



DIGI

Anti-Corruption Policy

Document Title:	Digi Anti-Corruption Policy	Reference no:	Digi/CEO Office/AC/V8.0/2020	Classification:	Internal
Concurred by:	Subject to internal approval	Approved by :	Subject to internal approval	Date:	29 May 2020

Document History

Version	Date of Issue	Author	Comment
1.0	2012/12/12	Paramjit Kaur Associate Principal	Final
2.0	2013/12/13	Selvi Nachiappan General Counsel	Final
3.0	2014/12/18	Suzana Ahmad Ethics & Compliance Officer	Final
4.0	2016/11/23	Ani Azurin Basir Associate Principal	Final
5.0	2017/03/29	Ani Azurin Basir Associate Principal	Final
6.0	2017/10/17	Ani Azurin Basir Associate Principal	Final
7.0	2019/12/31	Ani Azurin Basir Head, Compliance	Final
8.0	2020/05/29	Ani Azurin Basir Head, Compliance	Final

Management sign-off

Concurred by	Sign	Date
Albern Murty Digi Chief Executive Officer		

Recommended by	Sign	Date
Gowri Balasubramaniam Head, Compliance and Labour Law, CEO's Office		

Reviewed by	Sign	Date
Ani Azurin Basir Head, Compliance, Compliance and Labour Law, CEO's Office		



POLICY
Anti-Corruption

Valid from: 2020.05.29

Page: 3 of 8

Policy Owner:

Digi Head of Compliance and Labour Law

Approver:

Subject to internal approval

1 Policy Owner Mandate

- 1.1. Digi Policy Owner Anti-Corruption is given a mandate to ensure that Digi's zero tolerance on anti-corruption, such as stated in the Code of Conduct, is implemented throughout Digi's business activities and that Digi works against corruption through an adequate and risk based anti-corruption programme.
- 1.2. Digi Telecommunications Sdn Bhd ("**Digi**") is committed in conducting business and servicing its clients and customers with integrity and honesty. Accordingly, Digi does not condone and tolerate any form of corruption or bribery which is in contravention to the Malaysian Anti-Corruption Commission Act 2009 or any similar or related legislations globally. Digi strives to ensure that the management and its employees act professionally, fairly and with integrity in all of its business dealing and relationships with all its business associates, contractors, sub-contractors, service providers, vendors, consultants, agents, representatives and any other third-party performing work or services for or on behalf of Digi and includes its customers and potential and long-standing clients.
- 1.3. The purpose of this Anti-Corruption Policy ("AC Policy") is to set out the responsibilities of the management and employees of Digi on what constitutes gratification and how to deal with bribery and corruption issues. All employees of Digi, business associates, service providers and third parties engaging with Digi are expected to read, understand and comply with the requirements set in this AC Policy (available on Digi's corporate website). No waivers or exceptions will be granted for practices that deviate from Digi's AC Policy.
- 1.4. This AC Policy applies to all individuals under the employment of Digi at all levels, whether permanent, fixed-term or temporary, and wherever located including the Management of Digi (collectively referred to as "**Employees**").



POLICY
Anti-Corruption

Valid from: 2020.05.29

Page: 3 of 8

- 1.5. Apart from the Employees, this AC Policy also applies to all and any Third Party and any other third-party performing work or services for or on behalf of Digi who shall comply with this AC Policy to the fullest extent.

2 Definitions

“Act”	means the Malaysian Anti-Corruption Commission Act 2009, as amended from time to time.
“Bribery”	means an inducement or reward offered, promised, provided or received in order to improperly gain any commercial, contractual, regulatory or personal advantage or influence which includes passive and active bribery.
“Business”	means any activity carried on for the purpose of gain or profit and includes all property derived from or used in or for the purpose of carrying on such activity, and all the rights and liabilities arising from such activity.
“Compliance Function”	means the Compliance Department within Digi;
“Digi”	means Digi Telecommunications Sdn Bhd , its subsidiaries, controlled companies and related companies. The expression “Digi” is used for convenience where references are made to Digi’s group of companies in general. The companies in which Digi has direct or indirect shareholding are distinct legal entities.
“Employees”	has the meaning ascribed to it in Clause 1.4 of this AC Policy.
“Facilitation Payment”	means any sums of unofficial payment made to secure, expedite or facilitate an ordinary governmental action, process or procedure to a government official (either locally or internationally).



POLICY
Anti-Corruption

Valid from: 2020.05.29

Page: 3 of 8

"Family Members"	means a person's spouse(s), children (including step-children and adopted children), parents, step-parents, siblings, step-siblings, grandparents, grandchildren, in-laws, uncles, aunts, nieces, nephews, and cousins, as well as any other persons who are members of his/her household.
"Gratification"	means: (a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage; (b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity; (c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part; (d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage; (e) any forbearance to demand any money or money's worth or valuable thing; (f) 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 (g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).

**POLICY**
Anti-Corruption

Valid from: 2020.05.29

Page: 3 of 8

“Kickbacks”	means an illicit payment or commission made in return for facilitating a transaction, procurement of a project or furthering of a Business.
“Management”	means the Management of Digi which includes directors, managers, heads of departments or any similar position;
“Public Body”	<p>includes the following:</p> <ul style="list-style-type: none">(a) the Government of Malaysia;(b) the Government of a State;(c) any local authority and any other statutory authority;(d) any department, service or undertaking of the Government of Malaysia, the Government of a State, or a local authority;(e) any society registered under subsection 7(1) of the Societies Act 1966;(f) any branch of a registered society established under section 12 of the Societies Act 1966;(g) any sports body registered under section 17 of the Sports Development Act 1997;(h) any co-operative society registered under section 7 of the Co-operative Societies Act 1993;(i) any trade union registered under section 12 of the Trade Unions Act 1959;(j) any youth society registered under section 9 of the Youth Societies and Youth Development Act 2007;(k) any company or subsidiary company over which or in which any public body as is referred to in paragraph (a) to (j) has controlling power or interest; or(l) any society, union, organization or body as the Minister responsible for the Malaysian Anti-Corruption Commission may prescribe from time to time.



POLICY
Anti-Corruption

Valid from: 2020.05.29
Page: 3 of 8

“Third Party”	means any individual or organisation that the Employee comes into contact with during the course of work and the running of Digi’s business, and includes business partners, actual and potential clients/customers, intermediaries, referrers of work, vendors, suppliers, contractors, sub-contractors, service providers, distributors, business contacts, business associates, consultants, agents, representatives, advisers, Public Body (including their advisers, representatives and officials), politicians and political parties.
----------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

3 Requirements

3.1 Zero tolerance for corruption

Digi shall ensure that no employee engages in acts of corruption, including bribery, facilitation payments and trading in influence in both the public and private sectors. This also applies for acts of corruption made through a third party on behalf of Digi.

3.2 General Principles

All Employees shall, at all times in making any Business decision affecting Digi, comply with the following principles:

- (a) comply strictly to the provisions of the Act;
- (b) shall not participate or condone any acts or forms of Bribery;
- (c) the prevention, detection and reporting of any Gratification received, Bribery and other forms of corruption are the responsibility of all Personnel;
- (d) all Employees are required to avoid any activity that might lead to, suggest, imply or cause a breach of this AC Policy or the Act;



POLICY
Anti-Corruption

Valid from: 2020.05.29

Page: 3 of 8

- (e) always exercise proper care and judgement;
- (f) avoid conflict of interest;
- (g) conscientiously maintain the highest degree of integrity and ethics;
- (h) comply fully with all applicable laws, regulatory requirements on anti-corruption and all regulations, procedures, and policies issued by Digi;
- (i) Digi adopts a no gifts policy, subject to certain limited exceptions as detailed in this AC Policy;
- (j) notify the Management of Digi as soon as possible if it is believed or suspected that a conflict with this AC Policy has occurred, or may occur in the future, or if they have been offered any form of Gratification, Bribery, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity;
- (k) If any Third Party or external party is aware of any activity by any Personnel which might lead to, or suggest, a breach of this AC Policy, they should raise their concerns to the Management of Digi.

3.3 Gifts

3.3.1 General Principles of Gifts

- (a) Digi has adopted a "No Gift" Policy whereby, subject only to certain narrow exceptions, all Employees (including their Family Members) are prohibited from, directly or indirectly, receiving or providing gifts, entertainment and hospitality.
- (b) Digi requires all its Employees to abide by this AC Policy to avoid conflict of interest or the appearance of conflict of interest for either party in an on-going or potential business dealing between Digi and its business partners or the Third Party as a gift can be seen as a



POLICY
Anti-Corruption

Valid from: 2020.05.29

Page: 3 of 8

form of Bribery that may tarnish Digi's reputation or be in violation of the Act.

- (c) It is the responsibility of the Employees to inform the business partners or the service providers involved in any business dealings with Digi that Digi practices a strict "No Gift Policy" and to request the business partner's or the service provider's understanding for and adherence to this AC Policy.
- (d) Digi employees may only authorize, offer, give, accept or receive gifts that are promotional items of minimal value, normally bearing a company logo and only when it would be customary to do so.
- (e) Digi employees shall not authorize, offer, give, accept or receive cash or cash equivalents.
- (f) Exceptions can solely be made under the following circumstances and subject to review by the Compliance Function and prior written approval by Digi's CEO.

3.3.2 Exceptions for Receiving or Providing Gifts

Although the general principle is to immediately refuse or return such gifts, accepting a gift on behalf of Digi is allowed only in very limited circumstances, as follows and subject to the review of the Compliance Function and prior written approval of Digi's CEO:

- (a) Digi may provide gifts to Third Parties or receive gifts from Third Parties which are of minimal/nominal value (not expensive and extravagant), bearing the company logo (preferred) and only when it would be customary or reasonable to do so.
- (b) reasonable circumstances where gift may be given or received include the celebration of various festivals in Malaysia.
- (c) any gift given or received must not be made with the intention to



POLICY
Anti-Corruption

Valid from: 2020.05.29

Page: 3 of 8

improperly influence the Business decision-making by a Third Party or Personnel to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits towards Digi or the Personnel;

- (d) the Employee shall comply with this AC Policy, the Act and local laws and regulations in all relevant countries;
- (e) the gift received or provided shall not include cash or a cash equivalent;
- (f) the gift shall be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift;
- (g) value of the gift (including entertainment or hospitality) in cumulative offered to or received from each Third Party in a calendar year shall not exceed Ringgit Malaysia Five Hundred (RM500.00);
- (h) any gift received shall not be illicit, illegal or sexual in nature;
- (i) shall be given or received openly/publicly and not in secretly; and
- (j) in the case of gifts, they must not be offered to, or accepted from the Public Body, government officials or their representatives, politicians or political parties, without the prior approval of the Compliance Department and CEO of Digi.

3.3.3 Prohibited Gifts

Employees are prohibited from giving and should immediately decline, reject and return (if received) the following:

- (a) any gift of cash or cash equivalent which includes but is not limited to vouchers, discounts, coupons, shares, commission, digital assets;



POLICY
Anti-Corruption

Valid from: 2020.05.29

Page: 3 of 8

- (b) any gifts involving parties engaged or to be engaged in a tender or competitive bidding exercise;
- (c) any gifts that comes with a direct/indirect suggestion, hint, understanding or implication that in exchange for the gift, some expected or desirable outcome is required, irrespective of whether it materialises as anticipated. This includes without limitation receiving or giving a business advantage or obtaining approvals, licenses, permits from the regulatory authorities;
- (d) any gift that would be illegal or in breach of the Act or foreign bribery and corruption laws; and
- (e) any gift which is lavish or excessive, for e.g., valued above the maximum threshold permitted by Digi.
- (f) Should an employee receive a gift that is not in compliance with such rule, it shall be returned. If that is not possible, the gift must be turned over to Digi as soon as possible and it will be considered as the property of Digi.

3.4 Events and arrangements

3.4.1 General Principles of Events and Arrangements

- (a) The Employees may arrange or participate in events and arrangements provided that there is a clear and legitimate business reason, the costs are reasonable, and kept within reasonable limits, the context is open and transparent and the immediate superior is informed.
- (b) Expensive or extravagant arrangements shall not be arranged or attended unless it is necessary from a business perspective and documented approval is obtained from Digi's CEO.



POLICY
Anti-Corruption

Valid from: 2020.05.29

Page: 3 of 8

- (c) Digi shall not pay for travel, accommodation or other related expenses for third parties if Digi is arranging a business-related arrangement such as a meeting, seminar or presentation.
- (d) Third Party shall not pay for Digi's expenses in connection with a business-related arrangement arranged by an external third-party.
- (e) Exceptions can solely be made in special circumstances and subject to review by the Compliance Function and prior written approval by Digi's CEO.
- (f) In the case of events and arrangement, they must not be offered to, or accepted from the Public Body, government officials or their representatives, politicians or political parties, without the prior approval of the Compliance Department and CEO of Digi;
- (g) Any events or arrangements shall not be illicit, illegal or sexual in nature;
- (h) Invitation to participate in the events and arrangements should be addressed to the contracting legal entity of the Third Party to Digi's contract, and not to the individual employees (with exception of sole traders) of the Third Party with clear and written agenda and adequate business content;
- (i) Prior approval of Digi's CEO is required if travel, hospitality (including meals) accommodation or related expenses is to be borne by Digi, or if the event or arrangement is to take place abroad and if it involves any Public Body (approval granted by Digi's CEO must have proper justification, agenda, content and cost and is properly recorded and documented).



POLICY
Anti-Corruption

Valid from: 2020.05.29
Page: 3 of 8

3.5 Facilitation Payments and Kickbacks

Digi prohibits facilitation payments and Kickbacks of any kind.

3.6 Emergency Exceptions

If an employee has reason to believe that his or her own or other's life, health or property could be in danger, the restriction on facilitation payment and bribery shall not apply.

If such payments are made, they are to be documented and entered precisely and accurately in the Gift and Hospitality Register provided under Appendix 1 of this AC Policy. If making a payment subject to the above narrow exception, the employee shall consult Digi's Policy Owner Anti-Corruption and obtain an approval from the employee's immediate superior at the earliest opportunity.

3.7 Lobbyists

In the event Digi makes use of lobbyist, it shall be promptly disclosed to the third party the lobbyist is lobbying towards that the lobbyist represents Digi. This obligation shall be included in the agreement with the lobbyist.

This AC Policy shall be binding on the lobbyist engaged by Digi from the date of engagement until the date of expiry or early termination of engagement. To the extent applicable, all reference to the Employees in this AC Policy shall be read to include any lobbyist representing Digi.

3.8 Political Activity

Digi does not take political positions or associate with political movements, though we may participate in public debates which are of importance to our strategy and business performance.

Unless specifically approved by Digi's Management, Digi does not make any political donations or contributions to any political parties or politically motivated projects. Whilst the Employees of Digi are not restricted to make any personal political contribution in their own personal capacity, Digi will not make any reimbursement for personal contributions for these personal political contributions back to its employees.



POLICY
Anti-Corruption

Valid from: 2020.05.29

Page: 3 of 8

3.9 Sponsorships and Donations

Sponsorships and Donations, though permissible subject to the Digi sponsorship and donations process, must never be for the purpose of obtaining an unfair advantage. Employees should consult Digi's Compliance Function for Digi's Sponsorship Policy, Sponsorship Manual, Corporate Sponsorship Manual, Donation Manual.

3.9.1 General Principles for Sponsorship and Donations

The following are general principles to adhere to in providing sponsorships or donations:

- (a) ensure that such sponsorships, donations or other contributions are allowed by the Act or any other applicable laws and regulations, both local and foreign;
- (b) all request for charitable donations and sponsorships must require approval from the Management of Digi;
- (c) be only made to well established entities having an adequate organisational structure to guarantee proper administration of the funds;
- (d) be accurately recorded in Digi's accounting books and records; and
- (e) not used as a means to cover up undue payment, Bribery or Gratification, or with the intent of obtaining or retaining business or advantage in the conduct of business for Digi.

3.9.2 Suspicious Transactions

The following are the "red flags" to look out for:

- (a) the proposed recipient/organisation has affiliations with a Public Body or its related officials;



POLICY
Anti-Corruption

Valid from: 2020.05.29

Page: 3 of 8

- (b) the contribution is made on behalf of a Public Body or its related officials;
- (c) there is a risk of perceived improper advantage to Digi;
- (d) the proposed recipient, request or activity originates from or is based in a high-risk country.

3.9.3 Due Diligence

Before making a commitment to provide a donation or sponsorship or other contributions, the Management is required to conduct proper due diligence to ensure that the request is legitimate and that any “red flags” that are raised are resolved prior to committing the funds.

The following due diligence checklist should be adhered to in making a decision to provide a donation or sponsorship:

- (a) the request is properly evaluated against this AC Policy and related policies relating to sponsorship and donation;
- (b) there is no risk or perceived improper advantage for Digi;
- (c) the proposed recipient is a legitimate organisation and proper due diligence/background checks has been conducted to the satisfaction of Compliance Department; and
- (d) the proposed recipient/organisation does not have affiliations with a Public Body.

3.10 Gift and Hospitality Register

In these limited circumstances, Employees are expected to immediately record any gift, hospitality or entertainment received or given in the Gift and Hospitality Register as provided under Appendix 1 of this AC Policy which will then be submitted to the Compliance Function who will then decide whether to approve the giving or acceptance of the gift or require for the gift to be returned, to the extent capable of being returned. If the nature



POLICY
Anti-Corruption

Valid from: 2020.05.29
Page: 3 of 8

of gift is not capable of being returned, refund of money or credit equivalent to the value of gifts ought to be arranged.

3.11 Offence Under the Act

A. Receives or Gives Gratification

- (a) Section 16 of the Act, any person who by himself or by or in conjunction with any other person corruptly solicits or receives or agrees to receive for himself or any other person or corruptly gives, promises or offers to any person whether for the benefit of that person or of another person, any gratification as an inducement to or a reward for, or otherwise on account of (i) any person doing or forbearing to do anything in respect of any matter or transaction, actual or proposed or likely to take place or (ii) any officer of Public Body doing or forbearing to do anything in respect of any matter or transaction, actual or proposed or likely to take place, in which the Public Body is concerned, commits an offence.
- (b) Any person who commits an offence under Section 16 of the Act, shall on conviction be liable to imprisonment not exceeding twenty (20) years and a fine not less than five times the sum or value of the gratification is capable of being valued or of a pecuniary nature, or ten thousand ringgit, whichever is higher.

B. Offence by a Commercial Organization

- (a) Section 17A of the Act provides that a commercial organisation commits an offence if a person associated with the commercial organisation corruptly gives, agrees to give, promises or offers to any person any gratification whether for the benefit of that person or another person with intent to obtain or retain a business for the commercial organisation or to obtain or retain an advantage in the conduct of the business for the commercial organisation.
- (b) On conviction, a commercial organisation can be liable to a fine of not less than ten (10) times the sum or value of the gratification



POLICY
Anti-Corruption

Valid from: 2020.05.29

Page: 3 of 8

which is the subject matter of the offence, or One (1) million ringgit, whichever higher or imprisonment for a term not exceeding twenty (20) years or to both.

- (c) Where an offence is committed by a commercial organisation, its director, controller, partner, officer or any person who is concerned with the management of the affairs of the company is deemed to have committed the offence unless he/she can prove that the offence was committed without his/her consent and he/she has exercised proper due diligence.

3.12 Whistleblower Protection

Digi strongly encourage Employees, clients or Third Party to notify or report any improper conduct through the reporting procedure as provided under Digi's Whistleblowing Policy.

Section 7 of the Whistleblower Protection Act 2010 provides protection to whistleblowers and extends such protection to any person related to or associated with the whistleblower upon receipt of the disclosure of improper conduct by any enforcement agency provided that such disclosure is not specifically prohibited by any written law.

For further information, please refer to Digi's Whistleblowing Policy.

3.13 Breach

Any Employee who breaches this AC Policy may face disciplinary action, which could result in dismissal for gross misconduct. Digi reserves the right to terminate our contractual relationship with any Third Party if there is a breach of this AC Policy.

3.14 Adequate Procedures

Digi shall have adequate procedures in place to prevent Digi from being involved in corruption, including facilitation payments. This includes the following:



POLICY
Anti-Corruption

Valid from: 2020.05.29

Page: 3 of 8

3.14.1 Top level commitment

Top management in Digi shall demonstrate a visible and active commitment to Digi's zero tolerance for corruption and the anti-corruption programme.

3.14.2 Risk assessment

Digi shall annually or at any periodic intervals assess external and internal risks and where there is a change in law or business to identify, analyze, assess and prioritize any risk related to bribery and corruption. Based on the annual assessments, the respective business unit shall implement adequate procedures to prevent the company from being involved in corruption. The risk assessment shall be properly recorded and documented. The risk assessment will include procedures, steps of improvement and enhancement to strengthen Digi's framework in combatting corruption and bribery.

3.14.3 Integrity Due Diligence (IDD)

Due care shall be exercised before engaging with Third Parties to avoid unacceptable risk of being involved in or associated with corruption. This Policy is to be read together with Digi Business Partner Compliance Management Policy and Manual.

(a) **General**

Digi's dealings with Third Party, shall be carried out in compliance with the Act and all relevant local and foreign laws and consistent with the values and principles of this AC Policy. As part of this commitment, all forms of Bribery and corruption are unacceptable and will not be tolerated.

Digi expects that all and any Third Party acting for or on its behalf to share the principles, values and ethical standards to ensure that their actions does not implicate Digi legally and tarnish the Digi's reputation for being involved with Bribery or corruption.



POLICY
Anti-Corruption

Valid from: 2020.05.29

Page: 3 of 8

(b) **Suspicious Transactions**

The following are common “red flags” involving a Third Party which includes but is not limited to:

- (i) the transaction involves a country known for a high incidence of corrupt payments;
- (ii) business dealings involving Family Members or other “special” ties (which includes close relationships) with Public Body or its related officials;
- (iii) a reference check reveals a flawed background or a reputation for “getting things done” regardless of the circumstances or suggests that for a certain amount of money, he can fix the problem;
- (iv) objection to anti-bribery representations and warranties in commercial agreements or negative response when told of such requirements;
- (v) convoluted payment arrangements such as payment in cash, payment to a Third Party or into accounts in other countries or requests for upfront payment for expenses or other fees;
- (vi) the Third Party requires that his/her identity not be disclosed as part of the business transaction;
- (vii) inadequate credentials for the nature of the engagement or lack of an office or an established place of business;
- (viii) refusal or reluctance to complete the Due Diligence Questionnaire under **Appendix 2** of this AC Policy.



POLICY
Anti-Corruption

Valid from: 2020.05.29

Page: 3 of 8

(c) **Due Diligence Prior to Engaging with Potential Third Party**

To help ensure that Digi only does business with a Third Party that shares Digi's standards of ethics and integrity, the Management and the Employees shall conduct prior due diligence to assess the integrity of Digi's prospective business counterparties. Digi shall not enter into any business dealings with any Third Party which is reasonably suspected of engaging in Bribery or improper business practices unless those suspicions are investigated and resolved.

If at any point during the due diligence exercise or in the dealings with a Third Party, there are conflicts of interest or "red flags" that are raised, these warrant further investigation by referring the matter to Compliance Function and must be sufficiently addressed before the engagement of the Third Party can progress. Digi shall procure all Third Party prior to entering into business dealings with them to fill in the Due Diligence Questionnaire **Appendix 2** to assess the risk of the Third Party and whether is it fit and proper to conduct business relationships with them.

(d) **Due Diligence for Existing Third Party**

Digi performs an on-going monitoring and manages the risk profile of existing Third Party, by conducting the following:

- (i) no payment to personal account is allowed if the Third Party is a body corporate;
- (ii) any one-off advance payment to a Third Party after a contract is signed and prior to delivery of services or goods, must be reviewed and approved by the Management before payment is made;
- (iii) all and any Third Party is subject to periodic compliance risk profile review. It includes requesting the Third Party to update the Compliance Due Diligence Questionnaire as provided under **Appendix 2**. The frequency of review is as follows:

1. Higher Risk Third Party: Annual review; and



POLICY
Anti-Corruption

Valid from: 2020.05.29

Page: 3 of 8

2. All other Third Party: Every two (2) years review or at contract renewal, whichever is earlier.

(e) **Trigger Event for Conducting Compliance Due Diligence Check After Contracting**

The following are the trigger events that will cause Digi to perform due diligence after contracting:

- (i) change of payee and/or change of bank payment account request are raised by the Third Party;
- (ii) when the periodic compliance risk profile review is due;
- (iii) when there are changes of associated persons, for e.g., change of beneficial owner or authorized person;
- (iv) any negative news or updates on the Third Party which may raise concerns on doing business with the Third Party

3.14.4 Communication and Training

Training on this AC Policy and Digi's Code of Conduct is provided regularly to all Employees and Digi's zero-tolerance approach to Bribery and corruption will, where appropriate, be communicated to any Third Party that are engaging with Digi through various formats which includes but is not limited to corporate training programmes, seminars, townhall sessions, role-specific training, induction programmes featuring anti-corruption elements, web based programmed, other outreach programmes and their declaration under integrity pledge.

Digi also regularly communicate the requirements and obligations under this AC Policy and related policies through various mediums and platforms which includes but is not limited to emails, newsletters, posters, code of



POLICY
Anti-Corruption

Valid from: 2020.05.29

Page: 3 of 8

business conduct, Digi's website and internal platforms.

3.14.5 Record Keeping & Accounting

Any economic benefit or liability shall be recorded and maintained in designated company accounts utilizing clear terms to appropriately describe its nature and use in accordance with widely recognized and accepted accounting principles and practices in compliance with Digi's policy Accounting and Financial Reporting.

Digi ensures that all matters regarding the prevention of corruption and bribery which includes but is not limited to risk assessment, proposed improvements and amendments to process and procedures, annual reviews of policies, complaints, disciplinary actions taken on prohibited conducts is properly documented and recorded.

3.14.6 Monitoring Yearly review

- (a) Digi's Policy Owner Anti-Corruption shall initiate effective periodic monitoring activities to ensure compliance with Digi's Policy Anti-Corruption.
- (b) Digi's Policy Owner Anti-Corruption shall conduct a yearly risk-based review of the adequate procedures in place in Digi and remediate any weaknesses. The review, including remediating actions, shall be reported to Digi's CEO.
- (c) Digi ensures that the top-level management continuously monitors the effectiveness and reviews the implementation of this AC Policy annually and at appropriate intervals, considering its suitability, adequacy and effectiveness. Any improvements identified are made as soon as possible. Internal control systems and procedures are also subject to regular review to provide assurance that they are effective in eliminating any risks of Bribery and corruption.



POLICY
Anti-Corruption

Valid from: 2020.05.29

Page: 3 of 8

- (d) In addition to annual reviews, Digi is committed in ensuring the proper implementation and enforcement of the anti-bribery and corruption framework within Digi. These monitoring and enforcement steps may include the form of internal or external audits carried out by external reputable parties.
- (e) Digi also seeks to conduct continual evaluations and identify competent persons and establish proper compliance functions to perform the adequate monitoring and implementation of anti-corruption measures within Digi.
- (f) All Employees are aware that they are responsible for the success of this AC Policy and should ensure they use it to disclose any suspected danger or wrongdoing. Digi's Management will monitor closely the performance of Employees in relation to the anti-corruption framework to ensure their understanding and compliance with their respective roles and functions.

The Management will not be hesitate to conduct disciplinary proceedings against the Employees found to be non-compliant to this AC Policy or related policies.

4 Reporting

Digi's Policy Owner shall always notify the Group Chief Compliance Officer, the Digi's Head of Compliance, and the General Counsel in case of:

- Notice by public authorities commencing investigations or intervention towards Digi under anti-corruption laws and regulations.
- Material violations of anti-corruption laws and regulations.



POLICY
Anti-Corruption

Valid from: 2020.05.29
Page: 3 of 8

5 Reference documents

- Digi's Policy & Manual Business Partner Compliance Management
- Code of Conduct
- Digi Whistleblowing Policy
- Digi Sponsorship Policy
- Digi Sponsorship Manual
- Digi Corporate Sponsorship Manual
- Digi Donation Manual
- Digi Policy Accounting and Financial Reporting



POLICY
Anti-Corruption

Valid from: 2020.05.29
Page: 3 of 8

Appendix 1
Gift and Hospitality Register



Appendix 1 ABC
Policy - Gift and Hos

Appendix 2
Due Diligence Questionnaire



Appendix 4 - Due
Diligence Questionr