials. 	<ul style="list-style-type: none"> • CSR events or charitable programmes. • Guest appreciation (e.g. speakers, external trainers). • Sporting events. 	<ul style="list-style-type: none"> • Permissible up to RM500 / SGD 300 / NTD 4,800 / USD 170 per person

Table 1: Giving Gifts

3.2 For Gifts involving the Edgenta Group's corporate merchandise, we must comply with the *Corporate Merchandise & Gift Requests Standard Operating Procedure (SOP)*, as governed by the Corporate Communications Department (CCD).

4.0 Receiving Gifts

4.1 Permissible Receiving Gifts from External Parties, Intermediaries or Person Associated and the applicable are set out in Table 2:

No.	Type of Gift	Occasion / Purpose	Conditions
a)	<ul style="list-style-type: none"> Wreath Fruit basket Bouquets of flowers Wellness baskets Festive Gifts (e.g. mandarin oranges, dates) 	<ul style="list-style-type: none"> Condolence or bereavement. Hospitalisation or serious illness. Congratulatory gestures. Festive seasons. 	<ul style="list-style-type: none"> Permissible up to RM 300 / SGD 150 / NTD 5,000 / USD 170 per person without declaration. Items above the threshold, or any unusual or high-value Gifts must be declared via the e-Declaration Portal (in case of illness, declare within 7 days after returning to work).
b)	<ul style="list-style-type: none"> Event or Gift pack items (e.g. goodie bag, door gift) Stationery (e.g. notebooks, pens, calendars) 	<ul style="list-style-type: none"> Official meetings or business discussions. Seminars or trainings. Conferences, exhibitions, or trade shows. 	<ul style="list-style-type: none"> Permissible up to RM 100 / SGD 100 / NTD 1,800 / USD 100 per person without declaration. Items above the threshold, or any unusual or high-value Gifts, must be declared via the e-Declaration Portal.
c)	<ul style="list-style-type: none"> Commemorative plaques Mementos 	<ul style="list-style-type: none"> Official events and ceremonies. Recognition and appreciation. Special delegations or courtesy visits. Awards and competitions. 	<ul style="list-style-type: none"> Permissible up to RM 500 / SGD 300 / NTD 4,800 / USD 150 per person without declaration. Items above the threshold, or unusual or high-value Gifts, must be declared via the e-Declaration Portal.

Table 2: Receiving Gifts

4.0 Receiving Gifts (cont'd)

No.	Type of Gift	Occasion / Purpose	Conditions
d)	<ul style="list-style-type: none"> Souvenirs Pennants Handicrafts Printed materials 	<ul style="list-style-type: none"> CSR events or charitable programmes. Representing the Edgenta Group as a presenter or speaker. Sporting events. 	<ul style="list-style-type: none"> Permissible up to RM 500 / SGD 300 / NTD 4,800 / USD 150 per person without declaration. Items above the threshold, or any unusual or high-value Gifts, must be declared via the e-Declaration Portal.

Table 2: Receiving Gifts

5.0 Giving Hospitality

5.1 Acceptable forms of Hospitality include meals, refreshment, travel or accommodation. All Hospitality must:

- a) Avoid any perception of impropriety;
- b) Be reasonable in cost and properly documented; and
- c) Receive prior approval from the relevant reporting line, such as the HOD or the MD/CEO.

5.2 Permissible Giving Hospitality and the applicable conditions are set out in Table 3:

No.	Type of Hospitality	Occasion / Purpose	Conditions
a)	Meals and/or refreshments	<ul style="list-style-type: none"> Business meetings. Conferences or forums. Site visits. Networking receptions Appreciation or milestone events Edgenta Group-hosted business activities Celebratory events Other legitimate business-related discussions 	<ul style="list-style-type: none"> Permissible up to RM300 / SGD 200 / NTD 3,200 / USD 100 per person.

Table 3: Giving Hospitality

5.0 Giving Hospitality (cont'd)

No.	Type of Hospitality	Occasion / Purpose	Conditions
b)	Travel and/or Accommodation	<ul style="list-style-type: none"> • Business meetings • Conferences or forums • Site visits • Networking receptions • Appreciation or milestone events • Edgenta Group-hosted business activities • Celebratory events • Other legitimate business-related discussions 	<ul style="list-style-type: none"> • Applicable only to invited guests attending official events or meetings hosted by the Edgenta Group. • Prior written approval from HOD or MD/CEO is required.

Table 3: Giving Hospitality

5.3 All travel and accommodation expenses must comply with all relevant policies, procedures and approve according to the Group's DAL.

6.0 Receiving Hospitality

6.1 Permissible Receiving Hospitality from External Parties, Intermediaries or Person Associated and the applicable conditions, are set out in Table 4:

No.	Type of Hospitality	Occasion / Purpose	Conditions
a)	Meals and/or refreshments	<ul style="list-style-type: none"> • Business meetings • Conferences or forums • Site visits • Networking receptions • Appreciation or milestone events • Third party-hosted business activities • Celebratory events • Other legitimate business-related discussions 	<ul style="list-style-type: none"> • Permissible up to RM 300 / SGD 200 / NTD 3,200 / USD 200 per person without declaration. • Above the threshold, or any unusual or high-value items, must be declared via the e-Declaration Portal. • Must not contain Entertainment elements that could create reputational risk.

Table 4: Receiving Hospitality

6.0 Receiving Hospitality (cont'd)

No.	Type of Hospitality	Occasion / Purpose	Conditions
b)	Travel and/or Accommodation	<ul style="list-style-type: none"> • Business meetings • Conferences or forums • Site visits • Networking receptions • Appreciation or milestone events • Third party-hosted business activities • Celebratory events • Other legitimate business-related discussions 	<ul style="list-style-type: none"> • Permissible when provided in conjunction with, or as a complement to, a business event. • Must be declared via the e-Declaration Portal

Table 4: Receiving Hospitality

7.0 Entertainment

7.1 The Group recognises that Entertainment may, on occasion, support constructive business relationships. However, such activities must never influence business decisions or create reputational risk.

7.2 Permissible Receiving Entertainment from External Parties, Intermediaries or Person Associated and the applicable conditions, are set out in Table 5:

No.	Type of Entertainment	Occasion / Purpose	Conditions
a)	Sporting / Cultural Events (e.g., football matches, sporting or recreational events, art or cultural shows)	<ul style="list-style-type: none"> • Invited by business associates or clients. • Organised by third parties for relationship-building purposes. 	<ul style="list-style-type: none"> • Must be declared via the e-Declaration Portal. • Must not be frequent or extravagant. • Venue must be appropriate and in line with the Group's values.
b)	Festive or Appreciation Dinners / Celebrations	<ul style="list-style-type: none"> • Events held during festive seasons. • Celebration of business milestones or recognition of contributions. • Award ceremonies or opening events. 	<ul style="list-style-type: none"> • Must be declared via the e-Declaration Portal. • Must be in line with customary practice. • Must not present reputational risk or be excessive in nature.

Table 5: Receiving Entertainment

7.0 Entertainment (cont'd)

No.	Type of Entertainment	Occasion / Purpose	Conditions
c)	Golf Tournaments / Golf Games	<ul style="list-style-type: none"> • Intended for business networking or relationship-building. • Participation as an official representative of the Edgenta Group 	<ul style="list-style-type: none"> • Participation is permitted only with prior written approval or formal nomination. • Pre-approval from the MD/CEO or relevant HOD is required. • Completion and submission of the Golf Activity Request Form is mandatory (Refer to Appendix 1).

Table 5: Receiving Entertainment

8.0 Honorarium

- 8.1 The Group encourages employees' participation in external public platforms, such as serving as panellists, speakers, facilitators, trainers, or judges, where such participation may result in receiving an Honorarium as a token of appreciation.
- 8.2 Honoraria arising from approved professional engagements are not considered Gifts under the Guideline. They are governed by the *External Public and Event Participation and Engagement SOP*, issued under the CCD.
- 8.3 Where an Honorarium is offered, we must:
- a) Disclose the offer in the application form prior to the event, in accordance with the *External Public and Event Participation and Engagement SOP* governed by the CCD;
 - b) Obtain prior approval before accepting any form of Honorarium or monetary token; and
 - c) Declare any Honorarium received via the e-Declaration Portal.
- 8.4 Acceptance of an Honorarium must not conflict with official duties or compromise the Group's reputation, impartiality or independence.

9.0 Exceptions

- 9.1 Employees seeking an exception to any provision of the Guideline must complete the *Exception Form* (refer to Appendix 2) and submit it for approval.
- 9.2 Final approval must be obtained from the relevant HOD or MD/CEO, in accordance with the applicable reporting line.
- 9.3 All exception requests must be submitted to RICD for review and concurrence.
- 9.4 A copy of the completed and approved *Exception Form* must be submitted to RICD for record-keeping.
- 9.5 The respective division/department must retain a copy of the approved *Exception Form* for internal reference.

Appendix 1 – Golf Activity Request Form

This form must be completed by the Edgenta Group employees seeking approval to participate in golf-related activities. Approval must be obtained from the MD/CEO or the relevant Head of Business Division/Department (HOD).

For RICD Official Use Only	
Reference No	:
Date	:

**Please tick (X) where applicable*

	BUSINESS DIVISION / FUNCTION	COMPANY NAME
	Assets Consultancy	
	Healthcare Support - Concession	
	Healthcare Support - Commercial	
	Infrastructure Services	
	Property & Facility Solutions	
	Support Functions	
	Others (please specify):	

ORGANISATION INFORMATION	
Organisation Name	:
Type of Organisation	: <input type="checkbox"/> Public <input type="checkbox"/> Commercial <input type="checkbox"/> Others (please specify) _____
Department	:
Contact Person	:
Contact Number	:
Email Address	:

DETAILS OF GOLF ACTIVITY REQUEST	
Golf Activity / Event	:
<i>(Please specify name of the golf event)</i>	
Venue	:
Participant(s)	:
Estimated Amount (RM/USD)	:
Repeated Golf Activity	: Yes / No
<i>(With the same organisation and/or same personnel) (If yes, please provide justification for the repeated participation)</i>	
Justification	:
<i>(Please state the purpose or rationale for attending the golf activity (e.g. business development, stakeholder engagement or other legitimate corporate objectives)</i>	

APPROVAL		
Requested by:	Verified by: (Risk Integrity & Compliance Department (RICD))	Approved by: (MD/CEO or Head of Business Division/Department)
Name:	Name:	Name:
Designation:	Designation:	Designation:
Date:	Date:	Date:

Notes:

1. The completed Golf Activity Request Form must be submitted to RICD for concurrence.
2. Final approval must be obtained from the MD/CEO or the relevant Head of Business Division/Department (HOD).
3. A copy of the completed and approved form must be submitted to RICD for record-keeping.
4. The respective division/department must retain a copy for internal reference and record.

Appendix 2 - Gift & Hospitality Guideline Exception Form

This form must be completed by Edgenta Group employees seeking an exception to any provision of the Gift & Hospitality Guideline.

For RICD Official Use Only	
Reference No	:
Date	:

Exception Request	
A. Requestor Details	
Name:	
Title / Position:	
Division / Department:	
Description of Exception Requested:	
Reason / Justification for Exception:	
B. Requested by:	C. Recommended by: Reporting Manager
_____ Name: Designation: Date:	_____ Name: Designation: Date:
D. Verified by: Risk, Integrity & Compliance Department (RICD)	
HOD RICD: _____ Name: Date:	Comments:
E. Approved by:	
HOD or MD/CEO: _____ Name: Designation: Date:	Comments:

Notes:

1. The completed and approved Exception Form must be submitted to RICD for record-keeping.
2. The relevant division/department must retain a copy of the approved Exception Form for internal reference.

Appendix 3 - Gift & Hospitality Declaration Form

(Applicable to Overseas Business Units outside Malaysia)

For RICD Official Use Only	
Reference No	:
Date	:
Employee Details	
Employee Name:	
Employee ID:	
Title / Position:	
Division / Department:	
Country:	
Declaration Type	
<input type="checkbox"/> Receiving Gift <input type="checkbox"/> Receiving Hospitality <input type="checkbox"/> Receiving Entertainment	
Details of External Party, Intermediaries or Person Associated	
Name of Individual / Organisation:	
Relationship to Edgenta Group: (e.g. client, vendor, partner)	
Business Context / Engagement:	
Gift / Hospitality / Entertainment Declaration Details	
Description:	
Occasion / Purpose:	
Estimated Value:	RM/USD/SGD/NTW _____
Date Received:	
Venue / Location Received:	

Employee Declaration

I hereby declare that the above information is true, accurate, and complete to the best of my knowledge. I confirm that the Gift, Hospitality or Entertainment received complies with the Gift & Hospitality Policy and Guideline, and that no improper influence or conflict of interest has arisen.

Employee Signature:

Date:

Verified by:	
(Risk Integrity & Compliance Department (RICD)) Name: Designation: Date:	Comments:

Approved by:	
(MD/CEO or Head of Business Division/Department) Name: Designation: Date:	Comments:

Notes:

5. The completed Gift & Hospitality Declaration Form must be submitted to RICD for verification.
6. Final approval must be obtained from the MD/CEO or the relevant Head of Business Division/Department (HOD).
7. A copy of the completed and approved form must be submitted to RICD for record-keeping.
8. The respective division/department must retain a copy for internal reference and record.