



No Gift Policy

Document Number: PN-004

Ibright Great Resources Sdn. Bhd. (201101016376 / 944512-M) is unconditionally committed to upholding the highest standards of integrity

The Company strives to demonstrate our commitment to impartiality, equal opportunity and the highest standard of integrity in our business dealings, **the Company and our employees shall not accept or give any gifts, money or special favors from or to our business partners in any situation.**

Purpose

This policy is an extension of our Anti-Corruption policies.

This policy is meant to avoid any actual or appearance conflict of interest, favoritism and impropriety.

Definition

The term "gift" above shall mean anything of value, monetary or non-monetary including but not limited to gift items, discounts for products or services for personal use, travel and accommodation, use of vehicles, products, prizes, sponsorship, donation, monetary contributions, equipment, gift vouchers, ticket or entry to events. This policy extends to cover any gifts which are sent to the home of the employee.

Gift to any family member or relative of employee are deemed as gift received by employee.

The term "business partners" includes any existing or potential merchant, vendors, service providers and Bankers.

Exemption

The policy is exempted only for the following situations:

- a) Exchange of gifts valued not more than Ringgit Malaysia Five Hundred at the company-to-company level. For example, gifts exchanged between Companies and thereafter the said gift is treated as Company property;
- b) Gifts from our Company to **all** external institutions or all individuals in relation to the company's official functions, events and celebrations (For example: Commemorative gifts or door gifts offered to **all** guests attending the event) and vice-versa;



- c) Gifts bearing the Company's logo that are given out equally to members of the public, and business partners attending events such as conferences, exhibitions, training, trade shows and/or is deemed as part of the Company's promotional activities; and vice-versa;
- d) Gifts from Company to its employees and directors and/or their family members.
- e) Gifts to external parties who have no business dealings or potential business dealings with the Company.
- f) Discounts as part of an official quotation to our Client's company.

Sponsorships

Charitable donations, community investments and sponsorships can all be used as bribes. They can be made to support the pet cause of a public official with decision-making power over contracts or regulations that affect the company. They can be used to channel funds to front organizations controlled by a bribery recipient. They also present opportunities for employees to make inflated donations or sponsorship fees and receive money back from the recipients as kickbacks. Bribery can be difficult to detect due to the absence of benchmarks or 'market rates' in many instances.¹

To prevent conflicts of interest and the risk of impropriety, the Company does not sponsor or contribute to events or organizations linked to current or potential Clients, or Politically Exposed Persons (PEPs) – without exceptions. This restriction extends to any individuals, close contacts, or relatives sharing a common interest with these parties – without exceptions.

Furthermore, the Company shall not make any cash or monetary donations to any organization, without exceptions.

On the same note, the Company shall not seek any sponsorship from our vendors for our events. Formal brand or company collaborations, such as cross promotion of hardware and services with our business partners are exempted.

¹ Reference: <https://www.antibriberyguidance.org/guidance/10-sponsorship-donations-community-investment>



Enforcement

The Company takes a very serious view of integrity. Any staff suspected or reported to have violated this Policy will be subjected to due process, including an investigation, a fair Domestic Inquiry and if found guilty, shall be subjected to disciplinary action including termination without notice.

The Company reserves the right to report any violations or perceived violations to the Police and/or Malaysian Anti-Corruption Commission for further investigations.

Contact Information

If you require any clarification or wish to notify us of any concern in your dealing with us or our employee, please email us as per contact details in our Whistleblowing Policy

The policy is dated **01 March 2017**, updated on 31 Oct 2026.

BOARD OF DIRECTORS