



# ANTI-BRIBERY AND CORRUPTION

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POLICY

**PRIVASIA TECHNOLOGY BERHAD**



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## **1. INTRODUCTION**

Privasia Technology Berhad (“PTB”) is committed in conducting business and servicing its clients and customers with high ethical standards and integrity. Accordingly, PTB does not condone and tolerate any form of corruption or bribery which is in contravention of the Malaysian Anti-Corruption Commission Act 2009 (“the Act”) or any similar or related laws and regulations internationally.

PTB is committed to ensure that its management and employees act with the highest level of professionalism, act fairly and with integrity in all its dealing and expects that all its business associates, contractors, sub-contractors, service providers, suppliers, vendors, consultants, agents and representatives uphold the highest standard of integrity in performing work or services for or on behalf of PTB.

## **2. OBJECTIVE**

The objective of this Anti-Bribery and Corruption Policy (“ABC Policy”) is to set out the responsibilities of the management and employees of PTB on what constitutes gratification and how to deal with bribery and corruption issues.

All Employees of PTB, business associates, service providers and third parties engaging with PTB are expected to read, understand and comply with the requirements set out in this ABC Policy which is made available at <https://www.privasia.com/corporate-governance.html>. No waivers or exceptions will be granted for practices that deviate from PTB’s ABC Policy.

## **3. QUALIFICATION**

If a provision of law conflicts with this ABC Policy, the provision of the law will prevail. If you perceive that a provision in this ABC Policy conflicts with the law in your jurisdiction, you should consult with the Management of PTB, rather than disregard the ABC Policy without consultation.

#### 4. DEFINITIONS

“Act”	means the Malaysian Anti-Corruption Commission Act 2009, as amended from time to time.
“Bribery”	means an inducement or reward offered, promised or provided in order to improperly gain any commercial, contractual, regulatory or personal advantage which includes passive and active bribery.
“Business”	means any activity carried on for the purpose of gain or profit and includes all property derived from or used in or for the purpose of carrying on such activity, and all the rights and liabilities arising from such activity.
“Employees”	has the meaning ascribed to it in Clause 5 of this ABC Policy.
“Facilitation Payment”	means any sums of unofficial payment made to secure, expedite or facilitate an ordinary governmental action, process or procedure to a government official (either locally or internationally).
“Family Members”	means a person’s spouse(s), children (including step-children and adopted children), parents, step-parents, siblings, step-siblings, grandparents, grandchildren, in-laws, uncles, aunts, nieces, nephews, and cousins, as well as any other persons who are members of the same household.
“Gratification”	<p>means:</p> <ul style="list-style-type: none"> <li>(a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;</li> <li>(b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;</li> <li>(c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;</li> <li>(d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;</li> <li>(e) any forbearance to demand any money or money’s worth or valuable thing;</li> <li>(f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature,</li> </ul>

	<p>whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and</p> <p>(g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).</p>
“Kickbacks”	means an illicit payment or commission made in return for facilitating a transaction, procurement of a project or furthering of a Business.
“Management”	meansthe management of PTB which includes directors, managers, heads of departments or any similar position.
“Public Body”	<p>includes the following:</p> <p>(a) the Government of Malaysia or any country;</p> <p>(b) the Government of a State;</p> <p>(c) any local authority and any other statutory authority;</p> <p>(d) any department, service or undertaking of the Government of Malaysia or any country, the Government of a State, or a local authority;</p> <p>(e) any society registered under subsection 7(1) of the Societies Act 1966;</p> <p>(f) any branch of a registered society established under section 12 of the Societies Act 1966;</p> <p>(g) any sports body registered under section 17 of the Sports Development Act 1997;</p> <p>(h) any co-operative society registered under section 7 of the Co-operative Societies Act 1993;</p> <p>(i) any trade union registered under section 12 of the Trade Unions Act 1959;</p> <p>(j) any youth society registered under section 9 of the Youth Societies and Youth Development Act 2007;</p> <p>(k) any company or subsidiary company over which or in which any public body as is referred to in paragraph (a) to (j) has controlling power or interest; or</p> <p>(l) any society, union, organization or body as the Minister responsible for the Malaysian Anti-Corruption Commission may prescribe from time to time.</p>
“PTB”	meansPrivasiaTechnology Berhad, its subsidiaries, controlled companies

	<p>and related companies. The expression “PTB” is used for convenience where references are made to PTB companies in general. The companies in which PTB has direct or indirect shareholding are distinct legal entities.</p> <p>Controlled companies include any companies of which:</p> <ul style="list-style-type: none"> <li>(a) PTB owns or controls (directly or indirectly) more than fifty per cent (50%) of the voting rights;</li> <li>(b) PTB has the ability to direct (directly or indirectly) the casting of more than fifty per cent (50%) of the votes exercisable at general meetings on all, or substantially all matters; and/or</li> <li>(c) PTB has the right to appoint or remove (directly or indirectly) directors holding a majority of the voting rights at meetings of the board of directors on all, or substantially all matters.</li> </ul>
<p>“Third Party”</p>	<p>means any individual or organisation that the Employee comes into contact with during the course of work and the running of PTB’s business, and includes actual and potential clients/customers, intermediaries, referrers of work, vendors, suppliers, contractors, sub-contractors, service providers, distributors, business contacts, business associates, consultants, agents, representatives, advisers, Public Body (including their advisers, representatives and officials), politicians and political parties.</p>

**5. APPLICABILITY**

This ABC Policy applies to all individuals working for and on behalf of PTB at all levels, whether permanent, fixed-term or temporary, and wherever located including the Management of PTB (“**Employees**”).

Although this ABC Policy is specifically written for PTB’s Employees and the Management of PTB, PTB expects that all and any Third Party and any other third-party performing work or services for or on behalf of PTB to comply with this ABC Policy.

## 6. GENERAL RESPONSIBILITIES

All Employees (or where applicable, Third Party) shall, at all times in making any Business decision affecting PTB, comply with the following principles:

- (a) comply strictly to the provisions of the Act;
- (b) shall not participate or condone any acts or forms of Bribery;
- (c) the prevention, detection and reporting of any Gratification received, Bribery and other forms of corruption are the responsibility of all Employees;
- (d) all Employees are required to avoid any activity that might lead to, or suggest, a breach of this ABC Policy or the Act;
- (e) always exercise proper care and judgement;
- (f) avoid conflict of interest;
- (g) conscientiously maintain the highest degree of integrity and ethics;
- (h) comply fully with all applicable laws, regulatory requirements on anti-corruption and all regulations, procedures, and policies issued by PTB;
- (i) PTB adopts a No Gifts policy, subject to certain limited exceptions as detailed in this ABC Policy;
- (j) notify the Management of PTB as soon as possible if it is believed or suspected that a conflict with this ABC Policy has occurred, or may occur in the future, or if they have been offered any form of gratification, Bribery, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity;
- (k) if any Third Party or any other external party is aware of any activity by any Employees which might lead to, or suggest, a breach of this ABC Policy, they should raise their concerns to the Management of PTB.

## **7. NO GIFT POLICY (INCLUDING ENTERTAINMENT AND HOSPITALITY)**

### **A. General**

PTB has adopted a “No Gift” Policy whereby, subject only to certain narrow exceptions, all Employees (including their Family Members) are prohibited from, directly or indirectly, receiving from or providing to Third Party gifts, entertainment and hospitality.

PTB requires all its Employees to abide by this ABC Policy to avoid conflict of interest or the appearance of conflict of interest for either party in an on-going or potential business dealing between PTB and the Third Party as a gift can be seen as a form of Bribery that may tarnish PTB’s reputation or be in violation of the Act.

It is the responsibility of the Employees to inform the Third Party that PTB practices a strict “No Gift Policy” and to request the Third Party’s understanding for and adherence to this ABC Policy.

### **B. Limited Exceptions**

Although the general principle is to immediately refuse or return such gifts, accepting a gift on behalf of PTB is allowed only in very limited circumstances.

PTB may provide gifts to Third Parties or receive gifts which are reasonable in nature in conjunction with the celebration of various festivals in Malaysia subject to the threshold provided in Clause 7 (C), the principles in this ABC Policy and the prior written approval from the Management of PTB.

In the limited exceptions where providing or receiving gifts (including entertainment and hospitality), the following principles must be adhered to:

- (a) any gift given or received must not be made with the intention to improperly influence the Business decision-making by a Third Party or Employees 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;



- (b) the Employees shall comply with the Act and local laws and regulations in all relevant countries;
- (c) the Employees shall not include cash or a cash equivalent;
- (d) the gift shall be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift;  
  
value of the gift (including entertainment or hospitality) shall not exceed the threshold value stipulated in Clause 7 (C);
- (e) any gift (including entertainment or hospitality) received shall not be illegal or sexual in nature;
- (f) any gift shall be given or received openly and not secretly; and
- (g) in the case of gifts or hospitality or entertainment, they must not be offered to, or accepted from, members of Public Body, politicians or political parties, without the prior approval of the Management of PTB.

### **C. Threshold**

#### **(a) Threshold for Gifts**

- (i) Value of any gifts provided or received shall not exceed RM1,000 for corporations and organisations and shall not exceed RM300 for individuals and any gifts received or given shall be limited to 3 times annually for each recipient or giver, unless otherwise permitted by PTB's Management and PTB's Chief Executive Officer.
- (ii) Any gifts provided or received which exceed the allowable threshold must be recorded in the Gift and Hospitality Register as provided under Clause 7 (E) and in Appendix 1 of this ABC Policy.

**(b) Threshold for Entertainment and Hospitality**

- (i) Value of any entertainment or hospitality provided or received shall not exceed RM1,000 and shall be limited to 3 times annually for each recipient or giver, unless otherwise permitted by PTB's Management and PTB's Chief Executive Officer.
- (ii) Any entertainment or hospitality provided or received which exceed the allowable threshold must be recorded in the Gift and Hospitality Register as provided under Clause 7 (E) and in Appendix 1 of this ABC Policy.

**D. Prohibited Gifts**

The Management and the Employees are prohibited from giving and should immediately decline, reject and return (if received) the following:

- (a) any gift of cash or cash equivalent which includes but is not limited to vouchers, discounts, coupons, shares, commission, digital assets;
- (b) any gifts involving parties engaged or to be engaged in a tender or competitive bidding exercise;
- (c) any gifts that comes with a direct/indirect suggestion, hint, understanding or implication that in exchange for the gift, some expected or desirable outcome is required, irrespective of whether it materialises as anticipated. This includes receiving or giving a business advantage or obtaining approvals, licenses, permits from the regulatory authorities;
- (d) any gift that would be illegal or in breach of the Act or foreign bribery and corruption laws; and
- (e) any gift which is lavish or excessive, for e.g., valued above the maximum threshold permitted by PTB.

## **E. Gift and Hospitality Register**

In these limited circumstances, Employees are expected to immediately record any gift, hospitality or entertainment received or given which exceeds the threshold allowed under Clause 7 (C) in the Gift and Hospitality Register as provided under Appendix 1 of this ABC Policy which will then be submitted to the Management of PTB who will then decide whether to approve the giving or acceptance of the gift or require the gift to be returned, to the extent capable of being returned. If the nature of gift is not capable of being returned, refund of money or credit equivalent to the value of gifts ought to be arranged.

The Management of PTB must exercise proper care and judgment when deciding if a gift, hospitality or entertainment should be given or be accepted.

The Management is required to adhere to the principles in this ABC Policy in determining the appropriateness of the gift, hospitality or entertainment, in particular when dealing with members of Public Body as stricter rules should apply.

## **8. FACILITATION PAYMENTS AND KICKBACKS**

PTB does not make, and will not accept any Facilitation Payment or Kickbacks of any kind.

## **9. DONATIONS AND POLITICAL CONTRIBUTIONS**

PTB does not make any charitable donations or contributions to any Public Body, political parties or politically motivated projects unless prior approval is given by the Management of PTB for any legitimate purpose.

## **10. CHARITABLE DONATIONS AND SPONSORSHIPS**

### **A. General**

PTB allows charitable donations and sponsorships for legitimate purposes only and where it is permitted and allowed by the Act or other existing local or foreign laws and regulations.

However, these charitable donations or sponsorships may be misused or abused or perceived as a vehicle of Bribery and corruption.

The following are the principles to adhere to in providing charitable donations or sponsorships:

- (a) ensure that such contributions are allowed by the Act or any other applicable laws and regulations, both local and foreign;
- (b) all request for charitable donations and sponsorships must require approval from the Management of PTB;
- (c) be only made to well established entities having an adequate organisational structure to guarantee proper administration of the funds;
- (d) be accurately recorded in PTB's accounting books and records; and
- (e) not used as a means to cover up undue payment, Bribery or Gratification, or with the intent of obtaining or retaining business or advantage in the conduct of business for PTB.

### **B. Suspicious Transactions**

The following are the "red flags" to look out for:

- (a) the proposed recipient/organisation has affiliations with a Public Body or its related officials;
- (b) the contribution is made on behalf of a Public Body or its related officials;

- (c) there is a risk of perceived improper advantage to PTB;
- (d) the proposed recipient, request or activity originates from or is based in a high-risk country.

### **C. Due Diligence**

Before making a commitment to provide a donation or sponsorship, the Management is required to conduct proper due diligence to ensure that the request is legitimate and that any “red flags” that are raised are resolved prior to committing the funds.

The following due diligence checklist should be adhered to in making a decision to provide a donation or sponsorship:

- (a) the request has been adequately evaluated against this ABC Policy;
- (b) there is no risk or perceived improper advantage for PTB;
- (c) the proposed recipient is a legitimate organisation and proper due diligence/background checks has been conducted; and
- (d) the proposed recipient/organisation does not have affiliations with any members of Public Body.

## **11. DEALING WITH THIRD PARTIES**

### **A. General**

PTB’s dealings with Third Party, shall be carried out in compliance with the Act and all relevant local and foreign laws and consistent with the values and principles of this ABC Policy. As part of this commitment, all forms of Bribery and corruption are unacceptable and will not be tolerated.

PTB expects that all and any party acting for or on its behalf to share the principles, values and ethical standards to ensure that their actions do not implicate PTB legally and tarnish the PTB’s reputation for being involved with Bribery or corruption.

## **B. Suspicious Transactions**

The following are common “red flags” involving a Third Party which includes but is not limited to:

- (a) the transaction involves a country known for a high incidence of corrupt payments;
- (b) business dealings involving Family Members or other “special” ties with Public Body or its related officials;
- (c) 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;
- (d) objection to anti-bribery representations and warranties in commercial agreements or negative response when told of such requirements;
- (e) convoluted payment arrangements such as payment in cash, payment to a third party or into accounts in other countries or requests for upfront payment for expenses or other fees;
- (f) the Third Party requires that his/her identity not be disclosed as part of the business transaction;
- (g) inadequate credentials for the nature of the engagement or lack of an office or an established place of business;
- (h) refusal or reluctance to complete the Due Diligence Questionnaire under **Appendix 2** of this ABC Policy.

## **C. Due Diligence Prior to Engaging with Potential Third Party**

To help ensure that PTB only does business with a Third Party that shares PTB’s standards of ethics and integrity, the Management and the Employees shall conduct prior due diligence to assess the integrity of PTB’s prospective business counterparties.

PTB shall not enter into any business dealings with any Third Party which is reasonably suspected of engaging in Bribery or improper business practices unless those suspicions are investigated and resolved.

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” that are raised, these warrant further investigation and must be sufficiently addressed before the engagement of the Third Party can progress.

PTB shall procure all Third Party prior to entering into business dealings with them to fill in the Due Diligence Questionnaire in **Appendix 2** to assess the risk of the Third Party and whether it is proper to conduct business relationships with them.

#### **D. Due Diligence for Existing Third Party**

PTB performs an on-going monitoring and manages the risk profile of existing Third Party, by conducting the following:

- (a) no payment to personal account is allowed if the Third Party is a body corporate;
- (b) any one-off advance payment to a Third Party after a contract is signed, must be reviewed and approved by the Management of PTB before payment is made;
- (c) all and any Third Party are subject to periodic compliance risk profile review. It includes requesting the Third Party to update the Due Diligence Questionnaire as provided under **Appendix 2**. The frequency of review is as follows:
  - (i) Higher Risk Third Party: Annual review; and
  - (ii) All other Third Party: Every two (2) years review or at contract renewal, whichever is earlier.

#### **E. Trigger Event for Conducting Due Diligence Check After Contracting**

The following are the trigger events that will cause PTB to perform due diligence exercise after contracting with the Third Party:

- (a) change of payee and/or change of bank payment account request are raised by the Third Party;

- (b) when the periodic compliance risk profile review is due;
- (c) when there are changes of associated persons, for e.g., change of beneficial owner or authorized person;
- (d) any negative news or updates on the Third Party which may raise concerns on doing business with the Third Party.

## **12. CONFLICT OF INTEREST**

Conflict of interest arise in situations where there is personal interest that could be considered to have potential interference with objectivity in performing duties or exercising judgment on behalf of PTB. Employees should avoid situations in which personal interest could conflict with their professional obligations or duties. Employees must not use their position, official working hours, PTB's resources and assets, or information available to them for personal gain or to the PTB's disadvantage.

## **13. RECRUITMENT OF EMPLOYEES**

PTB provides equal opportunity for any qualified and competent individual to be employed by the company from various multicultural and multiracial backgrounds. The recruitment of employees is 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, PTB is committed in conducting background checks on potential employees to ensure that no one is employed on the basis of Gratification.

Detailed background checks must be carried out when hiring employees that would be responsible in management positions, as they would be tasked with decision making obligations.



## **14. OFFENCE UNDER THE ACT**

### **A. Receives or Gives Gratification**

- (a) Under Section 16 of the Act, any person who by himself or by or in conjunction with any other person corruptly solicits or receives or agrees to receive for himself or any other person or corruptly gives, promises or offers to any person whether for the benefit of that person or of another person, any gratification as an inducement to or a reward for, or otherwise on account of (i) any person doing or forbearing to do anything in respect of any matter or transaction, actual or proposed or likely to take place or (ii) any officer of Public Body doing or forbearing to do anything in respect of any matter or transaction, actual or proposed or likely to take place, in which the Public Body is concerned, commits an offence.
- (b) Any person who commits an offence under Section 16 of the Act, shall on conviction be liable to imprisonment not exceeding twenty (20) years and a fine not less than five (5) times the sum or value of the gratification is capable of being valued or of a pecuniary nature, or ten thousand ringgit (RM10,000.00), whichever is higher.

### **B. Offence by a Commercial Organisation**

- (a) Section 17A of the Act provides that a commercial organisation commits an offence if a person associated with the commercial organisation corruptly gives, agrees to give, promises or offers to any person any gratification whether for the benefit of that person or another person with intent to obtain or retain a business for the commercial organisation or to obtain or retain an advantage in the conduct of the business for the commercial organisation.
- (b) On conviction, a commercial organisation can be liable to a fine of not less than ten (10) times the sum or value of the gratification which is the subject matter of the offence, or One (1) million ringgit (RM1,000,000.00), whichever is higher or imprisonment for a term not exceeding twenty (20) years or to both.

- (c) Where an offence is committed by a commercial organisation, its director, controller, partner, officer or any person who is concerned with the management of the affairs of the company is deemed to have committed the offence unless he/she can prove that the offence was committed without his/her consent and he/she has exercised proper due diligence.

## **15. WHISTLEBLOWER PROTECTION**

PTB strongly encourage any Employees, clients or Third Party to notify or report to the Management of PTB or directly to the authorities on any improper conduct. Section 7 of the Whistleblower Protection Act 2010 provides protection to whistleblowers and extends such protection to any person related to or associated with the whistleblower provided that such disclosure is not specifically prohibited by any written law.

For further information, please refer to PTB's Whistleblowing Policy.

## **16. BREACH**

Any Employees who breaches this ABC Policy may face disciplinary action, which could result in dismissal for gross misconduct. PTB reserves the right to terminate contractual relationship with any Third Party if there is a breach of this ABC Policy.

## **17. REVIEW, MONITORING AND IMPLEMENTATION**

PTB ensures that the top-level management continuously monitors the effectiveness and reviews the implementation of this ABC Policy annually and at appropriate intervals, considering its suitability, adequacy and effectiveness. Any improvements identified are made as soon as possible. Internal control systems and procedures are also subject to regular review to provide assurance that they are effective in eliminating any risks of Bribery and corruption.

In addition to annual reviews, PTB is committed in ensuring strict implementation and enforcement of the anti-bribery and corruption framework within PTB. These monitoring and enforcement steps may include the form of internal or external audits carried out by external independent agency.

PTB further seeks to conduct continual evaluations and identify competent persons and establish proper compliance functions to perform the monitoring and implementation of anti-corruption measures within PTB.

All Employees are aware that they are responsible for the success of this ABC Policy and should ensure that they report any suspected danger or wrongdoing.

## **18. RECORDS**

PTB ensures that all matters regarding the prevention of corruption and bribery which includes but is not limited to risk assessment, proposed improvements and amendments to process and procedures, annual reviews of policies, complaints, disciplinary actions taken on prohibited conducts is properly documented and recorded.

## **19. TRAINING AND COMMUNICATION**

Training on this ABC Policy is provided to all Employees and our zero-tolerance approach to Bribery and corruption will, where appropriate, be communicated to any Third Party.

PTB regularly communicates the requirements and obligations under this ABC Policy and related policies through various mediums and platforms which includes but is not limited to emails, newsletters, posters, code of business conduct, PTB's website and internal platforms.

## **20. MODIFICATION**

PTB reserves the right to amend, modify or update this ABC Policy periodically and at any time by updating and publishing the effective date of the release of the new versions hereof through an internal circulation to the Employees or by making it available in PTB's corporate website.

## 21. QUERIES

If you have any questions or require further information about any aspect of this ABCPolicy, please contact us at [info@privasia.com](mailto:info@privasia.com).

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## **Appendix 1**

### *Gift and Hospitality Register*



Privasia - Appendix  
1 ABC Policy - Gift ar

## **Appendix 2**

### *Due Diligence Questionnaire*



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2 - Due Diligence Q