

VIRTUOSITY SOLUTIONS SDN BHD
(Company No. 1116815-X)
(Incorporated in Malaysia)

ANTI-BRIBERY & CORRUPTION POLICY

1. INTRODUCTION

The Malaysian Anti-Corruption Commission Act 2009 has been amended in 2018 to incorporate a new Section 17A on corporate liability for corruption. The Board of Directors (“the Board”) intends to establish an anti-bribery and corruption policy (“Policy”) in compliance with the Malaysian Anti-Corruption (Amendment) Act 2018. This policy serves to provide guidance on how to recognize and deal with bribery and corruption issues and act as a deterrence to such practice.

2. POLICY STATEMENT

Virtuosity Solutions Sdn Bhd (“**the Company**”) is committed to anti-bribery and anti-corruption practices. The Company has adopted a zero-tolerance approach against all forms of bribery and corruption by the Board of Directors, Management, and its employees, full time or part time of the Company, including all business associates, inter alia, customers, suppliers, consultant and contractors.

2.1 Definitions

“Bribery & Corruption” means any action which would be considered as an offence of giving or receiving ‘gratification’ under the Malaysian Anti-Corruption Commission Act 2009 (MACCA). In practice, this means offering, giving, receiving, or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person who is in a position of trust within an organization.

Bribery may be ‘outbound’, where someone acting on behalf of the Company attempts to influence the actions of someone external, such as a Government official or client decision-maker. It may also be ‘inbound’, where an external party is attempting to influence someone within the Company such as a senior decision-maker or someone with access to confidential information.

2. POLICY STATEMENT (CONT'D)

2.1 Definitions (Cont'd)

Gratification is defined as

- money, donation, gift, loan, fee, reward, valuable security, property, financial advantage or any similar advantage;
- office, dignity, employment, agreement to give employment or services in any capacity;
- any payment, release, discharge or liquidation of any loan, obligation or other liability (whether in hold or in part);
- any valuable consideration of any kind, discounts, commission, rebate, bonus, deduction or percentage;
- any favours, protection from penalties, protection from disciplinary, civil or criminal proceedings;
- any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the above.

2.2 Example of offences under Section 17A include:-

- offence of accepting gratification
- offence of giving or accepting gratification by agent
- offence of intending to deceive principal by agent
- corruptly procuring withdrawal of tender
- bribery of officer of a public body
- bribery of foreign public officials
- offence of using office or position for gratification

2.3 Gift, Entertainment and hospitality

Gift, entertainment and hospitality given or enjoyed in the ordinary course of business is acceptable subject to the following conditions

- reasonable in value
- respectful and customary
- not to obtain personal gain

2. POLICY STATEMENT (CONT'D)

2.4 Charitable donations

Donation and charities are acceptable subject to following conditions

- charitable contributions are not used to facilitate and conceal acts of bribery
- each contribution must be supported by an official receipt as proof of donation
- donations made are legal and ethical under local law and practices

2.5 Political contributions

The Company will not make any donations, whether in cash, kind, or by any other means, to support any political parties or candidates as this may be perceived as an attempt to gain an improper business advantage.

2.6 In recognition of this commitment, the Policy is adopted to ensure the Company employees are:

- Prohibited from offering, promising or paying a bribe of any kind;
- Prohibited from soliciting, accepting or receiving a bribe of any kind;
- Prohibited from giving or offering anything of value to a public official;
- Required to comply with the Company's guidelines and authorization level in relation to the giving and receipts of gifts;
- Not to request or accept anything of value that might influence your objectivity in carrying out your employment
- Not to offer, promise or give anything of value in order to obtain or retain any personal or business advantage

Virtuosity Solutions Sdn Bhd and its employees and third party acting on Virtuosity Solutions Sdn Bhd's behalf must not provide, offer or accept bribes, facilitation payments, or gift, to Government Officials or any commercial person or entity, regardless of local practices or customs.

3. TRAINING AND COMMUNICATION

The Company will communicate its anti-corruption compliance program, policy and measures to all associated persons and contracting third-parties and the anti-corruption policy is available on its website (www.virtuosity-global.com).

4. MONITORING AND REPORTING

4.1 All directors, management and employees are responsible for the success of this Policy and should ensure they use it to disclose any wrongdoing.

4.2 The channel of reporting are as follows. You may send your report : -
Director

Name : Mr. Yeong Chin Tze
Mail : Virtuosity Solutions Sdn Bhd
1, Jalan Taboh 33/22, Seksyen 33, 40400
Shah Alam, Selangor
(Please mark "Strictly Confidential")

Director

Name : Mr. Hii Tech Ann
Mail : Virtuosity Solutions Sdn Bhd
1, Jalan Taboh 33/22, Seksyen 33, 40400
Shah Alam, Selangor
(Please mark "Strictly Confidential")

Chief Executive Officer

Name : Mr. Choy Sing Kit
Mail : Virtuosity Solutions Sdn Bhd
1, Jalan Taboh 33/22, Seksyen 33, 40400
Shah Alam, Selangor
(Please mark "Strictly Confidential")

On becoming aware of corruption or corrupt practices within our company, please inform us without any delay about the same via email to vsabc@virtuosity-global.com.

5. REVIEW OF POLICY

This policy is subject to review regularly as and when required and will be amended appropriately to ensure that it continues to remain relevant and appropriate.

ANNEXURE I – External/3rd Party Acknowledgement

To: VIRTUOSITY SOLUTIONS SDN BHD

No. 1, Jalan Taboh 33/22, Seksyen 33,

40400 Shah Alam,

Selangor, Malaysia.

Sir/Madam,

Subject: ACKNOWLEDGEMENT OF UNDERSTANDING AND ACCEPTANCE OF VIRTUOSITY SOLUTIONS SDN BHD ANTI-CORRUPTION AND BRIBERY POLICY (“Policy”)

This is to confirm that:

We have been given a copy of your Anti-Bribery and Corruption Policy and have read and understood the letter & spirit of the same. (an electronic version of this Anti-Bribery and Corruption Policy is available at www.virtuosity-global.com)

We agree and undertake to abide by all terms and conditions of the Policy at all times during the term of my association with your company and shall not act in contravention of the same.

We shall not offer any money or any bribe to any person for whatsoever reason and purpose.

We acknowledge and accept that we, on becoming aware of such corruption or corrupt practices without any delay shall inform about the same via email to vsabc@virtuosity-global.com.

We further confirm that this matter has been placed before the Board / other competent forum of our company/firm and this declaration has been issued after taking all require compliances /authorization without our company/firm.



The person signing below is authorized to sign this acknowledgment on behalf of the company.

Designation: _____

Company Name: _____ Company's stamp: _____

Name (Print): _____ Signature: _____

Designation: _____ Date: _____