



THE ROYAL SELANGOR GOLF CLUB

Anti-Bribery & Anti-Corruption

Policy & Guidelines Summary

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1.0 General Information and Objectives

1.1 The Anti-Bribery & Anti-Corruption (“ABAC”) Policy & Guidelines (hereinafter referred to as “Policy & Guidelines”) defines the policies and procedures for The Royal Selangor Golf Club (collectively known as “RSGC” or “the Club”).

The Policy & Guidelines are applicable to the following stakeholders:

- a. The Committee and Sub-Committees of RSGC unless otherwise stated;
- b. every employee within the Club;
- c. members of the Club; and
- d. suppliers, sub-contractors, consultants, agents, representatives and others performing work or services for or on behalf of the Club.

It is the intention of the Committee of RSGC to ensure that these procedures serve as our commitment to prohibit bribery and corruption in the business conduct within the Club.

1.2 The main objectives of this Policy & Guidelines are as follows:

- To ensure the policies and guidelines / practices are oriented towards embedding ABAC stance organisation wide, with guidance from Guideline on Adequate Procedures and requirements of Malaysian Anti-Corruption Commission (“MACC”) Act 2009 (amended 2018), introduced via Section 4 of the MACC (Amendment) Act 2018;
- To ensure adequate and standardised ABAC policies and guidelines are consistently applied throughout the Club by all relevant staff; and
- To ensure that business operations within the Club are strictly adhering to the ABAC Policy & Guidelines.

2.0 Key Definition

2.1 Anti-Bribery and Anti-Corruption Policy & Guidelines

This refers to the ABAC Policy & Guidelines established by RSGC.

2.2 Bribery

Bribery is defined as offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person’s duties.



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2.3 The Committee

This refers to as the Committee of RSGC.

2.4 General Manager

Defined as the highest-ranking executive in the Club, responsible for carrying out corporate policies established by the Committee, acting as the main point of communication between the Committee and Club operation.

2.5 Code of Ethics and Conduct

This refers to as the formalised work and business ethics enforced within the Club.

2.6 Club Hospitality

This refers to any considerate care of members and/or visitors offered in the manner that complete expenses are borne by the Club itself. This includes refreshments, accommodation and entertainment at a restaurant, hotel, club, resort and other venues.

2.7 Corruption

Corruption is defined as the abuse of entrusted power for private gain.

2.8 Donation

This refers to the gift given out by the Club for charity, humanitarian aid or to support local community welfare, whether in-kind or by way of financial contribution.

2.9 Employee

This refers to any person who is in employment by the Club, but not limited to executives and non-executives, and contract employees.

2.10 Extortion Payment

This refers to money that is forcibly extracted from the Club or its employee by real or perceived threat to health, safety and liberty and is outside the scope of ABAC.

2.11 Facilitation Payment

This refers to illegal or unofficial payment made in return for services that the Club is legally entitled to receive without making such payment. For example, a payment made to a government official or a person with certifying / approval function to expedite the necessary action in the capacity of the abovementioned person.



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2.12 Gift

This refers to items given / received by the Club to / from a third party or items received by the Club from a third party without the expectation of payment or benefit in return.

2.13 Guideline on Adequate Procedure

This refers to the document issued by the Prime Minister's Department in December 2018, pursuant to Section 17A (4) and (5) of the MACC Act 2009 (amended 2018).

2.14 Limit of Authority

This refers to the approved documents stipulating the approving authority and authority limits allowed for the Committee and management at RSGC.

2.15 Management

This refers to the management team of the Club, including HODs and General Manager ("GM").

2.16 Sponsorship

This refers to support, either financially or by way of product and/ or services for an event or activities organised by a profit / non-profit organisation, local communities, government departments or agencies, primarily aimed at raising awareness about the Club profile.

2.17 Whistleblower

This refers to a person (internal or external) raising or reporting concerns of wrongful activities or wrongdoings as defined in the Whistleblowing Policy & Guidelines Document of RSGC.

2.18 Whistleblowing Policy & Guidelines

This refers to the Whistleblowing Policy & Guidelines of RSGC, applicable to the Club.

3.0 Gift and Corporate Hospitality

RSGC recognises the importance of gift and Club hospitality giving / acceptance, donation and sponsorship activities to maintain good rapport with its vendors and government officials. The policies set out below are to safeguard the Club's reputation and to protect its employees and club members from an allegation of soliciting bribes, corruption or exercising undue influence on an external party(s) for personal gain.



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3.1 Purchase of Gift and Club Hospitality

- a. Purchase requisition pertaining to gift and Club hospitality shall be a reasonable amount, subject to the approval of the relevant approving authority in line with the Limit of Authority (“LOA”). Such gifts and hospitality shall fulfil **ALL** the following conditions prior to approval:
 - i. They are intended to maintain good rapport with the vendors/ business partners of the Club and government officials;
 - ii. They are limited, customary and lawful under the circumstances;
 - iii. They do not have or perceived to be affecting the action(s) or decision(s) of the receiving party;
 - iv. There shall be no expectation of any specific favour, benefit or advantage from the intended recipients;
 - v. There shall not be any corrupt/ criminal intent; and
 - vi. The giving out of gifts or corporate hospitality shall be transparent.
- b. Purchase requisition pertaining to gifts and Club hospitality for government officials from the public sector, it shall be restricted to the statutory limit of the respective countries (*Note: RM500 by virtue of Circular 3/1998 for Malaysia*). However, the gift in the form of cash or cash equivalent (for example, but are not limited to, gift cards, cash vouchers, prepaid credits, money market funds, etc.) shall never be given or offered to any public or government officials.

3.2 Gift Acceptance

- a. An employee or a club member of RSGC shall not receive or solicit for personal gift from an external party unless under such circumstances it is customary and lawful to do so with a nominal value of up to RM250.
- b. An employee or a club member of RSGC who receives gifts under the circumstances as defined in Clause 3.2 (a) shall exercise judgment that such an act will not result in the following:
 - i. Influencing any present or future act or decision by the recipient;
 - ii. Inducing the recipient to perform or omit any act in violation of his/ her proper duties and responsibilities;
 - iii. Inducing such recipient to use or direct any other person to use his/ her influence with a government, of any of its representatives, divisions or agencies to affect or influence any act or decision of any such government, representatives, division or agency and in any or all the above cases, for the purpose of expediting, benefiting, prejudicing or affecting in any way whatsoever, whether directly or indirectly, the business dealings or relationship of the gift giver to RSGC.



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3.3 Entertainment Acceptance

Employees or club members of RSGC shall exercise proper care and judgment prior to accepting entertainment from an external party. This is vital to safeguard the Club's reputation and to protect its employees and club members from the allegation of soliciting bribes or corruption.

4.0 Corporate Social Responsibility

- a. All Corporate Social Responsibility ("CSR") related sponsorships and donations shall be made in accordance with RSGC's policies with prior approval by authorised personnel in line with the LOA.
- b. Given the nature of RSGC's business, government agencies or local authority bodies may request for sponsorship and / or donations in respect of CSR events. As part of RSGC's commitment to corporate social responsibility and sustainable development, as a general matter, RSGC provides such assistance in appropriate circumstances and in an appropriate manner.
- c. The policies set out below are to safeguard the Club's reputation and to protect its employees and club members from the allegation of soliciting bribes, corruption or exercising undue influence on external party(s) for personal gain.

4.1 Donation and Sponsorship

- a. Employees shall ensure that all sponsorships and donations are not used as a subterfuge for bribery or used to circumvent or avoid any of the provisions of the CoC, including, in particular, the prohibition on bribery. RSGC needs to be certain that donations to foreign-based charities or beneficiaries are not disguised illegal payments to government officials, and shall ensure that the charity does not act as a conduit to fund illegal activities in violation of international anti-money laundering, anti-terrorism and other applicable laws.
- b. The Policy & Guidelines, in accordance with RSGC's commitment to contribute to the community coupled with its values of integrity and transparency, all sponsorships and donations shall comply with the following:
 - ensure such contributions are allowed by applicable laws;
 - obtain all the necessary internal and external authorisations;
 - be made to well-established entities having an adequate organisational structure to guarantee the proper administration of the funds;
 - be accurately stated in the Club's accounting books and records; and
 - not to be used as a means to cover up an undue payment or bribery;



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4.2 Affiliation Sponsorship

Sponsorships, in the form of merchandise, may be provided to the member of the Club that is participating in an event and / or competition, and for the Club to be entering into an agreement with sponsorship partners for events and/or competition.

5.0 Facilitation and Extortion Payments

Facilitation of payment to an external party, in particular, government officials, is strictly prohibited as it is seen as a form of bribery and corruption. Extortion payment to an external party, on the other hand, is not categorised as an illegal activity by legal means, as the health, safety and liberty of one are paramount.

5.1 Facilitation Payment

- a. Facilitation payment to external party, in particular, government officials, is strictly prohibited as it is seen as a form of bribery and corruption unless it can be proven that such payment is legitimate and supported by an official receipt.
- b. Facilitation payment shall not be in any way or form be disguised or translated into a personnel remuneration package.

5.2 Exception to Facilitation Payment (Extortion Payment)

Extortion payment to any party shall not be made unless the employee(s) and/ or their families health, safety and/ or liberty are threatened.

6.0 Due Diligence Procedures and Dealing with External Parties and Public Officials

- 6.1 Prior to entering into or continuing a business relationship with any prospective or existing external parties for the performance of work for or on behalf of the Club, an appropriate counterparty due diligence must be performed on the external party to assess its integrity and exposure to bribery and corruption risks. The Club will not enter or continue a business relationship with any external party reasonable suspected of engaging in bribery or unethical business practices unless those suspicions are investigated and resolved.
- 6.2 Employees are required to ensure that appropriate due diligence and controls are applied to any external party engaged by the Club, to ensure that they comply with ABC throughout the external party's business relationship with the Club.



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- 6.3 When dealing with Public Officials, employees are strictly prohibited from offering, directly or indirectly, anything of value including gifts, entertainment, charitable contributions and sponsorships in order for that Public Official to act (or omit to act) in a way that differs from the Public Official's proper duties, obligations and standard of conduct. Due care and diligence must be exercised at all times when dealing with Public Officials.

7.0 Reporting Procedures on Suspected Bribery or Corruption Activities

Reference shall be made to the *RSGC's Whistleblowing Policy and Guidelines* pertaining to reporting procedures on suspected bribery or corruption activities.

Whistleblowers are encouraged to report in good faith or to raise a concern about any attempted, suspected and actual bribery or corruption activities that violate to the Policy & Guidelines at the earliest possible stage.

Upon making a disclosure in good faith, based on reasonable grounds and in accordance with the procedures pursuant to the *RSGC's Whistleblowing Policy and Guidelines*, the whistleblower shall be protected from any form of retaliation within the Club.

8.0 Training and Awareness Programme

- a. Annual training and awareness programmes on ABAC shall be provided to RSGC's employees, the Committee/ sub-committee members and key stakeholders as appropriate to their roles and taking into account the bribery risk assessment.
- b. Updates on this Policy & Guidelines with regards to its content as well as regulatory requirement affecting the ABAC practices shall be communicated to RSGC's employees, club members and key stakeholders.

9.0 Record-Keeping and Documentation

All records and documentation relating to the various policies and procedures which address specific areas of bribery and corruption risk must be properly maintained and retained.

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