

TAYOPACK Inspired by Zealous
GIFT POLICY



Effective Date: July 2025
Latest Amendment: March 2026

TAYOPACK SDN BHD

GIFT, ENTERTAINMENT AND CORPORATE HOSPITALITY POLICY (GECHP)

1. Introduction

Tayopack Sdn Bhd (“Tayopack” or “the Company”) is committed to upholding the highest standards of integrity, accountability, transparency, and ethical business conduct in all its operations and business relationships.

The purpose of this **Gift, Entertainment and Corporate Hospitality Policy (GECHP)** is to establish clear principles and requirements governing the giving, offering, receiving, and acceptance of gifts, entertainment, and corporate hospitality.

This policy is designed to ensure that such practices are conducted in a lawful, reasonable, and transparent manner and do not create any actual, potential, or perceived conflict of interest, bribery, corruption, or undue influence.

This policy shall be read together with Tayopack’s **Anti-Bribery and Corruption Policy** and other applicable internal policies and legal requirements.

2. Scope

This policy applies to all individuals acting for or on behalf of Tayopack, including but not limited to:

- I. Board of Directors
- II. Senior Management
- III. Employees (permanent, contract, temporary, probationary, and interns)
- IV. Consultants, agents, and representatives
- V. Contractors, suppliers, and service providers
- VI. Any third party acting on behalf of the Company

This policy applies to all dealings with customers, suppliers, vendors, contractors, regulatory bodies, government authorities, and all other business stakeholders.

3. Definition

3.1 Gift

A **Gift** refers to any item, benefit, favour, token, or thing of value that is offered, given, received, or accepted without payment or at a value below market price.

This includes, but is not limited to:

- I. Cash Or Cash Equivalents
- II. Vouchers Or Gift Cards
- III. Festive Hampers
- IV. Souvenirs
- V. Flowers
- VI. Promotional Items
- VII. Discounts Or Rebates
- VIII. Sponsorships
- IX. Personal Items

3.2 Entertainment

Entertainment refers to any social event, leisure activity, meal, or recreational arrangement provided or received for business-related purposes.

Examples include:

- I. Meals And Refreshments
- II. Event Tickets
- III. Sports Or Recreational Activities
- IV. Company Dinners
- V. Festive Functions
- VI. Customer Appreciation Events

3.3 Corporate Hospitality

Corporate Hospitality refers to business-related hospitality extended or received as part of maintaining legitimate professional relationships.

Examples include:

- I. Official Business Lunches Or Dinners
- II. Plant / Site Visits
- III. Transportation Arrangements
- IV. Accommodation For Official Business Visits
- V. Invitations To Conferences, Seminars, Or Corporate Events

4. Policy Statement

Tayopack permits the giving and receiving of gifts, entertainment, and corporate hospitality only where such activities are:

- I. Reasonable and proportionate
- II. Infrequent in nature
- III. For legitimate business purposes
- IV. Compliant with applicable laws and regulations
- V. Not intended to improperly influence business decisions

Under no circumstances shall any gift, entertainment, or corporate hospitality be offered, solicited, or accepted if it may:

- I. Influence or appear to influence decision-making
- II. Create an obligation or expectation of favour
- III. Secure an improper business advantage
- IV. Compromise professional judgment
- V. Constitute bribery or corruption

The Company strictly prohibits the giving or receiving of **cash or cash equivalents** under any circumstances.

5. Principles

5.1 Acceptability

Any gift, entertainment, or hospitality must be modest, reasonable, customary, and proportionate within normal business practice.

It must not exceed a level that may reasonably be perceived as excessive, inappropriate, or capable of influencing business judgment.

5.2 Prohibited Conduct

The following are strictly prohibited:

- cash payments
- vouchers / gift cards
- luxury or high-value personal items
- personal travel unrelated to business
- gifts during tender, quotation, or procurement process
- hospitality intended to influence contract decisions
- repeated or excessive entertainment from the same party

5.3 Declaration and Approval

Any gift, entertainment, or corporate hospitality offered to, received by, or intended to be provided by any employee, management representative, or person acting on behalf of Tayopack must be declared where it exceeds nominal value, may give rise to a conflict of interest, or may reasonably be perceived as influencing business judgment.

All such declarations shall be made using the **Gift Disclosure Form (TY-HR-001)** and submitted to the relevant Head of Department and/or Management for review and approval.

The completed form shall include, where applicable:

- I. Date of receipt or offer
- II. Description of the gift, entertainment, or hospitality
- III. Estimated value
- IV. Name of giver / recipient
- V. Organization / company represented
- VI. Business purpose or occasion
- VII. Justification for acceptance or provision
- VIII. Declaration of any conflict of interest

Prior approval must be obtained before accepting or extending any gift, entertainment, or hospitality that may exceed the Company's acceptable threshold.

The Company reserves the right to require the refusal, return, surrender, or appropriate disposal of any item deemed excessive, inappropriate, or non-compliant with this policy.

All submitted **Gift Disclosure Form (TY-HR-001)** records shall be retained by Human Resources or the designated department for compliance monitoring, record keeping, and audit purposes.

5.4 Government Officials and Regulatory Authorities

Employees and representatives shall not provide gifts, entertainment, or hospitality to government officials, enforcement personnel, regulators, or public officers without prior written approval from Top Management.

5.5 Conflict of Interest

All employees must avoid situations where the acceptance or provision of gifts, entertainment, or hospitality may create actual, potential, or perceived conflict of interest.

Any such conflict must be disclosed immediately.

5.6 Monitoring and Compliance

Compliance with this policy shall be monitored by Management.

Any breach of this policy may result in disciplinary action, termination of employment or contract, and legal action where applicable.

6. Reference

- Anti-Bribery & Corruption Policy
- Code of Conduct
- Procurement Policy
- Gift Disclosure Form (**TY-HR-001**)
- Malaysian Anti-Corruption Commission Act 2009 (MACC Act)



GIFT DISCLOSURE FORM

Document No	TY-HR-001
Revision No	R0
Effective Date	1 st July 2024
Page Number	1 of 2

EMPLOYEE INFORMATION

Employee Name:	Department:
Position:	Date of Disclosure:
GIFT DETAILS (Sender / Receiver)	
Company Name:	Individual Name:
Relationship To Tayopack Sdn Bhd: ☐ Suppliers ☐ Customer / Client ☐ Contractor ☐ Others: Please specify: _____	Description of Gift: _____ _____ _____
Date Gift Received:	Estimated Value of Gift (RM):
Reason for Gift (if known): 	

PURPOSE/CONTEXT

Was the gift received in connection with any business decision? ☐ Yes ☐ No If "Yes," please explain: _____ _____
Is the giver currently involved in any negotiation, contract, or procurement process with Tayopack? ☐ Yes ☐ No If "Yes," please explain: _____

Employee Action

Have you returned the gift?

☐ Yes

☐ No

If "No," please explain why not:



GIFT DISCLOSURE FORM

Document No	TY-HR-001
Revision No	R0
Effective Date	1 st July 2024
Page Number	2 of 2

Approval and Decision:

(To be completed by Human Resources)

Decision on Gift:

- ☐ The employee may retain the gift.
- ☐ The gift must be returned to the giver.
- ☐ The gift should be donated to charity or raffled for employees.
- ☐ Other: _____

Reason for Decision:

Reviewed by (HR Name):

Date of Review:

Employee Signature:

Date: