



MR D.I.Y. GROUP (M) BERHAD

GIFTS AND ENTERTAINMENT POLICY

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| MR D.I.Y. GROUP (M) BERHAD GIFTS AND ENTERTAINMENT POLICY | Version# | 01 |
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GIFTS AND ENTERTAINMENT POLICY

1. GIFTS

- 1.1 MR D.I.Y. Group (M) Berhad and its group of companies (“**MR. DIY**”) has adopted a “No Gift Policy” whereby, subject only to certain narrow exceptions, all MR. D.I.Y. Personnel are strictly prohibited from receiving, providing or offering to provide entertainment and gifts with a view to improperly cause undue influence on any party in exchange for some future benefit or result.
- 1.2 As set out in the Anti-Bribery and Corruption Policy, the giving or accepting of gifts may create the perception of a conflict of interest or other impropriety that could ultimately affect the reputation and standing of MR. D.I.Y.. As such, subject only to certain narrow exceptions as allowed in the Gifts and Entertainment Policy, all MR. D.I.Y. Personnel are prohibited from directly or indirectly receiving or providing gifts.
- 1.3 It is the responsibility of MR. D.I.Y. Personnel to inform external parties involved in any business dealings with MR. D.I.Y. that MR. D.I.Y. practices a “No Gift Policy” and to request the external party’s understanding for and adherence with this policy.

A. Receiving Gifts

- 1.4 MR. D.I.Y. is very much aware that especially in Malaysia, the exchange of gifts and/or gift giving is a central part of business etiquette. There are certain circumstances, whereby refusing the gift is likely to offend Third Parties and may affect any existing business relationships. As such, in these limited circumstances MR. D.I.Y. Personnel are allowed to accept the gifts.
- 1.5 Although the general principle is to immediately refuse or return such gifts, accepting a gift on behalf of MR. D.I.Y. is allowed only in limited circumstances, whereby refusing the gift is likely to seriously offend and may sever MR. D.I.Y.’s business relation with the Third Party. However, in no circumstance may these gifts consist of cash or a cash equivalent i.e. vouchers, gift cards etc.

- 1.6 In the event of such acceptance, all MR. D.I.Y. Personnel must record and report such gifts to their respective Head of Department who will then decide whether to approve the acceptance of the gift or require it to be returned.
- 1.7 Where there is a conflict of interest, the Head of Department cannot approve the acceptance of such gift. In such situations, the gift must be politely returned with an explanation of MR. D.I.Y.'s position on its "No Gift Policy".
- 1.8 The respective Head of Departments are expected to exercise their discretion with proper care and judgement in each case, taking into account the relevant laws and regulations, value, occasion and purpose of the gift. Should there be any doubts or uncertainties, please refer to the Legal Department.

B. Providing Gifts

- 1.9 Although the general principle is that all MR. D.I.Y. Personnel are not allowed to provide gift to Third Parties, MR. D.I.Y. acknowledges that there are certain exceptions to this general principle. In such circumstances, prior to providing such gift, approval must be sought from the respective Head of Department.
- 1.10 It must be noted that each gift offered should not exceed the value of RM 300 and not more than 3 times a year with the same person/ party. Approval from the CEO is required if the value of gift exceeds the limit stated herein.

C. Exceptions to the "No Gift Policy"

- 1.11 The following are situations where there are certain exceptions to the general practice of a "No Gift Policy":
 - (a) Exchange of gifts between companies as a courtesy call where the gift is subsequently treated as a company property;
 - (b) Commemorative gifts or door gifts for official visits or events sponsored by MR. D.I.Y.; and
 - (c) Token gifts given out to the public or to customers as a small promotional item.

1.12 Even in the above exceptional circumstances, all MR. D.I.Y. Personnel would have to comply by reporting and seeking the approval of the respective Head of Department after receiving a gift or prior to providing a gift.

2. ENTERTAINMENT

2.1 In general, all MR. D.I.Y. Personnel are strictly prohibited from providing or offering to provide entertainment with a view to improperly cause undue influence on any party in exchange for some benefit or result.

2.2 However, MR. D.I.Y. recognises that providing modest entertainment is a legitimate way of building business relationships and that it is common practice to build good relationships with Business Associates and Third Parties. In certain countries, the act of hospitality through entertainment is a central part of business etiquette. Therefore, with the prior approval of the respective Head of Department, employees are allowed to entertain Business Associates and Third Parties through a reasonable act of hospitality as part of business networking.

2.3 You are required to comply with the following policies and procedures when carrying out entertainment activities to Business Associates and Third Parties:

- (a) The entertainment is a reasonable act of hospitality as part of business networking;
- (b) When providing entertainment, it is a must that the MR. D.I.Y. Personnel directly pay for the entertainment rather than advanced or reimbursed to the recipient;
- (c) Entertainment offered shall not be more than 3 times a year with the same person/ party. If the entertainment offered exceeds the limit, approval from the CEO is required; and
- (d) Prior to providing such entertainment (especially entertainment for Government Officials), approval must be sought from the respective Head of Department. If prior approval is not possible, the said MR. D.I.Y. Personnel must thereafter inform and record the giving of such entertainment.

- 2.4 MR. D.I.Y. recognises that the acceptance of a reasonable and modest level of entertainment by Third Parties in the normal course of business is a legitimate way to network. All MR. D.I.Y. Personnel shall exercise proper care and judgment before accepting entertainment provided by Third Parties, taking into account the relevant laws and regulations, value, occasion and purpose of the entertainment.

3. UPDATES AND REVIEW

- 3.1 This Policy may be updated from time to time and any amendments and update will be immediately made available.