

THIRD PARTY DUE DILIGENCE QUESTIONNAIRE

Please provide answers to all of the questions. Some answers may simply consist of a “Yes or No”. Please do not omit any question. If a question is not applicable, write “N/A” in the space provided. If the space provided for a question is insufficient, you may attach additional pages. For any questions or issues completing the questionnaires, please contact [igu@digital-nasional.com.my].

INCORPORATION, OWNERSHIP AND EMPLOYEE INFORMATION

Is the Applicant an “Entity”, such as a corporation, partnership, non-profit organization, joint venture, subsidiary, sister company, government entity, NGO, etc.?

- ☐ Yes (Please specify the entity i.e. Corporation, Partnership): _____
- ☐ No (If no, please specify): _____

Please list all shareholders or owners who hold a financial interest in the Applicant's business of **10% or more**. Where applicable, please provide ownership information that identifies all individual owner of Applicant (or major shareholders if a public company).

Owner Name	% Ownership	Address	Country of Incorporation/ Nationality

Has the Applicant changed its business name in the last five (5) years?

- ☐ Yes ☐ No

GOVERNMENT

Does the Applicant have any owners, shareholders, or other key personnel (or any affiliated entity) Public Officials/Political Exposed Persons (PEP) or have connections (family, business, or otherwise) with public officials?

- ☐ Yes ☐ No

Government Connections/Relations

Identify who is or was the public official or who has connections a current or former public official

Are any owners, management or employees connected with a current or former Public Official (PO) / Political Exposed Person (PEP)? If yes, please detail:				
Person Name	Person Title	Organization Name	Position Held	Relationship to Public Official

VIOLATIONS

Within the last five (5) years, has the Applicant, or any of its directors, officers, principal owners or employees, ever been found by a court or agency to have violated any anti-bribery laws or securities laws?

☐ Yes ☐ No

If yes, please provide details:

Within the last five (5) years, has the Applicant or any of the principal officers, directors or shareholders ever been investigated or charged with any offense, including bribery, conflicts of interest, corruption, kickbacks, or money-laundering?

☐ Yes ☐ No

If yes, please provide details:

Has the Applicant ever paid money or given anything of value to a Public Officials in order to retain business or obtain an improper advantage in any jurisdiction?

☐ Yes ☐ No

If yes, please provide details:

Has the Applicant ever been suspended or debarred from doing business in any capacity as a result of fraud, misrepresentation, corruption, bribery, money laundering or any other related activities in any jurisdiction?

☐ Yes ☐ No

If yes, please provide details:

Has the Applicant ever made any public disclosures any authority fraudulent or corrupt misconduct or improper accounting to any government authority?

☐ Yes ☐ No

If yes, please provide details:

Policies and Procedures. Please answer the following regarding your policies and procedures.

No.	Compliance System and Anti-Corruption Prevention	Yes / No
1.	Is Applicant familiar with the prohibitions of the anti-bribery laws Malaysian Anti-Corruption Act 2009 or Foreign Corrupt Practices Act (FCPA), UK Bribery Act 2010 and/or the OECD Convention) on Combating Bribery of Foreign Public Officials?	
2.	Does the Applicant have an Anti-Corruption Policy?	
3.	Does the Applicant have procedures in place to monitor the effectiveness of its anti-bribery and anti- corruption policy?	
4.	Does the Applicant have Risk Register related to bribery and corruption?	
5.	Does Applicant provide training of anti-bribery laws to its employees and business associates?	
6.	Does Applicant have procedures in place to allow reporting of any misconduct? i.e. whistleblowing, complaint management	
7.	Does Applicant allow facilitation payments?	
8.	Does the Applicant have a background check program?	
9.	Does the Applicant have procedures in place to monitor the effectiveness of its anti-corruption policy? i.e. internal assessment	
10.	Does the Applicant have a Code of Conduct?	

Attachments

Please attach the following documents: -

- Applicant's Code of Conduct and Applicant's Anti-Corruption policy
- Applicant's Certificate of Registration
- Applicant's Articles of Association
- Applicant's Business License / NFP License / CIDB license
- Financial Statement

Note: Please ignore the above, if the documents have already been submitted.

As part of Organisation compliance requirement, we undertake due diligence prior to entering into any business relationship with contractors, sub-contractors, consultants and agents to ensure that our counterparties will meet Supplier's Code of Conduct requirements and obligations.

Digital Nasional Berhad

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