



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

APPENDIX C

Section 1 (Due Diligence Questionnaire)

1. Introduction

- 1.1 Collaborative Research in Engineering, Science & Technology (“**CREST**”) has a zero-tolerance policy against all forms of bribery and corruption and is committed to conduct all our business dealings and relationships in an ethical, responsible, transparent and efficient manner to the highest level of integrity and accountability. You are required to complete this questionnaire as part of the risk management exercise undertaken by us prior to entering into business relationship with any entity.
- 1.2 This questionnaire must be completed by a senior manager or an authorised signatory of your company with authority to enter into commercial transactions on behalf of your company unless you are being hired in your individual capacity in which case the questionnaire must be completed by you.
- 1.3 For the purposes of this questionnaire, “associate” shall have the meaning prescribed under the Malaysian Anti-Corruption Commission Act 2009 (“**MACCA**”), and includes any director, officer, employee, partner, or any person who performs services for or on behalf of your company.
- 1.4 Kindly complete this Due Diligence Questionnaire and provide the supporting documents (where applicable) and return a duly completed questionnaire to us.

2. Company Information

Company Name	
Registration No.	
Registered Address and Business Address	
Contact person and details	
Country of Operation	
Nature of Business	

3. Questionnaire

3.1 Please provide the following information on the members of the board of directors and executive officers of your company.

Full Name	Job Title	Nationality and Country of Residence

3.2 Please provide the following information for all key employees who will be responsible for overseeing or performing activities related to work with CREST, including those with participating in any decision-making process.

Full Name	Job Title	Nationality and Country of Residence

3.3 Does your organisation have any directors, shareholders, or employees who would be considered a current or former Public Official* or has connection or relationship with a current or former Public Official within the past three (3) years? If yes, please provide the following details:

Company	Position/Relationship	Title of Government Official

**Note: "Public Official" includes the Government of Malaysia, the Government of a State, any local authority or statutory authority, officer of the Government of Malaysia, officer of the Government of a State, officer of any local authority and any other statutory authority.*

3.4 In performing your services or fulfilling your contract with CREST, will your company require any licences, permits, or approvals from any Public Official, Government ministry or Government department? If yes, please provide the following details for each licence/permit/approval (if any).

3.5 Has your company, any present or former affiliated entity, any predecessor entity, or any present or former officer, director, shareholder, or employee been convicted, charged, or investigated for any violation of laws or regulations with respect to fraud, bribery, or corruption in any jurisdiction within the past five (5) years? If yes, please provide the details and supporting documents (if any).

3.6 Does your company have specific written policies or procedures addressing anti-bribery and anti-corruption compliance?

3.7 Does your company provide training on anti-corruption awareness to its employees?

3.8 Does your company currently use, or has it used in the past, any third parties - including subcontractors, sub-agents, suppliers, consultants, or sales representatives (collectively, "**Subcontractors**"), in carrying out services to be provided by your company?

3.9 Does your company include obligations to comply with applicable anti-bribery and anti-corruption laws in contracts or agreements with its Subcontractors

4. Confirmation

I, the undersigned, am duly authorized to complete and sign this questionnaire on behalf of the individual or company identified herein. I hereby certify that, to the best of my knowledge and belief, the foregoing information and confirmation provided in this questionnaire, including the supporting documents (if any), are true, accurate, complete and up-to-date, and that I will promptly notify CREST in the event of any changes or updates to the information provided in this questionnaire. I confirm and undertake that the company and its associates will comply with applicable anti-bribery and anti-corruption laws in all activities related to CREST.

Signature:

Name:
Designation:
Date:

Section 2 (Internal Assessment on the Corruption Risk)

1. Name of the Business Associate

2. Is the Business Associate an individual or entity?

3. Estimated value of the transaction (in RM):

4. Estimated duration of the contract:

5. Have you identified any red flags in the Business Associate? Examples of red flags are as follows:

- (a) Business Associate provides incomplete or inaccurate background information;
- (b) Business Associate and/or its company was recently created, incorporated, or organized, or otherwise lacks adequate historical information;
- (c) the transaction involves an industry that has a history of anti-bribery violations (e.g. manufacturing, transportation and storage, pharmaceutical and healthcare, oil and gas, public work contracts and construction);
- (d) indirect or unusual payments or billing procedures are being requested (e.g. payments requested to be made in cash, payments through bank accounts in a foreign country outside of the one where the services are being provided);
- (e) the total amount of the transaction appears to be unreasonably high or above the customary or arms-length amount;
- (f) Business Associate is or is owned by a Public Official or has a family or business ties with a Public Official;
- (g) Business Associate is hesitant to make anti-corruption compliance certifications in an agreement;
- (h) Business Associate has current or previous reputation or legal issues with corruption or related violations; or
- (i) Others (please specify):

Assessment Outcome:

No. of Red Flag(s)	Level of Risk

Note: If the level of risk is rated as medium or high, please proceed to Section 3.

To determine level of risk:

No. of Red Flag(s)	Level of Risk
[0]	Low
[1 – 2]	Medium
[3 and above]	High

I certify that I have completed the due diligence processes required by Collaborative Research In Engineering, Science & Technology (CREST) (“**Company**”)’s internal policies and have described above any Public Official connections, red flags or other compliance issues identified by the due diligence.

Signature:

Name:

Designation:

Date:

Section 3 (CEO’s Approval)

To be completed by the CEO

(only if the corruption risk is rated as medium or high in Section B)

I have reviewed and evaluated the completed Due Diligence Questionnaire along with the information provided above in Section A.

I make the following decision on whether the Company should proceed to enter into a business relationship with the Business Associate (please also provide reasons):

Signature:

Name:

Designation:

Date: