

1. ABBREVIATION

This policy / Policy	No Gift Policy
AVISENA	Avisena Group/ Avisena Holdings Sdn Bhd, its subsidiaries and controlled companies
BOD	Board of Directors, Avisena Holdings Sdn Bhd
Employees/You	Any person who is in employment of Avisena including not limited to executive and non executive and individual working for Avisena.
HOD	Head of Department

2. POLICY STATEMENT

Avisena as a service provider, pride ourselves on the relationships we have with our, and suppliers we do business with, and the difference we make together in creating better experiences for our customers. One of our core values is 'Saadiq', hence it is important that our core value applies to every aspect of our business.

We are committed to being honest, ethical and conduct ourselves with the highest degree of integrity while executing their duty within or outside of the Avisena premise. In going about our business, we will avoid the perception of impropriety and our No-Gift Policy is not to seek advantage by giving or accepting any improper gifts, entertainment or payments from any customer, supplier, potential supplier or any person we believe may be seeking to influence our business decisions or transactions, and nor must we do so as individuals. We do not accept any level of corruption.

3. INTRODUCTION

All Avisena's directors, employees, consultants and agents acting on behalf of Avisena and their immediate families are prohibited from directly or indirectly giving or receiving gift and any form of unjustified hospitality as a consideration and /or benefits while carrying their official duties during their course of employment and /or while having contractual engagement and /or dealings with Avisena customers, suppliers, contractors, public officials including but not limited to all other stakeholders.

This Policy includes supplier-provided food, beverages (alcoholic/non-alcoholic), meals or any form of entertainment including sporting events, and hospitality that is used as a reward or payment and/ or that is lavish and excessive in value.

4. OBJECTIVE

The principal objectives of this policy are:

- i. To ensure Avisena's relationships with our customers, partners, vendors, suppliers, contractors and consultants to be a positive point of difference for Avisena and to reflect our core values.
- ii. To create awareness to all employees and senior management to exercise proper care and judgment in handling gift activities and behave in a manner consistent with the general principles as set out in our Anti-Corruption Policy.
- iii. To maintain the highest degree of integrity in conducting our business.
- iv. To promote to all directors, employees, consultants and agent acting on behalf of Avisena to always avoid conflict of interest
- v. To refrain all directors, employees, consultants and agent acting on behalf of Avisena from taking advantage of their position or exercising their authority to further their own personal interest at Avisena's expense
- vi. To ensure compliance with applicable laws, regulations and Avisena's policies and procedures.

5. SCOPE

This Policy applies to all Avisena directors, consultant, employees and agents acting on behalf of Avisena.

6. GUIDANCE ON "NO GIFT" POLICY

In general, Avisena's employees should avoid and / or are encouraged to avoid the practice of giving and receiving gifts and hospitality. However, Avisena recognizes that in our vast working and commercial environment, we are bound to have business or engaged in a relationship with numerous parties of all sort of background and hospitality is at times is a common or cultural practice for them.

Employees are required to professionally inform vendors, potential vendors and others of this policy, and the reasons the company has adopted the policy. Employees should request that vendors respect our company policy and not purchase and deliver any gift for our employees, department, Unit Offices or Company, at any time, for whatsoever reason.

6.1 Exceptions to the No Gift Policy

The following gifts shall be exempted from the prohibition under this Policy:-

- Exchange of gifts at the company-to company level (e.g. gifts exchanged between companies as part of an official company visit/courtesy call and thereafter the said gift is treated as company property);
- Gifts from Avisena to external institutions or individuals in relation to the Avisena's official functions, events and celebrations (e.g. commemorative gifts or door gifts offered to all guests attending the event);

- Gifts from Avisena to employees in relation to an internal or externally recognised Company function, event and celebration (e.g. in recognition of an employee's service to the Company);
- Token gifts of nominal value bearing Company's logo (such as pens, notepads, planners, calendars and other small promotional items) that are given out to employees, customers, delegates, students and members of the public, attending events such as conferences, exhibitions, trainings, career fairs, etc, and deemed as part of the company's brand building or promotional activities; and
- Gifts or financial support or contributions to charitable organizations or individuals on a charity basis under the Avisena's Sponsorship and Donation policy. A Corporate Gift for a specific purpose is encouraged as opposed to a Personal Gift.

6.2 Receiving Gifts

In certain situation, gift giving is a central part of business etiquette. Despite acknowledging Avisena principles, some external parties may still insist on providing gift. Where it is likely to cause offence to the external party, the employee is required to seek for Head of Department permission for the gift. In the event the Head of Department approves the acceptance of the gift, he/she must also determine the treatment of the gift:

- a) Donate the gift to charity;or
- b) Hold it for departmental display; or
- c) Share with other employees in the department; or
- d) Permit it to be retained by the employee.

In such circumstance of where Avisena’s employee is caught in a situation where it is unavoidable (both offered and received), the following Guiding Principles must be adhered to:

No.	Criteria	Description
1	Modest	Not excessive or of such value i.e. not more than RM 300. It may seem to put undue pressure on the recipient, influence a business decision or even create the impression of a relationship of dependency
2	Infrequent	A recurring pattern of gifts and/or hospitality (e.g. each quarter) can be regarded as an indicator of inappropriate.
3.	Moment: offered and accepted at the right moment	Not coinciding with contract negotiations or decisions by the recipient on awarding projects or decisions on commercial issues
4.	Intentions: offered and accepted with the right intentions	To build goodwill or show appreciation, unsolicited (never asked for), not as a way of persuading the recipient, to influence a business decision, or to obtain favourable treatment.
5.	Transparent	Open and free discussion of the gift or hospitality with both our own and the recipient’s colleagues as well as any third party should not give rise to any concerns or embarrassment. Gifts received during festivals not on a personal basis , must be shared and distributed to all staff.
6.	Appropriate in the circumstances	The gift or hospitality should always be in line with applicable policies on the part of the recipient and with prevailing public opinion; it should be in line with our core values and applicable law; it should be mindful of Avisena’s excellent reputation; and it should be proportionate to the recipient’s position.

However, even if it may appear disrespectful to refuse a gift from an external party, nevertheless, if there is a conflict of interest situation (e.g. bidding is in progress and the company that gave the gift is one of the bidders) then clearly the Head of Department/ cannot approve the acceptance of said gift. In this situation, the gift must be politely returned with a note of explanation about the Company’s “No Gift” policy.

7 COMPLIANCE TO THE POLICY

A Gift Register is to be established and maintained at each department to record on the gift received to ensure transparency. This Policy shall be complied with at all times. Any violation of the Policy shall be deemed as major breach of discipline and is subjected to disciplinary actions.

8 EXCEPTIONS

Any form of deviation from this Policy, except those that are operational in nature, shall require the approval of the Board of Directors.

9 REVIEW FREQUENCY AND POLICY OWNER

- a) This policy shall be reviewed once every two years after the date of approval, or as when deemed necessary by the company.
- b) Risk Management Department shall be responsible for the development, updates and review of this policy.
- c) Risk Management Department also shall be responsible on the operationalization of this policy through standard operating procedure (SOP), templates, assessment methodology and internal guidelines that it may be issued from time to time.
- d) Amendments or modification to this policy shall be approved by the Board of Directors.