



A member of  MMC Group

GIFT, HOSPITALITY & REWARD

SENAI AIRPORT TERMINAL SERVICES SDN BHD
(242383-M)

EFFECTIVE DATE	REV	Prepared By	Reviewed By	Approved By
09.12.2021	1.0	Head, Compliance, Risk & Integrity Management	Head, Corporate Services	Acting Chief Executive Officer

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1. PURPOSE

This document is to provide further guideline in line with Code of Ethics provisions which outlining the rewards and gifts for employees of SATSSB in the course of business operation.

2. OBJECTIVE

Objective of this guidelines:

- 2.1 In line with the commitment to conduct business free from any corruption offence under any law such as the MACC (Amendment) Act 2018, SATSSB's Anti-Bribery Anti-Corruption Policy and SATSSB's Code of Ethics.
- 2.2 Implement an Anti-Bribery and Anti-Corruption management for the company.
- 2.3 Determine and provide the resources needed to establish, implement, maintain and ensure continuous improvement of the Anti-Bribery and Anti-Corruption management.
- 2.4 Enhance the current controls of the Company bribery and corruption risks.
- 2.5 Eliminate any form of bribery and corruption or prevent the occurrence and potential recurrence of bribery or corruption within the Company.

3. SCOPE

This guideline applies to:

- 3.1 SATSSB's employees as defined in para. 5 of this procedure
- 3.2 Contractors / vendors / consultants
- 3.3 Agents or any third parties on behalf of SATSSB

4. RESPONSIBILITIES

4.1 Any person described in para. 3 shall:

- a. Abide by this Policy to avoid conflict of interest or the appearance of conflict of interest for either party in on-going or potential business dealings between SATSSB and external parties as a gift can be seen as a bribe that may tarnish SATSSB's reputation or be in violation of anti-bribery and corruption laws or any other relevant rules and regulations.

- b. Uphold duties of good faith, fidelity, diligence and integrity and avoid any conflict-of-interest situation to choose between performing the duties and demands required of his position and his own private interests or personal benefit, including the benefit of his family / household and friends.
- c. Not allowed to provide or receive gifts to and from third parties with certain exceptions as being laid out in the Code of Ethics.

4.2 All employees, directors, and external rating committee members shall:

- a. Comply with SATSSB Code of Ethics & Anti Bribery & Anti-Corruption Policy
- b. Inform external parties involved in any business dealings with SATSSB
- c. Party's understanding for and adherence with this procedure.

4.3 Any employee who fails to comply with this procedure shall be subject to disciplinary action, up to and including termination, to the extent permissible under local law. The Head of Compliance, Risk and Integrity Management Department shall ensure the enforcement of this procedure. Any employee with knowledge or suspicion of violations of this procedure shall report his concerns to the Head of Compliance, Risk and Integrity Management Department.

5. GLOSSARY / DEFINITION

Abbreviation	Description
SATSSB	Senai Airport Terminal Services Sendirian Berhad
Gift/Reward	Anything of value that is given to or received from certain persons or organizations outlined in this Code of Ethics and Anti-Bribery and Anti-Corruption Policy.
Employee	Any person who is in the employment of SATSSB including but not limited to executives, non-executives, secretaries, secondees outsourced personnel and other representatives, consultants, interns, any Committee member and individuals on direct hire.
MACC	Malaysian Anti-Corruption Commission
GMD	Group Managing Director's or Chairman
CEO	Chief Executive Officer
HOD	Head of Department/Division

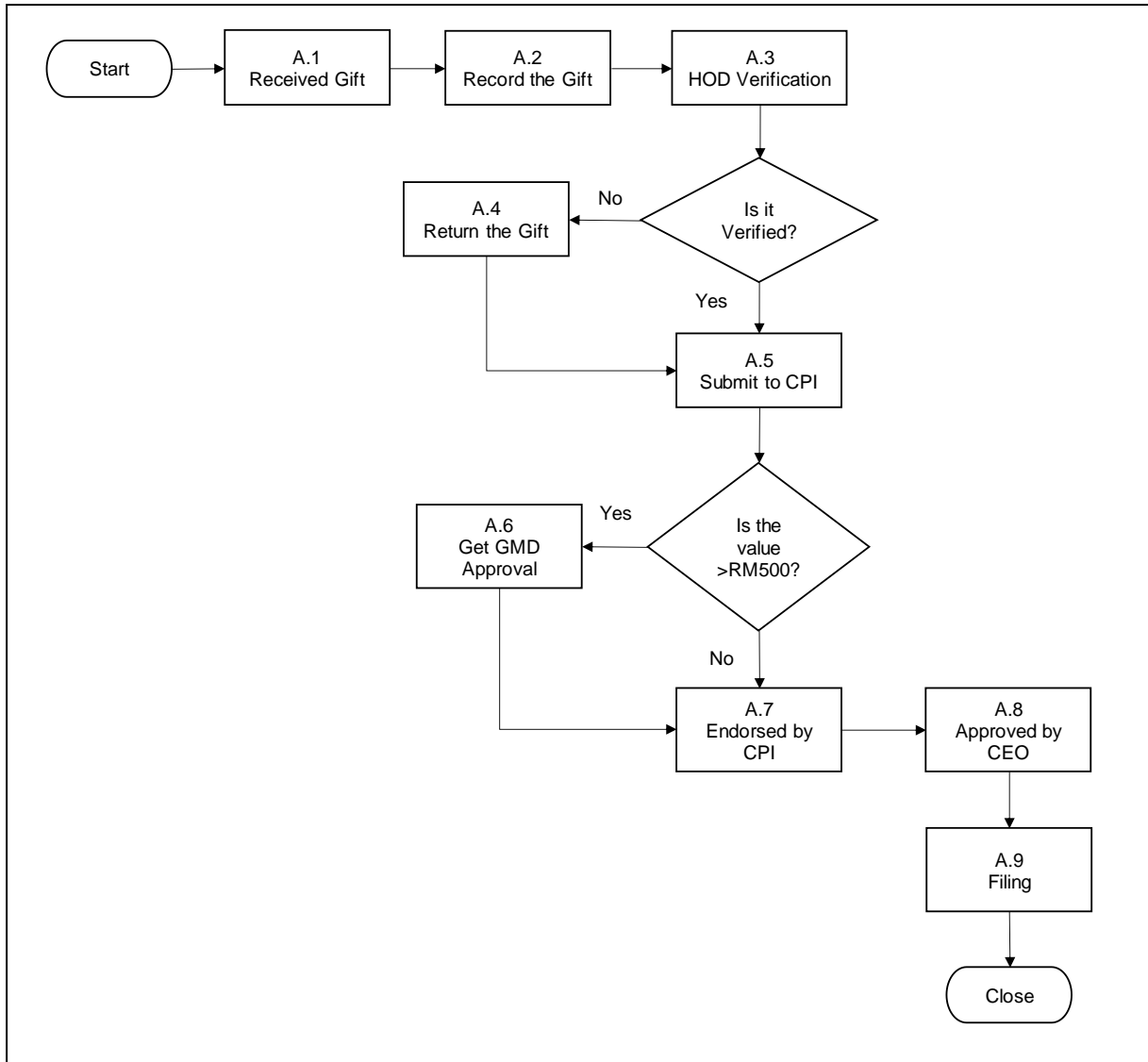
Abbreviation	Description
CPI	Compliance, Risk and Integrity Management Department

6. REFERENCE

- 6.1 Malaysian Anti-Corruption Commission (Amendment) Act 2018
- 6.2 Senai Airport Terminal Services Sdn Bhd Limits of Authority dated 16 November 2015
- 6.3 Code of Ethics Revision 1.0
- 6.4 Anti-Bribery and Anti-Corruption Policy and Framework (COR-INP-CPI-A002) Revision 1.0

7. FLOW CHART

A. Receiving Gift



8. PROCEDURE

A. Receiving Gift

NO.	TASK OUTLINES	ROLE	DESCRIPTIONS	OUTPUT
A.1	Received Gift	Department Representative	<p>1.0 Although the general principle is to immediately refuse or return such gifts, accepting a gift on behalf of SATSSB is allowed only in very limited circumstances, whereby refusing the gift is likely to seriously offend and may sever SATSSB business relationship with the Third Party.</p> <p>2.0 However, in no circumstances may an employee, director or his/her family/household members accept gifts in the form of cash or cash equivalent.</p>	Nil
A.2	Record the Gift	Department Representative	<p>1.0 Employee shall immediately record the gift in the gift register using Gift Activity Reporting Form (COR-INP-CPI-G307).</p>	Gift Activity Reporting Form (COR-INP-CPI-G307)
A.3	HOD Verification	Department Representative HOD	<p>1.0 The completed Gift Activity Reporting Form (COR-INP-CPI-G307) shall be submitted to the Head of Department for approval.</p> <p>2.0 Head of Department/Division who will then decide whether to approve the acceptance of the gift or require it to be returned.</p>	Gift Activity Reporting Form (COR-INP-CPI-G307)
A.4	Return the Gift		<p>1.0 Even if it may appear disrespectful to refuse a gift from an external party, nevertheless, 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) then clearly the Head Department/Division of cannot approve the acceptance of said gift.</p> <p>2.0 In this situation, the gift must be politely returned with a note of explanation about the Company's "Code of Ethics".</p>	Nil
A.5	Submit to CPI	Department Representative Integrity Officer	<p>1.0 In the event the Head of Department/Division approves the acceptance of the gift, he/she must also determine the treatment of the gift whether to:</p> <ul style="list-style-type: none"> • The item received can be retained by the recipient. • The item received to be held for display in the 	Gift Activity Reporting Form (COR-INP-CPI-G307)

NO.	TASK OUTLINES	ROLE	DESCRIPTIONS	OUTPUT
			Division/Department receiving it <ul style="list-style-type: none"> The item received to be shared with other employees in the Division/Department 2.0 Once the Gift Activity Reporting Form (COR-INP-CPI-G307) approved, the form shall be submitted to integrity officer.	
A.6	GMD Approval	HOD	1.0 HOD shall notify the GMD upon receiving any gift value more than RM500 to determine on the treatment of such gift. 2.0 If the notification rejected by the GMD, the gift shall be returned.	Notification Memo
A.7	Endorsed by CPI	Head of Compliance, Risk and Integrity Management Department	1.0 CPI shall endorse the completed Gift Activity Reporting Form (COR-INP-CPI-G307) before submitting to CEO for approval. 2.0 If the reward more than RM500 and required GMD approval, the notification memo shall be attached together with the required form before submitted to CPI.	Gift Activity Reporting Form (COR-INP-CPI-G307) Notification Memo
A.8	Approved by CEO	CEO	3.0 Chief Executive Officer shall review and approved the Gift Activity Reporting Form (COR-INP-CPI-G307).	Gift Activity Reporting Form (COR-INP-CPI-G307)
A.9	Filing	Document Controller	1.0 All the Gift Activity Reporting Form (COR-INP-CPI-G307) received, shall be retained properly according to Control Documented Information Procedure (COR-IMP-IMS-C111).	Gift Activity Reporting Form (COR-INP-CPI-G307)

9. ASSOCIATED PROCEDURE

Document No.	Procedure Title	Retention Time	Location	Responsibility
COR-IMP-IMS-C111	Control of Documented Information	3 years	CPI	IMR

10. RELATED DOCUMENT

Document No.	Document Title	Retention Time	Location	Responsibility
COR-INP-CPI-G307	Gift Activity Reporting Form	3 years	CPI	Integrity Officer