

WEN & CO ANTI-BRIBERY AND CORRUPTION POLICY

1. OBJECTIVES

This Policy aims to –

- (a) establish standards and guidance on the requirements and obligations imposed under Malaysian Anti-Corruption Commission Act 2009 (MACC) Act 2009 (“**MACC Act 2009**”) and Guidelines on Adequate Procedures issued pursuant to subsection (5) of Section 17A of MACC Act 2009 (“**Adequate Procedures Guidelines**”), which include amongst others, the five guiding principles under **TRUST**; and



- (b) forms the basis of other procedures and documents which supplements and clarifies this Policy from an operational standpoint.

2. MACC ACT 2009

Under the MACC Act 2009, giving and accepting any bribes constitutes as acts of corruption and are criminal offences resulting in legal consequences including a hefty fine and/or imprisonment of up to 20 years.

A commercial organization commits an offence if an associated person corruptly gives any gratification with intent to obtain or retain business or an advantage in the conduct of business, for the commercial organization. If an offence is committed by a commercial organization, the directors, controller, officer, partner or persons concerned in the management of the commercial organisation’s affairs is deemed to have committed the same offence under the MACC Act 2009. Therefore, it is essential for you to understand how bribery and corruption may happen or committed and the legal consequences arising from such illegal acts. You should also take steps in preventing such acts of bribery and corruption from happening.

4. APPLICATION OF THIS POLICY

This Policy is applicable to anyone who is employed by or work at Wen & Co (whether in Malaysia or outside of Malaysia) and includes all permanent, fixed term or temporary employees (executive and non-executive) (“**Personnel**”).

Contractors, sub-contractors, consultants, agents, representatives and service providers of any kind providing or performing its services or and any third parties in transaction with or for and on behalf of Wen & Co (“**Business Associates**”) are expected to comply with this policy in relation to all work conducted with or for and on behalf of Wen & Co.

5. TOP LEVEL COMMITMENT

Wen & Co is committed in –

- practising the highest level of integrity and ethics;
- complying fully with the applicable laws and regulatory requirements on anti-corruption; and
- adopting zero-tolerance approach towards bribery and corruption in all its forms.

Anti-corruption compliance function

The principal of Wen & Co sets the tone at the top spearheading Wen & Co’s efforts to establish, maintain and periodically review an anti-corruption compliance program and promoting a culture of integrity within Wen & Co in compliance with the Adequate Procedures Guidelines.

The principal of Wen & Co assigns to the principal and/or senior associate to be responsible for all anti-bribery and corruption compliance matters under this Policy, including provision of advice and guidance to personnel and business associates in relation to the anti-corruption program under this Policy.

The principal and/or senior associate shall be adequately equipped to act effectively against bribery and corruption in the following manner:

- (a) provide advice and guidance on anti-corruption compliance programme and issues relating to bribery and corruption;
- (b) take appropriate steps to ensure that there is adequate monitoring, measurement, analysis and evaluation of the anti-corruption compliance programme; and
- (c) report on the performance of the anti-corruption compliance programme to the Board regularly.

Appropriate resources shall be provided for effective operation of the anti-corruption compliance programme and Wen & Co is staffed with persons who have the appropriate competence, status, authority and independence.

The line of authority for the person tasked with responsibility for overseeing the anti-corruption compliance program shall be directly to the principal.

6. RISK ASSESSMENT

Corruption risks assessment to identify, analyse, assess and prioritise internal and external corruption risks should form the basis of Wen & Co's anti-corruption efforts.

All lines of businesses and support functions are required to conduct risk assessments on a periodic basis and a comprehensive risk assessment to be done every 3 years.

The risk assessment should be used to establish and improve appropriate processes, systems and controls to be approved by the Board to mitigate the specific corruption risks the business is exposed to.

All risk assessments must be duly documented, incorporated into the general risk register and available for review by the Board.

7. UNDERTAKING CONTROL MEASURES

Wen & Co may put in place control measures due diligence and reporting policy in order to address any corruption risks.

Facilitation Payments

Wen & Co prohibits proposal or offer of a facilitation payment. In Malaysia, facilitation payments are illegal and seen as a form of corruption. Facilitation payment is strictly prohibited for any conducts by the Personnel and Business Associates for and on behalf of Wen & Co. This includes whether the facilitation payment is made or sought from any parties and/or locations outside of Malaysia. Our Personnel and Business Associates must not directly or indirectly offer, promise or give any form of facilitation payment to any public officials for any purposes.

8. SYSTEMATIC MONITORING AND REVIEW

Wen & Co's commitment on anti-bribery and corruption effort within the organization will be a continuous effort in maintaining its integrity, ethics, reputation and standards.

Periodical and regular audits will be conducted within the organization to monitor, review, evaluate and improve the compliance, performance, efficiency and effectiveness of on-going anti-bribery and corruption control measures implemented by Wen & Co. The audits may be conducted by internal Personnel or by an external party appointed by Wen & Co. The results of any audit, risk assessment, review of control measures and performance shall be reported to the principal and acted upon accordingly.

Our Personnel is encouraged to raise any concerns or inadequacies in the anti-corruption compliance program to the principal.

9. TRAINING AND COMMUNICATION

This Policy is a public document which shall be communicated to all our Personnel and Business Associates. Our Personnel and Business Associates shall read and understand Wen & Co's commitment on anti-bribery and corruption, reporting channel and consequences of non-compliance with Wen & Co's policy a.

Adequate training shall be provided to our Personnel and if required, to be extended to our Business Associates to ensure their thorough understanding of Wen & Co's anti-corruption position, especially their role within or outside Wen & Co.

10. ENQUIRIES

In the event of any queries on this Policy, you may contact the principal at –

Name : Nicole Leong

E-mail Address : : nicole@wenlaw.co

11. DECLARATION

Effective from the date of this Policy, all our Personnel and Business Associates shall confirm that they have read, understood and will abide by this Policy by signing and returning the form set out in **Annexure** hereto.

A copy of this declaration shall be documented and retained by Wen & Co.

**ANNEXURE
FORM OF DECLARATION**

I hereby confirm that I have read, understood and will abide by this Policy.

Name :

Role / Designation :

Signature :

Date :

Date of Policy :
Rev. No. :