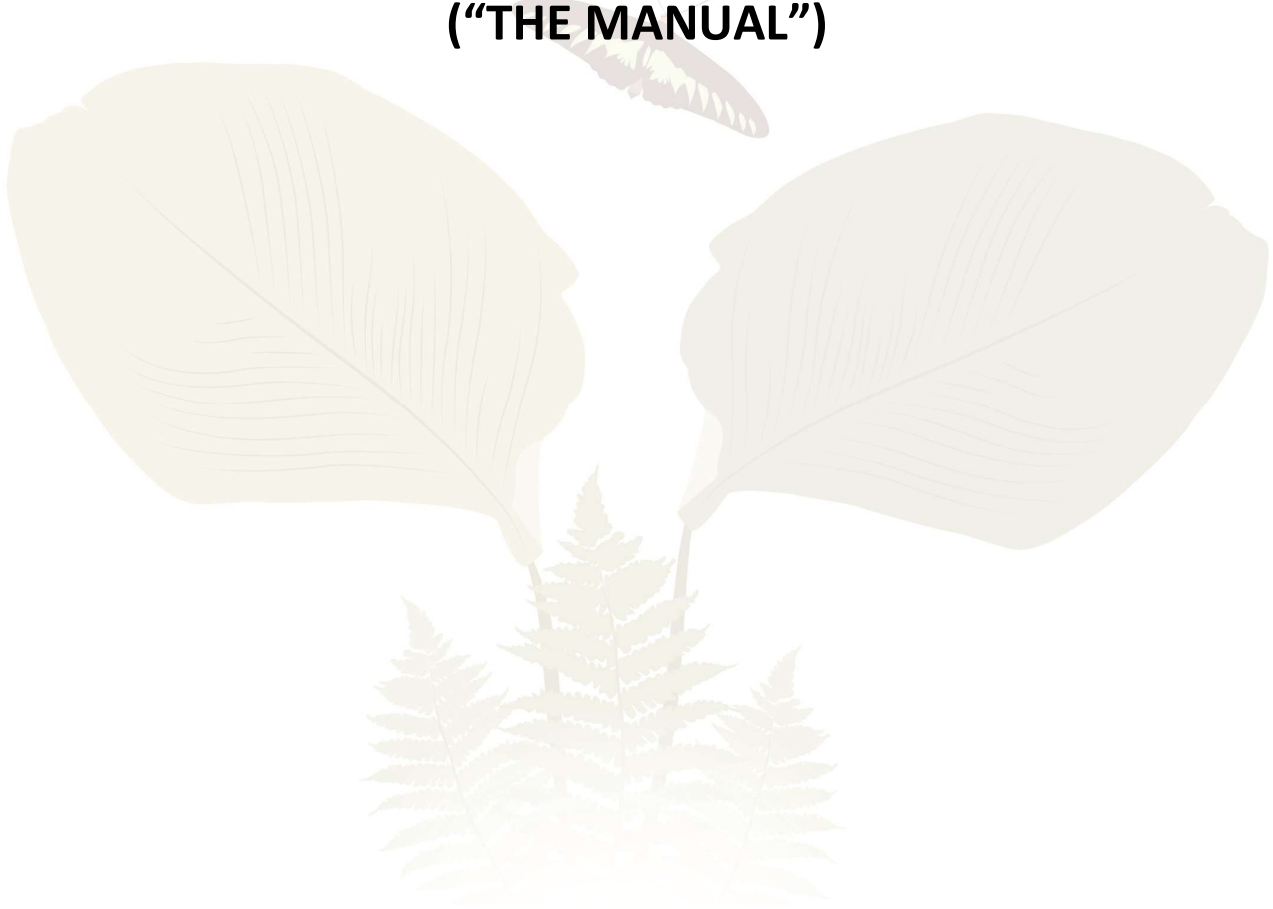




**BORNEO CONVENTION CENTRE KUCHING  
ANTI-BRIBERY AND CORRUPTION POLICY & GUIDELINES  
("THE MANUAL")**





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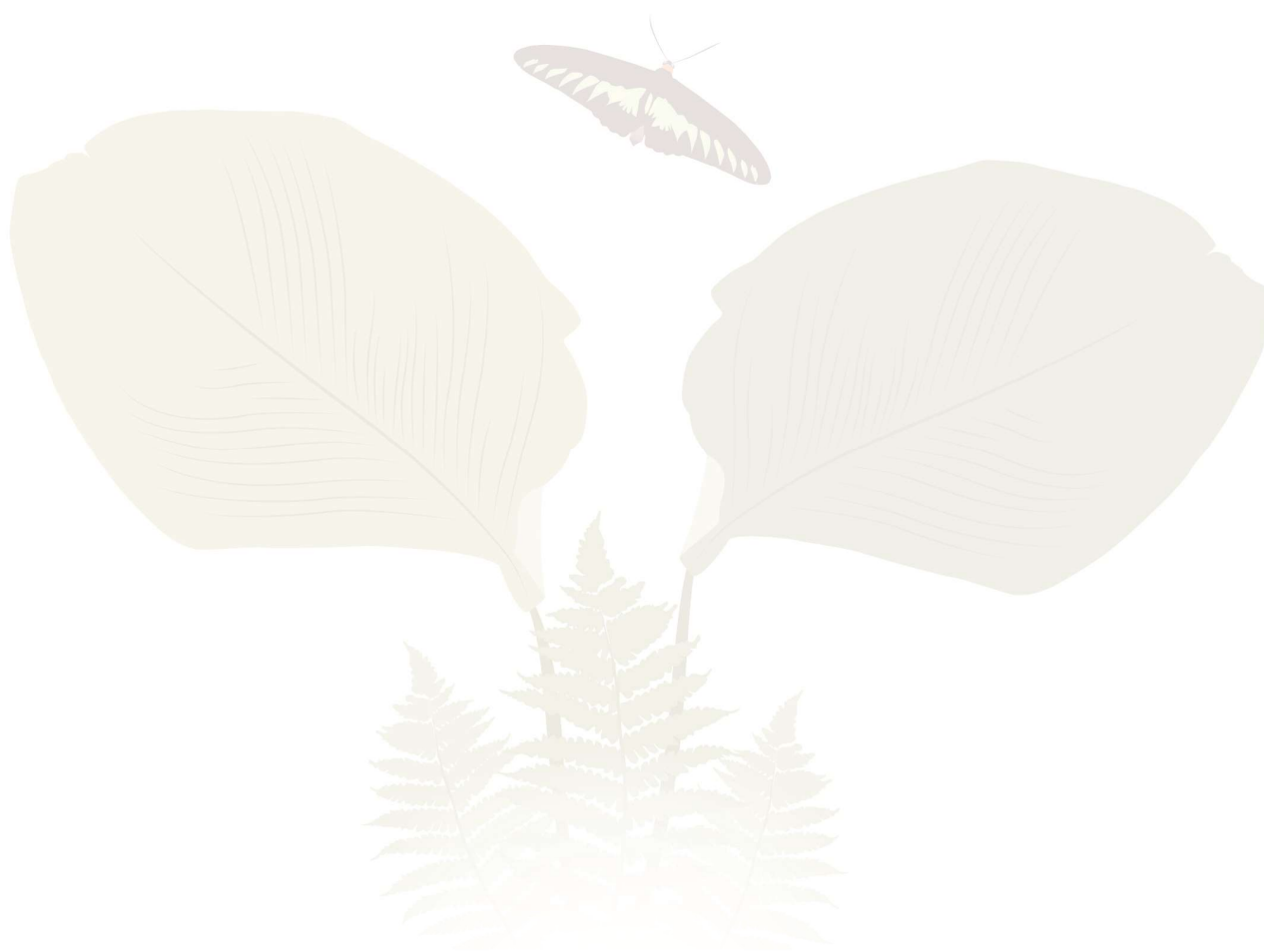
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## INTRODUCTION

Borneo Convention Centre Kuching (“BCK”) has adopted a zero-tolerance policy against all forms of bribery and corruption. The Code of Ethics (“Code”) sets out BCK’s core principles in this regard. The BCK Anti-Bribery and Corruption Policy and Guidelines (hereinafter referred to as the “The Manual”) elaborate upon those principles, providing guidance to employees concerning how to deal with improper solicitation, bribery and other corrupt activities and issues that may arise in the course of business. It is also intended to apply to every director (executive and non-executive) except as otherwise stated in The Manual. BCK also expects that contractors, subcontractors, consultants, agents, representatives and others performing work or services for or on behalf of BCK will comply with the relevant parts of The Manual when performing such work or services.

The Manual is not intended to provide definitive answers to all questions regarding bribery and corruption. Rather, it is intended to provide employees with a basic introduction to how BCK combats bribery and corruption in furtherance of the group’s commitment to lawful and ethical behaviour at all times. Some of the guidelines are designed to prevent situations in which bribery and corrupt practices may take root. The Manual also does not identify or set out every law, policy or procedure that may apply to you in the performance of your role. You are responsible for informing yourself concerning laws and other BCK policies and procedures that apply to you as a result of your role with BCK. This Manual does not constitute legal advice.

Engaging in bribery or corrupt practices can have severe consequences. Employee may face dismissal, fines and imprisonment, and BCK may face damage to reputation, financial loss and disbarment from business and other negative consequences.

If employee have any doubt about the scope of applicable laws or the application of BCK’s policies concerning the fight against bribery and corruption, the employee should contact his/her relevant Head of Department (“HOD”) or the Chief Executive Officer (“CEO”) and/or the Legal Department immediately.

**“ALWAYS ASK WHENEVER IN DOUBT”**

## PART 1: APPLICATION AND DEFINITIONS

### **1A. APPLICATION**

The Manual is intended to apply to every BCKK employee. It is also intended to apply to every director (executive and non-executive) for those companies, except as otherwise stated in The Manual.

Although the Manual is specifically written for BCKK employees and directors, BCKK expects that contractors, sub-contractors, consultants, agents, representatives and others performing work or services for or on behalf of BCKK will comply with it in relevant part when performing such work or services.

If a law conflicts with a policy as set out in this Manual, you should comply with the law. If you perceive that a provision in this Manual conflict with the law in your jurisdiction, you should consult with your HOD or the Human Resource Department, rather than disregard The Manual without consultation. However, if a local custom or policy conflicts with The Manual, you are called upon to comply with this Manual. If you have any questions about any of these conflicts, please consult your HOD, CEO and/or Legal Department.

### **1B. DEFINITIONS**

For the purpose of The Manual, unless the context otherwise requires, the following words and expressions shall have the following meanings:

<b>“You”</b>	Any person to who this Manual applies. Where more specific references are used (such as “employee”), the more specific reference is intended.
<b>“Family/household”</b>	includes your spouse(s), children (including step-children and adopted children), parents, step-parents, siblings, step-siblings, grandparents, grandchildren, in-laws, uncles, aunts, nieces, nephews, and first cousins, as well as other persons who are members of your household.
<b>“Employee”</b>	any person who is in the employment of BCKK including but not limited to executives, non-executives, secretaries, secondees and individuals on direct hire.
<b>“HOD”</b>	Head of respective department
<b>“CFO”</b>	Chief Financial Officer
<b>“CEO”</b>	Chief Executive Officer
<b>“BCKK”</b>	includes other subsidiaries and related companies within BCKK’s group of companies, including but not limited to Ivory Success Sdn Bhd and Borneo Isthmus Development Sdn Bhd.
<b>“The Centre”</b>	Means the building which is known as Borneo Convention Centre Kuching and bears the address Borneo Convention Centre Kuching, The Isthmus, Sejingkat, 93050 Kuching, Sarawak, Malaysia.
<b>“Third Party”</b>	include customers, potential customers, contractors, external companies and any other stakeholders with whom a business relationship, whether current, prospective or historic exists.



## PART 2: CONFLICT OF INTEREST

A conflict of interest arises in a situation in which an individual is in a position to take advantage of his or her role in BCCK for his or her personal benefit, including the benefit of his or her family/household and friends. A conflict of interest can make it difficult for an individual to fulfil his or her duties impartially and correctly. A conflict of interest can exist even if it results in no unethical or improper acts. A conflict of interest will undermine the duties of good faith, fidelity, diligence and integrity as expected by BCCK from its employees and directors in the performance of their duties and obligations.

You must therefore avoid conflicts of interest between your personal dealings and your duties and responsibilities in the conduct of BCCK's business; in particular, the use of BCCK office position, confidential information, assets and other BCCK resources for personal gain, or for the advantage of others with whom you are associated, is prohibited.

The situation under which conflicts of interest may arise include, but are not limited to:

- When you, in the exercise of your authority, give preference to your interests or the interests of your family/household members, associates or friends rather than the interests of BCCK;
- When you are in a position to influence decisions that are to be made by BCCK with respect to dealings with a business, enterprise or entity owned or partially owned by you, your family/household members, associates or friends; and
- When you compete with or against BCCK.

In certain instances, a conflict of interest that has been fully disclosed to BCCK may be tolerated by BCCK (for example, because measures are taken to ensure that it poses no risks to BCCK). Any conflict situations should be cleared with CEO and/or Human Resource Department, or in case of directors (executive and non-executive), with the Company Secretary. Failure to disclose fully the nature and scope of the conflict of interest may result in disciplinary action.





## PART 3: GIFT, ENTERTAINMENT AND CORPORATE HOSPITALITY

### **3A. “NO GIFT” POLICY**

BCKK has adopted a “No Gift” Policy whereby, subject only to certain narrow exceptions, BCKK employees and directors (executive and non-executive), family members or agents acting for or on behalf of BCKK employees, directors or their family members are prohibited from, directly or indirectly, receiving or providing gifts.

BCKK requires employees and directors to abide by this policy to avoid conflict of interest or the appearance of conflict of interest for either party in on-going or potential business dealing between BCKK and external parties as a gift can be seen as a bribe that may tarnish BCKK’s reputation or be in violation of anti-bribery and corruption laws.

It is the responsibility of employees and directors to inform external parties involved in any business dealings with BCKK that BCKK practices a “No Gift Policy” and to request the external party’s understanding for and adherence with this policy.

### **3A (i) RECEIVING GIFTS**

BCKK is very much aware that the exchange of gifts can be a very delicate matter where, in certain cultures or situations, gift giving is a central part of business etiquette. Despite acknowledging BCKK’s “No Gift Policy”, some external parties may still insist in providing gifts to BCKK employees, directors and/or their family members in certain situations which do not fall within the general exceptions.

Although the general principle is to immediately refuse or return such gifts, accepting a gift on behalf of BCKK is allowed only in very limited circumstances, whereby refusing the gift is likely to seriously offend and may severe BCKK’s business relationship with the Third Party.

In these limited circumstances, employees are expected to immediately submit the gift to the HOD or the CEO who will then decide whether to approve the acceptance of the gift or require it to be returned. Directors should inform the Company Secretary, as soon as reasonably practicable, to seek his/her advice when faced with a similar situation.

Even if it may appear disrespectful to refuse a gift from an external party, nevertheless, if there is a conflict of interest situation (e.g. bidding is in progress and the company that gave the gift is one of the bidders) then clearly the HOD cannot approve the acceptance of said gift (in the case of directors, the Company Secretary would advise the same). In this situation, **the gift must be politely returned with a note of explanation about BCKK’s “No Gift” policy.**

In the event the HOD or the CEO approves the acceptance of the gift, he/she must also determine the treatment of the gift whether to:

- a) donate the gift to charity; or
- b) hold it for departmental display; or
- c) share with other employees in the department; or
- d) permit it to be retained by the employee.

In determining the above, the HOD or the CEO are expected to exercise proper care and judgement in each case, taking into account pertinent circumstance including the character of the gift, its purpose, the position/seniority of the person(s) providing the gift, the business context, reciprocity, applicable laws and cultural norms.



### **3A (ii) PROVIDING GIFTS**

Generally, employees are not allowed to provide gifts to third parties with the exception of the CEO and CFO and any other officers identified in the gift and entertainment policy.

### **3A (iii) EXCEPTIONS TO THE “NO GIFT” POLICY**

Although generally BCCK practices a “No Gift” Policy, there are certain exceptions to the general rule whereby the receiving and provision of gifts are permitted in the following situations:

- a) Exchange of gifts at the company-to-company level (e.g. gifts exchanged between companies as part of an official company visit/courtesy call and thereafter said gift is treated as company property).
- b) Gifts from BCCK to external institutions or individuals in relation to BCCK’s official functions, events and celebrations (e.g. commemorative gifts or door gifts offered to all guests attending the event).
- c) Gifts from BCCK to employees and directors and/or their family members in relation to an internal or externally recognised company function, event and celebration (e.g. in recognition of an employee’s/director’s service to the company).
- d) Token gifts of nominal value normally bearing BCCK or company’s logo or (e.g. t-shirts, pens, diaries, calendars and other small promotional items) that are given out equally to members of the public, delegates, customers, partners and key stakeholders attending events such as conferences, exhibitions, training, trade shows etc. and deemed as part of the company’s brand building or promotional activities; and
- e) Gifts to external parties who have no business dealings with BCCK (e.g. monetary gifts or gifts in-kind to charitable organisations).

Even in the above exceptional circumstances, employees and directors are expected to exercise proper judgment in handling gift activities and behave in a manner consistent with the general principles set out as below:

- Conscientiously maintain the highest degree of **integrity**
- Always exercise **proper care and judgment**
- **Avoid conflicts of interest**
- **Refrain** from taking advantage of your position or exercising your authority to further your own **personal interest** at the expense of BCCK, and
- **Comply** with applicable laws, regulations and BCCK policies and procedures





Refer to the **DO's** and **DON'Ts** below:

**DO's**

- ✓ BCKK employees and directors must inform third parties involved in business dealings with BCKK that BCKK practices a "No Gift" Policy and to request the aforementioned parties to respect and adhere with BCKK policy.
- ✓ BCKK employees and directors are prohibited from accepting or providing gifts to third parties unless it falls under the general exceptions provided under the policy as stated in paragraph 3A (ii) and 3A (iii).
- ✓ BCKK HOD must exercise proper care and judgement when handling gift activities and apply the general principles stated in 3A (iii) in determining the appropriateness of the gift, in particular when dealing with public officials and public agencies/ bodies as strict rules apply.
- ✓ Employees are required to submit the gift to his/ her HOD or the CEO who will then decide whether to approve the acceptance of the gift or require the gift to be returned.

**DON'Ts**

There are certain types of gifts which are never permissible and BCKK employees and directors should immediately refuse if it involves the following:

- ✗ Any gift of cash or cash equivalent. Cash equivalent could be in the form of vouchers, discounts, coupons, shares, commissions and etc.
- ✗ Any gifts involving parties engaged in a tender or competitive bidding exercise.
- ✗ Any gifts that comes with a direct/ indirect suggestion, hint, understanding or implication that in return for the gift, some expected or desirable outcome is required ("quid pro quo").
- ✗ Any gift that would be illegal or in breach of local or foreign bribery and corruption laws.
- ✗ Any gift which is lavish or excessive or may adversely affect the reputation of BCKK.

You must immediately return or decline any gift that falls within the above-mentioned categories.



### **3B (i) PROVIDING ENTERTAINMENT**

BCKK recognises that providing modest entertainment is a legitimate way of building business relationships and as such a common practice within the business environment to foster good business relationship with external clients. As such, **eligible employees are allowed to entertain external clients through a reasonable act of hospitality as part of business networking as well as a measure of goodwill towards the recipients.**

In some countries, the act of hospitality through entertainment is a central part of business etiquette. However, this may not necessarily be the case in every country or in all circumstances as it may create a negative perception if observed or known by others despite selfless motives behind the entertainment provided.

Employees and directors should always bear in mind that this is an area where perception is often regarded as more important than facts and therefore you should always exercise proper care and judgment when providing entertainment to third parties especially when it involves public officials to ensure compliance with local anti-bribery and corruption laws.

Employees and directors are strictly prohibited **from providing or offering to provide entertainment with a view to improperly cause undue influence on any party in exchange for some future benefit or result.** Any acts of this nature, whether provided directly or indirectly through an intermediary, may be construed as an act of bribery.

You are required to comply with the policies and procedures of Human Resource Policy Handbook and maintain expenses within the limits of your entitlement, when carrying out entertainment activities.

Any entertainment activities that would involve public officials shall require prior approval from the HOD in consultation with CEO and/or Legal Department.

Specific rules governing employees' conduct when dealing with Public Officials is set out in greater detail in Part 4 of this Manual. Directors (executive and non-executive) are also expected to abide by the same rules.

### **3B (ii) RECEIVING ENTERTAINMENT**

BCKK recognises that the occasional acceptance of a reasonable and modest level of entertainment provided by third parties in the normal course of business is a **legitimate way to network** and build good business relationships.

However, it is important for employees and directors to **exercise proper care and judgment before accepting entertainment offered or provided by a third party.** This is not only to safeguard BCKK's reputation, but also to protect employees and directors from allegations of impropriety or undue influence.

You are required to comply with the policies and procedures of Human Resource Policy Handbook in relation to receiving entertainment from Third Parties.

In no event, however, may you or any of your family/household members accept entertainment in exchange for an exercise or non-exercise of your BCKK authority or otherwise to the detriment of BCKK.



Refer to the **DO's** and **DON'Ts** below:

### **DO's**

- ✓ BCK employees and directors must ensure that the entertainment offered is legitimate, modest and not lavish or excessive or extraordinary.
- ✓ BCK employees and directors are prohibited from offering or providing entertainment with a view to improperly creating undue influence on any party in exchange for some future benefit or result. Any acts of this nature, whether directly or indirectly, may be construed as an act of bribery.
- ✓ You must be aware and educate yourself on local anti-bribery and corruption laws when dealing with public officials as in some countries providing entertainment to public officials has the potential to be regarded as bribery.
- ✓ Eligible employees are required to comply with the policies and procedures of Human Resource Policy Handbook, and maintain expenses within the limits of their entitlement, when carrying out entertainment activities.
- ✓ Any entertainment activities that would involve public officials shall require the prior approval of the respective HOD in consultation with CEO and/or Legal Department.

### **DON'Ts**

There are certain types of entertainment activities which are never permissible and you should immediately refuse if it involves the following:

- ✗ Any entertainment that comes with a direct/ indirect suggestion, hint, understanding or implication that in return for the entertainment provided, some expected or desirable outcome is required ("quid pro quo").
- ✗ Any entertainment activities that would be illegal or in breach of local or foreign bribery laws.
- ✗ Any entertainment activities that would be perceived as extravagant, lavish or excessive or may adversely affect the reputation of BCK.
- ✗ Any entertainment activity that is sexually oriented or may otherwise tarnish the reputation of BCK.

You must immediately return or decline any offers of entertainment that falls within the above-mentioned categories.



### **3C (i) CORPORATE HOSPITALITY**

Corporate hospitality is generally defined as “corporate events or activities organised by an organisation which involves the entertainment of employees and Third Parties for the benefit of that organisation”.

Corporate events and activities include but are not limited to corporate sales event such as Association night, Chef Table, Networking Reception, product launching, Supplier Information Day; sporting events, gala dinners, concerts or activity-based events such as golf tournaments.

Corporate hospitality is recognised as a legitimate way to network and build goodwill in business relationships. However, there is a fine line between what is considered to be legitimate vs. illegitimate forms of corporate hospitality. The question is whether there is any intention to influence or be perceived to influence the improper outcome of a business decision by providing the corporate hospitality.

Corporate hospitality would be illegitimate in the following situations:

- If it provides an advantage to another person if offered; or
- If it is given with the intention of inducing the person to perform a relevant function improperly; or
- If there is knowledge that acceptance of the advantage would in itself be improper performance.

Transparency International has advocated corporate hospitality arrangements/activities should conform to the following basic principles:

- Transparency, in that all corporate hospitality is reported and written approval is obtained, all records of which are properly kept;
- Proportionality i.e. the corporate hospitality must not be too excessive. In addition, the corporate hospitality must commensurate with the recipient’s official capacity and not provided in his/her personal capacity;
- Reasonableness in ensuring that the corporate hospitality is not lavish; and
- Bona fide, where the intention to offer and/or provide the corporate hospitality is done with good and legal intentions.

### **3C (ii) PROVIDING CORPORATE HOSPITALITY**

BCCK recognises that providing corporate hospitality to its stakeholders be it through corporate events, sporting events or other public events, is a legitimate way to network and build goodwill in business relationships.

There may be occasions whereby BCCK may issue complimentary invitations in the form of passes, tickets or invitations to its clients, key stakeholders and other Third Parties to attend events organised or sponsored by BCCK, and other events organised or sponsored by external organisations.

While providing corporate hospitality is a reflection of BCCK’s courtesy and goodwill, the respective HOD must exercise proper care to protect BCCK’s reputation against any allegations of impropriety or the perception of bribery especially when the arrangements could influence or be perceived to influence the outcome of a business decision and are not reasonable and bona fide expenditures.

There should also be explicit, clear and internally transparent criteria to determine the selection of guests to be invited to a BCCK corporate hospitality event. Reasonable due diligence should be exercised, particularly when the arrangements involve public officials.

There are various local and international anti-bribery and corruption laws that impose strict restrictions on the value and level of entertainment and corporate hospitality to be accorded to third parties, particularly when it is offered to government or public officials.



BCCK is committed to comply with applicable laws governing the provision of corporate hospitality to third parties, especially when it involves public officials, and therefore expect employees to undertake the following:

- a) to publicise and make clear BCCK's policy on providing and receiving corporate hospitality;
- b) to obtain all necessary approvals for the issuance of complimentary tickets or passes to corporate hospitality events in accordance with the BCCK Limits of Authority;
- c) to expressly notify the recipients in writing that all complimentary tickets or passes are NON-TRANSFERABLE (e.g. the terms and conditions for use to be printed on the tickets, passes or invitations). In the event that the recipients are unable to attend, he/she is expected to return the tickets or passes to BCCK.

The unauthorised transfer of tickets or passes to persons other than the named recipient may signify to others that the invitation was extended to the recipient in his/her personal capacity.

All expenses incurred to provide the corporate hospitality must be properly documented, receipted and recorded in BCCK's records.

### **3C (iii) RECEIVING CORPORATE HOSPITALITY**

As a general principle, BCCK strictly prohibits employees and directors from soliciting corporate hospitality nor are they allowed to accept hospitality that is excessive, inappropriate, illegal or given in response to, in anticipation of, or to influence a favourable business decision, particularly from parties engaged in a tender or competitive bidding exercise (for e.g. contractors, vendors, suppliers and etc.).

Notwithstanding the above, BCCK recognises that the occasional acceptance of an appropriate level of hospitality given in the normal course of business is usually a legitimate contribution to building good business relationships. However, it is important for employees and directors to exercise proper care and judgement before accepting the hospitality.

This is not only to safeguard BCCK's reputation, but also to protect employees and directors from allegations of impropriety or undue influence. If you have any doubts on the appropriateness of a corporate hospitality offered by an external party for e.g. a contractor or supplier, you should either decline the offer or seek the advice of your HOD in consultation with CEO and/or Legal Department. In the case of directors (executive and non-executive), you should seek the advice from the Company Secretary.





Refer to the **DO's** and **DON'Ts** below:

### **DO's**

- ✓ You must ensure that the corporate hospitality accepted from an external party is legitimate, modest and not lavish or excessive or extraordinary in nature.
- ✓ You must exercise proper care and judgement before offering or providing corporate hospitality to Third Parties to ensure compliance with applicable laws and regulations, in particular when it involves public officials.
- ✓ Any corporate hospitality activities that would involve public officials shall require the prior approval of the respective HOD in consultation with CEO.
- ✓ If you have any doubts whether the corporate hospitality offered by an external party is appropriate or reasonable in nature, you should either decline the order or seek the advice of your HOD in consultation with CEO.

### **DON'Ts**

There are certain types of corporate hospitality activities which are never permissible and you should immediately refuse if it involves the following:

- ✗ Corporate hospitality offered by parties currently engaged in a BCCK tender or competitive bidding exercise.
- ✗ Corporate hospitality offered that comes with a direct/ indirect suggestion, hint, understanding or implication that in return for the corporate hospitality provided some expected or desirable outcome is required ("quid pro quo").
- ✗ Any corporate hospitality activities that would be illegal or in breach of local or foreign bribery laws.
- ✗ Corporate hospitality which is lavish or excessive or may adversely affect the reputation of BCCK.
- ✗ Any corporate hospitality activities that are sexually oriented or may otherwise tarnish the reputation of BCCK.

You must immediately decline any offers of corporate hospitality that falls within the above categories.



## PART 4: DEALING WITH PUBLIC OFFICIALS

### **4A (i) DEALING WITH PUBLIC OFFICIALS**

A “**public or government official**” includes, without limitation, candidates for public office, officials of any political party, and officials of state-owned enterprises other than BCKK.

Caution must be exercised when dealing with public officials as the laws of bribery and corruption in some countries are more stringent and provides for stricter punishments. Providing gift, entertainment or corporate hospitality to public officials or their family/household members is generally considered a “red flag” situation in most jurisdictions.

You are prohibited from paying for non-business travel and hospitality for any government official or his/her family/household members without permission from your HOD in consultation with CEO and Legal Department. Other than BCKK’s policies and procedures on gift, entertainment and corporate hospitality must also be abided by.

If approval is obtained for you to provide gift, entertainment or corporate hospitality to public officials, you must ensure that the gift, entertainment or corporate hospitality is not excessive and lavish, and must commensurate with the official designation of the public official and not his personal capacity. You must also be aware of local laws governing the activity and to ensure compliance. You should seek guidance from HOD, CEO and/or Legal Department prior to providing any gift, entertainment or corporate hospitality to public officials.

### **4A (ii). BCKK EMPLOYEES AS PUBLIC OFFICIALS**

Under anti-bribery and corruption laws in some jurisdictions, BCKK employees may be considered public officials by virtue of BCKK group of companies are government linked corporations and the Centre is a facility owned by the Government of the State of Sarawak.

To prevent violations of law and underscore our commitment to ethical behaviour worldwide, you should always abide by BCKK’s policies and provisions in relation to gifts (including the “No Gift” Policy), entertainment and corporate hospitality. In this regard, you are strictly prohibited from accepting gifts, entertainment or corporate hospitality that is excessive, lavish, inappropriate, illegal, or given to influence a business decision or with an understanding that, in return, some desirable outcome may be expected.

If you have any queries on this matter, you should always consult and seek further advice from HOD, CEO and/or Legal Department.

Refer to the **DO's** and **DON'Ts** below:

### **DO's**

- ✓ Do ensure that to provide or to offer to provide entertainment to public officials is lawful under local laws, as it might be deemed as bribery in certain countries or companies. If it is unlawful or if certain requirements must be met, you must ensure to fully comply with the law.
- ✓ Do ensure that proper care and judgment is exercised to confirm that there is no conflict of interest. It is unethical to offer or provide entertainment in exchange for some future benefit or result.
- ✓ Do ensure that due diligence is carried out to confirm that the public official is the appropriate person based on his/her official position. Any entertainment extended must commensurate with the public official's official position and not based on his/her popularity, political standing or your familiarity with the public official.
- ✓ Do ensure that the entertainment provided to the public official is reasonable and modest in value, and commensurate with the official designation of the public official. This is to avoid any perception of bribery.
- ✓ Do ensure that any "red flag" is resolved before giving out gift or entertainment.
- ✓ Do ensure that all documentation (including invoices and receipts) are properly recorded and kept.

### **DON'Ts**

- ✗ Do not try to circumvent any laws or policies with regards to gifts and entertainment, even if it means that BCKK might lose out on business opportunities as a result.
- ✗ Do not be too complacent with certain public officials or local customs that you might think you are familiar with. Do ensure to check that there are no changes to local laws or company policies.
- ✗ Do not approve any requests by the public official to transfer the gift or entertainment to his family members or friends that are not authorized to accept the gift or entertainment. Doing so might be perceived as bribery even with the least strict of laws or policies. Kindly advise the public official that 'transfer' of gifts or entertainment is against BCKK's policy.
- ✗ Do not offer to provide gifts, entertainment or hospitality that are illegal or unduly dangerous, indecent, sexually oriented or disrespectful.
- ✗ Do not exceed the monetary threshold as specified in the Entertainment Policy in Human Resource Policy Handbook.
- ✗ Do not act on your own accord when providing entertainment to public officials. Always consult your HOD, CEO and/or the Legal Department.
- ✗ Do not conceal, alter, destroy or otherwise modify any documentation that relates to entertainment or corporate hospitality accorded to public officials.



## **PART 5: CORPORATE SOCIAL RESPONSIBILITY (CSR), SPONSORSHIPS AND DONATIONS.**

As a responsible corporate citizen, BCKK is committed to cultivating a strong relationship with the local communities in which we live and work by contributing to the well-being of the people and the nation. It is however important that all Corporate Social Responsibility ("CSR"), sponsorships and donations are made in accordance with BCKK policies and receive prior authorization from BCKK Management or the Board where applicable.

### **5A. CORPORATE SOCIAL RESPONSIBILITY ("CSR")**

As part of our commitment to CSR and sustainable development, as a general matter, BCKK provides such assistance in appropriate circumstances and in an appropriate manner. However, such requests must be carefully examined for legitimacy and not be made to improperly influence a business outcome.

The proposed recipient must be a legitimate organisation and appropriate due diligence must be conducted in particular to ascertain whether any public officials are affiliated with the organisation.

Any red flags must be resolved before committing any funds to the programme. Even requests determined to be legitimate must be carefully structured to ensure that the benefits reach their intended recipients. If you are in any doubt as to whether a charitable contribution or social benefit is appropriate, consult your HOD, CEO and/or Legal Department for assistance.

### **5B (i). SPONSORSHIPS AND DONATIONS**

As set out in the Manual, employees must ensure that all sponsorships and donations are not used as a subterfuge for bribery or used to circumvent, including in particular, the prohibition on bribery.

BCKK needs to be certain that donations to foreign-based charities or beneficiaries are not disguised illegal payments to government officials, and must 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.

In accordance with BCKK's commitment to contribute to the community coupled with its values of integrity and transparency, all sponsorships and donations must 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 proper administration of the funds;
- be accurately stated in the company's accounting books and records; and
- not to be used as a means to cover up an undue payment or bribery.

Example of red flags to look out for are as follows:

- The proposed recipient/organisation has affiliations with a Public Official or their relatives are involved;
- The contribution is made on behalf of a Public Official;
- There is a risk of a perceived improper advantage for BCKK;
- The proposed recipient is based in a high-risk country, the request comes from a high-risk country or the activity takes place in a high-risk country.

BCKK requires employees to use good judgment and common sense in assessing the requests. When in doubt, employees should seek further advice from HOD, CEO and/or Legal Department.

**5B (ii). DUE DILIGENCE CHECKLIST**

Before making a commitment to a CSR activity, sponsorship or donation requested by external stakeholders, you must first conduct proper due diligence to ensure that the requests are legitimate and that any red flags raised are resolved prior to committing the funds.

The request is evaluated against BCCK's guidelines on CSR, sponsorships and donations and meets the following criteria:

- The request does not fall under the list of activities which BCCK does not support or contribute to;
- There is no risk of a perceived improper advantage for BCCK;
- The proposed recipient is a legitimate organisation and proper due diligence are made/background checks;
- The proposed recipient/organisation does not have affiliations with a Public Official.

If the request meets the above requirements and it is reasonably ascertained to be legitimate in nature, you can proceed to prepare a recommendation/Memorandum seeking Management's approval.

If the request comes from a high risk country (countries perceived to have high levels of corruption), or the proposed beneficiary is based in a high risk country, or the activity takes place in a high risk country or the proposed recipient is government owned or if a government official or their relative is involved and it is reasonably expected that a BCCK subsidiary may have business that could be influenced by that government official or the Government Official's agency, ministry or department, a memorandum must be sent to CEO for review as to whether or not the proposed investment/ sponsorship or donation should proceed and if deemed necessary, the Legal Department should be consulted to ensure compliance with anti-bribery and corruption laws.



Refer to the **DO's** and **DON'Ts** below:

### **DO's**

- ✓ Ensure that the activity is in line with BCCK's policy and guidelines on CSR, sponsorships and donations and does not fall under the list of CSR activities which BCCK does not support or contribute to. In case of any doubts, please refer to HOD, CEO and/or Legal Department.
- ✓ Ensure that the request has been carefully examined for legitimacy and that an appropriate level of due diligence has been conducted on the requesting party.
- ✓ Ensure that the proposed recipient is a legitimate organisation and the funding of the CSR activity is in compliance with the applicable laws and not made to improperly influence a business outcome or perceived to provide an improper advantage to BCCK.
- ✓ If the request comes from a high-risk country or the proposed activity takes place in a high-risk country or the proposed recipient is Government owned or involves a Government Official or their relatives, the request must undergo a more stringent due diligence process to determine whether there are any red flags raised.
- ✓ Any red flags must be resolved before committing any funds to the programme.

### **DON'Ts**

- ✗ Do not commit any funds without first undergoing the proper processes and procedures to evaluate the legitimacy of the request.
- ✗ Do not try to circumvent any guidelines, rules or procedures put in place by making charitable contributions as a subterfuge for illegal payments.
- ✗ Do not conceal, alter, destroy or otherwise modify any relevant information, which in the normal course of business, may raise potential red flags that would require additional investigation, particularly if it involves public officials. If you are unsure or have any concerns, please consult either your HOD, CEO and/or Legal Department.





## PART 6: POLITICAL CONTRIBUTIONS

As a matter of general policy, BCKK does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office.

BCKK may, in very limited circumstances, make political contributions in countries where such contributions are permitted under the law. The authority to approve such political contributions is with the CEO or the respective Board of Directors.

If any contribution is made, it must be permissible under applicable laws and must not be made with any promise or expectation of favourable treatment in return and must be accurately reflected in BCKK's books and records.

Good faith payments to a government entity such as payments to the host country's federal treasury required by contract or law, are not prohibited, so long as they are made with due care to the government entity and not to any individual official.

BCKK encourages employees to participate in the political election process by voting. Employees may choose to make personal political contributions as appropriate within the limits established by law. Under no circumstances, however, will any employee be compensated or reimbursed in any way by BCKK for a personal political contribution.

Employees are prohibited from acting on the below without first obtaining approval from their respective HOD:

- using their position with BCKK to try to influence any other person (whether or not employed by BCKK) to make political contributions or to support politicians or their parties in any country;
- make any contribution or incur any expenditure using BCKK resources to benefit any political campaign, party or politician in any country;
- the use of BCKK facilities, equipment and resources for any political campaign or party functions

Furthermore, charitable donations may not be used as a subterfuge for prohibited political payments.

Notwithstanding the foregoing, it is BCKK's policy to engage and communicate its views and position on issues of public interest that have an important impact on BCKK.

Employees must comply with local laws concerning lobbying in the jurisdictions in which BCKK engages in lobbying and must conduct themselves in a manner which is in accordance with local laws and consistent with the values and principles of the Manual.





Refer to the **DO's** and **DON'Ts** below:

**DO's**

- ✓ Be aware and educate yourself with all applicable laws and regulations in your jurisdiction that may prohibit or restrict companies from getting involved in political activities, make political contributions or engage in lobbying activities.
- ✓ In countries where political contributions are allowed under the law, any such contribution shall require the prior approval of the respective HOD.
- ✓ Make clear that your political views are your own when engaging in personal political activity and it does not reflect the views of BCKK.
- ✓ If you plan to seek or accept a public office, you will need to comply with the policies and procedures of Human Resource Handbook.

**DON'Ts**

- ✗ You are prohibited from using your position with BCKK to try to influence any other person (whether or not employed by BCKK) to make political contributions or to support politicians or their parties without the prior approval of your HOD.
- ✗ You are prohibited from making any contribution or incurring any expenditure using BCKK resources to benefit any political campaign, party or politician in any country without the prior approval of your HOD.
- ✗ BCKK facilities, equipment and resources may not be used for the furtherance of any political campaigns or party functions without the prior approval of the respective HOD.
- ✗ Charitable donations may not be used as a subterfuge for prohibited political payments.



## PART 7: FACILITATION PAYMENT

### **7A: MAKING FACILITATION PAYMENT**

“Facilitation payment” is as payments made to secure or expedite the performance by a person performing a routine or administrative duty or function. Offering, promising or requesting facilitation payments is just as prohibited as actually paying or receiving facilitation payments. Facilitation payments need not involve cash or other financial asset; it can be any sort of advantage with the intention to influence them in their duties.

BCCK prohibits accepting or obtaining, either directly or indirectly, facilitation payments from any person for the benefit of the employee himself or for any other person. The reason underlying this prohibition is that facilitation payment is seen as a form of bribery and corruption.

All employees must not offer, promise, give, request, accept or receive anything which might reasonably be regarded as a facilitation payment. If you receive a request or if you are offered facilitation payments, you must report it to your HOD and CEO.

### **7B: EXCEPTION TO MAKING FACILITATION PAYMENT**

However, there are certain situations or circumstances where you are faced with having to make facilitation payments in order to protect your life, limb or liberty. In dangerous situations like this, you are allowed to make payments but you must immediately report to your HOD, CEO and/or Legal Department. Making facilitation payment in such a situation is the only exception which can be used as a defence when faced with allegations of bribery and corruption.

## PART 8: MONEY LAUNDERING

Money laundering occurs when the criminal origin or nature of money or assets is hidden in legitimate business dealings or when legitimate funds are used to support criminal activities, including financing terrorism.

BCCK strongly objects to practices related to money laundering, including dealing in the proceeds of criminal activities.

Money laundering is a very serious crime and the laws governing this type of crime can have extra territorial effect, i.e. the application of the law is extended beyond local borders. The penalties for breaching anti-money laundering legislation are severe and can include extradition and incarceration in foreign jurisdictions.

To avoid violating anti-money laundering laws, employees are expected to always conduct counterparty due diligence to understand the business and background of BCCK's prospective business counterparties and to determine the origin and destination of money, property and services.

Counterparty means any party that BCCK is currently in relationship with or intends to do business with in the future, either on a regular or once-off basis. Counterparties include but are not limited to customers, contractors, suppliers, consultants, agents, JV partners and any other business partners.

A number of initiatives can be taken to strengthen anti-money laundering governance, they include the following:

- Adequate training and compliance programs should be conducted to ensure understanding and strict compliance to any internal anti-money laundering policies;
- Employees frequently involved in decision making process concerning counterparties particularly in matters on financial transactions should be properly acquainted with the applicable laws and regulations related to money laundering;
- Employees should be attentive to and report suspicious behaviour by customers, consultants and business partners using proper reporting channels, in-house experts on anti-money laundering should always be consulted;
- Convoluted payment arrangements such as payment in cash, payment to a third party or to accounts in other countries or requests for upfront payment for expenses or other fees;
- Periodic audits should be conducted and a process should be developed to follow all available accounting, record-keeping and financial reporting requirements applicable to cash and payments in connection with other transactions and contracts.



## PART 9: DEALING WITH THIRD PARTIES

### 9A. DEALING WITH THIRD PARTIES

BCCK's dealings with third parties, which include contractors, suppliers, agents, consultants, joint venture partners, introducers/government intermediaries etc., must be carried out in compliance with all relevant laws and consistent with the values and principles of the Manual. As part of this commitment, all forms of bribery and corruption are unacceptable and will not be tolerated.

BCCK expects that all third parties acting for or on its behalf to share the Company's values and ethical standards as their actions can implicate BCCK legally and tarnish the Company's reputation. Therefore, where we engage third parties, such as contractors, agents, intermediaries or joint venture partners, we are obligated to conduct appropriate counterparty due diligence to understand the business and background of BCCK's prospective business counterparties before entering into any arrangements with them to ensure that we are dealing with counterparties that subscribe to acceptable standard of integrity in the conduct of their business.

To help ensure that we only do business with third parties that share BCCK standards of integrity, we must do the following:

- Conduct due diligence to assess the integrity of BCCK's prospective business counterparties. Do not enter into any business dealings with any third party reasonably suspected of engaging in bribery and improper business practices unless those suspicions are investigated and resolved;
- All third parties are made aware of the Manual and our expectations of them;
- Continue to be aware of and to periodically monitor third party performance and business practices to ensure ongoing compliance.

If at any point during the due diligence exercise or in the dealings with a third party, there are conflicts of interest or "red flags" are raised, these warrant further investigation and must be sufficiently addressed before the engagement of the third party can progress.

Examples of common "red flags" involving third parties include:

- The transaction involves a country known for a high incidence of corrupt payments;
- Family, business or other "special" ties with government or public officials;
- A reference check reveals a flawed background or a reputation for getting "things done" regardless of the circumstances or suggests that for a certain amount of money, he can fix the problem;
- Objection to anti-bribery representations and warranties in commercial agreements or negative response when told of such requirements;
- Convoluted payment arrangements such as payment in cash, payment to a third party or to accounts in other countries or requests for upfront payment for expenses or other fees;
- The third party requires that his/her identity not be disclosed as part of the business transaction;
- Inadequate credentials for the nature of the engagement or lack of an office or an established place of business

BCCK requires its employees to use good judgment and common sense in assessing the integrity and ethical business practices of third parties and have provided the above as a guideline.

Employees should seek advice from HOD, CEO and/or Legal Department whenever particular questions arise relating to third parties that BCCK has appointed or is considering appointing

**9B (i). DEALING WITH CONTRACTORS AND SUPPLIERS**

BCCK is committed to uphold the highest standard of ethics and integrity in all aspects of its procurement activities.

BCCK should avoid dealing with any contractors or suppliers known or reasonably suspected of corrupt practices or known or reasonably suspected to pay bribes.

BCCK must ensure that all procurement activities are in line with the procurement policies and procedures that are applicable in your jurisdiction, which include:

- Due diligence of contractors and suppliers are undertaken before they are registered/licensed with BCCK;
- Contractors and suppliers are made aware of and understand the Manual and that they will comply accordingly;
- All commercial contracts and invitations to bid, incorporate the provisions relating to business conduct, conflict of interest and fighting corruption and unethical practices;
- In Malaysia, the General Terms and Conditions of License for contractors incorporate the provisions relating to business conduct, conflict of interest and fighting corruption and unethical practices;

BCCK should monitor significant contractors and suppliers as part of their regular review of the performance of the third parties. BCCK has the right to terminate their services in the event that these third parties pay bribes or act in a manner which is inconsistent with the Manual.

If any red flags are raised, these issues must be resolved. If it is not possible then the company must be barred from being on the list of registered or licensed contractors /suppliers and/or disqualified from participating in any BCCK tender exercise.

For further guidance on the implementation of the Manual for contractors and suppliers, employees should consult Central Procurement or Legal Department.

**9B (ii). DUE DILIGENCE CHECKLIST FOR CONTRACTORS AND SUPPLIERS**

BCCK in particular, the procurement function follows the following procedures when dealing with contractors and suppliers:

- Perform a risk assessment using a risk-based approach;
- Undertake due diligence on the third party depending on the level established by the risk analysis;
- Preparing and maintaining appropriate written documentation of the due diligence and risk assessment performed.



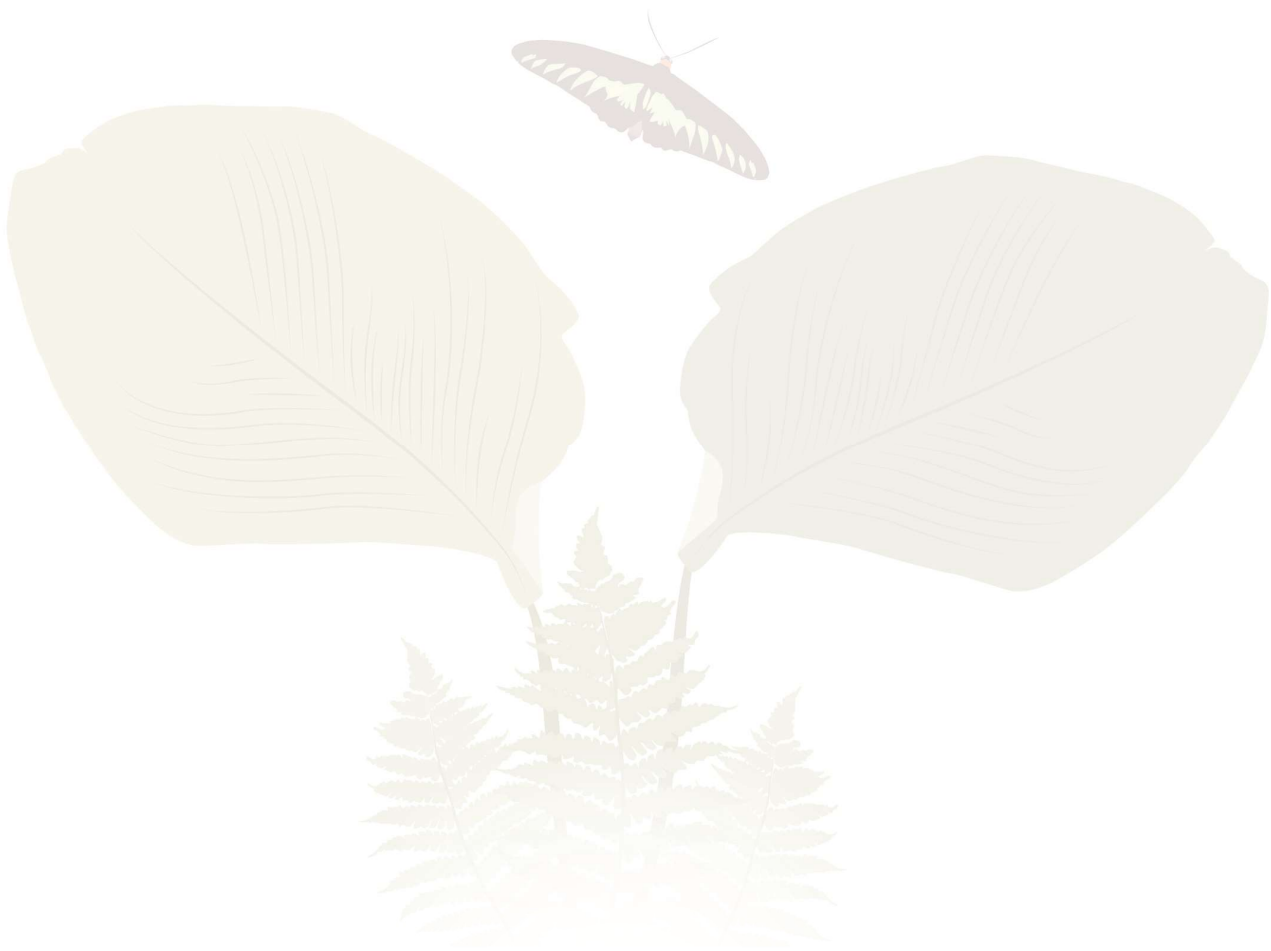
## PART 10: RECRUITMENT OF EMPLOYEES

BCKK, being a diversified business entity, provides equal opportunity for any qualified and competent individual to be employed by the company from various multicultural and multiracial background, sourced from both BCKK sponsorship programme and externally, local and internationally.

The recruitment of employees should be based on approved selection criteria to ensure that only the most qualified and suitable individuals are employed. This is crucial to ensure that no element of corruption is involved in the hiring of employees.

In line with this, proper background checks should be conducted in order to ensure that the potential employee has not been convicted in any bribery or corruption cases nationally or internationally. More detailed background checks should be taken when hiring employees that would be responsible in management positions, as they would be tasked with decision-making obligations.

If you find or suspect that another person subject to this policy has violated or about to violate this policy or applicable law, whether deliberately or inadvertently, you must forthwith report the same, in writing, to your HOD, CEO or the Human Resource Department.







Refer to the **DO's** and **DON'Ts** below:

### **DO's**

- ✓ Do ensure that the due process and procedure are carried out based on the approved selection criteria when recruiting new employees. This is to avoid any allegations of bribery and corruption.
- ✓ Do ensure that due diligence is carried out to confirm that the candidate is the suitable person based on eligibility criteria and/or other prerequisites, rules and guidelines.
- ✓ Do ensure that relevant approvals are obtained from the respective Approving Authority prior to issuance of an offer letter.
- ✓ Do ensure that if the candidate to be employed has a family/household relationship to a BCKK employee or director, it is properly recorded and is being made transparent.
- ✓ Do ensure that all rights, entitlements and benefits given to the candidate are reasonable in value.
- ✓ Do ensure that any "red flag" is resolved before recruiting. For example, if the candidate is a relative of a government official, you must ensure that it is not against the laws of the relevant country.
- ✓ Do ensure that all documentations (including invoices and receipts) are properly recorded and kept.

### **DON'Ts**

- ✗ Do not recruit an employee without undergoing the proper process and procedures set by BCKK to ensure that there is no perception of bribery or corruption.
- ✗ Do not try to circumvent any guidelines, rules or procedures when selecting new employees as it might put you and BCKK in trouble in the event of any bribery allegation.
- ✗ Do not try to conceal any information where you think that there might be a conflict of interest. If you are unsure, please consult your HOD or Human Resource Department.
- ✗ Do not arbitrarily award rights, entitlements and benefits. The value and types of rights, entitlements and benefits must be based on the guidelines prepared by BCKK.
- ✗ Do not fail to give particular attention to any laws, guidelines or policies when a public official is involved, as some countries might impose particular requirements. Always consult your HOD, Human Resource Department or Legal Department.
- ✗ Do not conceal, alter, destroy or otherwise modify any documentation.



## PART 11: WHISTLEBLOWING POLICY

### **11A. BCCK WHISTLEBLOWING POLICY**

BCCK is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

#### **11A (i). SCOPE OF THE POLICY**

This policy is designed to facilitate employees and directors (executive & non-executive) of BCCK and members of the public to disclose any improper conduct (misconduct or criminal offence) through internal channel. Such misconduct or criminal offences include the following:

- Fraud;
- Bribery;
- Abuse of Power;
- Conflict of Interest;
- Theft or embezzlement;
- Misuse of Company's Property;
- Non-Compliance with Procedure

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under BCCK's Code or any criminal offence under relevant legislations in force.

This policy is not to invalidate the HR disciplinary action process and procedures but to provide more avenues for employees and members of the public to disclose improper conduct committed or about to be committed to BCCK.

Only genuine concerns should be disclosed. The Whistleblower is responsible to ensure that the disclosure is made in good faith and free from any malicious intent. In addition, any disclosure which is found to be frivolous or vexatious will not be entertained.

If the investigation later revealed that the disclosure was made with malicious intent, appropriate action can be taken against the whistleblower.

The whistleblower who wishes to withdraw his/her disclosure is required to write to the relevant Reporting Channel and provide reason(s) for the withdrawal. Nevertheless, BCCK reserves the right to proceed with investigation on the subject matter of the disclosure.

### **11B. PROCEDURES IN MAKING A DISCLOSURE**

#### **11B (i). REPORTING CHANNELS**

Disclosure can be made to ANY of the following reporting channels, in strict confidential manner:

- Email:** email to [whistle@bcck.com.my](mailto:whistle@bcck.com.my)
- In Person:** in person to Chief Executive Officer / Chief Financial Officer / Director of Human Resource
- In Writing:** in writing to BCCK Whistleblowing Committee, Borneo Convention Centre Kuching, The Isthmus, Sejingkat, 93050 Kuching.
- Hotline:** Hotline at 082 392 888 from Monday to Friday during office hour (8.30am – 5.30pm)

**11B (ii). DISCLOSURE OF IDENTITY**

In order to enable BCK to accord the whistleblower with the necessary protection under this policy and also to obtain more details pertaining to the disclosure, the whistleblower is required to disclose his/her personal details as follows:

- Name;
- NRIC No. / Passport No.;
- Contact Details – Office Contact/Mobile No/Home No/Email address

These personal details will be kept confidential.

**11B (iii). CONTENT OF THE DISCLOSURE**

Any disclosure made herein should contain the following information:

- Details of the person(s) involved;
- Details of the allegation;
  - Nature of the allegation;
  - Where and when the alleged misconduct/ wrongdoing took place;
- Other relevant information; and
- Any supporting evidence if available.

**11B (iv). ANONYMOUS WHISTLEBLOWER**

Any anonymous disclosure will not be entertained. Any employee or member of public who wishes to report improper conduct is required to disclose his identity to BCK in order for BCK to accord the necessary protection to him. However, BCK reserves the right to investigate into any anonymous disclosure.

**11B (v). PROTECTION TO WHISTLEBLOWER**

A whistleblower will be accorded with protection under the policy provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved.

The protection to the whistleblower can be revoked under the following circumstances, among others:

- The whistleblower participated in the improper conduct;
- The whistleblower wilfully discloses a false statement;
- The disclosure is made with malicious intent; and/or
- The disclosure is frivolous or vexatious.

**11B (vi). NOTIFICATION**

Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.



## PART 12: PROCEDURAL MATTERS

### **12A (i). CONSEQUENCES OF A BREACH**

Adherence to this Manual is critical to the smooth running of its business or enterprise and is for the common good of BCCK and its employees. Any conduct which is not in accordance with the principles set out in this Manual will be dealt according to the Human Resource Policy Handbook and other applicable local laws.

### **12A (ii). REGISTERING ANY CONFLICTS OF INTERESTS, GIFTS AND CORPORATE HOSPITALITY**

Any conflicts of interests (potential or real) and matters related to giving or receiving gifts/ entertainment/ corporate hospitality will be registered according to the policies and procedures of Human Resource Policy Handbooks. Please liaise with Human Resource Department personnel for further information on the procedures for registration.

**BCCK reserves the right to amend this policy and guidelines.**

