



# Anti-Bribery & Corruption Policy (“the Policy”) – Summary

The Fifth Academy PLT (known as TFA)

## 1.0 Purpose and Scope

**1.1 The Fifth Academy PLT (known as TFA)** is committed to conducting its business in accordance with the highest ethical standards and in full compliance with all applicable laws, regulations, and standards in all locations and jurisdictions in which it operates.

**1.2** This Policy applies to TFA, its directors, employees, and external parties who have dealings with TFA.

**1.3** TFA adopts a **ZERO-TOLERANCE APPROACH** towards any form of bribery and corruption and is committed to acting professionally, fairly, and with integrity in all its business dealings and relationships. TFA expects all external parties who conduct business for or on behalf of TFA to share the same commitment and to have in place appropriate anti-bribery and corruption (“ABC”) compliance policies and programmes consistent with the principles set out in this Policy.

**1.4** TFA strictly prohibits the offering, giving, solicitation, or acceptance of any form of bribery or corruption by its employees or external parties conducting business for or on behalf of TFA.

**1.5** TFA has implemented a robust ABC Programme supported by relevant policies and procedures to ensure that bribery and corruption risks identified are appropriately mitigated.

## 2.0 Definitions

### **Bribery**

An inducement, reward, or benefit offered, promised, provided, or accepted to gain any commercial, contractual, regulatory, or personal advantage through improper performance.

### **Improper Performance**

Occurs when a person fails to act in good faith, impartially, or in accordance with a position of trust.

### **Corruption**

The abuse of public or private office for personal gain.

**Charitable Donation**

A voluntary contribution of cash or items in kind where no direct benefit accrues to TFA.

**Conflict of Interest**

A situation where personal interests interfere with an individual's objectivity in acting in TFA's best interests.

**Employee**

Includes permanent, temporary, casual, part-time, fixed-term employees, interns, trainees, secondees, and agency-contract personnel performing duties for TFA.

**Entertainment**

Any benefit received or offered where the donor is present, including meals, events, tickets, travel arrangements, or similar relationship-building activities.

**Facilitation Payment**

An unofficial payment made to expedite routine government actions. This excludes officially published fast-track services with lawful fees.

**Gift**

Anything of value given to or received from any party that may influence or appear to influence a business relationship.

**Kickback**

A payment made in return for an improper business favour or advantage.

**Political Contribution**

Any contribution made to support political parties, candidates, or political activities.

**Public Officials**

Includes government officers, statutory bodies, political representatives, international organisations, and other prescribed public bodies.

**Sponsorship**

A non-routine contribution made in exchange for marketing, branding, or public recognition.

**Third Party**

Any individual or organisation engaged by or interacting with TFA, including vendors, suppliers, consultants, agents, intermediaries, and business partners.

### **3.0 Key Elements of the Policy**

#### **3.1 Bribery and Corruption**

All forms of bribery and corruption, whether direct or indirect, are strictly prohibited.

#### **3.2 Public Officials**

Employees must deal with Public Officials transparently and in good faith. Offering anything of value to influence official actions is strictly prohibited.

#### **3.3 Gifts and Entertainment**

Employees and their immediate family members must not offer or accept gifts or inducements that may conflict with their duties. Full disclosure and approval are required where applicable.

#### **3.4 Charitable Contributions and Sponsorships**

All charitable contributions and sponsorships must be made in good faith and without corrupt intent.

TFA does not make political contributions, whether in cash or in-kind.

#### **3.5 Third Parties**

TFA prohibits bribery, corruption, facilitation payments, and kickbacks involving third parties.

Due diligence and ongoing monitoring are required for all third-party relationships.

#### **3.6 Payments and Controls**

All payments must follow proper authorisation procedures with clear documentation and segregation of duties.

#### **3.7 Hiring and Promotion**

Hiring and promotion decisions must be based on merit and free from improper influence or business inducements.

#### **3.8 Books and Records**

Accurate and complete records must be maintained. Falsification or concealment of records is strictly prohibited.

### **4.0 Further Clarification**

**4.1** TFA recognises that business practices may vary across jurisdictions.

**4.2** This Policy does not prohibit customary and proportionate business practices conducted transparently and properly recorded, including:

- Normal hospitality
- Ceremonial gifts during traditional festivals



- Official fast-track services with published fees

**4.3** Where there is a conflict between this Policy and applicable law, the law shall prevail.

### **5.0 Review of the Policy**

This Policy shall be reviewed every **two (2) years** or as and when necessary.