



MGB BERHAD

Registration No. 200201021504 (589167-W)

DONATIONS AND SPONSORSHIP POLICY

1. POLICY STATEMENT

All Donations and Sponsorships provided by MGB Berhad (“**MGBB**”) and its subsidiaries (“**MGB Group**” or “**Group**”) must be ethical and legal under applicable laws and not with intention to influence any business decisions or cause other to perceive it as such.

2. SCOPE

This Policy is applicable to all Directors and employees of MGB Group, its business associates acting on MGB Group’s behalf. Joint-venture companies and associated companies are encouraged to adopt these or similar principles. This Policy should be read in conjunction with the Anti-bribery and Corruption Policy, and the Whistleblowing Policy of the Group.

3. DEFINITIONS

Business Associate means an external party with whom MGB Group has, or plans to establish, some form of business relationship. This may include clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendor, advisers, agents, distributors, representatives, intermediaries and investors.

Donations mean voluntary contributions in the form of monetary or non-monetary gifts to a fund or cause.

Personnel means Directors and all individuals directly contracted to the MGB Group on an employment basis, including permanent, temporary employees and interns.

Sponsorships mean partnering with external organisations to deliver mutual benefits through exchange of monies, products, services, content or other intellectual property.

4. DONATIONS AND SPONSORSHIPS

The Group makes donations to LBS Foundation, a registered non-profit organisation with the sole aim is to give back to the community through its 4 main pillars: Education, Community, Environment and Health.

Other Donations and sponsorships request will be assessed on a case-by-case basis and subject to the approval of the Executive Director.



MGB BERHAD

Registration No. 200201021504 (589167-W)

DONATIONS AND SPONSORSHIP POLICY

4.1 Acceptable Donations & Sponsorships

- (a) Any charitable Donation or Sponsorships made or offered on behalf of the Group must:
 - (i) not be related to, dependent on, or made in order to win, or influence, a business deal or decision;
 - (ii) be given direct to the relevant charity or organization; and
- (b) The Head of Department who handles the request for any Sponsorship or Donation shall conduct due diligence on the recipient to ensure that the recipient is a legitimate organisation, prior to obtaining approval from Executive Director.

4.2 Non-Acceptable Donations & Sponsorships

- (a) The Group shall not donate to private individuals or private accounts or to individuals or organisations that could prove detrimental to the reputation of the Company.
- (b) The Company should not support via a sponsorship where the activities or proposals:
 - conflict with the Company's values or objectives;
 - will require the Company to give, or appear to presume a strong explicit endorsement of the products and services of the recipient; or
 - do not demonstrate a genuine readiness or capability to carry out the obligations.

5. DONATIONS AND SPONSORSHIPS REQUESTS

All Donations or Sponsorship requests must be made in writing to the Group in reasonable period of time before the anticipated completion of the relevant event/action.

The Executive Director shall approve the proposal upon being satisfied with result of the due diligence conducted on the recipient in accordance with the guideline of the Group.



MGB BERHAD
Registration No. 200201021504 (589167-W)

DONATIONS AND SPONSORSHIP POLICY

6. POLICY VIOLATION

The procedure of reporting any violations of this Policy shall be referred reporting mechanism contained in the Whistleblowing Policy.

7. POLICY REVIEW

This Policy has been approved by the Board and shall be made available on the Group's corporate website and internal computer networking system. All Heads of Department are responsible to inform their staff and clearly explain to them the contents of this Policy.

This policy shall be reviewed by the Board of Directors and updated whenever necessary to ensure its effective implementation. Any subsequent amendments to this Policy should be approved by the Board of Directors.

Due Diligence Checklist on Recipient

Relationship with the Recipient		Yes	No
1	There has been no difficulty in obtaining the required information from the Recipient		
2	There are no concerns or evidence of corruption (convictions) in respect of the Recipient		
3	There are no allegations of corruption activity against the Recipient or any of its personnel		
4	The Recipient has its own anti-corruption/ code of conduct/ anti-fraud/ compliance programme		
5	The Recipient has its own due diligence procedure in place for the sourcing of customers and procurement of vendors, subcontractors etc.		
6	The value of the contract secured by the Recipient is reasonable		
7	There is no adverse news related to the Recipient on its integrity		
8	The Recipient is being associated with disreputable suppliers/ subcontractors etc.		
9	The Recipient is not readily and efficiently able to deal with the due diligence questions.		
Recipient as a Public Official		Yes	No
10	The Recipient is a public official		
11	The owners, directors, shareholders, officers or any employees of the Recipient being current or former public officials		
Recipient's Dealing with Public Official		Yes	No
12	The Recipient is recommended by a public official		
13	The directors or shareholders of the Recipient has business/activities associated with public officials.		