



Mynews Holdings Berhad

**Anti-bribery and
Anti-corruption Policy**



TABLE OF CONTENTS

	Page
1. Policy Statement	1
2. Scope and Applicability	1
3. Definition of Bribery	1
4. Conflict of Interest	1
5. What is and What is NOT Acceptable	
A. Gift, Entertainment, Hospitality, and Travel	1
B. Facilitation Payments and Kickbacks	3
C. Charitable contributions	3
6. Business Relationship / Vendor / Supplier	3
7. myNEWS employee responsibility	4
8. Raising a concern	4
9. Protection	4
10. Training and Communication	5
11. Financial and Non-Financial Controls	5
12. Record Keeping	5
13. Monitoring and Review	5

Policy Statement

Mynews Holdings Berhad (“myNEWS” or the “Company”) has adopted a **zero-tolerance policy against all forms of bribery and corruption**. myNEWS is committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices. It is myNEWS’s policy to conduct all its business activities with honesty, integrity and the highest possible ethical standards and vigorously enforce its good business practices.

Scope and Applicability

This Anti-Bribery and Anti-Corruption Policy (this ‘Policy’) applies to all myNEWS employees and “Third Party” i.e., contractors, vendors, suppliers, agents, consultants, business partners and any person associated with myNEWS.

Definition of Bribery

Bribery refers to an act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value, or of an advantage, so to induce or influence an action or decision.

A bribe refers to an inducement, payment, reward or advantage offered, promised or provided to any person in order to gain any commercial, contractual, regulatory or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law. Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively, or through a third party.

Conflict of Interest

All businesses that myNEWS deals with must be on an **arm’s length basis**. Nothing should be accepted, nor should the employee have any outside involvement directly or indirectly, that could impair, or give the appearance of impairing an employee’s ability to **perform duties to exercise business judgement in a fair and unbiased manner**. Any conflict of interest shall be declared to the Management and be managed accordingly.

What Is Acceptable and what Is NOT acceptable

- A. Gifts, entertainment, hospitality and travel
- B. Facilitation payments and kickbacks
- C. Charitable donation and sponsorship

A) Gifts, Entertainment, Hospitality and Travel (“GEHT”)

“GEHT” means something that is given to another person - any item / experience of value, including but not limited to cash, vouchers or any item (e.g., pens, hampers, concert tickets), food or beverages (e.g., supplier or sub-contractor buying meals and entertainment), accommodation and transportation.

Employees or members of their immediate families should not offer, provide, solicit or accept GEHT (cash or its equivalent, favors, or anything of substance) to or from Third Parties that do business or trying to do business with myNEWS, at any time, on or off the work premises (“No GEHT policy”).

However, the Company is aware of the reality of commercial and business practices, that, **modest and reasonable** GEHT giving and receiving are a central part of business etiquette. Hence, the employees are allowed to **only offer, provide, or accept (not solicit)** GEHT under **limited exemptions and reasonable conditions** as the Company defines.

Exemptions for employee or their family members in this No GEHT Policy are:

- A. Accepting gifts such as t-shirts, pens, goody bags, cards, thank you notes, certificates or other forms of thank you and recognition that employees obtain as members of the public at events such as seminars, conferences, training events, etc. that is offered equally to all participants of the event;
- B. Accepting gifts of food that may arrive during the holidays, and at other times of the year when gift giving is traditional, belong to the entire department even if addressed to a single employee. Under no circumstances may an employee take a food gift home; food gifts must be shared with and distributed to all employees, with email notice, during working hours, in a central, worksite location; and
- C. Any other GEHT the Company allows within its internal policy / guideline / procedures.

As a general guide, the following are the minimal requirements before any giving and receiving of GEHT can be considered acceptable under this Policy:

- a) It is not made with the intention of influencing a Third Party to obtain / retain business or provide business advantage or as an explicit or implicit exchange for favors / benefits;
- b) It is not made with the suggestion that a return favor is expected;
- c) It is in compliance with laws and regulations;
- d) It is given in the name of the company, not in an individual’s name;
- e) It is given openly, not secretly;
- f) It does not include cash or cash equivalent (such as gift certificates or vouchers); or
- g) It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the GEHT.

Nonetheless, employees and third parties shall act with due care to ascertain any GEHT related practice neither violates the giver’s and/or receiver’s policies, nor any laws and regulations.

GEHT Declaration

ALL GEHT besides the exemptions are required to be **declared** and we will keep a written record of the amount and reason for the GEHT provided / accepted, all GEHT are subject to Management review.

If there are any doubts against the type of GEHT received, you should contact Chief Integrity Officer for clarification. To be on a safe side, not accepting any GEHT will be the best way to eliminate the risks.

“ALWAYS ASK WHENEVER IN DOUBT”

Engaging in bribery or corrupt practices can have severe consequences. The company will not hesitate to take all necessary disciplinary and legal actions in combating bribery and corruption.

B) Facilitation Payments and Kickbacks

myNEWS does not make, and will not accept, facilitation payments or “kickbacks” of any kind. Facilitation payments are typically payments (sometimes known as “grease payments”) made to secure or speed up a deal or business decision. In return for a business favor/advantage, such payments are considered bribe to secure the award of a contract. All employees and Third Parties associated with myNEWS should avoid any activity that might lead to Facilitation Payment or Kickback.

C) Charitable donation and sponsorship

myNEWS accepts and indeed encourages the act of donating to charities, whether through services, time, or direct financial contributions (cash or otherwise) Sponsorships are generally made to promote the Company’s reputation, brands, products, or services.

myNEWS will ensure that all contributions (charitable donations / sponsorship) made are legal and ethical under local laws and practices; and the donations / sponsorships are not offered/made without the proper approval, via due diligence procedures on the third-party beneficiaries.

All employees must be careful to ensure that charitable donations / sponsorships are not used to facilitate and conceal acts of bribery.

Business Relationship / Vendor / Supplier

myNEWS expects all Third Parties doing business with myNEWS to approach issues of bribery and corruption in a manner that is consistent with the principles set out in this Policy. myNEWS requires all Third Parties to cooperate and ensure compliance with these standards, to continue the business relationship.

In order to maintain the highest standard of integrity, myNEWS will conduct the following to ensure Third Party shares that same standard and integrity:

- Conduct due diligence enquiries to review the prospective business associates
- All third parties are made aware of myNEWS Anti-Bribery and Anti-Corruption Policy
- Continue to be aware of and to periodically monitor third party performance and business practices to ensure ongoing compliance

myNEWS Employee Responsibility

As an employee of myNEWS, you must ensure that you read, understand and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information given.

All myNEWS employees should comply with the following:

- 1) **Cannot** give, promise to give, or offer, a payment, GEHT with the expectation or hope that a business advantage will be received, or to reward a business advantage;
- 2) **Cannot** give, promise to give, or offer a payment to Third Party to “facilitate” or expedite a procedure;
- 3) **Cannot** accept payment from Third Party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them;
- 4) **Cannot** accept any GEHT from a third party if you know or suspect that it is offered, or provided with an expectation that a business advantage will be provided in return;
- 5) **Cannot** threaten or retaliate against another Employee who refuses to commit a bribery offence, or who has raised concerns under this policy.

Raising A Concern

All employees are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. When an employee, or any Third Party have reasonable ground to believe there is any instances of malpractice or improper conduct, he/she may report the matter, in good faith, via the whistle blowing channel available on myNEWS’ website: <https://www.mynews.com.my/investors.php> or email to the Audit Committee Chairperson: whistleblowing@mynews.com.my

Protection

If you refuse to accept or offer a bribe or you report a concern relating to potential act of bribery and corruption, myNEWS understands that you may feel worried about potential repercussions. myNEWS support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

myNEWS will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe to other corrupt activities, or because they report a concern relating to bribery and corruption.

If you have reasons to believe you’ve been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your superior or Chief Integrity Officer immediately.

Training and Communication

All new employees will be briefed, and all existing employees will receive periodic refresher memoranda, about this Policy; including but not limited to compliance with laws, regulations, or internal written procedures relevant to myNEWS' line of business and the position they hold.

The Company acts with due care before engaging with new business associates and ensure that we communicate about the Company's commitment in line with this Policy. Chief Integrity Officer shall ensure a copy of this Policy, the Company's Code of Ethics and Conduct, and Whistle Blowing Policy and Procedure are made available to each business associate via its official website (<https://www.mynews.com.my/investors.php>), or any other suitable channel.

Financial and Non-Financial Controls

The Company adopts segregation of duties for relevant job functions (i.e., financial and non-financial related). Designated personnel for preparing, verifying, or approving each transaction/activity is documented in written procedures (i.e., Limit of Authority, and other operating procedures) and communicated to employees of the Company for adherence.

Record Keeping

The records include accounts, invoices, correspondences, memoranda, meeting papers, books, and other documents or transcribed information of any type. Heads of Department must maintain written records to evident that adequate financial and non-financial controls established within the Company has taken place to mitigate any bribery / corruption risks. All records shall be retained for at least seven (7) years from its date of generation, to enable the Company to comply with request from the authorities.

Monitoring and Review / Compliance Function

The Company will establish and put in place appropriate performance measures and reporting system to monitor performance against metrics and compliance with the relevant policies, procedures and controls.

Chief Integrity Officer / Compliance Function will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.