

VPMY STATEMENT ON ANTI-BRIBERY AND CORRUPTION

Value Partners Asset Management Malaysia Sdn Bhd (“VPMY”) is highly committed to conduct its business dealings and relationships in a manner that is professional, ethical and honest with high level of integrity. VPMY has zero-tolerance on bribery and corruption and is fully supportive of and shall ensure enforcement of Section 17A under the Malaysian Anti-Corruption Commission Act 2009.

VPMY is aware that it is an offence if any of its associated person 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:

- a. To obtain or retain business for VPMY; or
- b. To obtain or retain an advantage in the conduct of business for VPMY.

(A person is associated with VPMY if he is VPMY’s director, partner, employee or agent of VPMY; or he performs services for or on behalf of VPMY.)

Board of Directors and all employees of VPMY as well as VPMY’s stakeholders which include customers, vendors, consultants, agents, outsourced personnel and other representatives are subjected to the principles and obligations as outlined in the [VPMY anti-bribery and corruption policy](#) and is expected to uphold the same level of commitment that VPMY has towards bribery and corruption.

VPMY’s associated persons are prohibited from:

- a. soliciting, receiving, or agreeing to receive any form of gratification from any person as an inducement or an award for the act of doing, or omitting to do something in any transaction or any matter relating to VPMY; and
- b. giving, promising to give or offer any form of gratification to any person as an inducement or an award for the act of doing, or omitting to do something in any transaction or any matter relating to VPMY.

VPMY shall never solicit gifts or entertainment in its business dealings. Gifts or entertainment offered or received by VPMY must not be excessive (i.e. value equivalent to less than RM250) or gives the impression of a quid pro quo. At no time should cash or cash vouchers be given or received and the following benefits are absolutely prohibited:

- a. money or any kind of financial securities or any kind of benefit which can be easily converted into money (such as gift cards and vouchers);
- b. any offer of benefits which is not reflected in VPMY’s book of account; or
- c. illegal entertainment (such as prostitution or gambling).

Any actual, apparent or potential conflicts of interest should be immediately raised to VPMY in accordance to its [Whistleblowing Policy](#).