

Anti- Corruption and Anti- Bribery Policy

1. INTRODUCTION

This Anti-Corruption Policy establishes basic standards and a framework for the prevention and detection of bribery and corruption in INTI's operations. It promotes compliance with the Malaysian Anti-Corruption Commission Act 2009, and other applicable anti-corruption laws.

The Malaysian Anti-Corruption Commission Act 2009 and many other anti-corruption laws prohibit offering or providing benefits, directly or indirectly, to government officials or to the private sector, for the purpose of securing an undue advantage or improper benefit. Further, other laws around the world also prohibit bribery of individuals in the public and private sector.

Most importantly, we have a zero tolerance policy for giving or accepting bribes or kickbacks, regardless of local laws or custom. Here at INTI, we do not pay bribes, **even if it means we may lose money or delay a project.**

2. POLICY STATEMENT

All INTI personnel are required to comply fully with this Anti-Corruption Policy, the Malaysian Anti-Corruption Act 2009 and other applicable anti-corruption laws. The basic rules are these:

- INTI personnel shall not offer, give, solicit, or receive bribes or kickbacks.
- INTI personnel must fully, fairly and accurately characterize and record all transactions and expenditures in the books, records and documents of the company or relevant institution.
- Prohibited activities may not be taken directly or indirectly through third parties such as agents, consultants, contractors, partners or vendors of INTI.

3. YOUR RESPONSIBILITIES

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for INTI or under its control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the compliance officer as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. If you are unsure

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whether a particular act constitutes bribery or corruption, please contact the Compliance Officer.

4. CONSEQUENCES OF NON-COMPLIANCE

Compliance with this Policy and with the laws of Malaysia is a condition of employment with INTI. Failure to comply with this Anti-Corruption Policy and the Guidelines established under this Policy, the Code of Conduct and Ethics or applicable laws is grounds for disciplinary action, including termination of employment.

The consequences of failing to comply with anti-corruption laws in Malaysia can be very serious. Violations can result in millions of dollars in fines against INTI. INTI or individual institutions also may be disqualified from conducting business with public agencies, or lose licenses or accreditation. Independent of whether any enforcement action is taken against INTI, INTI personnel involved in violations may be subject to prosecution, criminal fines, and imprisonment.

By law, fines and penalties imposed upon individuals may not be paid directly or indirectly by INTI.

5. DEFINITIONS

Bribery is the offer, promise, giving, demanding or accepting of an advantage as an inducement for an action which is illegal, unethical, a breach of trust or the improper performance of a contract – that the briber would not receive in the absence of the bribe. Inducement can be anything of value to the person who is being influenced which can take the form of gifts, hospitality, fees, rewards, jobs, internships, examination grades, favours or other advantages. It does not matter whether the bribe is given or received directly or through a third party or whether it is for the benefit of the recipient or some other person.

Corruption is the misuse of entrusted power for personal gain.

Government Officials include any officer or employee of any governmental entity at any level;

- any private person acting in an official capacity for or on behalf of any governmental entity (such as a consultant retained by a government agency);
- officers and employees of companies or institutions in which the state has a majority ownership interest or over which the state exercises control, including public schools, colleges and universities;

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- Candidates for political office, and political parties and their officials; and
- officers, employees, or official representatives of public international organizations, such as the World Bank, United Nations, and International Monetary Fund.

Kickback is an illicit payment made to someone in return for facilitating a transaction or appointment.

6. WHO IS COVERED BY THE POLICY?

This policy applies to all INTI Directors, individuals working at INTI including employees (whether permanent, or by way of contract, full time or part-time), consultants, contractors, trainees and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as employees in this policy) and all third parties acting on behalf of INTI. This policy applies to conduct both within and outside of Malaysia.

7. RELATIONSHIP TO OTHER POLICIES AND LOCAL LAWS

This Policy is consistent with and supports the provisions of the INTI Code of Conduct and Ethics, the Supplier Code of Conduct and INTI's Gifts, Meals and Entertainment Policy and all Malaysian laws and regulations on Anti – Corruption including the Malaysian Anti-Corruption Commission Act 2009.

8. WHAT IS NOT ACCEPTABLE?

It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that either a personal or business advantage will be received, or to reward either a personal or business advantage already given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain either a personal or business advantage for them;

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- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that either a personal or business advantage will be provided by INTI in return;
- accept a gift or hospitality from a third party who is tendering for a contract to be awarded by INTI either on its own or jointly with other parties:
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

(a) No Bribery

INTI personnel should never be involved in offering, promising, authorizing, making, receiving or otherwise furthering a payment of money or transfer of anything of value **to or from any person** for an improper purpose.

The giving or receipt of gifts is allowed, if the following requirements are met:

- (i) it is made with the intention of not influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- (ii) if it does not include cash or a cash equivalent (such as gift certificates, vouchers or tickets);
- (iii) if it is appropriate in the circumstances. For example, in Malaysia it is customary for small gifts to be given during the various festive season;
- (iv) if taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time reference should be made to INTI's Gifts, Meals and Entertainment Policy and to INTI's Supplier Code of Conduct for the monetary threshold);

Gifts should not be offered to, or accepted from, government officials (this includes public school teachers/counsellors/staff) or representatives, or politicians or political parties, without the prior approval of INTI's Compliance Officer. Any such gifts must be registered regardless of value.

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(b) Facilitation Payments and Kickbacks

INTI personnel should not make, and should not accept, facilitation payments or "kickbacks" of any kind to obtain a favourable outcome. Facilitation payments are typically small, unofficial payments made to secure or expedite a deal.

If you are asked to make a payment on INTI's behalf, you should always be mindful of what the payment is for and if it forms part of the official service rendered by the other party and is being offered to the public at large. You should always ask for an official receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Compliance Officer.

Similarly, if you were offered or received any benefits in monetary form or in kind, directly or indirectly you should be cautious as to the intention of the offerings. The gifts should not form, influence or be seen as influencing the judgement and/or your engagement in any act that may directly or indirectly assist the giver in attaining a favourable or desired outcome e.g. awarding of jobs and contracts, student grades, testimonials, etc.

All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by INTI or any INTI Personnel.

(c) Responding to Solicitations and Extortion

If a government official or other person requests a bribe or other improper payment or transaction, INTI personnel should diplomatically but clearly advise the requestor that it is against INTI's policy to make such payments, and decline to make or promise to make the payment. The solicitation should be promptly reported to the Compliance Officer.

The only exception to this rule is where the request is a demand that is accompanied by a credible threat to personal safety or safe passage. In such cases, which are equivalent to extortion, INTI personnel may make the requested payment to avoid the threat, but must promptly report the demand as provided above. A threat of property damage or harm to business does not fall within the scope of this exception.

(d) Third Parties

Anti-corruption laws around the world prohibit corrupt payments made directly by INTI personnel and also indirectly through an agent or other intermediary such as

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a consultant acting on our behalf. It is unlawful to make a payment of anything of value to any agent or other intermediary if there is reason to believe that any portion of the payment will be offered, given, or promised to anyone else for a corrupt purpose.

Accordingly, this Policy applies to activities conducted with or through an agent, consultant, joint venture, or other business partner. INTI personnel who manage, supervise, or oversee the activities of third parties working with INTI should ensure that such persons or entities understand and fully comply with this Policy. The most important step we can take to protect ourselves from liability for improper payments made by third parties is to choose carefully our partners, including agents and consultants, and monitor their conduct. INTI has adopted a Policy for Engaging Third Parties relevant to the engagement of certain third parties, which include standards and procedures for selection, appointment, and monitoring. These include a requirement of appropriate due diligence and approval prior to engagement, written contract provisions, and appropriate monitoring controls. Consult the Third-Party Policy for more information.

9. ACCURATE BOOKS AND RECORDS AND FINANCIAL CONTROLS

INTI personnel must maintain complete and accurate records with respect to all transactions and expenditures undertaken on behalf of INTI or its subsidiaries.

- We must exercise special care when transactions involve payments or other benefits to government officials.
- We must accurately record all payments to public officials and commercial partners.
- We must reject and report any requests for false invoices or payment of expenses that are unusual, excessive or inadequately described and/or inadequately supported.
- We must not request from third parties nor issue out false invoices.
- We must not make misleading, incomplete or false entries in INTI books and records for any reason.

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10. SEEKING ADVICE AND REPORTING VIOLATIONS

INTI personnel or third parties who have a query or doubt whether or not a particular action they have observed, heard about or learnt about, is inconsistent or in violation of this policy and or the Malaysian Anti - Corruption Act 2009, should raise their concerns to INTI's Compliance Officer.

INTI personnel also may seek advice or report a possible violation by using the confidential INTI Ethics Platform at <https://intiethics.newinti.edu.my/> or by calling INTI's Compliance Officer. The platform is available at all times.

INTI shall not allow any person to suffer harm or abuse of any kind because he or she has raised the concern honestly and in good faith. Any retaliation against a concerned person shall be a violation of this policy, INTI's Code of Conduct and Ethics and INTI's Whistleblower's policy.