

Dynaquest Anti-Corruption Policy

Approval Date : 15 May 2020

Effective Date : 15 May 2020

1. Introduction

- 1.1. Dynaquest Sdn Bhd (“Dynaquest”) has a Capital Markets Services License (“CMSL”) issued by the Securities Commission (“SC”) to conduct investment advisory activities. In this capacity, we must commit to the highest standards of ethical conduct and integrity in business activities.
- 1.2. Dynaquest resolves to comply with all applicable laws and regulations which govern our operations, including all laws relevant to countering corruption. In particular, the Malaysia Anti-Corruption Commission Act (MACC) 2009 and the MACC Amendment Act 2018.
- 1.3. Dynaquest adopts a zero-tolerance approach against all forms of bribery and corruption. This Anti-Corruption Policy (hereinafter referred to as the “Policy”) sets out Dynaquest’s general principles and standards in this regard, in accordance to the Guidelines on Adequate Procedures issued by the Governance, Integrity and Anti-Corruption Centre (GIACC).
- 1.4. This Policy is applicable to all persons associated with Dynaquest, which include directors (executive or non-executive), shareholders and employees (permanent, contract or temporary) (hereinafter referred to as “Associated Person(s)”).
- 1.5. This Policy is intended to provide guidance to Associated Persons concerning bribery and other corrupt activities and issues that may arise in the course of business, and to ensure that Dynaquest has adequate procedures in place to prevent and detect corrupt activities.
- 1.6. This Policy is not intended to provide definitive answers to all questions regarding corruption and does not relieve any individual from his/her

responsibility to comply with applicable legislation, regulations, guidelines or codes of conduct that may be prescribed by relevant regulatory authorities.

2. Guidance on Anti-Corruption

2.1. General

2.1.1. All forms of corruption are prohibited. Associated Persons must not participate in any corrupt activities for his/her and/or Dynaquest's advantage or benefit.

2.1.2. Any person who fails to comply with Subsection 2.1.1 commits an offence under the MACC Act 2009 and shall on conviction be liable to a fine and/or imprisonment.

2.2. Definitions

2.2.1. Bribery

Bribery is the act of giving or receiving any gratification or reward to a person in order to influence his/her conduct, inclining him/her to act contrary to the known rules of integrity. Bribery is a form of corruption.

2.2.2. Corruption

Corruption is defined as the abuse of entrusted power for one's private gain, which includes but is not limited to, bribery, breach of trust, money-laundering and fraud.

2.2.3. Facilitation Payment

Facilitation payment is defined as unofficial payments in cash or any other provisions to an individual in control of a process or decision to secure or expedite a routine or administrative duty or function.

2.2.4. Gratification

Section 3 of the MACC Act 2009 defines "gratification" as:

- money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, finance benefit, or any other similar advantage;
- any office, dignity, employment, contract of employment or services and agreement of employment or render services in any capacity;
- any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- any forbearance to demand any money or money's worth or valuable thing;
- any other service or favour of any description;

- any offer, undertaking or promise, whether conditional or unconditional, of any gratification.

2.2.5. Third Party

A third party is an individual or entity with whom an Associate Person comes into contact during the course of his/her work for/with Dynaquest. It includes but is not limited to existing and potential customers, service providers, consultants, advisers, agents, brokers and distributors.

2.3. Gifts, Entertainment and Hospitality

2.3.1. Except as otherwise provided in this Policy, the receipt of gifts, entertainment and hospitality from any persons, either directly or indirectly, is strictly prohibited.

2.3.2. Except as otherwise provided in this Policy, Associated Persons must not offer or promise gifts, entertainment and/or hospitality to any persons, either directly or indirectly, with the intention to benefit himself/herself and/or Dynaquest.

2.3.3. However, gifts with the following nature are deemed acceptable:

- small promotional items such as pens and other low value promotional objects;
- gifts/goodie bags presented at meetings, conferences, seminars or other work-related events;
- gifts that are part of official company visits;

- gifts from Dynaquest to Associated Persons, either directly or indirectly, in relation to celebrations, company events or as a recognition of his/her loyal and outstanding service;
- refreshments/meals during meetings, conferences, seminars or other work-related events.

2.4. Facilitation Payments

- 2.4.1. Associated Persons must not offer, promise, or give, directly or indirectly, unofficial payments in cash or any other provisions to any persons to secure or expedite a routine or administrative process/function for the benefit of himself/herself or Dynaquest.
- 2.4.2. Associated Persons must not use his/her position at Dynaquest to request or obtain, directly or indirectly, unofficial payments in cash or any other provisions from any persons to perform and/or expedite his/her routine or administrative duty.
- 2.4.3. Associated Persons must not accept, either willingly or reluctantly, direct or indirect unofficial payments in cash or any other provisions from any persons to perform and/or expedite his/her routine or administrative duty.

2.5. Referral Fees

- 2.5.1. Associated Persons must not offer referral fees or other beneficial arrangements, either directly or indirectly, to any persons for recommending services of Dynaquest to prospective clients.

2.5.2. Associated Persons must not request, obtain or accept referral fees or other beneficial arrangements, either directly or indirectly, from any persons for recommending any third party services to Dynaquest.

2.6. Solicitations

2.6.1. Associated Persons must not solicit corporate directorships, gifts or favours from our clients or anyone who has business dealings with Dynaquest.

2.6.2. Associated Persons must not borrow from/become indebted to our clients or anyone who has business dealings with Dynaquest.

2.7. Political Contributions

2.7.1. Dynaquest does not make any political contributions under normal circumstances. In an event where Dynaquest is to make political contributions, such contributions must comply with applicable laws and must not be associated with any promise or expectations of favourable treatment in return.

2.7.2. Associate Persons may make political contributions in his/her personal name, but such contributions must comply with applicable laws and must not be associated with any promise or expectations of favourable treatment in return.

2.7.3. Associated Persons are prohibited from using his/her position with Dynaquest to influence any persons to make political contributions.

2.7.4. Associated Persons must not use Dynaquest's facilities and/or resources for any political campaigns without the prior approval of the top management including the Board.

2.8. Charitable Contributions

- 2.8.1. All sponsorships, donations and in-kind services must comply with applicable laws.
- 2.8.2. Donations and/or in-kind services must only be provided to well-established and legitimate entities with an adequate organisational structure that ensures proper administration of funds.
- 2.8.3. Charitable contributions must not be used as a subterfuge for prohibited political contributions, money laundering, bribery and/or other corrupt activities.

3. Enforcement

3.1. Policy Review and Amendment

- 3.1.1. Dynaquest shall conduct regular risk assessment to identify potential corruption risks within the company, which will cover the following areas:
 - Internal anti-corruption procedures;
 - Compliance of external parties acting on behalf of Dynaquest in relation to this Policy.
- 3.1.2. This Policy shall be reviewed and improved by management or an external audit if necessary at least once every three years, taking into

account the latest legal and regulatory requirements in relation to anti-corruption.

3.1.3. Any amendments made to this Policy must be approved by the Executive Chairman before they take effect.

3.2. Training and Communication

3.2.1. Associated Persons must be aware of Dynaquest's zero-tolerance stance towards corrupt activities and be familiar with this Policy.

3.2.2. Anti-corruption messages/training will be communicated to Associated Persons once a year in the form of digital material through email.

3.2.3. Associated Persons will be notified on any material change to this Policy by email.

3.2.4. The latest version of this Policy is available on Dynaquest's website: www.dynaquest.com.my.

3.2.5. Associated Persons must sign a declaration form which states that he/she:

- Have read, understand and will adhere to Dynaquest's Anti-corruption Policy (hereinafter referred to as the "Policy");
- Understands and will comply with all applicable laws in relation to anti-corruption;
- Has not been convicted by the relevant authorities for crimes related to corruption;

- Agrees that the declaration form shall form part of the terms and conditions of his/her appointment/contract of service;
- Acknowledges that Dynaquest has the right to terminate or suspend his/her contract with immediate effect and disqualify him/her from future opportunities for employment if he/she is found to be in breach of this Policy and/or any applicable laws.

3.3. Due Diligence

3.3.1. General

Dynaquest must ensure that an appropriate level of due diligence has been conducted prior to entering into any formalised relationships with any relevant parties or personnel such as Board members, employees, service providers and any other third parties.

3.3.2. Methods

Dynaquest adopt the following due diligence methods:

- Background checks on the person or entity;
- Document verification;
- Interviews with the relevant party.

3.3.3. During the due diligence exercise, if there are indications that a particular relevant party/personnel has engaged in actual and/or suspected corrupt activities, such issues must be investigated and addressed before any appointments/contracts of service can be made.

3.4. Dealing with Third Parties

- 3.4.1. All dealings with third parties must be in compliance with all applicable laws.
- 3.4.2. Due diligence must be conducted to assess the integrity of a third party before any decisions on entering a formalised relationship can be made.
- 3.4.3. Associated Persons must communicate Dynaquest's anti-corruption commitment to potential third parties with whom he/she comes into contact during the course of working at Dynaquest. All potential third parties must be made aware of this Policy and our expectations of them in relation to countering bribery and other corrupt activities. Only those who share our values and standard of integrity may be considered for any business dealings.
- 3.4.4. Associated Persons must not enter into any business dealings with any third parties who have been suspected of engaging in bribery and/or other corrupt activities, unless those allegations have been investigated and resolved.
- 3.4.5. Prior to the engagement of any business relationships, all third parties must sign a declaration form which states that they:
 - Have read, understand and will adhere to Dynaquest's Anti-corruption Policy (hereinafter referred to as the "Policy");
 - Understand and will comply with all applicable laws in relation to anti-corruption;
 - Have not been convicted by the relevant authorities for crimes related to corruption;

- Undertake to inform Dynaquest of any breach of this Policy and/or any applicable anti-corruption laws;
- Agree that the declaration form shall form part of the terms and conditions of their appointment/contract of service;
- Acknowledge that Dynaquest has the right to terminate or suspend their contract and disqualify them from tendering for future contracts if they are found to be in breach of this Policy and/or any applicable laws.

3.4.6. For existing business relationships that were established before the implementation of this Policy, third parties must be made aware of this Policy and our expectations of them in relation to countering bribery and other corrupt activities. Existing third parties must also sign the declaration form set out in Section 3.4.5.

3.4.7. All third parties will be notified on any material change to this Policy.

3.5. Record Keeping

Dynaquest must have proper record keeping in case of inspection by relevant authorities regarding corruption, which includes:

- Financial Transactions

Dynaquest's accounting books and records must accurately state any political and charitable financial contributions, as well as all commissions and expenses/payment paid to any third parties.

- Declaration Forms

All signed declaration forms must be properly filed and kept at Dynaquest's premises.

3.6. Whistleblowing

- 3.6.1. Dynaquest encourages openness and transparency in its commitment to the highest standard of integrity. It is the duty of the Associated Persons to ensure that suspected corrupt activities are reported promptly.
- 3.6.2. Any conduct that is not in accordance with the principles set out in this Policy will be dealt with according to applicable laws. Associated Persons who encounter any actual or suspected violations of this Policy are encouraged to report his/her concerns.
- 3.6.3. All concerns raised will be taken seriously and will be thoroughly investigated. Malicious/vindictive or other baseless accusations are strictly prohibited and appropriate actions shall be taken against any individuals making such accusations.
- 3.6.4. All reports made, either anonymously or otherwise, will be treated confidentially. Dynaquest will ensure that no individuals will suffer any detrimental treatment as a result of reporting in good faith their suspicion of actual or potential corrupt activities. Whistleblowers are also protected under the Whistleblower Protection Act 2010 and Section 65 of the MACC Act 2009.
- 3.6.5. Any individual who knows and fails to report a corrupt activity is committing an offence under the MACC Act 2009 and shall on conviction be liable to a fine and/or imprisonment.

- 3.6.6. Disclosures about corruption and queries with regards to this Policy may be made by email to: info@dynaquest.com.my. External parties and members of the public are also welcome to email us any concerns in relation to real or suspected corrupt activities within Dynaquest.
- 3.6.7. Dynaquest reserves the right to report any activities suspected of being criminal in nature to relevant authorities.