



SENHENG NEW RETAIL BERHAD
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ANTI-BRIBERY & ANTI-CORRUPTION POLICY

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Anti-Bribery and Anti-Corruption Commitment

Senheng New Retail Berhad (the "Company") and its group of companies (collectively referred to as the "Group" hereinafter) and its employees, and Directors ("Senheng Group"), have always believed in being open and transparent in conducting its business. With this also comes the Group's commitment to operating in an ethical and responsible manner, accompanied by the highest standards of integrity and compliance with laws and regulations.

The Group adopts a zero-tolerance policy against all forms of bribery and corruption. Refusal to engage in bribery, refusal to participate in acts of corruption, actively raising concerns, or the reporting of possible wrongdoing, will not be penalised even if such actions note result in the Group losing business, not meeting its targets, or suffering disadvantage.

1.0 Introduction

This Anti-Bribery and Anti-Corruption Policy ("this Policy") has been developed as part of the Group's Anti-Bribery Management System, which has been designed to help prevent, detect, and address bribery and corruption, by establishing a culture of integrity, transparency, and compliance.

This Policy applies equally to the Group's business dealings with commercial ("private sector") and Government ("public sector") entities, and includes the Group's interactions with its directors, personnel, agents, and other appointed representatives at all levels.

Scenarios covered in this Policy are only illustrative and are not exhaustive. It is incumbent upon the reader to seek immediate guidance from Corporate Compliance & Management ("CCM") in the event that any person subject to this Policy finds themselves in a scenario not dealt with in this Policy or has any doubt about the scope of applicable laws, or the application of this Policy.

1.1 Objective

The objective of this Policy is to:-

- (a) set out the Group's position on bribery in all its forms, and matters of corruption that may be faced in the course of its operations; and
- (b) provide information and guidance on how to recognise and deal with potential acts of bribery and corruption.

1.2 Application

This Policy applies to any person, either individually or collectively, in discharging their duties on behalf of the Group, including but not limited to:-

- (a) Employees;
- (b) Board of Directors ("Board");
- (c) Business partners or associates; and

Associated companies of the Group, in which it is a non-controlling stakeholder, as well as its business partners, associates, suppliers, customers, consultants, agents, outsourced personnel and others who perform work or services for or on behalf of the (insofar as these entities do not have their own Anti-Bribery and Anti-Corruption Policies, or to the extent that this Policy is stricter than the others).

1.3 Related Documents

This Policy shall be read together with:-

- (a) The Group's various other policies, procedures, and guidelines for both the Group and individual entity levels (i.e. Gift and Hospitality Policy, Whistleblowing Policy, etc.);
- (b) All applicable laws and regulations as amended from time to time including any re-enactment thereof, in particular with respect to anti-bribery and anti-corruption laws including but not limited to Malaysian Penal Code 1936, Malaysian Anti-Corruption Commission ("MACC") Act 2009, Malaysian Anti-Money Laundering Act 2011 and Malaysian Companies Act 2016; and
- (c) The Prime Minister's Department Guidelines on Adequate Procedures pursuant to Subsection (5) of Section 17A of the MACC Act 2009 (as may be amended from time to time).

1.4 Compliance with Laws and Regulations

This Policy shall at all times comply with and be subject to the laws and regulations of Malaysia. In the event of any conflict or inconsistency between the provisions of this Policy and the laws and regulations of Malaysia, the latter shall prevail.

However, the provisions in this Policy are to be adhered to in the event of any conflict or inconsistencies with a local custom or practices.

In the event of any conflict between the local laws in the reader's jurisdiction and this Policy, it is imperative not to disregard this Policy without first consulting with the CCM.

1.5 Validity of this Policy

This Policy shall become effective immediately upon approval by the Board.

2.0 Definition

The terms used in this Policy shall have the meanings ascribed to them as in Appendix 1, unless the context otherwise requires.

3.0 Payments, Gifts, Hospitality, Donations and Other Benefits

3.1 Payments

All payments made by the Group must be warranted, transparent and proper. No payments may be made as subterfuge for bribery or any acts of corruption.

The Group adopts a strict policy of disallowing the use of facilitation payments, financial or any other incentives in order to secure an improper advantage, to obtain or retain business, or direct business to / from any other person or entity, including expediting the performance of duties of a non-discretionary nature.

These include:

- Commissions that you have reason to believe will be interpreted as bribes or that the recipient will use to pay bribes or for other corrupt purposes.
- Facilitation payments (also known as "grease payments"), which are payments made to government officials in order to gain access to, secure, or speed up the completion of a routine task that they are in any case required to carry out. Payments for facilitation are prohibited by the Group.

There could be instances where payments may be made in exchange for a lawful express or preferential service (such as expedited passport and visa approval process). These payments are not considered as facilitation payments provided that the payments fulfil the following criteria:

- (a) the express or preferential service is available to everyone.
- (b) the payment for express or preferential service is made in accordance with an official and published price list.
- (c) the payment for express or preferential service is not payable individual but to the organization or entity.
- (d) an official receipt will be issued by the organization or entity for the payment of express or preferential service.

However, Directors or employees may encounter situations whereby they have no alternative but to make a facilitation payment in order to protect themselves, or their relatives, from injury, loss of life or liberty. Any request for, or payment of, facilitation payments under such circumstances should be immediately reported to the CCM. It is also incumbent on the payer to ensure any such payment has been recorded transparently in the Gift, Hospitality, Donations, and Sponsorships Logbook ("Logbook").

In addition, if a payment has been made whereby Directors or employees are unsure of the nature of such payment, their immediate superior (where applicable) and the CCM must be immediately notified and consulted.

3.2 Gifts, Hospitality and Entertainment

The giving and receiving of modest gifts and reasonable acts of hospitality and modest entertainment invitations (including meals, invitations to attend promotional events or parties) particularly during festive periods is customary and *allowed* by the Group *only* as a legitimate means of building goodwill in business relationships.

Any gift-giving and / or receiving or event of hospitality and entertainment must be in accordance with the policy and procedures as highlighted in the Gift and Hospitality Policy.

The basic rules on Gifts, Entertainment and Hospitality expenses are:

- (a) Made openly: It will not be performed in secret and be undocumented – if it is, then the purpose becomes questionable.

- (b) Bona fide: Made for the right reason: if a gift, entertainment, or hospitality, it should be given clearly as an act of appreciation, if travel expenses then for a bona fide business purpose.
- (c) Infrequent: The giving or receiving of gifts, entertainment and hospitality is not overly frequent between the giver and the recipient.
- (d) No obligation: The activity will not create any obligation or expectation on the recipient.
- (e) Conforms to the recipient's rules: The gift, hospitality, or reimbursement of expenses will meet the rules or code of conduct of the recipient's organisation.
- (f) No undue influence: The expenditure will not be seen as intended for, or capable of, achieving undue influence in relation to a business transaction or public policy engagement.
- (g) Proportionate: The value and nature of the expenditure is not disproportionate to the occasion.
- (h) Documented: The expense will be fully documented including purpose, approvals given and value.
- (i) Accords with stakeholder perception: The activity would not be viewed unfavourably by stakeholders were it made known to them.
- (j) Reviewed: The records of entertainment and hospitality expenses and the effectiveness of the policy and procedures are reviewed by Management.
- (k) Legality: It is compliant with relevant laws.

All gifts and any event of hospitality and entertainment offered and received that breaches the limits as prescribed in the respective Gifts and Hospitality Matrix or Limits of Authority and relevant policies, including the conditions as stipulated above, must be declared in the Logbook.

In these circumstances, all declarations must be properly recorded in the Logbook within 30 days of the giving and / or receiving of the gifts, entertainment and hospitality. Failure to do so will be considered a violation of this Policy.

Approvals or directions must also be sought from the CCM on the next course of action with regards to such receipts of gifts, entertainment, and hospitality. These approval requests and approval received must be properly documented together with the Logbook, for the purpose of tabling to the Board.

For procedures on dealing with gifts, hospitality, and entertainment, kindly refer to the Group's Gift and Hospitality Policy.

3.3 Donations and Sponsorships

All donations and sponsorships are made in accordance with the Group's policies and receive prior authorisation from the Group's Management or the Board. Donations and sponsorships may be allowed, subject to the conditions as highlighted in the Gift and Hospitality Policy. Any donations and sponsorships extended must be properly documented and retained in the Logbook and supporting documentation available for audit and / or monitoring purposes.

Donations to foreign-based charities or beneficiaries must be handled with special caution to ensure that they are not disguised illegal payments to foreign public officials, and to ensure that the donations do not act as a conduit to fund illegal activities in violation of international anti-money laundering, anti-terrorism, and other applicable laws.

Generally, all sponsorships and donations must comply with the following:

- (a) ensure such contributions are allowed by applicable laws;
- (b) obtain all necessary internal and external authorisations;
- (c) be made to well established entities having an adequate organisational structure to guarantee proper administration of the funds;
- (d) be accurately stated in the company's accounting books and records; and
- (e) not to be used as a means to cover up an illegal payment or bribery.

Examples of red flags to look out for are as follows:

- (a) The proposed recipient / organisation has affiliations with a Public Official, or their relatives are involved;
- (b) The contribution is made on behalf of a Public Official.
- (c) There is a risk of a perceived improper advantage for the Group; and
- (d) The proposed recipient is based in a high-risk country, the request comes from a high-risk country, or the activity takes place in a high-risk country.

The Group requires employees to use good judgment in assessing the requests for donations and sponsorships. When in doubt, the CCM must be consulted before any such transaction is entered into. It is necessary to establish an internal process for the monitoring of donations and sponsorships within the Group.

For procedures on dealing with donations and sponsorships, kindly refer to the Group's Gift and Hospitality Policy.

3.4 Political Contributions

The Group's funds or resources must not be used to make any direct or indirect political contributions without prior written approval from the Board establishing that it is in the best interest of the Group to do so, and after having satisfied itself that the Group is acting responsibly in accordance with all applicable local laws and requirements. No such political contributions may be used as a subterfuge for bribery.

If any donation is made, it must be allowable under applicable laws and must not be made with any promise or belief of advantageous treatment in return and must be accurately reflected in the Group's accounting records.

While employees, Directors and business associates are not prohibited from making personal political donations or contributions, those donations or contributions must never be associated with the Group and must always be made in employees', Directors', and business associates' own personal capacity. Under no circumstances, however, will any employee be compensated or reimbursed in any way by the Company for a personal political contribution.

Any approval request and approval received for the making of political contributions must be properly documented and retained in the Logbook, and available for audit and / or monitoring purposes.

For procedures on dealing with political contributions, kindly refer to the Group's Gift and Hospitality Policy.

4.0 Recruitment of Employees

The Group recognises the importance of integrity in its employees and Directors. The Group should conduct its recruitment practices in a way that is fair and transparent.

The Group's recruitment, training, performance evaluation, remuneration, recognition and promotion for employees and Management shall be objective and show no favour and shall include assessments of individuals' commitment to integrity.

The Group will not offer employment to prospective employees in return for previous favour or in exchange for improper favour, such as awarding of contracts. The Group shall award contracts and employee positions based on merit. Support / Referral letters in all forms shall not be recognised as part of the business decision making process. Where applicable, proper background checks should be conducted in order to ensure that the potential employee has not been convicted in any bribery or corruption cases nationally or internationally.

5.0 Operational Functions Vulnerable to Bribery and Corruption

There are several areas of the Group's operating tasks that could raise increased potential vulnerabilities to bribery and corruption. As a result, these components of the operational functions of the Group require more extensive rules and strategies than other aspects. This does not imply that, in comparison to other parts of operational functions, bribery, corruption, and attentiveness in addressing them should be considered less seriously. Bribery and corruption are highly severe issues that must constantly be kept in mind when dealing with them. It is crucial that there be a culture of always searching for gaps and flaws that may not have been noticed earlier. Additionally, it should be recognized that deficiencies and gaps may only be evident in specific situations and facts rather than being universal and general.

6.0 Managing Relationships

6.1 Relationship with Business Associates and Third Parties

The Group will not engage in any form of bribery or provide improper incentive to induce any person to transact with the Group including contractors, suppliers, agents, consultants, joint venture partners, introducers, intermediaries etc. This prohibition specifically includes kickbacks in any form, offers to split or share any commission, or any other improper or hidden compensation.

The Group will not enter into any contracts or business arrangements, directly or indirectly, without conducting the appropriate due diligence to ensure that the entity is not likely to commit an act of bribery or corruption in the course of its work with the Group.

The extent of the required due diligence shall be based on the circumstances of the proposed transaction. Such due diligence may include searches through relevant databases, checking relationships with public officials and documenting the reasons for choosing one particular business associate over another.

Accordingly, standard clauses will be included in all legal documents and / or contracts with business associates and third parties, requiring them to comply with the Group's Business Code of Ethics, this Policy and other applicable laws besides granting the Group the right to terminate any contract or business relationship in which bribery or an act of corruption has been observed or proven to have occurred.

For procedures on dealing with business associates and third parties, kindly refer to the Group's Gift and Hospitality Policy.

6.2 Conflict of Interest

Conflicts of interest – whether actual, potential, or perceived may give rise to a risk of corruption. Any person discharging their duties on behalf of the Group must avoid situations that create or appear to create conflicts of interest. The use of their position, the Group's assets and resources, or information available to them for personal gain, or gain to relatives and associates, or undue disadvantage to the Group, is strictly prohibited.

While circumstances of conflict of interest may not always be forbidden by laws against bribery and corruption, they can raise the likelihood of corruption. Even if the time or circumstance for declaring conflicts of interest as required by the Group has not yet come, you should be forthright in doing so whenever the Group may require such disclosures to the Managing Director and the CCM immediately and / or if actual, potential, or apparent conflicts exist.

7.0 Risk Assessment

Risk assessment must be conducted every three (3) years, or as and when deemed necessary by the Audit and Risk Management Committee ("ARMC"), to identify current bribery and corruption risks potentially affecting the Group's operations, and to determine the level of Anti-bribery controls necessary for any particular aspect of the Group's operation.

The following shall be taken into consideration when performing risk assessments:-

- (a) Inherent risk, which includes an assessment of the overall risks of bribery and corruption associated with the governance structure and internal control systems / procedures of the Group;
- (b) Reputational risk, which includes an assessment of the risk that the Group's reputation would face due to bribery and corruption;
- (c) Transactional risk, which includes an assessment of the risks associated with a business transaction undertaken by the Group or any person discharging their duties on behalf of the Group;
- (d) Business opportunity risk, which includes the risk that pursuing or obtaining certain business opportunities may result in acts of bribery or corruption; and
- (e) Business partnership risk, which includes risks derived from relationships with or partnership with any person discharging their duties on behalf of the Group.

The results of the risk assessment shall be incorporated into the Bribery Risk Register of the Group, categorised by Group and / or entity level and location, and shall be presented to the Board.

8.0 Staff Declaration

All the Group's personnel shall declare in writing that they have read, understood and will abide by this Policy. A copy of this declaration shall be documented and retained by the Group Human Resource Department for the duration of the personnel's employment. A sample declaration is appended in Appendix 2 of this Policy.

The CCM reserves the right to request any information, including on employees' assets, in the event that the person is implicated in any bribery and corruption-related accusation or incident.

9.0 Operation, Support, and Improvement of this Policy

9.1 Responsibility for this Policy

The Group's Management, including the Board, have overall responsibility for ensuring this Policy complies with the Group's legal and ethical obligations, and that all persons discharging their duties on behalf of the Group complies with it.

Corporate Compliance & Management ("CCM") is the anti-bribery and anti-corruption

compliance arm of the Group. The CCM has primary and day-to-day responsibility for implementing this Policy, and for monitoring its application and effectiveness.

The CCM also acts as the first point of reference for any person who wishes to consult on any matters pertaining to bribery and corruption, including scenarios and areas as discussed in this Policy. In turn, the CCM shall report to the ARMC on all matters pertaining to bribery and corruption periodically or immediately depending on the severity of the issue.

Such reporting by the CCM shall form the basis of the Board's deliberation on the next course of action to be taken in pursuit of the Group's efforts against bribery and corruption.

Management at all levels is responsible for ensuring those reporting to them is aware of and understand this Policy.

9.2 Review and Changes to this Policy

This Policy shall be reviewed every three (3) years, or as and when deemed necessary by the ARMC, to ensure the Policy is updated with the relevant developments in the legislation as well as evolving industry and international standards.

Any changes to this Policy shall be approved by the Board.

9.3 Communication of this Policy

To ensure all employees, directors, business associates and any person discharging duties on behalf of the Group are aware of this Policy, they must be advised that this Policy is available on the Group website, www.senheng.com, for their review. All these people must be informed whenever significant changes are made to this Policy.

9.4 Training and Awareness

The Group shall conduct annual awareness programmes for all its employees and directors, on the Group's position and commitment in relation to anti-bribery and anti-corruption.

Training in this Policy shall form part of the induction process for all new employees and directors.

The Group's zero-tolerance on, and compliance with, anti-bribery and anti-corruption practices must also be communicated to all business associates at the onset of relationship with them and repeated or reinforced as appropriate thereafter.

Group Human Resources, in collaboration with the CCM, shall maintain records of all training and awareness programmes, including details and attendance of participants.

9.5 Infringement of this Policy

Any infringement of this Policy, including any acts of bribery and misconduct, shall constitute serious misconduct or offences warranting disciplinary action against the offenders, including summary dismissal. The Group reserves the right to terminate its contractual relationship with other persons if they breach this Policy.

Non-compliance / Infringement issues identified by audits, and any risk identified through this and other means, shall be reported to the top Management including the Board in a timely manner in accordance with the level of risk identified.

The Group recognises that demands for bribes to be paid may be accompanied by threats to personal safety. These should be rare, but if any person discharging duties on behalf of the Group is subjected to an immediate threat to their safety, the person may put personal well-being first, even if this means that the person makes a payment that would contravene this Policy. However, the person must immediately report all of the circumstances of the threat and the payment to the CCM. If a threat is made but the person is able to notify the CCM before making such payment, then the person should do so. Otherwise, notification must be made, and approvals must be sought as soon as possible retrospectively. Such payments must be accurately described and recorded in the Logbook.

Any deviation or waiver from this Policy must be approved by the Board.

9.6 Raising Concerns

Any person who learns of an actual or suspected violation of applicable laws or this Policy is required to report the concern promptly using the reporting channels and guidelines stated in the Group's Whistleblowing Policy.

Reports made in good faith, either anonymously or otherwise, shall be addressed in a timely manner and without incurring fear of reprisal regardless of the outcome of any investigation, as provided by the Code.

9.7 Compliance Function

Appropriate resources, including manpower with appropriate competencies, authority and independence shall be provided for effective operation of the compliance function and overall anti-bribery and anti-corruption management system.

Internal control systems and procedures will be subject to annual audits to provide assurance that they are effective in countering bribery and corruption. Any deficiencies identified must be rectified as soon as possible.

Such audits may be conducted internally by the Group Internal Audit function of the Group or by an independent external party. Audit documentation should include performance improvement action plans.

9.8 Continuous Improvement

The Group is committed to continuously improving its policies and procedures relating to anti-bribery and anti-corruption.

The Group shall monitor the legal and regulatory requirements wherever it operates, and any changes to its business environment and risks, to identify opportunities or requirements to improve or enhance this Policy and the overall management of bribery and corruption within the Group. A report shall be submitted to the top Management, including the Board on a regular basis for the appropriate action to be taken.

Appendix 1

Definition

Agent	Any person employed by or acting for another and includes an officer of a public body or an officer serving in or under any public body, a trustee, an administrator, or executor of the estate of a deceased person, a subcontractor, and any person employed by or acting for such trustee, administrator or executor, or subcontractor.
Bribe or Bribery	Any act considered to be the offence of giving or receiving "gratification" under the MACC Act 2009. This includes offering, promising, giving, accepting, or soliciting something of value, directly or indirectly, and irrespective of location(s), to illicitly influence the decisions or actions of a person of position of trust within an organisation, or a function that is expected to be performed impartially or in good faith, or to obtain or retain commercial advantage.
Business Associate	An external party with whom the Group has, or plans to establish, some form of business relationship. This may include clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries, and investors.
Corporate Compliance & Management ("CCM") of the Group	A compliance unit appointed by the Management to oversee day-to-day responsibilities for implementing this Policy.
Conflict of Interest	A situation in which a person is in a position to derive personal benefit from actions or decisions made in their official or professional capacity.
Controlled organisation	An entity on which the Group has power over, including rights to appoint and remove Management.
Corporate Gift	Something given from one organisation to another, with the appointed representatives of each organisation giving and / or accepting the gift. Corporate gifts, usually bearing the entity's name and logo, may also be promotional items given out equally to the general public at events, trade shows and exhibitions as a part of building the Group's brand. The gifts are given transparently and openly, with the implicit or explicit approval of all parties involved. Examples include items such as diaries, table calendars, pens, notepads T-shirts bearing the logo of the Group's or the entities within the group and plaques.
Corruption	Transparency International defines corruption as "the abuse of entrusted power for personal gain".

	<p>For the purpose of this policy, corruption is defined primarily as any action considered as an offence of giving or receiving “gratification” by the MACC Act 2009.</p> <p>This includes, but is not limited to, acts of extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud, or money laundering. A comprehensive list of these acts may be found within the MACC Act 2009.</p>
Employees	All individuals directly contracted to the Group on an employment and / or contract basis, including permanent and temporary employees and Directors.
Facilitation Payment	A payment or other provision made personally to an individual in control of a process or decision to secure or expedite the performance of a routine or administrative duty or function.
Foreign public official	<p>Defined by the MACC Act 2009 as:-</p> <ul style="list-style-type: none"> (a) Any person who holds a legislative, executive, administrative or judicial office of a foreign country whether appointed or elected; (b) Any person who exercises a public function for a foreign country, including a person employed by a board, commission, corporation, or other body or authority that is established to perform a duty or function on behalf of the foreign country; and (c) Any person who is authorised by a public international organisation to act on behalf of that organisation.
Gratification	<p>Defined by the MACC Act 2009 as:-</p> <ul style="list-style-type: none"> (a) Money, donation, gift, loan, fee, reward, valuable security, property, or interest in property of any description whether movable or immovable, financial benefit, or any other similar advantage; (b) Any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity; (c) Any payment, release, discharge or liquidation of any loan, obligation, or other liability, whether in whole or in part; (d) Any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage; (e) Any forbearance to demand any money or money’s worth or valuable thing; (f) Any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil, or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and (g) Any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).
Hospitality	Includes, but is not limited to, considerate care of guests, business associates, etc., which may include refreshments, accommodation, and entertainment, at a restaurant, hotel, club, resort, convention, concert, sporting event or any other venue such as Company offices, with or without

	the personal presence of the host. Provision of travel and sponsorship of events may also be included, as may other services such as provision of guides, attendants and escorts, use of facilities such as a spa, golf course or ski resort with equipment included.
Improper favour	<p>Includes the definition of bribe and gratification under the MACC Act 2009 as well as the following as defined by Transparency International:-</p> <p>(a) Patronage – A form of favouritism in which a person is selected, regardless of qualifications or entitlement, for a job or government benefit because of affiliations or connections;</p> <p>(b) Clientelism – An unequal system of exchanging resources and favours based on an exploitative relationship between a wealthier and / or more powerful “patron” and a less wealthy and weaker “client”;</p> <p>(c) Nepotism – A form of favouritism based on acquaintances and familiar relationships whereby someone in an official position exploits his or her power and authority to provide a job or favour to a family member or friend, even though he or she may not be qualified or deserving.</p>
Officer of a public body (“Public Official”)	<p>Defined by the MACC Act 2009 as:-</p> <p>Any person who is a member, an officer, an employee, or a servant of a public body, and includes a member of the administration, a member of Parliament, a member of a State Legislative Assembly, a judge of the High Court, Court of Appeal or Federal Court, and any person receiving any remuneration from public funds, and, where the public body is a corporation sole, including the person who is incorporated as such.</p>
Personal Gift	<p>Something given from one individual to another, with the intention of creating or enhancing a personal relationship. The gifts are given in a private setting, without the knowledge or approval of the company’s Management of one or both parties.</p> <p>This includes, but is not limited to, cash, cash equivalents such as credit cards, bitcoin or savings accounts, electronic items, watches, luxury pens, chocolates, liquor, property, vehicles, free fares, shares, interest, free loans, lottery tickets, travel facilities, entertainment, services, club memberships, any form of discount or commission, jewellery, decorations, souvenirs, vouchers or any other items of value.</p>

Public body	<p>Defined by the MACC Act 2009 as:-</p> <ul style="list-style-type: none"> (a) The Government of Malaysia; (b) The Government of a State; (c) Any local authority and any other statutory authority; (d) Any department, service or undertaking of the Government of Malaysia, the Government of a State, or a local authority; (e) Any society registered under subsection 7(1) of the Societies Act 1966; (f) Any branch of a registered society established under section 12 of the Societies Act 1966; (g) Any sport body registered under section 17 of the Sports Development Act 1997; (h) Any co-operative society registered under section 7 of the Co-operative Societies Act 1993; (i) Any trade union registered under section 12 of the Trade Unions Act 1959;
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	<p>(j) Any youth society registered under section 9 of the Youth Societies and Youth Development Act 2007;</p> <p>(k) Any company or subsidiary company over which or in which any public body as is referred to in paragraph (a) – (j) has controlling power or interest; or</p> <p>(l) Any society, union, organisation, or body as the Minister may prescribe from time to time by order published in the Gazette.</p>
Gifts, Hospitality, Donations and Sponsorships Logbook	Logbook recording any receipts / offering of gifts, hospitality, donation, sponsorships, and other benefits to third parties, maintained by each business unit, by both Group and entity level as well as by location, which is to be submitted every quarter to the ARMC.
Relative	<p>Defined by the MACC Act 2009 as:-</p> <p>(a) A spouse of the person;</p> <p>(b) A brother or a sister of the person;</p> <p>(c) A brother or a sister of the spouse of the person;</p> <p>(d) A lineal ascendant or descendant of a person;</p> <p>(e) A lineal ascendant or descendant of the spouse of the person;</p> <p>(f) A lineal ascendant or descendant of the person referred to in paragraph (b);</p> <p>(g) The uncle, aunt or cousin of the person; or</p> <p>(h) The son-in-law or daughter-in-law of the person.</p>
The Group	Includes all subsidiary and related parties of Senheng New Retail Bhd., i.e. controlled organisations which operate within Malaysia.
Top Management of the Group	Refer to a specific group of persons in the Group, i.e. Managing Director and C-suite Officers.

Appendix 2

Sample of Staff Declaration Form

I, _____, hereby declare that I have read and understood Senheng Group's Anti-Bribery and Anti-Corruption Policy. I will abide by the requirements and provisions set out in the Policy, as required by my employment contract.

X
