



SMHB Sdn. Bhd.
SMHB Engineering Sdn. Bhd.
SMHB Environmental Sdn. Bhd.

GIFT, HOSPITALITY AND DONATION POLICY

This Gift, Hospitality and Donation Policy (“this Policy”) is adopted by the SMHB Group of companies (collectively referred to as “the Company”).

The Company is committed to conducting business transparently, honestly and with integrity, and in accordance with applicable anti-bribery and anti-corruption laws.

The Company does not prohibit giving and receiving gifts and hospitality, and the provision of donations, however, these must NOT be done with the intention of influencing decisions or given to risks of perceived improper advantage to the Company and/or used as a scheme to conceal bribery.

This Policy is to be read in conjunction with the Company’s

- Policies and Core Values;
- Whistle-Blower Policy;
- Code of Conduct; and
- Applicable internal processes and procedures of the Company.

This Policy applies to all directors and employees (permanent, contract, probationary and temporary) of the Company.

General Principles

The giving and receiving of any gifts and hospitality, and the provision of donations (including scholarships, CSR initiatives) shall only be allowed if in compliance with the following General Principles:

- (a) absence of intention to influence actions or decisions or judgment;
- (b) no expectation of any specific favour or improper advantages;
- (c) not create any conflict of interest;
- (d) must be performed in an open and transparent manner;
- (e) do not involve any corrupt or criminal intent or any other intention that might lead to a breach of this Policy and any other policy and procedure of the Company; and
- (f) not in violation of any applicable laws and regulations, including those related to bribery.

The following shall be adhered in respect of giving and receiving of gifts and hospitality, and the provision of donations.

Gifts and hospitality must:

- (a) not be in the form of cash or cash equivalent;
- (b) have no recurring pattern which can be regarded as an indicator of inappropriate influence;
- (c) not coincide with contract negotiations or decisions / assessments by recipient, or during tender / procurement exercise;

- (d) have the value and nature within general ethical boundaries (i.e. not lavish), and not unjustifiable or overly frequent; and
- (e) have a value that is not in excess of the authorised limit as prescribed within the applicable internal process / procedure.

Donations (including sponsorships, CSR initiatives) must:

- (a) not be in any form of contribution to any political parties, political party officials or candidates for political office.
- (b) be made only to beneficiaries that are licensed under the applicable laws / regulations and legitimate organisations which are legally permitted to receive public donations.

Any gifts or hospitality given or received, or donations provided within the above General Principles shall be in accordance with applicable internal processes / procedures.

Government Officials

Directors and employees of the Company shall be aware and shall not be in violation of the governing principles / policies / processes which regulate the giving and acceptance of gifts, hospitality and donations with regards to government officials and those related to them.

Raising A Concern and Sanction

Any director or employees of the Company, who knows of, or suspects, a violation of this Policy, is encouraged to whistle-blow or report the concerns without fear and reprisal through the mechanism provided by the Company's Whistle-Blower Policy.

Any directors or employees of the Company who breaches this Policy will face disciplinary action which could result in dismissal for gross misconduct.

This Policy takes effect on 1 May 2021.