

Policy Ref No.	Subject Matter	Created	Revised	Version
IRGA2022-0001/POD/WB	NO-GIFT POLICY	18/07/2022		1.0

## NO-GIFT POLICY

### 1. APPLICATION

This No-Gift Policy (“Policy”) applies to all Personnel and their family members of IRGA Berhad and its subsidiaries (“IRGA”, “Company” or “IRGA Group”). It also extends to third parties acting on behalf of IRGA.

### 2. POLICY STATEMENTS

The Policy provides directions and measures for employees and members of the organisation when they are presented with gifts from parties seeking to do business with IRGA. This Policy ensures that any sort of gifts that are extended to a member of the organisation, employees, or their family members, by vendors, suppliers, customers, potential vendors, and potential suppliers or any other individual or organisation, regardless of the value, will not be accepted at any time. A violation of this Policy will lead to a disciplinary action against the person committing the act. This Policy should be read in conjunction with Anti Bribery and Corruption Policy and Whistleblowing Policy, and the relevant definitions.

### 3. PURPOSE

The purpose of the No-Gift Policy is to strictly prohibit all Personnel, and their family members from giving or receiving any gifts. This is to ensure the avoidance of situations in which the judgement of employees and members of the organisation are influenced in a decision-making process or places them in a position of conflict.

### 4. DEFINITION

“Gift” is defined as anything of value that is given to or received from any persons of the organisation with which IRGA is in business with or is actively considering doing business with. For the purpose of this Policy, gifts would include “hospitality” and the term “hospitality” includes any form of entertainment given to or offered by customers, suppliers, or third parties to build business relationships.

### 5. EXEMPTIONS

Exemptions from this Policy are as follows:

- i. Gifts such as t-shirts, pens, goodie bags including cards such as “thank you” notes, certificates or other forms of appreciation and recognition that employees obtain as members of the public at events such as seminars, conferences, training events etc that is offered equally to all participants of the event.
- ii. Gifts of food even if addressed to a single employee is considered gift to the company; food gifts are encouraged to distributed to all staff with email notices during work hours in a central, worksite location.
- iii. Gifts from IRGA to employees and directors and/or their family members in relation to an internal or externally recognised Company function, event, and celebration (e.g., in recognition of an employee’s/director’s service to the Company);

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- iv. Gifts to external parties who have no business dealings with IRGA (e.g., monetary gifts or gifts in-kind to charitable organisations should be guided by the broader ESG Policy).
- v. All gifts under this exemption must be recorded in a gift receiving register or any other form that requires the Head of Department (“HOD”)/Chief Executive Officer (“CEO”)’s acknowledgment.
- vi. Any other exceptions to the No-Gift Policy may be made only with the permission of the CEO.
- vii. In general, the value of the gift in the above-mentioned circumstances and where applicable should not exceed a nominal value of RM500.

## 6. REPORTING

1. All gifts including hospitality claims need to be properly documented in a register kept by HR/HOD/CEO as applicable, specifying the purpose, amount and persons involved.
2. Reporting to the Board of Directors is done on a periodic basis.

## 7. GENERAL PRINCIPLE SURROUNDING GIFTS

1. The general principle on giving and receipt of gifts must always consider the following:
  - i. Modest – be reasonable in value and perishable in nature such as fruit basket or flowers, not exceeding the approved limit
  - ii. In-frequent - where it is not interpreted as exerting undue influence.
  - iii. Timing – it should avoid coinciding with contract negotiations or awarding of projects or other commercial matters.
  - iv. Intention – it should not be perceived as influencing a business decision or to obtain favourable treatment.
  - v. Appropriateness – the gift should always be in line with all other applicable policies and law and considering its appropriateness in the circumstances.
  - vi. Cash and gift vouchers – gifts in the form of cash and gift vouchers are strictly prohibited.

## 8. CONSIDERATIONS WHEN RECEIVING GIFTS

1. If offered a gift and the value is unable to be determined, it should be declared to the CEO/HOD for decision.
2. Should the gift be found to be inappropriate, personnel are encouraged to return the gift with an explanation advising that IRGA does not permit such gifts.
3. If personnel are in doubt whatsoever, do not accept said gift.

## 9. CONSEQUENCES OF NON-COMPLIANCE WITH POLICY

Failure to comply with this Policy may result in severe consequences which could result in disciplinary actions including termination of employment. IRGA may refer the matter to designated departments or authorities for investigation and subsequent actions.