

ANTI-CORRUPTION AND BRIBERY POLICY

1. INTRODUCTION

(a) Company's Commitment

AE Research Management Sdn. Bhd. (“**Company**”) is fully committed to conduct its business ethically and with integrity. The Company adopts a zero-tolerance approach against bribery and corruption of sorts and takes a strong stand against any acts of such nature in line with applicable laws such as the Malaysian Anti-Corruption Commission Act 2009, the Malaysian Anti-Corruption Commission (Amendment) Act 2018 and any of its amendments and re-enactments.

** “Corruption” is defined as the act of giving or receiving of any gratification or reward in the form of cash or in-kind of high value for performing a task in relation to his/her job description.*

***“Bribery” is defined as money, donation, gift, any valuable thing of any kind, any forbearance to demand any money or money's worth or valuable thing, any other service or favour of any kind, or any offer, undertaking or promise of any such gratifications.*

In the event there is a conflict between the provisions of any applicable laws and the terms of this Policy, the former shall prevail.

(b) Purpose

The purpose of this Policy is to act as a guide for the directors, employees and associated persons (collectively referred to as “**personnel**”).

**“Associated persons” shall include partners and persons who performs services for or on behalf of the Company.*

That being said, this Policy does not lay out conclusive responses to every scenario. In the event that you are unsure about whether an act may constitute “corruption or bribery”, please refer to the following persons:-

- Mr. Quah Hong Chye, CEO
(hcq@aeresearchmanagement.com); or
- Ms. Stefanie Yeoh Sue Lin, Person Responsible for Compliance
(stefanie@aeresearchmanagement.com)

2. NO GIFT POLICY

2.1 General

In line with the Company's No Gift Policy (additionally, the Company does not practice softing) and for avoidance of conflicts of interest, the personnel and their family members are prohibited from accepting or providing gifts, save for a few exceptional circumstances.

The directors and employees of the Company are duty-bound to inform external third parties with whom it conducts business of this policy.

**Family members include spouse(s), children (including step-children and adopted children), parents and other persons who are members of the personnel's household.*

2.1.1 Accepting Gifts

The Company acknowledges that unique situations may arise (that do not fall within the general exceptions) that it would be offensive to reject a gift from an external party, eg. where exchanges of gifts form part of business etiquette.

In such situations, directors or employees are expected to immediately declare and record the gift in the Gift Declaration form and submit the form to the CEO or Person Responsible for Compliance for their approval. If approval is not given, such gift is to be returned immediately with an explanation note about the Company's No Gift Policy.

2.1.2 Providing Gifts

As a general rule, all directors, employees or associated persons of the Company are strictly prohibited from providing gifts to external third parties except in accordance with Clauses 2.1.3 and 2.2.

2.1.3 General Exceptions

General exceptions to the Company's No Gift Policy include:-

- (i) Mutual exchanges of gifts at company-to-company level (such gifts are thereafter deemed Company's property);
- (ii) Gifts to the directors, employees and/or associated persons and/or their family members in relation to an internal or externally recognised event, celebration and occasion (e.g. in recognition of a director's/employee's/associated person's service to the company);

- (iii) Token gifts of nominal value (e.g. those bearing the logo of the Company) which are given to promote/expand the Company's branding;
- (iv) Greeting cards sent to convey celebratory wishes; and
- (v) Gifts of monetary/non-monetary kind to charitable organisations.

Notwithstanding the above, the acceptance or provisions of such gifts shall be carried out with the highest level care without compromising the Company's integrity and in compliance with applicable laws, rules, regulations, guidelines and policies. Ultimately, such gifts are prohibited to effect business decisions.

2.2 Entertainment And Travel (“Hospitality”)

The Company acknowledges that one of the cornerstones of every business is marketing to build and foster business relationships. Therefore, only eligible personnel are entitled to hospitality expenses to entertain external third parties for the purpose of business networking, provided that such hospitality is reasonable and proportionate to the purpose for which it was expended.

Similarly, personnel are prohibited from accepting hospitality unless it is legitimately for business networking purposes to avoid legal, reputational or integrity risks.

Personnel are reminded that hospitality undertaken directly or indirectly with the ultimate purpose to unduly influence an external third party in exchange for some benefit is strictly prohibited.

3. DEALING WITH PUBLIC OFFICIALS

Personnel shall exercise extra caution with respect to dealings with public officials as this involves an increase of reputational risk and risk of prosecution for corruption and bribery.

Personnel are prohibited from paying for non-business related gift or hospitality for any public official and/or his family member(s) without prior permission from the Company's CEO. Should approval be granted, personnel shall ensure that any gift or E&T shall not be extravagant in nature, disproportionate with the official designation of the public official and not given to him in his personal capacity.

**“public official” is defined as persons including, without limitation to any officer of a Governmental Authority, member of a political party, political candidate, officer of a public international organization, or officer or employee of a state-owned enterprise.*

4. SPONSORSHIPS AND DONATIONS

The Company recognises that it has a social responsibility in the advancement of society, in particular the finance and securities industry.

However, any sponsorships and donations made not be used as a tactical ploy as a subterfuge for bribery, disguised as illegal payments or kickbacks to public officials, family members or entities associated with them. In addition to that, all care must be taken to ensure that the recipient persons, charities or organisations are not used or camouflaged as a conduit for illegal activities or money-laundering/terrorism financing activities.

The Company does not make or condone charitable donations or contributions to political parties. That being said, the Company does not place any restrictions on its personnel to make such political donations in their personal capacities but will not make any reimbursements to the personnel for such donations or contributions.

5. FACILITATION PAYMENTS

The Company has a strict policy against facilitation payments. If a personnel is forced to make a facilitation payment by any authority or public official, that personnel shall immediately report the same to the Person Responsible for Compliance.

**“Facilitation payments” are payments/provisions made personally to an individual in control of a process or decision.*

6. EMPLOYMENT

The Company is an equal opportunity employer. Its recruitment and promotion of staff are based on the staff suitability, capabilities, aptitude, skills and competencies. There shall be no element of corruption in the hiring and promotion process.

In keeping with this stance, the Company shall conduct background checks on prospective staff (or existing staff if the need arises) to ensure that the staff has not been convicted of any offences involving bribery or corruption, both locally and internationally.

7. RESPONSIBILITIES

All personnel shall adhere strictly to the Company’s stand on anti-bribery and corruption, which includes the following:

- (a) familiarise himself with this Policy;

- (b) attend any required training on anti-bribery and corruption that commensurate with his position;
- (c) educate and train his subordinates on the terms of this Policy;
- (d) make any declaration in accordance with this Policy accurately in a prompt and complete manner;
- (e) swiftly report and escalate any reports of suspected bribery or corruption (red flags) to the CEO or Person Responsible for Compliance for their further action; and
- (f) immediately refer to the CEO or Person Responsible for Compliance in the event of any ambiguities or lack of clarity.

8. WHISTLEBLOWER

The Company strives to maintain the highest level professionalism and integrity at all times. As such, the Company encourages openness and transparency amongst the personnel in the conduct of its business.

Thus, if a personnel has any reasonable suspicions of an act (actual or perceived) of bribery or corruption or any violations of this policy, that personnel is urged to lodge a report to the CEO or Person Responsible for Compliance immediately. A report made in good faith and without any malicious intent shall be kept confidential and no detrimental action shall be taken internally against the whistleblower, notwithstanding that after investigation, it is shown that he was mistaken.

9. PENALTY

The Company views acts of bribery and corruption with great disdain and does not in condone such actions by any of its staff or associated persons.

If a director/staff is proven to have been involved in the commission of such violations, he shall be subjected to disciplinary actions, including but not limited to suspension and even termination.