

# Computer Land Technologies

Computer Land Technologies Sdn Bhd  
Co. 201201023346 (1007838-K)

## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

### Group of companies

**Computer Land Malaysia Sdn. Bhd.** Co. 200801029498 (1007838-K)

**Easycloud Sdn. Bhd.** Co. 201901028664 (1337993-X)

**Computer Land Digital Sdn. Bhd.** Co. 201901046352 (1355682-H)

(Formally Smartthings Sdn Bhd)

**Securenow Solution Sdn. Bhd.** Co. 201901046379 (1355709-A)



## INTRODUCTION

Computer Land Technologies has established an Anti-Corruption Policy establishes basic standards and a framework for the prevention and detection of bribery and corruption in CLT's operations. It promotes compliance with the Malaysian Anti-Corruption Commission Act 2009, and other applicable anti-corruption laws.

The Malaysian Anti-Corruption Commission Act 2009 and many other anti-corruption laws prohibit offering or providing benefits, directly or indirectly, to government officials or to the private sector, for the purpose of securing an undue advantage or improper benefit. Further, other laws around the world also prohibit bribery of individuals in the public and private sector.

## POLICY STATEMENT

Computer Land Technologies (CLT) and group of companies is committed to conducting business ethically and honestly, and has zero-tolerance for bribery and corrupt activities. We are committed in all business dealings and relationship and will constantly uphold all laws relating to anti-bribery and anti-corruption in Malaysia, in particular, the Malaysia Anti-Corruption Commission Act 2009.

## SCOPE OF POLICY

The principles and obligations outlined in this policy apply to all employees of CLT, Board of Directors, and CLT's stakeholders, which include customers, vendors, agents, consultants, outsourced personnel and other representatives.

This policy sets forth CLT minimum compliance standards concerning interactions with third parties. However, where local law and regulations require more stringent controls, then such stricter controls must be followed.

## DEFINITION OF BRIBERY

A bribe refers to "offering, promising, giving or soliciting of undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties" as defined by the Anti Bribery Management System.

## FIGHTING BRIBERY, CORRUPTION AND UNETHICAL PRACTICES

### 1. Solicitation, Bribery and Corruption

Employees are prohibited from, directly or indirectly, soliciting, accepting or obtaining or agreeing to accept or attempting to obtain, from any party for themselves or for any other party, any bribe or gratification as an inducement or a

reward for doing or forbearing to do, or for having done or forborne to do, any act in relation to CLT's affairs or business, or for showing favour or forbearing to show disfavour to any party in relation to CLT' affairs or business.

## 2. **Receiving Facilitation Payments**

Employees are prohibited from, directly or indirectly, accepting or obtaining or attempting to accept or obtain facilitation payments from any person for themselves or for any other person subject to this policy. The term "facilitation payments" generally means payments made to secure or expedite the performance by a person performing a routine or administrative duty or function.

## 3. **Prohibition on Commissions, Discounts and Secret Profits**

Employees must not, directly or indirectly, receive or obtain, in respect of any goods or services purchased or other business transacted (whether or not by them) by or on behalf of CLT, any discount, rebate, commission, service, interest, consideration of value or other benefit or payments of any kind (whether in cash or in kind) which is not authorised by CLT's policies or procedures.

## 4. **Receiving Gifts and Entertainment**

Employees are required to comply with the Code of Ethics or any other policy and procedures relating to the receipt of gifts and entertainment.

## 5. **Political Contributions, Sponsorships and Donations**

### Political Contributions

CLT does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office.

### Sponsorships and Donations

- a. Employees must ensure that all sponsorships and donations are not used as a subterfuge for bribery or used to circumvent or avoid any of the provisions of the COE, including in particular, the prohibition on bribery.
- b. In accordance with CLT's commitment to contribute to the community coupled with its values of integrity and transparency, all sponsorships and donations must comply with the following:
  - i. Ensure such contributions are allowed by applicable laws;
  - ii. Obtain all the necessary approval/authorisations;
  - iii. Be made to well-established entities with an adequate organisational structure to guarantee the proper administration of the funds;
  - iv. Be accurately stated in the company's accounting books and records; and
  - v. Not to be used as a means to cover up an undue payment or bribery;

## 6. **Reporting of a Concern and Whistleblowing**

Recognising the abovementioned values, CLT provides an avenue for all employees of

CLT, members of the public and stakeholders to disclose any improper conduct within CLT.

All disclosures of improper conduct within CLT are to be channelled in accordance with the established CLT's Whistleblowing Policy and Procedural Manual. Misconduct can be reported by submitting the Whistleblowing Incident Report Form (WIRF) available at CLT's website.

