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is a dishonest behaviour which can include giving or accepting bribes or inappropriate gifts, double-dealing, under-the-table transactions, manipulating elections, diverting funds, laundering money, and defrauding investors. The Transparency International definition of corruption is 'the abuse of entrusted power for personal gain'.

In addition, corruption may also include acts of extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.

For the purpose of this policy, corruption is defined primarily as any action which would be considered as an offence of giving or receiving 'gratification' under the MACCA.

according to MACCA:

- (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);

according to MACCA consists of:

i) Offence of giving and accepting gratification.

Any person who

(a) corruptly solicits or receives or agrees to receive for himself or for any

If there is any doubt, the advic

include but not limited to reporting to the relevant regulatory/ enforcement body(s).

UCSI practises an open-door policy and encourages all its employees to share concerns and suggestions with superiors and colleagues who are able to address them in an appropriate manner. The following channels may be used for this purpose:

(a) Anti-Corruption e-Form at:

<http://www.ucsigroup.com.my/anticorruptionform>

(b) Emails:

i. Senior Director, Group Human Resource:
khalid@ucsigroup.com.my

ii. UCSI Risk Manager:
nadia.nasir@ucsigroup.com.my

(c) Call the UCSI Risk Manager at 03-91018880 extension 2404

If any Third Party has any doubt, received any unjust treatment or aware of any activity by any employees of UCSI which might lead to, or suggest a breach of this Policy, they should contact the relevant personnel as described in (a), (b) and (c) above.

Reports made in good faith, either anonymously or otherwise, shall be addressed in a timely manner and there is no fear of reprisal regardless of the outcome of any investigation.

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct. UCSI reserves the right to terminate the contractual relationship with any Third Party if they breach any

