

TRANSNATIONAL

Insurance Brokers (M) Sdn. Bhd.

ANTI-BRIBERY AND CORRUPTION POLICY STATEMENT

In accordance to the Malaysian Anti-Corruption Commission Act 2009 ("MACC Act 2009") and the Malaysian Anti-Corruption Commission (Amendment) Act 2018, we, Transnational Insurance Brokers (M) Sdn Bhd (Transnational) is committed to pursuing its business objectives based on the highest standards of ethical and moral practice.

The commitment comes from the top down, with our Board of Directors taking responsibility for implementing the relevant policies with zero-tolerance for bribery and corrupt gratification activities and dedication to act professionally, fairly, and with integrity in all the Company's business dealings and relationships.

Prevention of Bribery and Corruption

1. Collectively where applicable and when dealing with Transnational, you agree to:
 - a) act honestly, reliably and fairly;
 - b) not offer, promise or make any attempt at dishonestly influencing any person's decision by directly or indirectly offer or make promise of corrupt payments, in cash or in kind;
 - c) not defraud or deceive anyone or act dishonestly;
 - d) not participate in any cartel or bypass normal procurement/tender process and procedure;
 - e) not make any facilitation payment, offer or accept any gift, hospitality, entertainment, donation or other benefits that may or are intended to improperly influence a business decision or impair independent judgement;
 - f) not participate in any other criminal activity such as extortion, abuse of power, embezzlement, money laundering or any similar or equivalent improper act/practice;
 - g) provide Transnational with true and accurate information concerning suspected activities of corruption;
 - h) comply with all applicable anti-bribery and corruption laws and regulations;
 - i) comply with Transnational's Anti-Bribery and Corruption Policy and any of Transnational's related policies and procedures if applicable;
 - j) exercise reasonable care to avoid any actual or potential conflict of interests in executing any duties with or on behalf of Transnational.

Investigation

2. You understand and agree that in the event of a non-compliance of any part of the commitment listed in this policy statement, resulting in any suspected or alleged corruption, Transnational may conduct an investigation.
3. You will provide all reasonable assistance, information and documentation to Transnational as requested during the course of an investigation.

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Suspension/Termination

4. In the event of non-compliance of any part of the commitment listed in this policy statement, Transnational has the right to take necessary action against you as afforded under existing applicable law and regulation, which include Transnational's right to suspend or terminate a contractual and/or business relationship with you following appropriate written notice.
5. You agree that you will indemnify Transnational for any liability or loss suffered by Transnational due to your non-compliance actions as maybe allowable under existing applicable law and regulation.

Acknowledgement and Confirmation

6. You acknowledge and confirm that this policy statement shall be disseminated to all of your staff and/or representatives dealing with Transnational and to comply accordingly.

Raising Concerns

7. What happens if I need to raise a concern?

- 7.1. This section of the policy covers 3 areas:

- (i) How to raise a concern?

If anyone suspects that there is an instance of bribery or corrupt activity occurring in relation to the Company, they are encouraged to raise their concerns at as early a stage as possible. Thereafter, they must complete and submit the Complaint Form (can be made on anonymous or named basis) as per Appendix 5 to the Company and/or email at compliance@transnat.com.my.

- (ii) What to do if you are a victim of bribery or corruption?

The victim must inform to the Compliance Officer of the Company as soon as possible if they are offered a bribe by anyone working with or associated to the Company, if they are asked to make one, if they suspect that they may be bribed or asked to make a bribe in the near future, or if they have reason to believe that they are a victim of any other corrupt activity.

- (iii) Protection

If the victim of bribery/corruption refuses to accept or offer a bribe or they report a concern relating to potential act(s) of bribery or corruption, the Company understands that they may feel worried about potential repercussions. The Company will support anyone who raises concerns in good faith under this Policy, even if investigation finds that he/ she is mistaken.

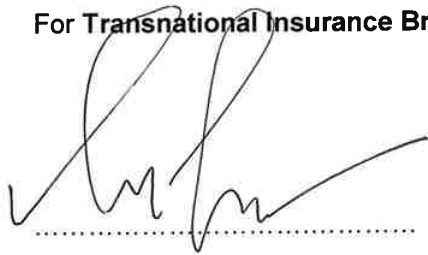


Appendix 1

- 7.2. The Company will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.
- 7.3. Detrimental treatment refers to dismissal, disciplinary action or unfavourable treatment in relation to the concern the individual raised.
- 7.4. If anyone has reason to believe they have been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, they should inform the Compliance Officer of the Company immediately.

Your Sincerely,

For Transnational Insurance Brokers (M) Sdn Bhd



Ng Pei Hua
Executive Director



Rosmini Binti Rosdi
Compliance Officer

T R A N S N A T I O N A L

Insurance Brokers (M) Sdn. Bhd.

COMPLAINT FORM

- Please provide the following details of any suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Company.
- Please note that you may be called upon to assist in the investigation, if required.

REPORTER'S INFORMATION (This section may be left blank if the reporter wish to remain anonymous)

Name	
Designation & Department	
Contact Number	
Email Address	

SUSPECT'S INFORMATION

Name	
Designation & Department	
Contact Number	
Email Address	

WITNESSES'S INFORMATION (If any)

Name	
Designation & Department	
Contact Number	
Email Address	

COMPLAINT - Briefly describe the misconduct/ improper activity based on the following questions:

1	What misconduct/ improper activity occurred?	
2	Who committed the misconduct/ improper activity?	
3	When did it happen and when did you notice it? Please state the date and time.	

4	Where did it happen? Please state the location and address.	
5	How the misconduct happen? Please state the mode of transaction.	
6	Is there any evidence that you could provide?	
7	Are there any other suspected parties involved?	
8	Other details/information which would assist in the investigation.	

Signature:

Name:

NRIC No:

Date: