

Anti-Corruption & Anti-Bribery Policy

Purpose of the Policy

1. This policy outlines acceptable and non-acceptable behaviour to ensure compliance with as many international anti-corruption and anti-bribery laws as possible. This includes compliance with all laws, domestic and foreign, prohibiting improper payments, gifts or inducements of any kind to and received from any person, including officials in the private or public sector, customers and suppliers.

Definitions

1. Bribe: Dishonestly persuade (someone) to act in one's favour by a gift of money or other inducement.
2. Corruption: The misuse of a public office or power for private gain or the misuse of private power in relation to business outside the realm of government.
3. Kickbacks: The return of a sum already paid or due as a reward for awarding of furthering business.

Scope

1. This policy is applicable to all employees of Times Software. All suppliers and contractors are also made to comply with this policy. This Policy is intended to supplement all applicable laws, rules, and other corporate policies.

Compliance

1. Times Software recognizes that the exchange of business courtesies in form of gifts, meals and entertainment is a common practice to establish good business relationships as well as recognition of service well done. Such practices are allowed, provided that the value of the gift, meal or entertainment does not violate any laws of the given country and is not intended to improperly influence the decisions of the person involved.
2. Times Software Sdn Bhd's employees are strictly prohibited from offering, paying, promising, or authorizing any gifts, kickbacks and payments from/to any person acting on behalf of an organization, government bodies or personal interest in exchange of:
 - Causing a person to abuse their position,
 - Influencing important decision on contracts and/or
 - Inducing a person to violate laws.
3. Employees are strictly prohibited from soliciting any gifts, kickbacks and payments as an inducement to perform an operation, service or function on behalf of Times Software Sdn Bhd.

Whistleblowing Policy

1. Should you suspect any of the employees of violating this policy, you are to report to your supervising officer immediately. Should the person you are suspecting is your supervising officer, you are to report it to the Director.

2. All reports will be treated with strict confidentiality and no employees will suffer any consequences of reporting suspected violations.
3. Times Software Sdn Bhd will treat all reporting of violations seriously and investigate all suspected wrongdoings without prejudice and with equal measures.

Violation

1. Times Software Sdn Bhd will take serious action on any employees that are found violating this policy.
2. Should any employee be found violating this policy, he/she will be subjected to disciplinary actions that could result to instant dismissal and subject to criminal liability should any laws had been broken.

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