



Anti-Bribery & Anti-Corruption Policy

Version 1.1



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Document Change History

Version	Date	Description
1.0	11/05/2020	New document created
1.1	02/07/2020	Document further reviewed and updated

Anti-Bribery & Anti-Corruption Policy

Overview

Rexit Berhad and its subsidiaries takes a very serious stand against any incident that is seen or deem to be an act of bribery or corruption for the Organisation has zero tolerances towards such conducts.

This policy applies to all members of the Board of Directors (executive and non-executive) and staff of Rexit Berhad and its subsidiaries who are required to strictly abide by its provisions.

Bribery will be defined as act of offering someone money, something valuable or favour given in order to influence the judgement or conduct of a person in a position of trust to do something of unfair advantage for you;

Corruption will be defined as a dishonest or fraudulent conduct by those in power or with authority entrusted to them in the Organisation to solicit for favours, money or something valuable for private gain.

Scope

This document:

- Affirms Rexit's strict stand against bribery or corruption as defined.
- Imparting companywide awareness against bribery or corruption and the consequences for any violation.
- How to respond when encountering hospitality practices.
- Responsibility of staff to report suspected cases of bribery or corruption to the management or board.

Glossary

Rexit – Rexit Berhad and all its subsidiaries.

Audiences of Document

The intended audience of this document are as follows:

Audience	Application of the Document
Board of Directors	The Board of Directors are responsible in approving this policy and delegates the responsibility of overseeing the implementation and reviewing of this policy to Senior Management.
Rexit's Staff and Senior Management	Rexit's staff will need to understand and comply with the Anti-Bribery & Anti-Corruption Policy in place in the company. Senior Management of Rexit will oversee the implementation, review and use of this document as a basis for all staff to be guided and follow strictly so as to conform to the requirements of this anti-bribery & anti-corruption policy.
Internal Audit Department	The Internal Audit Department will use this document as a guide to check that the policy is being conformed to and there are no breaches to this policy.
Training Department	To provide training from time to time to all staff to ensure they are well aware of what the anti-bribery & anti-corruption constitutes.

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Policy Awareness	<p>All new employees should be made aware of the importance of the anti-bribery & anti-corruption policy. Every employee of the company should have access to a copy of this policy which may be included in existing communication mechanisms for policy dissemination (Intranet).</p> <p>Clients, Suppliers or Third Party with mutual business interest with Rexit Berhad should also be made aware of the importance of Rexit's anti- bribery & anti-corruption policy through communicating the policy to them where needed.</p>
Training	<p>Training is to be provided to new staff upon their joining the Organisation during the Induction Training and to all staff from time to time to reinforce their awareness on the requirements, strict adherence in conforming to it and the consequences for any violation.</p>
Violations	<p>Violations of this policy by staff will incur disciplinary measures that may lead to termination of service and not dispelling that the matter may be further escalated to the appropriate authorities for criminal actions to be taken against the erring person.</p> <p>Violation of this policy by Supplier will result in their appointment being terminated and possible criminal actions taken against the erring party.</p>
Application	<p>In observing and conforming to requirements to ensure strict adherence so as not to violate any law or guidelines, the following are to be observed and to be adhered to strictly.</p> <p>When dealing with our Clients, Suppliers or any Third Party who has mutual business interest with Rexit:</p> <ol style="list-style-type: none">i) <i>The Parties undertake that neither the Party nor any party acting on the Party's behalf, has offered, promised, given, authorised, requested or accepted any undue financial or other advantage of any kind or in any way connected with any purpose nor has either Party made any improper payments to or received from any person, including officials in the public or private sector, customers, suppliers and/or any other person related to or affiliated with the other Party, with the intention of influencing any act or decision where either Party is involved in or securing any improper business advantage for either Party.</i>ii) <i>The Parties shall throughout the course of the business relationship, comply with and take reasonable measures to ensure that any other parties acting on the Party's behalf complies with all applicable laws, statutes and regulations relating to anti-bribery and anti-corruption.</i>iii) <i>The Parties shall maintain in place throughout the course of the business relations, the Party's own policies and procedures to ensure compliance with anti-bribery and anti-corruption laws, statutes and regulations including the maintaining of detailed and accurate accounting records of transactions.</i>

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Application iv) *The Parties immediately report to the other Party in the event any offer, request or demand for any undue financial or other advantage of any kind is made by or received from any party acting on the Party's behalf and/or from any officials in the public or private sector, customers, suppliers and/or any other person related to or affiliated with either Party.*

**Accepting
Invitations or
Gifts**

Notwithstanding the guide mentioned in item i), ii), iii) and iv) in the preceding section, we are mindful of the hospitality practices where there is a need to meet up with clients or suppliers occasionally with the aim of establishing and strengthening relations in furtherance of the Organisation's product and services and that there are times and occasions when we may be offered gifts and or invitations to meals or events which we find difficult to turn down so as not to disappoint our clients, suppliers or business partners.

To ensure that such gifts, invitations or entertainments are accepted appropriately, the following guidelines are to be followed:

Accepting invitation to Meals and/or Social Events

- the acceptance must be made in good faith to improve the image of the Organisation and to improve the cordial relationship with the party concerned;
- the acceptance must be proportionate to the occasion and it must not be felt that the giver is trying to gain an unfair advantage on the Organisation;
- it does not give an appearance that it is being given as a bribe, payoff or to secure an unfair advantage on the Organisation.

Accepting Gifts

- The value of the gift is reasonable, proportionate and made in good faith and within the jurisdiction of the law to improve the cordial relations between the Organisation and the giver;
- The gift accepted should not be in cash and does not give the appearance of been given as a bribe, payoff or been given to obtain an unfair advantage on the Organisation;
- The gifts are given openly and transparently and it would not embarrass the Organisation if the giver were to disclose the gift publicly.

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Donations & Sponsorship

Donations and Sponsorship

- The donations or sponsorship given must not be used as a trickery to conceal bribery.
- Ensure donations to charities or beneficiaries given are not disguised as illegal payments to public officials or conduit to fund illegal activities. All donations and sponsorship must adhere to the following:
 - Ensure such contributions are allowed by applicable laws;
 - Be accurately reflected in the company's accounting books and records.

Employee's Responsibility

Each employee is responsible to ensure that he/she adheres strictly to the policy and guidelines as stated herein in this document.

Each employee is also responsible and is free to speak out against any suspected cases of bribery or corruption committed by staff of the organisation to their superiors or directly to the CEO, COO, CFO or the Chairman of the Audit & Risk Management Committee (ARMC) without fear of their identity being exposed or fear of any retaliation.

All Employee are to exercise good judgement and always be seen to act appropriately in the interest of the Organisation.

Reporting Channel

Any real and/or suspected cases of bribery or corruption may be reported to our confidential reporting channel at the following email address:

1. anti.briberycorruption@rexit.com

End.