

9. DEFINITIONS

Definitions of words in relation to corruption are as specified in MACC Act/Guidelines.

10. RED FLAGS

This list is not exhaustive and all employees should be alert to other indicators that may raise a suspicion of corrupt activity. Employee must report to the immediate supervisor/HOD/HRD if any of these indicator is encountered.

The following is a list of "red flags" that may indicate the possible existence of corrupt practices and is for illustration purpose only:

- i) Unexpected additional fee or commission to “facilitate” a service.
- ii) Payments to be made through third party account, or to a country/geographic location different from where the Third Party resides or conduct business.
- iii) Demanding lavish gifts or hospitality before commencing or continuing contractual negotiations or provision of services.
- iv) Third-Party refuses to divulge adequate information during due diligence procedures and requests an unexpected additional fee or commission to "facilitate" a service.
- v) Private meetings requested by public contractors or companies hoping to tender for contracts.
- vi) Not following policies or procedures – abusing the decision-making process.
- vii) Unexplained preferences for certain contractors/refuses to put terms agreed in writing.
- viii) Invoices rendered or paid in excess of contractual amounts.
- ix) A third party engages in, or has been accused of engaging in, improper business practices.
- x) A third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials.
- xi) A third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us.
- xii) A third party requests that a payment is made to "overlook" potential legal violations.
- xiii) A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us.
- xiv) Unreasonable fee to provide consultancy services.