



# ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

JUNE 2018



Dear Colleagues,

The Amber Courier Sdn Bhd Anti-bribery and Anti-Corruption Policy elaborates on principles of the corruption practices that arise in the daily life of the business. A set of policies and procedures designed to prevent and detect the corruption of our daily life.

I'm honored to hold the commitment to enforce the Anti-Brinery and Anti-Corruption principles that are conducted in the business. The policy is implemented to defense the corruption towards governance, assessment, budget and strategic to strengthen the Amber Courier.

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

James Ngu Sie Kung  
CEO of Amber Courier Sdn Bhd

## 1.0 INTRODUCTION

1.1 Amber Courier Sdn Bhd is committed to conducting all our business honestly and ethically. We'll fully compliance to Bribery and corruption to which they are bound to observe in the performance of our business. We'll fully comply with the local and international laws and regulations in the countries to perform our duties.

## 2.0 OBJECTIVES

2.1 The Policy sets out the Employee's responsibilities on standards to perform their day-to-day duties.

## 3.0 SCOPE

3.1 The policy applies to all levels of employees including the Directors of the company. Besides, it also includes the clients, trainees, suppliers, distributors, agents, consultants, government, and other government agencies.

## 4.0 DEFINITIONS

### 4.1 BRIBERY

**BRIBERY** is defined as the procedure of the offering, promising, giving, demanding, receiving, or soliciting something under **MACCA act 694** which will influence the outcome of the transaction whether it benefits the Amber Courier or the employees themselves.

Under Act 694, the “**gratification**” is defined as the following:

- (a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being
- (b) property of any description whether movable or immovable, financial benefit, or any other similar advantage;
- (c) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- (d) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- (e) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- (f) any forbearance to demand any money or money's worth or valuable thing;
- (g) 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
- (h) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f);

## **4.2 EMPLOYEE**

The EMPLOYEE means all employees, managers, agents, director and individual working for Amber Courier of all levels and positions whether full-time, part-time, contract or temporary staff.

## **4.3 CORRUPTION**

Corruption refers to the misuse of entrusted power of the personal gain or enrichment, or the miss used of the power of the position to achieve their needs improperly or unlawfully to enrich or empowering themselves.

## **4.4 CONFLICT OF THE INTEREST**

Conflict of interest when any person influences the outcome of the decision making of the process in the business by person's objectivity when performing duties or making judgement on behalf of the Amber Courier. Amber Courier committed to ensure any ethical, legal, financial or conflict of interest are prohibited no matter whether it is actual, potential, or perceived which may be financial or non-financial. The Employee must not use their power for personal gain or to the Amber Courier disadvantage. The Employee must report immediately to the CEO or manager when confronted with such conflict.

## **4.5 FACILITATION PAYMENT**

The Facilitation Payments are to be made personally to government services or certain government process in control of a process or decision. The EMPLOYEES must make sure these payments are not paid even though it's to secure or expedite the business. The director or manager must be immediately notified and consulted.

## **4.6 LOCAL AND INTERNATIONAL LEGISLATION**

Amber Courier is committed to conducting the business ethically and in compliance with country and international laws and regulations. The laws prohibit bribery and corruption must mandated to establish and maintain the business to prevent corruption. In cases of conflict between MACCA, this Policy law shall prevail.

## **4.7 WHISTLEBLOWER**

Whistleblower is the personal of the Amber Courier who reports improper conduct that happen in Amber Courier

## **5.0 GIFTS AND DONATION**

Charitable contributions and sponsorship to the parties to develop and maintain the business relationship. Any charitable contributions by Amber Courier must be done with the approval of the CEO with transparency. The employees should not accept or gift anything to the other parties if it'll influencing the other parties to develop the business. The EMPLOYEES also encouraged for not involved in political donation or support any parties to obtain the business or advantages to Amber Courier.

## **6.0 RESPONSIBILITIES OF EMPLOYEES**

The EMPLOYEE is encouraged to understand and comply with this Policy to conduct Amber Courier business. The Employee shall undertake to declare any actual or potential conflict of interest and comply with Amber Courier policies in the employment contract. If the EMPLOYEE finds out the bribery and corruption in the department, the EMPLOYEE must report immediately to the CEO or manager.

## **7.0 THE COMPLIANCE OF ANTI-BRIBERY AND ANTI-CORRUPTION**

The manager must oversight of the implementation of compliance controls related to the policy. The EMPLOYEE shall conduct regular assessments to judge bribery and corruption in Amber Courier. The reviews are from time to time in the development in the legislature to evolving industry and international standard.

## **8.0 RECORDS KEEPING**

The EMPLOYEES must ensure that all invoices, accounts, documents, permits, PYTO, and records relating to dealings with other parties are prepared and maintained with accuracy and completeness. Any gifts, hospitality, travel, or entertainment offered by other parties must submitted the details to the department in charge of internal audit to minimize the risk of financial outflow in contravention of anti-bribery or anti-corruption laws. All claims relating to the travelling, gifts, hospitality, and entertainment must be approved by the head of the department with strict accuracy and completeness.

## **9.0 TRAINING**

The Amber Courier will conduct or send the EMPLOYEE to attend the awareness programs for anti-bribery and anti-corruption organized by Amber Courier, Customs, or Other Government Agency. The Amber Courier will record the training in collaboration with company compliance and integrity.

## **10.0 REPORTING**

The EMPLOYEE has responsibility to ensure the suspected bribery and corruption incidents are reported immediately. When the associated partner or the Employee are suspected breach of the Anti-Bribery and Anti-Corruption, the whistleblowing channels below: -

- a. Email :
  - i : Senior Independent Director
  - ii : Department Manager
  - iii : Managing Director
  - iv : Chief Executive Director
- b. WhatsApp Hotline : +6013 881 0307
- c. Letter to Company Compliance and whistleblowing unit at:  
Amber Courier Sdn Bhd  
No.96, Lorong Setia Raja 4H, Stutong Avenue 2,  
93350 Kuching, Sarawak, Malaysia
- d. [whistleblowing@ambergloballogistics.com](mailto:whistleblowing@ambergloballogistics.com)

## **11.0 IMPROVEMENT**

Amber Courier and the board of directors committed to monitor compliance with this policy and review the policy regularly to ensure it is adequate where certification is available. The management reserves the right to amend, modify, suspend, or terminate this policy at any time with or without notice.

Date: 1st JUNE 2018