

APPROVAL MANDATE MATRIX

SCHEDULE 1

	Nature of Expenses	HOD	Comp Officer	CEO	Chairman	Board
A.	Gifts, Entertainment, Hospitality And Travel					
1	Gifts received < RM500 (allowed but must informed HOD)	√				
2	Gifts received > RM500 (not allowed)	N/A	N/A	N/A	N/A	N/A
3	Reasonable and appropriate meals, entertainment, local tours, culture and sporting events and accommodation to third parties who attend business meetings, conferences or events which are hosted, supported or sponsored by Dufu provided they are conducive and legitimate underlying purpose.					

	<ul style="list-style-type: none"> ❖ Amount less than RM1,000 ❖ RM1,000 – RM5,000 ❖ RM5,001 – RM100,000 ❖ Amount more than RM100,000/- 	√		√	√	
B.	Facilitation/ Kickbacks Payment					
	Facilitation/ Kickbacks Payment (cash or in kind) to in any form is strictly prohibited	N/A	N/A	N/A	N/A	N/A
	Facilitation/ Kickbacks Payment (cash or in kind) to in any form to safeguard security of Employees or Family of Employees					
	<ul style="list-style-type: none"> ❖ Amount less than RM1,000 ❖ RM1,000 – RM5,000 ❖ RM5,001 – RM100,000 ❖ Amount more than RM100,000/- 		√	√	√	√
C.	Political Contribution					
	Donations (cash or in kind) to Political Parties or Candidates in any form is strictly prohibited	N/A	N/A	N/A	N/A	N/A
D.	Charitable Contributions & Sponsorship (Monetary or non-monetary in equivalent)					
	For Government linked service sectors such as Bomba, Police, Jabatan Perkhidmatan Awam, Public Hospitals etc					
	<ul style="list-style-type: none"> ❖ Amount less than RM1,000 ❖ RM1,000 – RM5,000 ❖ RM5,001 – RM100,000 ❖ Amount more than RM100,000 	√	√	√	√	√
	For Non-Profit Charitable Organisations endorsed by the Government (eligible to claim Income Tax deduction)					
	<ul style="list-style-type: none"> ❖ Amount less than RM1,000 ❖ RM1,000 – RM5,000 ❖ RM5,001 – RM100,000 ❖ Amount more than RM100,000 	√	√	√	√	√
	For Non-Profit Charitable Organisations not endorsed by the Government					
	<ul style="list-style-type: none"> ❖ Amount less than RM1,000 	√	√	√		

	❖ RM1,000 – RM5,000	√	√	√	√	
	❖ RM5,001 – RM100,000		√	√	√	
	❖ Amount more than RM100,000		√	√	√	√
	For Non-Profit Charitable Organisations of which Key Directors are party of interest					
	❖ Amount less than RM1,000		√	√	√	
	❖ RM1,000 – RM5,000		√	√	√	
	❖ RM5,001 – RM100,000		√	√	√	√
	❖ Amount more than RM100,000		√	√	√	√

*HR Director in substitution

SCHEDULE II

BRIBERY & CORRUPTION RISK ASSESSMENT MANUAL

Risk Descriptions	New Risk Mitigating Controls	Existing Controls
<p>A. <u>Significant Investments of Non-Operating Assets (including purchase of capital expenditure)</u></p> <ol style="list-style-type: none"> 1. Accepting bribe or any form of gratification to manipulate the need for such investments or purchase of significant capital expenditure, including but not limited to, approving non-performing or blacklisted vendors, vendors with no experience or blatantly accepting false information submitted as if information provided is true and accurate. 2. Soliciting or accepting bribe or any form of gratification in return for disclosing proposals of other vendors. 3. Soliciting for bribe or any form of gratification from third parties with promise of awarding the contract. 4. Making investments or awarding any part of the work to any company when the decision maker has a direct or an indirect interest in that company but fails to make any declaration of conflict of interest. 	<ul style="list-style-type: none"> • Establishment on Adequate Procedures related to the Policy. • Training, awareness and communication for all employees. • Employees’ self-declaration on conflict of interest. 	<ul style="list-style-type: none"> • Standard Operating Procedures (“SOP”) on investment on non-operating assets and capital expenditure. • Capital Justification Form is required to justify the purchase of the said investments with calculation on ROI is required, where applicable. • Price comparisons with other same or similar suppliers/vendors prior to making award. • Approval matrix for expenditure and purchases. • Investment Committee’s approval is required for the purchase of all non-operating assets and for any operating assets with more than RM2 million. • Dufu’s Code of Conduct. • Dufu’s Whistleblowing Policy and Procedures

BRIBERY & CORRUPTION RISK ASSESSMENT MANUAL

Risk Descriptions	New Risk Mitigating Controls	Existing Controls
<p>B. <u>Procurement (general purchases, goods and services, events etc.)</u></p> <ol style="list-style-type: none"> 1. Excessive reliance on or insistence on dealing with or appointing specific third party, agents or a single supplier in procurement process notwithstanding compliance with due process and comparative quotations. 2. Collusion in selecting supplier or vendor without due process or comparative quotations. 3. Collusion in selecting service provider for continuing a service contract without due process or comparative quotations. 4. Collusion in approving for purchase of low quality or off-specification supply or goods. 5. Purchase from fictitious suppliers or vendors. 6. Soliciting for or accepting bribe or any form of gratification from supplier, vendor or service provider in return for awarding contract or promise to purchase goods or services. 7. Employee has direct or indirect interest in the supplier, vendor or service provider's company. 8. Making high-value purchase without just cause from a unique or exclusive supplier. 	<ul style="list-style-type: none"> • Establishment on Adequate Procedures related to the Policy. • Training, awareness and communication for all employees. • Employees' self-declaration on conflict of interest. • Contract/ agreement with vendor or third party shall include Dufu's commitment towards Anti-Corruption. • Vendor's Letter of Declaration to undertake their commitment towards Dufu's Policy. • Establishment of Supplier's Code of Conduct available on Dufu's website 	<ul style="list-style-type: none"> • SOP for procurement. • Tender or sourcing for comparative quotations (at least two other quotes) prior to making purchases or appointing service provider. • Regular price review on goods, products, items and services to ensure competitive pricing and conform to current market value. • Quarterly review on performance of vendors/ suppliers. • Approval matrix for expenditure and purchases.

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Risk Description	New Risk Mitigating Controls	Existing Controls
<p>D. <u>Sales and Marketing</u></p> <ol style="list-style-type: none"> 1. Provide gifts, donations, entertainment or commission to close deals. 2. Colluding or obtaining illicit means to fix abnormal demand and supply, price adjustments, credit or debit notes and/ or rebates. 3. Unnecessary appointment of consultant with no added value to the sales and marketing on maintaining or creating new business dealings. 	<ul style="list-style-type: none"> • Establishment on Adequate Procedures related to the Policy. • Establishment on Dufu's Charity and Sponsorship Policy • Training, awareness and communication for all employees. • Employees' self-declaration on conflict of interest. 	<ul style="list-style-type: none"> • SOP on sales, entertainment, travelling and reimbursements and the approval matrix required • Dufu's Code of Conduct. • Dufu's Whistleblowing Policy and Procedures.

BRIBERY & CORRUPTION RISK ASSESSMENT MANUAL

Risk Description	New Risk Mitigating Controls	Existing Controls
<p>E. <u>Strategic Relation with vendors or service providers/ Government Liaison</u></p> <ol style="list-style-type: none"> 1. Engaging agents, consultants, middleman or runners to facilitate fast track processing with government agencies for governmental related applications. 2. Provision of high value gifts such as angpows, hampers or shopping vouchers to government authorities or officials and / or their immediate family members. 3. Unusual or unauthorized payments through improper channels to third party to secure, retain or influence decisions on the Group's business operational matters. 4. Unjustifiable cash payments made without supporting documents or for ambiguous purposes. 	<ul style="list-style-type: none"> • Establishment on Adequate Procedures related to the Policy. • Establishment on Dufu's Charity and Sponsorship Policy • Training, awareness and communication for all employees. • Employees' self-declaration on conflict of interest. 	<ul style="list-style-type: none"> • SOP on payment,entertainment and travelling. • Approval matrix for payments and purchases. • Dufu's Code of Conduct. • Dufu's Whistleblowing Policy and Procedures.

BRIBERY & CORRUPTION RISK ASSESSMENT MANUAL

Risk Description	New Risk Mitigating Controls	Existing Controls
<p>F. <u>Gift, Entertainment, Hospitality and Travel</u></p> <p>1. Giving exorbitantly high value gift in itself or through lucky draw, entertainment packages or luxury travel incentives to government authorities or officials, bankers, politicians, suppliers and customers and / or their immediate family members.</p> <p>2. Receiving and / or accepting exorbitantly high value gift in itself or through lucky draw, entertainment packages or luxury travel incentives from any suppliers or contractors (whether for the employee or his immediate family members or relatives) in return for favour of any kind.</p>	<ul style="list-style-type: none"> • Establishment on Adequate Procedures related to the Policy. • Training, awareness and communication for all employees. • Employees' self-declaration on conflict of interest. • Vendor's Letter of Declaration to undertake their commitment towards Dufu's Policy. 	<ul style="list-style-type: none"> • SOP on entertainment, travelling, payment and claims reimbursement. • Dufu's Code of Conduct. • Dufu's Whistleblowing Policy and Procedures.

Risk Description	New Risk Mitigating Controls	Existing Controls
<p>G. <u>Donations and/ or Sponsorship</u></p> <p>1. Any large charitable contributions or sponsorship (whether in cash or any items in value) in local and foreign countries.</p> <p>2. Any donations or sponsorships made to charitable organisations or non-government organisations under suspicious arrangements.</p>	<ul style="list-style-type: none"> • Establishment on Adequate Procedures related to the Policy. • Establishment on Dufu's Charity and Sponsorship Policy • Training, awareness and communication for all employees. • Employees' self-declaration on conflict of interest. 	<ul style="list-style-type: none"> • SOP and Approval Matrix on payment process. • Segregation of duty on payment process • Dufu's Code of Conduct. • Dufu's Whistleblowing Policy and Procedures.