

## POLICY on NO Gifts, Gratuities, Favours or Invitation

<b>Principle</b>	Adhering & adapting to <b><u>NO GIFTS POLICY</u></b> , the Management is fully aware, in support and in favour of such practise. However, as part of our believes in fostering good business relations - in extending our appreciation and recognition for their invaluable support and partnership; we are of the view that certain gifts (both receiving & giving) during festive seasons are OKAY as they are perceived as <b><u>ACCEPTABLE COURTESY</u></b> and in <b><u>GOOD FAITH</u></b> as the gifts are, though of certain value, but they are generally consumable or perishable goods that can be shared out amongst associates, personal and does not grow in VALUE over time.
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<b>Objectives</b>	<p>To establish guidelines on receiving “allowable” gifts from vendors/suppliers as well as giving out gifts/ang pow to business partners/suppliers/vendors.</p> <p>To have a more controlled and informed guidelines in order to ensure all are aware of the strict compliances and the integrity of team members are preserved.</p> <p>To provide an understanding in view of industry norm &amp; practices; on gifts or contributions consideration given out for charitable, certain courses, parties or authorities that are in need of assistance and support. Declaration to Senior Management team must be made.</p>
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<b>Recipient C/O Company</b>	Whether the gift items are attention to Company or Department or Individuals; all are given or extended in view of the person’s position with the company - thus they are properties of Company and this Policy shall come into effect.
<b>Annual Pledge Policy</b>	Vendors/suppliers will be made aware through our Annual Integrity Pledge that all gifts/hampers received by company or individuals will be shared out with associates; except gifts of personalized nature such as plaque/pewter or framed picture. Suppliers/Vendors are aware that all form of gifts received are appreciated and taken in good faith; and they are not in any way in for exchanging favours or for future favourable returns. <b>All associates are fully aware and reminded yearly through this PLEDGE form that a full disclosures &amp; obtaining prior approval from Senior Management is a MUST before giving or accepting any gifts/gratuities/favours/benefits/excessive entertainment that are beyond common courtesies with accepted business practices.</b>

Type of gifts (Common)	Allowable	
	Hampers	Bouquet of Flowers
	Liquors	Dinner Invitation
	Travelling Souvenirs	Event Launches Invitation (Networking)

### **FESTIVE HAMPERS**

Generally, hampers are received as a customary practise in celebrating a good end to a year and a great start for a fresh new year. This practise is most common especially during the Chinese New Year season.

### **LIQUOR**

Liquor bottles received with estimate value of above **RM1000** (does not come together in hamper) must be declared with Human Resource. Individual recipient can keep the bottle with the intention to be shared out during corporate events like farewell, festive meet, corporate social meet or celebration.

### **OTHER KINDS**

For gifts, invitation or ang pow received from vendor/suppliers/business partners to individuals for special occasions like promotion/home moving/hospitalization/new-born child/marriage that value above **RM500**, a declaration is needed to be made in HR. Though personal gifts are not encouraged but gifts for occasions such as the above, we acknowledge they are made in “good faith” but proper procedure must be adhered to in order to prevent perception of kickbacks or avoid any doubts of integrity nature.

Gifts or ang pow for authority/influential figures invitation to their private event such as wedding/anniversary/opening ceremony/launches/company event; in your capacity as a representative member of Matrix, the appropriate amount for gifts/ang pow must be made known and requested formally with approval obtain from senior team member.