



**ANTI-BRIBERY AND CORRUPTION DUE  
DILIGENCE QUESTIONNAIRE**

**MEASAT Global Berhad**

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**ANTI-BRIBERY AND CORRUPTION DUE DILIGENCE QUESTIONNAIRE** *(to be completed by Third Party)*

MEASAT Global Berhad (“**MGB**”) and all its subsidiaries (“**Company**”) strictly prohibits bribery and corruption in all their businesses. The Company adopts a **ZERO TOLERANCE APPROACH** against all forms and acts of bribery and corruption and is committed to operating in compliance with all applicable laws on anti-bribery and corruption and in accordance with the highest ethical and professional standards.

Anti-bribery and corruption laws in Malaysia and other jurisdictions in which the Company operates prohibit bribery and corruption conducted through associated persons or intermediaries. The Company, its directors and management may be liable for corruption and bribery committed by the Company’s Third Parties.

Therefore, before the Company does business with a Third Party, the Company shall conduct appropriate due diligence to manage corruption risks associated with such business relationships. The Company expects its Third Parties to apply the highest ethical standards in their business relationships and to ensure that they have an appropriate anti-bribery and corruption compliance framework in place.

This Questionnaire is intended for use in obtaining the appropriate approval prior to entering any business relationship with any Third Party under the Company’s Anti-Bribery and Corruption Due Diligence Policy. Please complete the following Questionnaire, using additional pages where necessary, and return a scanned, signed copy together with all related documents to the Company’s contact person. Please bear in mind that this is a preliminary request, and that additional information or documents may be required as the due diligence progresses.

Receipt of this information is a precondition to the approval of entering into any business relationship with any Third Party. If you have any questions, please direct them to the Company’s contact person. If you subsequently learn that any of the information provided below is incorrect or incomplete, please correct or complete it (as applicable) and notify the Company as soon as possible. If you have previously submitted this Questionnaire to the Company, please review and update any information that may have changed.

The information contained in and documents furnished along with this Questionnaire will be treated in confidence.

<b>GLOSSARY</b>	
<b>Associated Company</b>	<p>a corporation in which the investor has significant influence, and which is neither a subsidiary nor a joint venture of the investor.</p> <p>It is presumed that an investor does have “significant influence” if it holds, directly or indirectly, through subsidiaries, 20% or more of the voting power of the investee.</p>
<b>Beneficial Owner</b>	<p>means the ultimate owner of the voting shares and does not include a nominee of any description. The individual who is the beneficial owner would meet one or more of the following criteria:</p> <ul style="list-style-type: none"> <li>(a) has interest, directly or indirectly, in not less than 20% of the voting shares;</li> <li>(b) holds, directly or indirectly, not less than 20% of the voting shares of the company;</li> <li>(c) has the right to exercise ultimate effective control whether formal or informal over the company or the directors or the management of the company;</li> <li>(d) has the right or power to directly or indirectly appoint or remove a director(s) who holds a majority of the voting rights at the meeting of directors; or</li> <li>(e) is a member of the company and, under an agreement with another member or other members of the company, controls a majority of the voting shares in the company.</li> </ul>
<b>Director</b>	<p>includes any person occupying the position of director of a corporation by whatever name called and includes a person in accordance with whose directions or instructions the majority of directors of a corporation are accustomed to act and an alternate or substitute director.</p>
<b>Government / Public Official</b>	<p>refers to:</p> <ul style="list-style-type: none"> <li>(a) any officer, or employee, appointed or elected, of a local, state, or federal government, or any department, agency, ministry, or instrumentality of a government;</li> <li>(b) any individual who, although temporarily or without payment, holds a public position, employment or function;</li> <li>(c) an individual acting in an official capacity for or on behalf of a government department, agency, ministry, instrumentality, public international organization, or enterprise performing governmental function, or owned or controlled by, a government;</li> <li>(d) a political party official, officer, or employee, or any candidate for political office, or a member of a political party or a person with significant influence in a political party;</li> <li>(e) any officer or employee of an entity owned or controlled by a government, as well as entities that perform a government function;</li> <li>(f) a member of a royal family, military, former political party official or highly connected individuals whether or not having formal authority or holding office, but could otherwise be influential including through partially owning or managing a state-owned or state-controlled entity; or</li> <li>(g) any persons with political influence but not necessarily holding any formal position in any political party.</li> </ul>
<b>Key Senior Executives</b>	<p>refers to Chief Executive Officer, Chief Financial Officer, C-Suites and Head of Department responsible for overseeing or performing the current proposed contractual or commercial relationship.</p>

## GLOSSARY

<b>Politically Exposed Persons (“PEPs”)</b>	<p>refers to:</p> <ul style="list-style-type: none"><li>(a) foreign PEPs – individuals who are or who have been entrusted with prominent public functions by a foreign country. For example, Heads of State or of government, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations, important political party officials;</li><li>(b) domestic PEPs – individuals who are or have been entrusted domestically with prominent public functions. For example, Heads of State or of government, senior politicians, senior government, judiciary or military officials, senior executives of state owned corporations and important political party officials; or</li><li>(c) persons who are or have been entrusted with a prominent function by an international organisation which refers to members of senior management. For example, directors, deputy directors and members of the board or equivalent functions.</li></ul> <p>The definition of PEPs is not intended to cover middle ranking or more junior individuals of foreign or domestic PEPs.</p>
<b>Subsidiary</b>	<p>a corporation shall be deemed to be a subsidiary of another corporation, but only if:</p> <ul style="list-style-type: none"><li>(a) the other corporation<ul style="list-style-type: none"><li>(i) controls the composition of the board of directors of the corporation;</li><li>(ii) controls more than half of the voting power of the corporation; or</li><li>(iii) holds more than half of the issued share capital of the corporation, excluding any part of the share capital which consists of preference shares; or</li></ul></li><li>(b) the corporation is a subsidiary of any corporation which is that other corporation’s subsidiary.</li></ul>
<b>Third Party</b>	<p>includes, without limitation, agents, consultants, contractors, suppliers, transaction counterparties, clients, joint venture or consortium partners etc.</p>

## INTERPRETATION

- (a) Words denoting the singular number only shall include the plural number and vice versa.
- (b) Words denoting any gender shall include all other genders.
- (c) References to persons shall be deemed to include bodies corporate or unincorporate.

<b>SECTION A: THIRD PARTY DETAILS</b>	
Registered Company Name (including any previous legal names and/or trading names): <i>(Referred to as "Third Party", "you" or "your" for the purpose of this Questionnaire)</i>	
Company Registration Number:	
SST Registration Number:	
Registered Place of Business/Address:	
Mailing Address:	
Contact person (Name & Designation):	
Phone Number:	
Mobile Number:	
Contact Person for Finance (Name & Designation):	
Phone Number :	
Mobile Number:	
Company Website:	
Type of Business (e.g.: sole proprietorship, partnership, corporation, individual / independent worker):	
Jurisdiction Where Third Party is Registered or Incorporated:	
Date of Incorporation:	
Describe briefly the nature and history of your business <i>(If available, please also attach copies of current sales brochures, annual reports or similar documents):</i>	
Describe briefly the proposed business relationship with the Company:	

**Ownership details**

Please provide the details of your owners, partners, shareholders, principals, Beneficial Owners (in each case, holds no less than 20% of the voting shares, directly or indirectly).

In relation to persons identified above, the respective percentages held and jurisdiction/nationality of each owner, partner, shareholder, principal or Beneficial Owner.

You may provide the details by way of separate documents.

Name (individual or company):	Role (i.e., Owner/ Partner / Shareholder / Principal and Beneficial Owner)	Ownership Percentage:	Place of Registration (for company) / Nationality (for individual):

**Directors and Key Senior Executives**

(Please provide details of your Directors and Key Senior Executives)

You may submit CV if necessary.

Name:	Position:

Please provide details of your Directors, Key Senior Executives, employees, contractors and/or consultants who are principally or likely to be responsible for overseeing or performing the current proposed contractual/commercial relationship with the Company.

You may provide the details by way of separate documents.

Name:	Role / Position held:

**SECTION B: COMPLIANCE SECTION**

1.0 Anti-Bribery and Corruption Programme		Yes	No	Comments
1.1	Do you have an Anti-Bribery and Corruption Policy?			
2.0 Use of Other Parties		Yes	No	Comments
2.1	Do you intend to use other parties (sub-agents, consultants, venture partners, business associates etc.) in relation to the			

	<p>current proposed contractual/commercial relationship with the Company?</p> <p><i>If yes, please provide the following details:</i></p> <p><i>Name of such additional party:</i>  <i>Address:</i>  <i>Role/function of such additional party:</i></p> <p><i>(If your answer is "No", you may proceed to Question 3.0)</i></p> <p>Please note that the use or involvement of any other party in relation to any transaction with the Company requires the Company's prior written consent and the Company reserves its right to request such other party to complete this Questionnaire or provide any further information.</p>			
2.2	<p>To the best of your knowledge, has any such other party, its present or former Directors, Key Senior Executives or any of its shareholders or Beneficial Owners (who, in either case, holds no less than 20% of the voting shares, directly or indirectly), been suspended from doing business in any capacity in the past 5 years by any regulatory authority or charged with any criminal act/offence or have been investigated by any government authority in relation to any allegation of fraud, bribery, misrepresentation or other activities?</p> <p><i>If yes, please provide detailed information.</i></p>			
2.3	<p>Do you conduct any anti-bribery and corruption due diligence on your business counterparties?</p>			
<b>3.0 Interaction with Government / Public Official</b>		<b>Yes</b>	<b>No</b>	<b>Comments</b>
3.1	<p>To the best of your knowledge, has any of your owners, principals, shareholders, partners, Beneficial Owners (in each case, holding not less than 20% of the voting shares, directly or indirectly), Directors or Key Senior Executive been designated as a Politically Exposed Person ("PEP")?</p> <p><i>If yes, please provide detailed information.</i></p>			
<b>Name:</b>		<b>Designation:</b>		<b>Description of PEP and Nature of the relationship:</b>
		<b>Yes</b>	<b>No</b>	<b>Comments</b>
3.2	<p>To the best of your knowledge, will there be any anticipated interaction between you (or any of your owners, principals, shareholders, partners, Beneficial Owners (in each case, holding not less than 20% of the voting shares, directly or indirectly), Directors, Key Senior Executives and/or employees) with any Government/Public Official with respect to the proposed contractual/commercial relationship with the Company?</p> <p><i>If yes, please provide the following details:</i></p>			

Name of the individual who will be interacting with a Public Official:	Name of the Public Official:	Position held by the Public Official:	Purpose for the interaction with respect to this proposed contractual /commercial relationship:

4.0 Violation of laws		Yes	No	Comments
4.1	<p>Have you or any of your owners, principals, shareholders, partners, Beneficial Owners (in each case, holding not less than 20% of the voting shares, directly or indirectly), Directors or Key Senior Executives been suspended from doing business in any capacity in the past 5 years by any regulatory authority or charged with any criminal act/offence or have been investigated by any government authority in relation to any allegations of fraud, bribery, misrepresentation or other activities?</p> <p><i>If yes, please provide detailed information.</i></p>			
4.2	<p>Have you or any of your owners, principals, shareholders, partners, Beneficial Owners (in each case, holding not less than 20% of the voting shares, directly or indirectly) or Directors or Key Senior Executives ever been sanctioned or blacklisted by any governmental or regulatory authority in any jurisdiction?</p> <p><i>If yes, please provide details of the sanction(s), the date and status of the sanction, and the date it was lifted or resolved.</i></p>			

#### SECTION C: BANK DETAILS FOR PAYMENT PURPOSE

Beneficiary Name		SWIFT Code/ ABA No.	
Bank Name		Bank Code	
Bank Account No.		Branch Code	
Bank Address		Account Type (Current/Savings)	

#### SECTION D: DOCUMENTS REQUIRED

Please attach your supporting documents as follows:	Documents Attached
1. Organisation Chart.	
2. Code of Conduct.	
3. Anti-Bribery and Corruption Policy.	
4. Certificate of Registration or its equivalent in the country in which you are incorporated. <i>(for Malaysian companies, Form 9 (Certificate of Incorporation) or Notice of Registration pursuant to Sections 15 and/or 17 of Companies Act 2016).</i>	



5. Memorandum and Articles of Association OR Constitution.	
6. Information on Directors (for Malaysian companies, Form 49 or the Notification of Change in the Register of Directors, Managers and Secretaries Form pursuant to Section 58 of Companies Act 2016 and Annual Return).	
7. Information on Shareholders/Members and Substantial Shareholders (where applicable) (for Malaysian companies, the Register of Members for private limited companies or Register of Substantial Shareholders for public limited companies/public listed companies, as the case may be.	
8. Proof of Registered Address or Business Address (for Malaysian companies, Form 44 or Notification of Change in the Registered Address Form pursuant to section 46 of Companies Act 2016).	
9. Audited financial statements for the last 3 years.	
10. Identification Card (Sole Proprietor)	
11. Form D & Schedule of particulars of Business and Partners (Partnership).	
12. SST Registration Letter	
13. Copy of Bank Statement Header/Bank Confirmation Letter.	
14. Certificate of Tax Residency (Overseas Companies)	

**SECTION D: CERTIFICATION/CONSENT**

1. By signing this document, the undersigned, being duly authorised to complete this Questionnaire on your behalf, hereby represents and certifies the following:
  - a. that he/she has the proper mandate and authority to disclose such information; and
  - b. that the information provided in this document is, to the best of your knowledge, accurate, current and complete at the date of disclosure.
2. You understand that the Company will rely on the information provided in this Questionnaire to determine whether to enter into any contractual relationship with you, and that any false or misleading information provided will entitle the Company to immediately terminate (without any liability to the Company) any contract or agreement with you.
3. You understand that as part of the due diligence process, the Company may conduct a background check on you. As such, you hereby authorise the Company and its representatives to conduct relevant checks and obtain relevant information pertaining to you, any of your shareholders, Directors or Key Senior Executives, from any party who has such information. You and any of your shareholders, Directors or Key Senior Executives, shall release liability of all persons or entities requesting or supplying such information.
4. You agree to update the Company as soon as reasonably possible in the event there are any changes to the responses contained in this Questionnaire.

**Personal Data**

5. You hereby consent and authorise the collection, usage, access, transfer, storage and processing of the personal data and information provided in this Questionnaire or that is subsequently provided by you from time to time for the purposes of conducting due diligence to facilitate the Company's implementation of its anti-bribery and corruption program, as well as for any other purposes that is required or permitted by any law, regulations or guidelines.
6. Where you have provided personal information relating to others (e.g., your shareholders, Directors, Key Senior Executives or such other parties), you represent and warrant that you have obtained their consent or is otherwise entitled to provide their information to the Company.

**Declaration**

I have the authority to bind the business of the Third Party.

**For and on behalf of [insert name of Third Party]:**

**Signature:**

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**Name:**

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**Designation:**

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**Date:**

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