NTT DATA Payment Services Sdn. Bhd.

Group Anti-Bribery and Corruption Policy

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This Group Anti-Bribery and Corruption Policy is issued by Group Legal, Compliance & Sustainability. This policy is jointly owned by Group Legal, Compliance and Sustainability and Group Human Resources and Administration.

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1. INTRODUCTION

1.1 NTT DATA Payment Services Sdn Bhd (the "Company"), its related corporations as defined under the Companies Act 2016, and any other entities within NTT DATA Group for which the Company provides management oversight and strategic direction as the regional headquarters, now and in the future (the "Group") is dedicated to upholding the principles and standards of NTT DATA Group. NTT DATA Group refers to NTT DATA Group Corporation and its consolidated subsidiaries.

The Group is committed to opposing all forms of corrupt practices, conducting business in accordance with the highest ethical standards and in full compliance with all applicable anti-bribery laws and regulations, including but not limited to those as defined in the Malaysian Anti-Corruption Commission Act 2009 and the Malaysian Anti-Corruption Commission (Amendment) Act 2018 (collectively known as "MACCA") and any other applicable local anti-bribery laws of the countries in which the Group operates.

Bribery has no place in the Group. The Group adopts a zero-tolerance approach to bribery and corruption. Employees are prohibited from offering (or agreeing to give), soliciting, or accepting (or agreeing to accept) bribes and other improper financial advantages:

- Employees may not provide anything of value to obtain or retain business or any advantage, financial or otherwise. "Anything of value" extends beyond cash or cash equivalents to include improper gifts, entertainment, travel and/or lodging, charitable and political contributions, and employment or internships for clients, government officials, or their related persons.
- The prohibition against the provision of anything of value applies to not only government officials and employees or officials of organizations with government ownership or control, but also includes clients, suppliers, and any person with whom the Group does or anticipates doing business. The Group expressly prohibits the provision of facilitation payments.

The Group requires its directors, employees, and any other persons associated with it ("Associated Persons") to exercise the utmost vigilance, to follow the policy and procedures to mitigate bribery and corruption risks, and to identify and report suspected or suspicious transactions, arrangements, engagements, meetings, conversations, suggestions, or any similar or related circumstances.

This Group Anti-Bribery and Corruption Policy ("Policy") sets out the guidelines and requirements of the Group relating to compliance with anti-bribery or corruption laws. In the event of any conflict between this Policy and applicable local laws, Associated Persons must comply with the stricter requirement. Where compliance with this Policy would result in a breach of local law, the local law shall prevail, and guidance must be sought from Group Legal, Compliance and Sustainability ("GLCS").

1.2 The MACCA –

a) criminalizes the giving, offering, receiving, promising, or soliciting of bribes;
b) covers bribery in both the public and private sectors;
c) makes no exceptions to Facilitation Payments as elaborated in Section 4.3 below;
d) creates a specific offence of bribing a "foreign public official" in order to influence them even if they are not influenced, or intended to be influenced to act improperly; and

e) holds the organization, its directors and senior management criminally liable if they fail to prevent bribery by “Associated Persons” unless they can show that they have “adequate procedures” designed to prevent bribery on their behalf.

2. POLICY STATEMENT AND PURPOSE

2.1 This Policy sets out the requirements that must be complied with by the Associated Persons and other third parties who deal with the Group in the conduct of its day-to-day operations.

2.2 The Policy aims to:

a) communicate the Group’s zero tolerance approach to incidents of bribery and corruption clearly to the Associated Persons and any third party who deals with the Group and to affirm the Board of Directors’ endorsement of that approach, as exemplified by the Code of Business Ethics

b) ensure that all Associated Persons are aware of their responsibilities in relation to:
   i) compliance with all relevant bribery and corruption laws and applicable regulations;
   ii) the avoidance, prevention and reporting of bribery and corruption; and
   iii) the monitoring and mitigation of bribery and corruption risks.

c) ensure that instances of actual or suspected bribery and corruption are appropriately dealt with

d) encourage the Associated Persons to report concerns to the relevant channels.

e) require that the Group implement all procedures to regulate, monitor, record and report corporate gifts, hospitality and entertainment given or received, and to emphasize the risks associated with gifts, hospitality and entertainment, particularly when they involve significant value

f) require that the Group maintain appropriate oversight of its relationships with Associated Persons (including customers, suppliers and referrers of business) and other third parties (including through contractual terms) to mitigate, bribery and corruption risks, and to require compliance by associated persons with the relevant bribery and corruption laws and applicable regulations in relation to the services they provide to the Group. Furthermore, this oversight will enable the Group to take appropriate remedial action (including termination of any relevant contract) where necessary

g) require that the Group implements appropriate procedures to regulate, monitor, record and report corporate donations and sponsorship and to assess the associated bribery and corruption risks

h) mitigate the potential risk of criminal liability, regulatory sanctions or reputational damage that the Group, its Board of Directors, its senior management, and the Associated Persons, may incur as a result of failing to comply with relevant bribery and corruption laws or regulations.

3. APPLICATION AND DEFINITIONS

3.1 APPLICATION

This Policy applies to the Group and its Associated Persons. Companies in which the Group holds a non-controlling interest are strongly encouraged to adopt this Policy.

For the purposes of compliance, Associated Persons are subject to the following:

1. Directors and Employees

Directors and employees must adhere to this Policy via the Group's internal governance framework, including all approval processes, reporting requirements, training programs, and disciplinary procedures. Specifically, Directors and employees must:

a) Comply with all applicable anti-bribery and corruption laws, regulations, and this Policy.

b) Take reasonable steps to identify and prevent corruption, including maintaining accurate records of all transactions and gifts (offered, given, or received).

c) Promptly disclose any incidents, suspected breaches of this Policy, or circumstances suggesting that bribery or corruption may have occurred.

2. Third Parties

Third Parties must comply with this Policy through contractual obligations. This includes undergoing due diligence, providing declarations of integrity, and acknowledging the Group's contractual rights (such as audit and termination) to address non-compliance. Third Parties are expected to maintain standards equivalent to those set out in this Policy.

3.2 DEFINITIONS

Term	Definition
Associated Person(s)	An Associated Person is a person who performs services for or on behalf of the Group. This includes its directors, employees and other persons associated to it which will generally include suppliers of services, outsourced service providers, subsidiaries and associated companies.
Bribery	Bribery is the giving, offering, promise, solicitation, request or acceptance of gratification in order to induce or reward a breach of, the improper performance of a duty or to influence a Public Official or a third party in the performance of his or her duties or office (even if that Public Official or third party is not influenced, or intended to be influenced, to act improperly). Generally, bribery is committed when a person directly, or indirectly through another person or organization, offers, gives, requests or receives a benefit with the intention or knowledge that the benefit will be used to induce someone to perform a dishonest or improper act, or to influence a Public Official or third party. An individual in a position

	to bribe or be bribed may be someone who is able to obtain, retain, confer or direct business or business advantages.
Cash Equivalent	Cash Equivalent includes gift cards, vouchers, prepaid cards, e-wallet credit, precious metals / gems / jewellery, cryptocurrency, shopping credits, or anything readily convertible into cash.
Charitable Donations	Any money, goods, or services given by the Group to charitable, non-profit, or community organisations, including those made as part of the Group's corporate social responsibility (CSR) initiatives.
Corruption	Corruption is the abuse of public or private office to obtain an undue advantage. Often, but not always, bribery is a vehicle for, and enabler of, corrupt behaviour.
Entertainment / Hospitality	Entertainment / Hospitality means meals, drinks, receptions, social events, sporting events, cultural events, travel, lodging, or other hosted activities connected to a business relationship.
Gift	Gift means anything of value given or received without full market consideration, including cash equivalents, vouchers, discounts, merchandise, hampers, festive gifts, tickets, services, loans, favours, prizes, or personal benefits.
Gratification	Any advantage or benefit of any kind (whether given to the person you are trying to influence ("A") or to someone else ("B") if giving the advantage to B is designed or likely to influence A which includes money, stock, securities, contractual rights or interests, real estate, personal property, gifts, meals, entertainment, contributions or donations, travel and related expenses, discounts beyond those generally available, preferential treatment, favours or access to services or opportunities, goods or services without commercially reasonable justification, or offers of employment, internships or similar arrangements.
Public Official(s)	• any officer, employee or representative of a government, whether national, federal or local • any individual exercising a legislative, administrative, judicial or other public or official function, whether appointed or elected • any officer, employee or representative of any entity controlled or owned by a government, state or sovereign, including but not limited to central banks, sovereign wealth funds, and any other business venture that is owned or controlled by a government entity • a candidate for, or holder of, public office; • any official of a political party; • any officer, employee or representative of a public international organization • any sovereign individual
Sponsorship	Any financial or in-kind support provided by the Group for events, activities, or initiatives organised by external parties, including merchant or client events, industry events, business activities, or CSR-related programmes.

Third Party(s)	Third Party includes supplier, vendors, merchants, agents, consultants, distributors, service providers, intermediaries, joint venture partners, and customers.

4. POLICY REQUIREMENTS

4.1 REJECT ALL FORMS OF BRIBERY AND CORRUPTION

This Policy prohibits the Associated Persons from participating in bribery or corruption in any form, whether directly or via third parties, irrespective of whether bribes are being given, offered, promised, requested, solicited or received.

4.2 GIVING AND/OR RECEIVING GIFTS AND/OR ENTERTAINMENT

Directors, employees and representatives of the Group must never give, offer, promise, request, solicit, receive, or accept any gift, entertainment, hospitality, travel, or other benefit that:

a) is intended to improperly influence a business decision;
b) could create the appearance of impropriety, favoritism, or obligation;
c) is excessive, lavish, frequent, or inappropriate in value or nature;
d) is given or received during a tender, procurement, licensing, audit, regulatory review, or contract negotiation in circumstances that could affect impartiality;
e) is prohibited by law, regulation, or the recipient's or giver's organization policies; or
f) is provided in exchange for a business advantage, favourable treatment, confidential information, or any improper purpose.

The Group permits only reasonable, infrequent, bona fide gifts and business hospitality that are lawful, transparent, properly approved where required, and accurately recorded. Monetary thresholds and approval requirements for gifts and entertainment are set out in Appendix A and form part of this Policy.

4.3 FACILITATION PAYMENTS

A "facilitation payment" (or "grease" payment) is a payment which is not officially required or sanctioned but which is made to a Public Official to speed up, or otherwise smoothen, the performance of a duty or function which that official is required to perform in any case. Examples include a payment made to a customs official to ensure the speedy completion of customs clearance procedures. Facilitation Payments are a form of bribery and are strictly prohibited even where such payments may not be expressly prohibited under any local laws, local practice or custom in certain jurisdictions.

When encountering any such requests for payments, the Directors and Employees of the Group must immediately refuse such requests even if there would be negative business consequences. The Directors and Employees of the Group must immediately report to the relevant Head of Department or the Group HR as soon as possible and if ever in doubts, to immediately clarify and report with the relevant Head of Department or the Group HR and/or directly to the Group CEO.

4.4 SUPPLIERS OF SERVICES

Suppliers of Services are third parties that provide goods and services for and on behalf of the Group under an approved contractual arrangement and who are deemed to be Associated Persons.

To mitigate bribery and corruption risks associated with the Suppliers of Services, an employee who is responsible for the relationship with the Suppliers of Services must ensure that appropriate due diligence has been carried out at the time of on-boarding of such a supplier and, before the goods and services are provided by the supplier, all such due diligence must be adequately documented, and must include:

a) the collection of basic information about the Supplier of Services including the beneficial owners of the third party, the business rationale for the relationship, and the third party's qualifications for providing the services

b) identification of the individuals responsible for managing the relationship, both within the Group and within the Suppliers of Services

c) process of payment to the Suppliers of Services and a determination as to, whether the accounts used for payment are in fact controlled by the Suppliers of Services and whether the mode of payment represents any bribery and corruption risks

d) appropriate contractual language which has been reviewed, agreed upon, and adequately documented by the GLCS

4.5 PAYMENTS TO THIRD PARTIES

Payments to persons who are not a party to a contractual relationship with the Group are generally prohibited. Exceptions may only be made where the rationale is investigated, the arrangement is vetted for bribery risks, and the payment is formally approved. An example includes paying a sub-contractor's fee to an individual's personal account rather than their registered business entity.

Payments are recorded in books and records accurately, fairly and transparently, in such a way as to allow for review to be carried out on the recipient and rationale of payment.
Requests for cash payments are subject to heightened scrutiny. These must be thoroughly investigated and, if approved, the specific reasons for bypassing standard electronic payment methods must be documented.

4.6 SPONSORSHIPS AND DONATIONS

The Group may provide sponsorships or make donations as part of its business activities and corporate social responsibility ("CSR") initiatives. This may include, but is not limited to, sponsorships of merchant or client events, industry forums, conferences, promotional or relationship-building activities, as well as charitable, community, or other CSR-related programmes.

It is important that such sponsorships and donations are not used in any way as improper inducements to influence Public Officials or third parties. All such sponsorships and donations must not be used as a means of bribery or corruption and must be free from any suspicious or inference that they are designed to give rise to any expectation that a quid-pro quo is expected.

Providing charitable donations and sponsorships as an inducement for obtaining improper advantage is strictly prohibited. Charitable donations and sponsorships must be subject to appropriate due diligence so as to identify potential connections with persons who may be in a position to benefit the Group. Proper internal assessment, record keeping and reporting must be conducted to ensure such sponsorship and donations are free from any suspicion of bribery or corruption.

The Group requires employees to use good judgment and common sense in assessing the requests. When in doubt, employees should seek further advice from the relevant Heads of Department or escalate the matter to GLCS or the Group CEO to determine the authenticity of such requests.

4.7 POLITICAL DONATIONS OR FAVOURS

The Group will not undertake any political donations or favours. These are therefore strictly prohibited, whether to influence a Public Official so as to obtain or retain business or a business advantage for the Group, or otherwise. There are no exceptions to this Policy.

4.8 MERGERS, ACQUISITIONS AND JOINT VENTURES

The Group must ensure that bribery and corruption risk is included in due diligence process in relations to any proposed mergers, acquisitions and/or joint ventures.

4.9 BUSINESS PARTNERS

All Business Partners must be made aware of this Policy. Whenever commercially possible, Business Partners must be required to declare their awareness of and undertake to comply with this Policy by executing a Declaration of Integrity.

5. RECORD KEEPING, AUDIT AND REPORTING

This Policy requires the Associated Persons to ensure that fair, accurate and transparent records of all transactions are maintained and that these records are readily accessible. Such records should identify the relevant counterparty, contractual relationship under which the transaction occurs, date and amount of any exchange of payments pursuant to the contractual relationship and, where relevant, details of any associated arrangements.

Monitoring of compliance to this Policy shall be undertaken by GLCS. In addition, compliance may be subject to periodic audit by the Internal Audit Department, which shall have access to all relevant records, systems, and personnel as necessary. All employees must provide full cooperation, and any identified non-compliance shall be rectified promptly.

6. TRAINING

Training for the employees of the Group will be carried out by GLCS and Group HR in line with the requirements of this Policy.

Such training will be provided to new and existing employees which will enable these employees to understand:

a) their obligations under this Policy;
b) what bribery and corruption is;
c) the effect of misconduct on the Group; and

d) how to identify, report and appropriately manage any issues relating to bribery and corruption.

7. INCIDENT MANAGEMENT

7.1 DIRECTORS AND EMPLOYEES

The Directors and employees who become aware of an actual, potential, or suspected breach of this Policy or any applicable law or regulation must report the matter promptly to the Group HR.

Where the report involves actual or suspected bribery or corruption, the Group HR shall escalate the matter to GLCS and Internal Audit Department for further investigation. The outcome of such investigation will be reported to senior management and the Board of Directors, where appropriate.

If necessary, the Directors and employees may use the Group's whistleblowing channel at wb@whistleblowerghl.com to make such a report or if this matter is serious enough to warrant involvement of NTT DATA Headquarters, contact NTT DATA Global Whistle Line at nttdata_whistleline@ogaso.com.

Employees who report actual, potential or suspected bribery or corruption in good faith will be protected from discrimination, bullying or other potential repercussions irrespective of whether their suspicions prove to be valid.

7.2 THIRD PARTIES

Third Parties must report any actual, potential, or suspected breach of this Policy to the Group's whistleblowing channels at wb@whistleblowerghl.com or, where appropriate, the NTT DATA Global Whistle Line at nttdata_whistleline@ogaso.com.

8. CONSEQUENCES OF NON-COMPLIANCE

Employees who engage in or facilitate bribery, or who fail to comply with all applicable anti-bribery laws, regulations, and this Policy, may be subject to disciplinary action, up to and including termination of employment. The Group reserves the right to terminate immediately any business relationship that violates our high ethical standards.

In addition, criminal liability on the Group and the Associated Persons, including fines and/or imprisonment, may arise as a result of breaching relevant bribery and corruption laws.

9. REVIEW OF THIS POLICY

This Policy and any of its appendices may be reviewed and updated every two (2) years by GLCS. Reviews will take into account changes in laws and regulations, changes in the Group's businesses and operations, as well as changes in the general business environment.

APPENDIX A

GUIDELINE ON THE GIVING AND/OR RECEIVING OF GIFTS AND ENTERTAINMENT

1. INTRODUCTION

This Guideline shall be read together with paragraph 4.2 of the Group Anti-Bribery and Corruption Policy, the Group Code of Business Ethics and the Group Whistleblowing Policy. The giving and/or receiving of Gifts and Entertainment (“G&E”) is permissible only where it is reasonable, for a legitimate business purpose (i.e to build goodwill and strengthen business relationships), and complies with the monetary thresholds and approval requirements set out herein.

Any giving and/or receiving of G&E that is excessive, lavish or could reasonably be perceived as a form of bribery or improper inducement is strictly prohibited. Proper oversight is essential to mitigate reputational and legal risk to the Group.

2. OBJECTIVE

This Guideline serves as a framework for the Group to:

a) govern the giving and/or receiving of G&E;
b) establish monitoring mechanisms to ensure all G&E activities comply with applicable laws, regulations and internal policies;
c) eliminate bribery and corruption risks; and
d) protect the Group’s reputation by conducting business with integrity.

3. APPLICATION

This Guideline applies to all Directors and employees of the Group. Entertainment and hospitality expenses are restricted to employees with Third Party-facing roles, including Group Chief Executives, Business Heads, Head of Departments, and Sales, Business Development, and Marketing personnel.

4. DEFINITIONS

a) **Cash or Cash Equivalents**

Cash or any instrument that is readily convertible to cash or transferable to another person, including but not limited to reloadable prepaid cards, stored-value cards, digital or crypto currencies, precious metals, gems or jewellery.

Cash or Cash Equivalents are strictly prohibited regardless of value.

For the avoidance of doubt, non-transferable vouchers or coupons for specific retailers, products or services may be permitted, provided that they:

i) are not reloadable;
ii) are not exchangeable for cash;
iii) are not transferable; and

iv) comply with the monetary threshold and reporting requirements under this Guideline.

b) **Gift and Entertainment (G&E)**

i) Gifts: Any items of value, benefits, or advantages given to or received from a Third Party.
ii) Hospitality & Entertainment: Provisions of food and beverage, business meals, or access to events including but not limited to sporting matches, concerts, and cultural performances. This also includes travel and accommodation expenses.
iii) Sponsored Events: Any event organized or sponsored by a Third Party to which a Director or employee is invited, including but not limited to seminars, conferences, forums, workshops, or training sessions, where the costs are borne partially or fully by the Third Party.

c) **Third Party**

Subject to the definition in the Policy, Third Party includes any external person or entity such as a customer, client, counterparty, service provider, sub-contractor or a public official.

For the avoidance of doubt, dealings involving Public Officials are subject to heightened scrutiny and must strictly comply with all applicable anti-bribery and corruption laws.

5. ROLES AND RESPONSIBILITIES

5.1 Directors/Employees

All Directors/employees of the Group are required to:

a) understand their obligations under this Guideline and comply with this Guideline at all times;
b) act with integrity, honesty and transparency at all times;
c) take full accountability for their G&E activity(s);
d) exercise good judgment in deciding whether the giving and/or receiving of the G&E is appropriate;
e) consult with GLCS when unsure about the applicability of any aspects of this Guideline; and
f) report violations or suspected violations to the GLCS.

5.2 Executive Management

Refers to all C-suite and Group Heads ("Executive Management") who are required to:

a) lead by example in complying with this Guideline; and
b) adhere to the Limits of Authority (LOA) for G&E approvals.

5.3 Heads of Departments

All Heads of Departments are required to:

a) monitor all G&E activities involving employees reporting directly or under their purview;
b) adhere to the Limits of Authority (LOA) for G&E approvals;
c) provide guidance to their direct reports to ensure compliance with this Guideline; and
d) report violations or suspected violations to Group HR or GLCS.

5.4 Group Human Resources and Administration Department ("Group HR")

The Group HR is responsible for:

a) advising on queries about this Guideline;
b) monitoring adherence to the Guideline; and
c) escalating instances of non-compliance.

5.5 Group Legal, Compliance and Sustainability Department ("GLCS")

The GLCS is responsible for:

a) advising on queries about this Guideline;
b) reviewing this Guideline against the local laws and regulatory requirements and providing any modifications as needed; and
c) ensuring that the necessary reporting requirements are met.

6. PERMITTED GIFTS

6.1 No Gift Policy

The Group operates a "No Gift" Policy. Directors and employees are discouraged from giving or receiving gifts from Third Parties.

However, as an exception and subject to this Guideline, Directors and/or employees may give or receive modest gifts only when all of the following conditions are met, subject to the applicable threshold in Paragraph 12:

a) fosters goodwill and strengthens business relationships;
b) does not create the perception of an entitlement to preferential treatment, award of business or better pricing;
c) is consistent with cultural/religious traditions or custom.
d) they are of nominal or modest value;
e) they are occasional and not frequent;
f) they are customary and appropriate;
g) they do not influence, and cannot reasonably be seen as influencing, a business decision;
h) they are not cash or cash equivalents;
i) they comply with the recipient's organization rules and local law; and
j) they are reported and approved if above the applicable threshold.

Examples may include:

1. Festive Items: Modest festive hampers (e.g., traditional snacks or fruit baskets), seasonal calendars, and festive red/green packets (without cash).
2. Corporate Branding: Company-branded merchandise of nominal value or any other items with undeterminable retail value, such as calendars, pens, notebooks, lanyards, or umbrellas.
3. Commemorative Items: Flowers, plaques, or small trophies given in recognition of an event or achievement.

6.2 Handling and Treatment of Gifts

In the event a gift is received from a Third Party and, where applicable, permitted in accordance with this Guideline, the HOD must determine the treatment of the gift as follows:

a) Donate the gift to charity;
b) Hold it for departmental/office consumption or display;
c) Share it with other employees in the department; or
d) Permit it to be retained by the employee concerned (only if deemed low-risk and appropriate).

7. PROHIBITED GIFTS

The following are prohibited regardless of amount:

a) cash or cash equivalents;
b) personal luxury items;
c) gifts to secure or reward business;
d) gifts to public officials without specific prior written approval from GLCS;
e) gifts that are hidden, undocumented, or sent to a home address without business justification;
f) repeated gifts to the same recipient or from the same source that create a sense of obligation.

8. PERMITTED ENTERTAINMENT

8.1 Reasonable business meals or hospitality may be given or accepted, subject to the applicable threshold in Paragraph 12, where:

a) a legitimate business purpose exists;
b) the host is present;
c) the nature and cost are reasonable and proportionate;
d) the frequency is not excessive;
e) it is not during a sensitive decision-making process in a way that could impair objectivity; and
f) it does not violate law, customer rules, or this Policy.

Examples may include:

a) ordinary business lunches or dinners;
b) modest refreshments during meetings; or
c) occasional attendance at industry events with a business purpose.

9. PROHIBITED ENTERTAINMENT

Entertainment is not permitted if it is:

a) lavish, extravagant, or excessive;
b) unrelated to a genuine business purpose;
c) offered during a live procurement or approval process where impartiality may be affected; or
d) extended primarily for personal benefit rather than business relationship development.

The following types of Entertainments are strictly prohibited:

a) Entertainment that causes or is likely to cause harm or health and safety risk;
b) Entertainment that is illegal or does not comply with applicable laws and regulations
c) Entertainment involving gaming or gambling activities; or
d) Entertainment that is adult-oriented and which may be offensive, discriminatory or sexually explicit.

10. TRAVEL, ACCOMMODATION, AND CONFERENCE

Any payment, reimbursement, or sponsorship of travel, accommodation, conference attendance, or related expenses for or from a Third Party must be approved by the Group Head of Legal, Compliance and Sustainability and the relevant approving authorities designated in Paragraph 12.

Such support is only permitted where:

a) there is a legitimate and documented business purpose;
b) expenses are reasonable and directly related to the business purpose;
c) payments are made transparently, preferably directly to service providers rather than to individuals;
d) no side trips, personal guests, or leisure add-ons are funded unless specifically approved and properly segregated; and
e) the arrangement complies with law and internal approval requirements.

Director or employee participation in complimentary seminars, webinars, or industry briefings hosted by regulators or professional service providers (e.g. law firms, auditors, or consultants) is permitted without prior written approval and no reporting is required.

This is subject to the condition that the event is for professional development or information sharing and does not include any funding for travel, accommodation, or personal leisure expenses. Any invitation involving travel or overnight stays remains subject to the full scrutiny and approval process outlined below in Paragraph 12.

11. PUBLIC OFFICIALS AND GOVERNMENT-LINKED ENTITIES

Dealings involving public officials, regulators, tax authorities, customs authorities, licensing bodies, or employees of state-owned or state-controlled enterprises present elevated risk.

No Directors or employee may offer, promise, give, request, or approve any G&E for a Public Official without prior written clearance from Group Head of Legal, Compliance and Sustainability and the relevant approving authorities designated in Paragraph 12.

As a general rule:

a) facilitation payments are prohibited;
b) extra caution is required for festive gifts and ceremonial items;
c) even small benefits may be unlawful or improper; and
d) all such interactions must be documented accurately.

12. APPROVAL & REPORTING REQUIREMENT

12.1 The Company adopts the following minimum approval thresholds for all permitted giving and/or receiving of G&E:

a) RM350 and below
G&Es with a value of up to RM350 (or local currency equivalent) require no approval or reporting provided they are infrequent, appropriate, and not otherwise prohibited under this Policy and Guideline and subject to the Claims Policy issued by Group HR.

For the avoidance of doubt, where G&Es described in Paragraphs 6.1 and 8.1 (e.g., business lunches or dinners, festive items and corporate branded merchandise) are **received from a Third Party on a spontaneous or ad hoc basis and the value is not readily ascertainable**, such items may be treated as falling within this threshold, provided they are reasonably assessed as nominal in value, infrequent, not lavish or inappropriate and the Third Party is not a Public Official.

b) Above RM350 and up to RM750
G&Es with a value above RM350 and up to RM750 require prior written approval from the relevant Head of Department and post-event reporting to Group Legal, Compliance and Sustainability with payment receipts for giving of G&Es.

c) Above RM750
G&Es with a value above RM750, or anything involving:
i. a Public Official;
ii. travel, accommodation or conference from or to a Third Party;
iii. ongoing tender or contract negotiations;
iv. repeated benefits from or to the same Third Party; or
v. any situation creating reputational or conflict concerns,

requires prior written clearance from the Group Head of Legal, Compliance and Sustainability. Following such clearance, prior joint written approval must also be obtained from 1) Group CEO or the CEO; and 2) Group CFO or any one member of the Executive Management in accordance with the Company's Limits of Authority (LOA) and post-event reporting to Group Legal, Compliance and Sustainability for giving of G&Es.

Where the Group CEO is the requester, the Chairman of the Board shall approve such requests for G&Es under item 12.1(b) or item 12.1(c) above.

The flowchart of the above requirements is set out in Annexure 1.

Regional offices of the Group shall use the fixed exchange rate below:

Amount (MYR)	Thai Baht (THB)	Philippine Peso (PHP)	Other Countries
RM 350	2800	5200	Applicable foreign exchange rates at the time of reporting and/or seeking approval
RM750	6000	11200	

12.2 Reporting Requirements

All G&Es with a value **above RM350** or the local currency equivalent as per Paragraph 12.1 above (for regional offices), must be reported via email or any other designated channels to GLCS within three (3) working days of the activity. The report must be accompanied by relevant evidence (e.g., receipts, invoices, or event invites) to verify the value and nature of the activity.

The report must include the following details:

a) Date of the G&E
b) Name of the company within the Group
c) Name of the person reporting
d) Whether it is a giving or receiving activity
e) Name of the Third Party
f) Purpose of G&E
g) Value of the G&E (with supporting evidence)
h) List of Attendees
i) Approval status and name of the approver

12.3 Calculating Monetary Value

a) The threshold applies per head (individual/entity basis) or per activity. Each separate business engagement shall be calculated independently.
b) For the purpose of seeking prior written approval, where the exact value of the G&E (to be given or received) is unknown, employees must provide a reasonable, good-faith estimate based on the current fair market or retail value of the items or services.
c) If an estimated value was used for approval, the actual value must be disclosed in the final report to GLCS as specified in Paragraph 12.2.
d) Any artificial splitting of a single activity to avoid the approval threshold is strictly prohibited.

12.4 Please refer to Annexure 2 for an example of an approval and reporting email.

13. CONSEQUENCES OF NON-COMPLIANCE

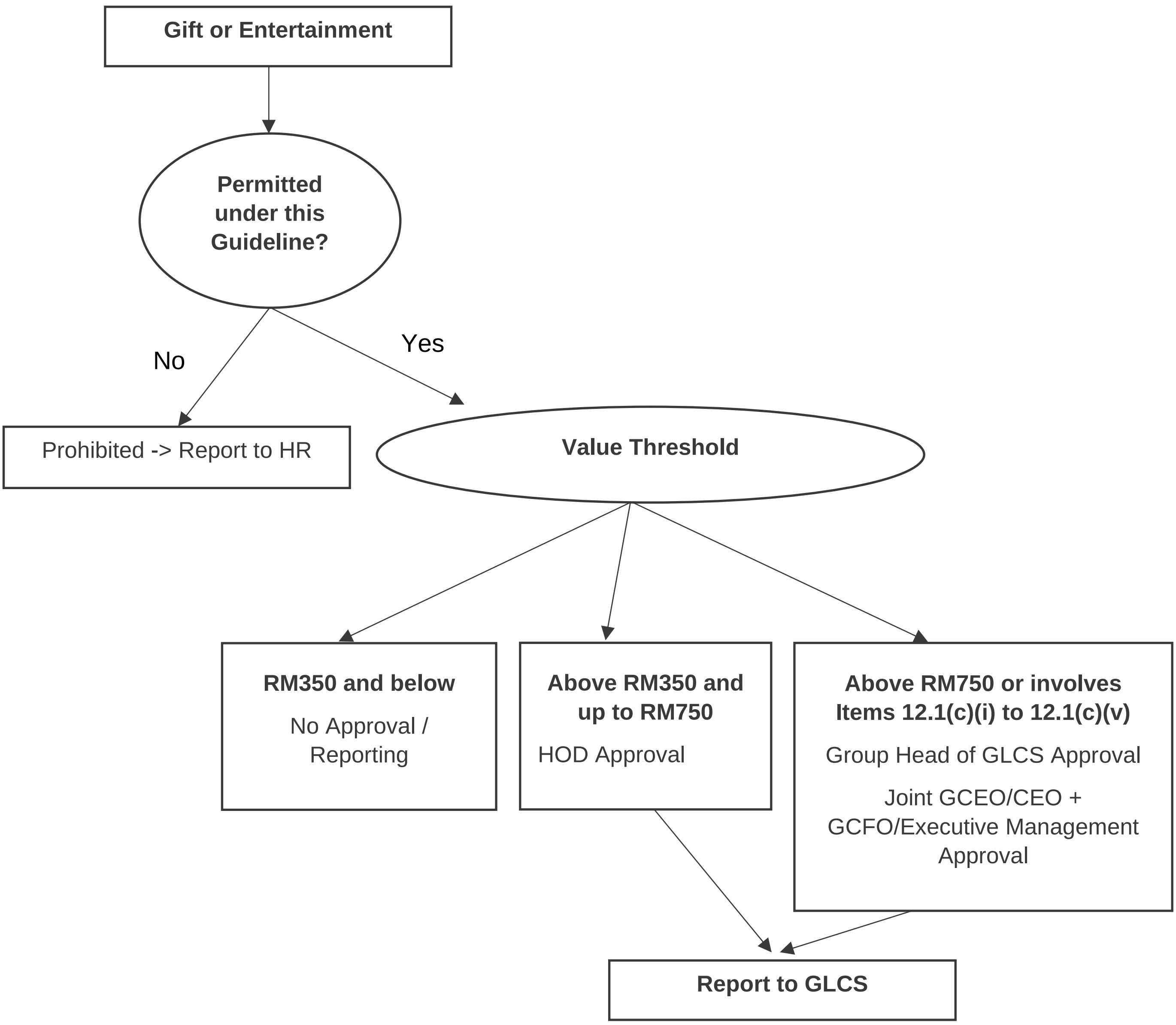
A breach of this Guideline constitutes misconduct and may lead to disciplinary action up to and including dismissal, as well as criminal prosecution, regulatory action or sanctions, where applicable.

14. CONFLICT OF INTEREST

Any G&E that creates, or appears to create, a personal obligation, bias, or divided loyalty must be treated as a potential conflict of interest and disclosed promptly.

ANNEXURE 1

APPROVAL & REPORTING REQUIREMENT FLOWCHART



ANNEXURE 2

1. EXAMPLE OF APPROVAL EMAIL

Subject: G&E Approval Request: Business Lunch with XYZ Sdn Bhd

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Dear [Name of Approver (HOD)],

I am writing to seek approval for the following Gifts & Entertainment (“G&E”) activity in accordance with the Guideline on Gifts & Entertainment and applicable Limits of Authority.

Details of G&E:

1. Proposed date of G&E: 25.01.2026
2. Company: NTT DATA Cardpay Sdn Bhd
3. Name of requester: Alissa Aiman
4. Activity type: Giving
5. Third party: XYZ Sdn Bhd
6. Purpose of G&E: Business Lunch
7. Estimated Value of G&E: RM400
8. List of Attendees: Alissa Aiman, Daniyal (XYZ Sdn Bhd), Shafiq (XYZ Sdn Bhd)

I confirm that this activity is **not offered with the intention to influence, or be perceived as influencing, any business decision or contract**, nor to obtain any improper advantage for NDPS Group.

Kindly review and approve if appropriate.

Thank you.

2. EXAMPLE OF REPORTING EMAIL

Subject: G&E Reporting – Business Lunch with XYZ Sdn Bhd

Dear Group Legal, Compliance & Sustainability Team,

This email is to report a Gifts & Entertainment ("G&E") activity in accordance with the Guideline on Gifts & Entertainment.

Details of G&E:

1. Date of G&E: 25.01.2026
2. Company: NTT DATA Cardpay Sdn Bhd
3. Name of reporting person: Alissa Aiman
4. Activity type: Giving
5. Third party: XYZ Sdn Bhd
6. Purpose of G&E: Business Lunch
7. Value of G&E: RM390 (Receipt attached)
8. Approval status: Approved
9. Approver's name: [Name of Approver (HOD)]
10. List of Attendees: Alissa Aiman, Daniyal (XYZ Sdn Bhd), Shafiq (XYZ Sdn Bhd)

Please let me know if any further information is required.

Thank you.