



# edotco Group Sdn Bhd

## ANTI-BRIBERY & ANTI-CORRUPTION POLICY

**Statement of Confidentiality:**

The information in this policy is the sole property of edotco Group Sdn Bhd (“**edotco**”) and is strictly confidential. This document shall not be used for any other purposes except as permitted in the document and shall not be disclosed to unauthorized parties without the prior written consent of edotco Group.

**Policy Owner:**

Compliance Department

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## 1. GLOSSARY OF ABBREVIATIONS

The following abbreviations wherever used herein shall have the following definition, unless expressly indicated otherwise:

ABBREVIATIONS	DEFINITION
ABAC	Anti-Bribery and Anti-Corruption
AGB	Axiata Group Berhad
AML	Anti-Money Laundering and Counter Financing of Terrorism
Board/Directors	Board of Directors
BRCC	Board Risk and Compliance Committee
CEO	Chief Executive Officer
CSR	Corporate Social Responsibility
DC	Disciplinary/Defalcation Committee
edotco	edotco Group Sdn Bhd
edotco Group	edotco Group of Companies
Expolink	Expolink Europe Limited
CEO	Chief Executive Officer
CPO	Chief People Officer
HIA	Head Internal Auditor
RCO	Risk and Compliance Officer
GDS	Gifts, Donations and Sponsorship
HOD	Head of Department
HR	Human Resources
LoA	Limits of Authority
PEP(s)	Politically Exposed Person(s)
R&C	Risk & Compliance
SLT	Senior Leadership Team
UI.EP	Uncompromising Integrity and Exceptional Performance

## 2. GLOSSARY OF TERMS

The following terms wherever used herein shall have the following definition, unless expressly indicated otherwise:

TERMS	DEFINITION
ABAC Policy or This Policy	This Anti-Bribery and Anti-Corruption Policy
Axiata Group	Axiata Group Berhad and its subsidiaries and associates, owned directly or indirectly by Axiata Group Berhad as well as joint venture entities established.
edotco Group or the Group	edotco Group Sdn Bhd and its subsidiaries and associates, owned directly or indirectly by edotco Group as well as joint venture entities established
edotco Group Governance Instruments	All applicable policies and procedures, Code of Conduct and Limits of Authorities of edotco Group
Board of Directors	A corporate governing body of the organisation or entity
Board members	A group of individuals elected to represent the shareholders to act as a corporate governing body to supervise the activities of an organisation
Business counterparties	edotco Group’s suppliers, contractors, vendors, agents, consultants, representatives, distributors, joint venture partners and other external stakeholder(s) acting for or on behalf of edotco Group
Entertainment and Corporate Hospitality	Anything of value which includes but is not limited to accommodation, travel tickets, event tickets, meals provided or hosted by a third party directly or indirectly through its representatives, agents, business associates to develop, foster or to continue a relationship
Facilitation Payment	‘Speed’ or ‘grease’ payment (financial or non-financial) made directly or indirectly intending to secure or expedite the performance of a person carrying out a routine or administrative duty or function

<b>TERMS</b>	<b>DEFINITION</b>
Gift	anything of value, be it in kind or cash, that is given to or received from a third party, for example, gift vouchers, a bottle of wine, etc.
Money Laundering	A process whereby criminals attempt to hide and disguise the true origin and ownership of the proceeds from their criminal activities thereby avoiding prosecution, conviction and confiscation of the criminal funds
Nepotism	The act of influence whereby an employee seeks unfair advantage for his or her family member employed or to be employed in the edotco Group
Personnel	All the employees and officers of edotco Group and Board members
Politically Exposed Person (PEP)	A person entrusted with a public or governmental function
Stakeholders	Internal and external parties that have dealings with edotco Group which includes all members of the Board of Directors, heads, senior managers, managers and individuals at all levels including permanent, temporary and contract employees; and trainees or interns of edotco Group as well as third parties including customers, suppliers, contractors, vendors, agents, consultants, representatives, distributors, joint venture partners and other external stakeholder(s) acting for or on behalf of edotco Group
Subsidiaries	Any company or entity in which edotco Group, directly or indirectly, has more than 50% shareholding or control
Terrorism Funding	A process by which terrorists fund their operations to perform terrorist acts.
Third parties	edotco Group’s suppliers, contractors, vendors, agents, consultants, representatives, distributors, joint venture partners and other external stakeholder(s) acting for or on behalf of edotco Group
Whistleblowing or Speak Up Channel	The whistleblowing or speak up platform developed and maintained/operated by Expolink Europe Limited

### 3. OUR BELIEFS AND VALUES



#### OUR VALUES

**Uncompromising Integrity,  
Exceptional Performance**

- 3.1 edotco Group advances and enriches Asia by developing and enhancing today's digital communications for a better tomorrow.
- 3.2 We strongly believe that our values of Uncompromising Integrity and Exceptional Performance ("UI.EP") will serve as the core and foundation of our operations that enable us to provide agile, quality and reliable services and conduct business with integrity, honesty and transparency.
- 3.3 Each Stakeholder including but not limited to our Directors, employees, agencies, distributors, vendors, consultants, etc. plays an important role in edotco Group's commitment to conducting its business fairly, impartially and in full compliance with all applicable laws and regulations in Malaysia and in all other countries where the Group operates.
- 3.4 **Uncompromising Integrity** - always doing the right thing and fulfilling promises made to earn the trust of our Stakeholders. We are committed to upholding the highest standards of lawful and ethical conduct; and to demonstrating honesty, fairness, and accountability in all our dealings.
- 3.5 **Exceptional Performance** – always pushing ourselves to deliver outstanding performance. We are determined to be the winner, leader and best-in-class in what we do. While we are tough with performance standards, we are compassionate with people – we call it "performance with a heart".

## 4. INTRODUCTION

4.1 edotco Group takes pride in its beliefs and core values of UI.EP and is committed to conducting business with zero tolerance of any forms of bribery and corruption.

4.2 edotco Group embraces Axiata Group’s core values of UI.EP and strictly prohibits the receipt and the giving of bribes, or participation in any acts or situations that may lead to, or be perceived as, bribes such as promises, offers, acceptance, receipt or solicitation of gifts and hospitality, anything of value, facilitation payment, or improper payment, to or from any person, entity or agency, to obtain, retain or provide an improper business advantage or favourable treatment.

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*We strongly believe that no one business opportunity or relationship is valued more than the brand and reputation of the edotco Group.*

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4.3 All Directors, employees and officers (collectively known as the “personnel”) are committed to upholding their commitment to prevent bribery and corruption and to complying with this Policy.

4.4 All Stakeholders are required to adhere to this Policy that is established as part of edotco Group’s Anti-Bribery and Anti-Corruption (ABAC) compliance framework and should be read in conjunction with the local and other applicable regulations and laws in the geographies the Group operates, and any other edotco Group Governance Instruments. The dedicated Risk & Compliance (R&C) Division shall oversee adherence by all Stakeholders to edotco Group’s commitment to uncompromising integrity.

4.5 edotco Group’s Governance Instruments detail the steps and guidelines to support the implementation of this Policy.



## 5. SCOPE, OBJECTIVES AND APPLICABILITY

- 5.1 This Policy is applicable to all Stakeholders of edotco Group. Joint-venture companies in which edotco Group does not have a controlling stake or co-venture and associated companies are encouraged to adopt this Policy or similar principles.
- 5.2 The objectives of this Policy are set out below:
- a. to ensure the adherence of this Policy by edotco Group to all applicable regulations and legislation of the jurisdictions in which edotco Group operates;
  - b. to provide information and guidelines to all Stakeholders on how to assess situations or circumstances that can or may be perceived to be improper, unethical or related to bribery and corruption;
  - c. to create awareness and educate all Stakeholders on edotco Group's core value of uncompromising integrity, and the expected conduct thereof; and
  - d. to serve as a complementary guideline to all Stakeholders without being exhaustive or invalidating edotco Group's existing Code of Conduct, frameworks, policies, procedures, manuals and guidelines.



The ABAC Policy governs edotco Group's employees and third-party practices in conducting business for and on behalf of the Group

## 6. RESPONSIBILITIES

6.1 All Stakeholders are required to comply with this ABAC Policy at all times during the course of their work.

### Board of Directors and SLT

- ▶ Adhere to and uphold the value of uncompromising integrity **in any decision-making process.**
- ▶ Reward and conduct business by upholding the highest ethical standards.
- ▶ Embrace **edotco Group’s core values** and lead by example.
- ▶ Create and encourage a positive, open, honest and transparent environment where employees and business counterparties are comfortable to raise and report concerns.
- ▶ Not tolerate or allow discrimination or retaliation against those who raise or report genuine concerns

### Employee

- ▶ **Adhere to this Policy** during the performance of and carrying out of duties for or on behalf of edotco Group.
- ▶ Embrace the principle of not operating outside the law or being inconsistent with the policies and values.
- ▶ **Acknowledge** ABAC compliance and **attend regular training on** ABAC-related matters.
- ▶ **Raise or speak up regarding** suspected or actual concerns, violations or non-compliance.

### Third party

- ▶ **Understand and share** the same core and ethical values as edotco Group.
- ▶ Act in accordance with this Policy that is consistent with edotco Group’s core values during the performance of its work for or on behalf of edotco Group.

## 7. NON-COMPLIANCE TO ABAC POLICY

- 7.1 Failure to comply with this Policy may subject an individual to disciplinary action, up to and including termination of employment, in accordance with edotco Group's Disciplinary Policy.
- 7.2 Non-compliance to this Policy or any such violation should be escalated immediately through the available reporting channels, including the Speak Up channel. Such escalations will be investigated confidentially by the Investigations Unit of the Internal Audit Division.
- 7.3 Relevant ABAC provisions are included in third-party contracts, including the right to conduct audits and inspections on its third parties and business partners, as well as a clause on termination, if the partner/party fails to comply with edotco Group's ABAC Policy, relevant laws and regulations. If the third parties and business partners are found to have breached this ABAC Policy, or any laws or regulations, such breach may result in termination of the contract(s) and if required, be subject to legal proceedings.
- 7.4 edotco Group is committed to protect, within reason and means, anyone who reports or raises a concern in good faith, and those who participate in or conduct an investigation, from retaliation.

## 8. BRIBERY AND CORRUPTION



Bribery is conducted with the intention of influencing a person's actions

- 8.1 Bribery is an act of giving/offering or receiving/accepting or promising to give/offer or receive/accept anything of value or gratification **with the intention of influencing** a person's actions or decisions to obtain or retain an improper advantage.



Corruption is the misuse of office or position or power for gain to oneself

- 8.2 Corruption **involves the misuse of office or position or power for gain** to oneself, relatives or associates, by directly or indirectly offering, giving, receiving or promising a gratification of value (which could be financial or non-financial), to/from any person one is dealing with to obtain or retain business or to gain an improper business advantage which is illegitimate, immoral or incompatible with ethical standards.

## 9. WHAT IS ANYTHING OF VALUE OR GRATIFICATION?



Cash or cash equivalent, gifts and hospitality, promises or offers of services

- 9.1 Gratification or bribe may be in any form, monetary or otherwise, to obtain or retain an undue business or personal advantage, which includes but is not limited to:
- a. Cash or cash equivalent, for example, money, loan, valuable security (shares, bonds etc.), rebates, commissions, discounts and jewellery;
  - b. Gifts and hospitality that are or deemed to be lavish, for example, providing or receiving 5-star hotel and first-class air travel, tour packages for self and/or family;
  - c. Promises or the award of contract, employment or business opportunity to any Stakeholder (directly or indirectly) in breach of our governance instruments; and
  - d. Offers of free services of whatever nature to any Stakeholder.

## 10. GIFTS, ENTERTAINMENT AND CORPORATE HOSPITALITY

10.1 All Stakeholders as well as their family members, who are acting for, and on behalf of the Group, directly or indirectly, are discouraged from giving or accepting gifts, entertainment and corporate hospitality.

10.2 edotco Group recognises that occasional acceptance or offer of modest gifts, entertainment and corporate hospitality may be a legitimate contribution to good business relationships. All Stakeholders are required to observe the following nine (9) principles before accepting or providing gifts, entertainment and corporate hospitality:

**Intention** – Gifts, entertainment and corporate hospitality should be offered in ‘good faith’ and not convey an expressed or perceived “advantage” or “benefit”, monetary or otherwise, to the individual or entity making or receiving the offer.

**Proportionality** – Gifts, entertainment and corporate hospitality should be proportionate to the nature, scale and complexity of edotco Group’s business activities. This would be determined on a case-by-case basis through taking into account all relevant considerations, including cross-cultural sensitivities.



Common examples of modest and acceptable gifts are fruit baskets, flowers, caps, mugs, pen drives, and other tokens of edotco Group corporate gifts that are priced within the Group approved threshold

**Value** – Gifts, entertainment and corporate hospitality should not be lavish, excessive, outside the norm or exceed the maximum or equivalent threshold stipulated in the GDS Policy or any other Governance Instruments.

**Timing** – During an active or anticipated procurement or tender exercise, all Stakeholders participating in the exercise in any way whatsoever, shall not:

- a. receive gifts or hospitality of any kind from any external party participating, planning to participate, or expected to participate, in the procurement or tender transaction;
- b. provide anything other than a corporate gift and token hospitality to any external/third party related to the transaction;
- c. be involved in any discussions regarding business or employment opportunities, for personal benefit or the benefit of a business associate;
- d. abuse the decision-making and other delegated powers given by top management;  
and
- e. bypass normal procurement or tender process and procedure.

**Reciprocity** – Gifts, entertainment and corporate hospitality would not offend or transgress the rule of reciprocity in customary gift-giving, namely whether the act of giving can reciprocate the act of receiving.

**Doubtful parties** – Gifts, entertainment and corporate hospitality to perceived doubtful parties (such as those without prior business dealings or relevance to edotco Group’s business activities), would be inherently inappropriate.

**Culture** - All Stakeholders need to be particularly aware of cross-cultural differences in what is considered appropriate in accepting and giving gifts, entertainment and corporate hospitality in the countries where it conducts business activities, transactions or dealings. Utmost care must be taken to ensure any gift, entertainment and corporate hospitality that is to be accepted or given, which may be considered appropriate under local culture, is in accordance with or conforms to this Policy.

**Conflict of interest** – Gifts, entertainment, and corporate hospitality should not give rise to actual/real or perceived conflict of interest.

**Coverage** - This Policy covers offers/acceptance, or promises to offer/accept gifts, entertainment and corporate hospitality to or from any of the Stakeholders.



Advance approval should be obtained prior to expenditure on gifts, entertainment and corporate hospitality by an edotco employee in reference to Group Governance Instruments i.e. GDS Policy and Procedures.

If you are unsure about gifts, entertainment and corporate hospitality, please contact **your line manager, your Risk & Compliance Officer or BRCC** for advice.



## 11. DONATIONS AND SPONSORSHIPS



Donation is something contributed or given (in cash or in kind) by edotco Group as charity without expecting any advantages or returns



Sponsorship is financial support given to an association, organisation or event for branding display or other

11.1 edotco Group occasionally makes donations and participates in sponsorships in countries in which we operate to further our business objectives. Such donations or sponsorships shall not violate our core values, policies and applicable laws.

*All Stakeholders exercise good judgement and perform reasonable due diligence.*

11.2 The donations or sponsorships should not be made to secure any improper advantage or retain any business relationship.

11.3 Good judgement and due diligence must be exercised to assess the purpose and intention of the donation or sponsorship, and the reputation or status of the beneficiaries. All sponsorships or donations shall be offered and made transparently in accordance with edotco Group's Governance Instruments.

## 12. CORPORATE SOCIAL RESPONSIBILITY (“CSR”)



CSR is a self-regulated and ethics-driven activity to ensure the sustainability of society and our environment through voluntary activity.

- 12.1 edotco Group actively supports various types of CSR activities in countries in which we operate, to ensure the sustainability of society and our environment.
- 12.2 CSR activities must be carefully examined and assessed for legitimacy and genuineness in not being carried out to improperly influence a business outcome.
- 12.3 The proposed recipient must be a legitimate organisation and the rightful recipient. Therefore, appropriate due diligence must be conducted to ascertain whether any Public/Government Officials are affiliated with the organisation. There should be a transparent selection and decision-making process, with proper records kept.
- 12.4 CSR activities must be approved and implemented in accordance with edotco Group’s Governance Instruments wherein the activities are structured to ensure that the intended purpose is met and benefits are extended to the intended recipient(s).

## 13. FACILITATION PAYMENTS

- 13.1 Facilitation payments are gratification or inducements to secure or expedite a routine function which one person shall be or is responsible for performing as part of his/her daily roles and responsibilities. The payments are usually small payments paid unofficially to expedite routine administrative processes on matters such as visas, permits, licenses, and custom clearance.
- 13.2 Stakeholders are prohibited to directly or indirectly offer, promise, give, solicit or accept, agree to accept, or attempt to obtain anything that might be regarded as a facilitation payment in any form.
- 13.3 There may be certain exceptional situations or circumstances where Stakeholder(s) may have to make facilitation payments under duress or coercion, including life-threatening and actual or potential loss of life, limb and liberty situations. However, it must be immediately reported to edotco Group or the respective designated R&C Officers and appropriate document(s) of such incident along with the reasons must be recorded. edotco Group and the assigned R&C Officers shall take immediate action(s) as may be required.

## 14. CONFLICT OF INTEREST

- 14.1 All Stakeholders have a contractual obligation and are accountable for decisions made or actions taken, which should always be in the best interest of edotco Group.
- 14.2 All Stakeholders shall recognise and avoid situations of conflict of interest (actual, real, perceived or potential) to maintain integrity and develop trust by making professional and impartial business decisions.
- 14.3 Conflict of interest arises when an individual's objectivity is compromised or perceived to have been compromised, and there is a conflict between his/her professional duties or responsibilities at edotco Group and his/her personal interest.
- To make impartial decisions in the best interest of edotco Group by recognising actual or potential conflict of interest*
- 14.4 If any conflict of interest is identified, even if it is perceived or potential, the Stakeholder must immediately declare and report the situation(s) as referred in the edotco Group's Governance Instruments. The Stakeholder shall also take the necessary actions to immediately distance, recuse or remove himself/herself from the situation.

## 15. DEALING WITH THIRD PARTIES OR BUSINESS PARTNERS

- 15.1 The edotco Group’s commercial success is built upon knowing our business partner who shares the same ethical values and beliefs. edotco Group builds trust and a constructive business relationship or enters into a contractual agreement with third parties which include vendors, suppliers, agents and intermediaries, contractors and sub-contractors, consultants, customers and any person or organisation working for on behalf of edotco Group.
- 15.2 edotco Group adopts the following guiding principles - “CODE” - in our Third Party ABAC Framework to ensure the Group only enters or establishes business relationships with third parties that share the same ethos as the Group.

**Create awareness** – Raise the third party’s awareness and understanding of edotco Group’s core values and ethos through training.

**On-going monitoring** – edotco Group monitors third parties with active contractual relationships to identify and assess potential risks, and to determine whether they consistently demonstrate professionalism, provide exceptional performance and conduct business with integrity and transparency.

**Due diligence** – Before engaging or establishing business relationships with third parties, an appropriate level of due diligence must be performed and documented, proportionate to the associated risks. If “red flags” are detected during the due diligence, the assessor must escalate and resolve the issues with all the relevant functions and personnel before engaging the third party.

**Expectations** – Agreements and contracts with third parties shall include edotco Group’s expectations to embrace and observe edotco Group’s existing code of conduct and this Policy.

## **16. INTERACTIONS WITH PUBLIC/ GOVERNMENT OFFICIALS AND POLITICALLY EXPOSED PERSONS (“PEPs”)**

- 16.1 edotco Group operates in an industry with regular interactions with Public/Government Officials (including regulators) and PEPs, who are in a position (actual or perceived) to make or influence decisions that have an effect or impact on its business and operations.
- 16.2 edotco Group shall never improperly influence a Public/Government Officials and PEPs to seek or retain business advantage and will make committed efforts to transact in a fair and transparent manner. A high degree of caution and diligence shall be exercised in all dealings and interactions with regulators, Public/Government Officials and PEPs.
- 16.3 When dealing or interacting with Public/Government Officials and PEPs, employees are required to be aware of, apprised of and adhere to edotco Group’s code of conduct, ABAC procedures and applicable laws, and all rules and regulations governing interactions with Public/Government Officials.

### **Who is defined as a Public/Government Official?**

- 16.4 The definition of Public/Government Officials will vary depending on the legal jurisdictions of the countries. However, for this Policy, a Public/Government Officials, whether domestic or foreign, shall be construed as:
- ▶ Any person who holds a legislative, executive, administrative or judicial office whether appointed or elected; and
  - ▶ Any person acting in an official capacity for or on behalf of a government department or agency or instrument of a government.

## What is the meaning of Politically Exposed Persons (“PEPs”)?

16.4 Politically Exposed Person(s) shall be construed as individuals, who have been entrusted with prominent public functions, including but not limited to:

- ▶ Public/Government Officials;
- ▶ Political party officials such as senior officials appointed to roles in major political parties domestically or in foreign countries; and
- ▶ Any relatives or associates of a Public/Government Official or political party official, including but not limited to, spouses, parents, siblings, children and spouses’ parents, persons who are nominees or employees of a Public/Government Official or an organisation in which such Public/Government Official, his relatives or associates have a controlling interest.

## Things to keep in mind while interacting with Public/Government Officials and PEPs

16.6 All Stakeholder(s) must be conscious of the importance of taking adequate care to comply with edotco Group’s policies and national and foreign laws and regulations relating to bribery and corruption involving Public/Government Officials and PEPs.

16.7 All Stakeholders, who are required to interact with Public/Government Officials (domestic and foreign) and PEPs for or on behalf of edotco Group shall exercise due care by observing “PLOD” principles as explained below:

**Perception** – All our interactions with Public/Government Officials or PEPs must be conducted professionally and aligned with edotco Group’s values and code of conduct.

**Legitimacy** –All our interactions with Public/Government Officials or PEPs shall always be aligned with edotco Group’s corporate objectives.

**Objectivity** – All our interactions with the Public/Government Officials or PEPs shall be conducted objectively in furtherance of our corporate values and commercial relationships.

**Declaration** – All our interactions with Public/Government Officials, or PEPs shall be declared to the R&C Division in accordance to the ABAC procedures.

16.8 While maintaining professional working relationships with Public/Government Officials and PEPs, all Stakeholders shall exercise due care and diligence in all the dealings.

16.9 The Stakeholder(s) shall also not use/receive private funds for, on behalf of or to benefit edotco Group and/or any of the Stakeholder(s), while dealing with Public/Government Officials, PEPs or any of their relatives or associates.



## 17. POLITICAL CONTRIBUTIONS AND DONATIONS

- 17.1 edotco Group prohibits any kind or form of political contributions or donations. Stakeholder(s) must not use edotco Group's funds and resources to make contributions or donations to any political campaigns, political parties, political candidates or their respective offices/officials or any Stakeholder affiliated organisations.
- 17.2 Stakeholder(s) are prohibited from acting as follows:
- a. Using their position to influence any person to make any political contributions or to support politicians or their parties in any country;
  - b. Making any contribution or incurring any expenditure using edotco Group's resources to benefit any political campaign, party or politician in any country;
  - c. Using edotco Group's personnel, assets, facilities, equipment and resources to support any government party candidates or political campaigns; and
  - d. Contributing or donating to a charity of a Public/Government Official's choice.

## **18. MERGERS, ACQUISITIONS AND INVESTMENTS**

- 18.1 edotco Group invests, acquires, merges or leverages other forms of investments to extend its reach to new businesses, geographical areas and countries.
- 18.2 Any form of investment to expand edotco Group's footprint exposes the Group to inheriting potential fraud, bribery and corruption risks etc. Therefore, appropriate controls must be in place to mitigate, ring-fence or minimise those associated risks such as conducting comprehensive due diligence.
- 18.3 ABAC due diligence shall be applied to all investments on a risk-based approach, with the extensiveness and comprehensiveness of the due diligence proportionate to the investment and the perceived likelihood of risk. Due diligence processes shall take place before and post-acquisition and investment.
- 18.4 edotco Group or its respective subsidiaries' Board and relevant committees overseeing mergers, acquisitions or investments should seek to develop a full understanding of bribery and corruption risks related to the target companies.
- 18.5 The working committee handling the merger, acquisition or investment shall ensure that the target (i.e. a company that is a target for merger, acquisition or investment) has the equivalent of edotco Group's Governance Instruments.

## **19. AVOIDING NEPOTISM**

- 19.1 edotco Group adheres to a transparent and fair manner in its recruitment process and does not discourage multiple family members from working for the Group. However, the Group strictly condemns nepotism and is committed to minimising potential, actual or perceived conflicts of interest which may arise when an employee reports to another employee or is bound by work authority in addition to family relationships, intimate relationships and such similar relationships.
- 19.2 edotco Group also reserves the right to take relevant action when relationships of its employees have an impact to his/her work ethics.
- 19.3 Any requests/references for employment received from public officials, third parties or customers shall undergo regular recruitment due process and shall be identified separately (irrespective of whether appointed or rejected). Acceptance or offer of anything of value or in kind for such cases is strictly prohibited.
- 19.4 In case any department intends to hire a relative of a Public/Government Official or customer, it should be declared to the RCO, and due diligence should be conducted on the individual before recruitment.

## **20. ANTI-MONEY LAUNDERING / COUNTER TERRORISM FUNDING**

- 20.1 edotco Group strictly prohibits money laundering/terrorism funding under the applicable laws and regulations in all the respective countries where it operates.
- 20.2 All employees are expected to be mindful of the risk that the Group's business may be used for money laundering/terrorism funding activities and must familiarise themselves with the edotco Group's Policy.
- 20.3 When in doubt or if any suspicious transactions or potential cases of money laundering/terrorism funding are observed, employees shall immediately notify their immediate superior and go through the proper channels.
- 20.4 Any non-compliance with money laundering/terrorism funding laws, whether those of Malaysia or any foreign country where we operate, will be investigated diligently. Appropriate and immediate actions shall be taken based on the outcome of the investigation to ensure we remain committed to edotco Group's Governance Instruments.

## 21. RECORD-KEEPING AND DOCUMENTATION

- 21.1 edotco Group is committed to maintaining accurate and detailed books and records that always fairly reflect all transactions of the Group. All transactions shall be accounted in a transparent manner and accurately reflect and disclose the business rationale, purpose, substance and legality of all local and cross-border transactions, payments and expenses such as Gifts, Entertainment, and Corporate Hospitality received by or given to Stakeholders, Public/Government Officials, and others.
- 21.2 edotco Group affirms that it will not:
- a. Alter, conceal any information, falsify and omit or misrepresent the facts of any record;
  - b. Encourage or allow anyone else to compromise the accuracy and integrity of the Group's records; and
  - c. Engage in any scheme to defraud anyone.
- 21.3 Our records management and retention policies shall also ensure records are maintained to meet the relevant legal, tax and regulatory requirements and the records that are no longer needed or are beyond the statutory retention period are securely disposed of.
- 21.4 All employees should take adequate measures to retain information that may be relevant for litigation purposes or be subject to a legal prohibition or stipulation until they are authorised in writing to do otherwise by the relevant department.

## 22. SPEAK UP CHANNEL

- 22.1 edotco Group is committed to upholding the highest standards of lawful and ethical conduct, by demonstrating honesty, fairness and accountability in all our conduct and dealings.
- 22.2 To encourage employees, suppliers, business partners, contractors, customers and other Stakeholders to voice their concerns, including actual or suspected misconduct, illegal or unethical behaviour, edotco Group has adopted the group-wide Speak Up channel established by Axiata Group.
- 22.3 This reporting channel is available 24 hours a day, 7 days a week. In addition, reported concerns can be submitted in native languages within edotco Group's footprint.
- 22.4 An individual can opt to remain anonymous if he/she wishes and his/her identity will be protected in accordance with this Whistleblowing/Speaking Up Policy and Procedures at all stages of the investigation.
- 22.5 An individual shall ensure that there is a reasonable belief or basis for the concern and the disclosure is made in good faith and not for the personal gain or motivated by ill or malicious intention. Mere rumour or hearsay information is not the basis for speaking up or to whistle blow.



Axiata Group Berhad has established a global Speak Up channel and website at <https://wrs.expolink.co.uk/axiata>

This reporting channel is available 24 hours a day, 7 days a week.

22.6 For further information on the whistleblowing/Speak Up channel, refer to edotco Group's Whistleblowing/Speaking Up Policy and Procedures.

## **23. TRAINING AND COMMUNICATION**

23.1 edotco Group will also regularly provide ABAC awareness and training to its employees, as appropriate to their roles, risks and business scenarios they face. This awareness and training will be updated for necessary changes. All new employees whose day-to-day activities may be affected by this Policy will receive the relevant training within a set timeframe after commencing employment with edotco Group as stipulated in the ABAC procedures.

23.2 Training for all employees, including temporary staff, contract workers and business associates, shall be mandatory and monitored for its completion. Periodic confirmation will be sought from relevant personnel on compliance with this ABAC Policy.

23.3 edotco Group shall communicate to its Stakeholders the necessity to comply with this Policy at the outset of business relations through the appropriate communication channels.

## **24. RISK AND COMPLIANCE (“R&C”) DIVISION**

- 24.1 edotco Group has a dedicated R&C Division to oversee the design, implementation, monitoring and management of the ABAC framework and activities/matters.
- 24.2 The R&C Division shall perform functions as set out below within the Group’s structure, equipped to act effectively against bribery and corruption:
- a. provide advice and guidance to personnel on ABAC matters;
  - b. take appropriate steps to ensure that adequate monitoring, measurement, analysis and evaluation of ABAC is performed;
  - c. report on the performance and monitoring of ABAC to the top management and the BRCC regularly; and
  - d. Appropriate resources shall be provided for the effective operations of ABAC and the R&C shall be staffed by persons who have the appropriate competency, status, authority and independence.
- 24.3 edotco Group shall conduct regular risk assessments to identify the bribery and corruption risks affecting the business, set anti-bribery and corruption objectives, and assess the effectiveness of the controls in achieving those objectives.



## **25. REVIEW AND UPDATES TO THIS POLICY**

- 25.1 This Policy shall be monitored and reviewed at least once every two (2) years by the R&C Division. The required updates and amendments shall be recommended by the RCO to the GCRCO for the same to be tabled to Axiata Group and/or edotco Group's BRCC and Board for final approval in accordance with Axiata Group and edotco Group's Governance Instruments. All Stakeholders shall be informed of any revisions made to this Policy.
- 25.2 edotco Group reserves the right to vary and/or amend the terms of this ABAC Policy from time to time.

END OF DOCUMENT