

Anti-Bribery & Corruption Policy

Jiggee does not pay bribes and does not accept them. Not to win a pitch, not to speed up a permit, not to keep a client.

This document is our full policy, published openly at jiggee.com/anti-bribery-policy so that clients, suppliers, partners and our own team can hold us to it. It sets out what counts, who it binds, what to do when something goes wrong, and who decides.

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1. Where we stand

Jiggee does not pay bribes and does not accept them. Not to win a pitch, not to speed up a permit, not to keep a client. If the only way to win a job is to pay for it, we would rather lose the job.

We know that sounds like the sort of line every company writes. The difference is in what follows — what specifically counts, who it binds, what to do when it happens, and who decides. That is the rest of this document.

2. Who this applies to

This policy binds everyone who acts for Jiggee:

- Our directors and management
- Full-time and part-time employees, and interns
- Freelancers, crew and production partners engaged on our projects
- Suppliers, venues, agents and consultants acting on our behalf
- Joint-venture and co-production partners on Jiggee-led work

That list is deliberately wide, and it is not our choice. Under Malaysian law a “person associated with” a commercial organisation includes anyone performing services for or on behalf of it. When a freelance producer we hired pays a bribe on a Jiggee job, it is Jiggee that answers for it.

3. The law we work under

Section 17A of the Malaysian Anti-Corruption Commission Act 2009, in force since 1 June 2020, makes a commercial organisation criminally liable when a person associated with it corruptly gives or offers gratification to obtain or retain business or a business advantage.

Two things about that section shape how we run:

- **The penalty is severe.** A fine of not less than ten times the value of the gratification or RM1 million, whichever is higher, and imprisonment of up to 20 years.

- **Liability is personal as well as corporate.** Directors, controllers, officers, partners and anyone concerned in the management of the organisation are deemed personally liable for the same offence if the organisation is found liable.

The one defence available is that the organisation had **adequate procedures** in place to prevent the conduct. This policy, and the controls under it, are those procedures.

We also operate under the Principles of Professional Conduct and Ethics of the **International Live Events Association**, of which Jiggee is a member — which require the use of only legal and ethical means in industry negotiations, and truthful and accurate information in the performance of our duties.

4. What counts as bribery

Bribery is offering, giving, requesting or accepting anything of value to improperly influence a decision. “Anything of value” is broader than cash. In our industry it usually arrives as something else:

- A cash payment or “commission” to a client’s staff member for awarding a job
- An undisclosed rebate or kickback from a venue or supplier, routed to an individual rather than to the client’s budget
- Free tickets, hospitality suites or after-parties given to a decision-maker while a tender is open
- A site inspection trip with no working agenda, for the person who signs off the contract
- A job, internship or contract given to a decision-maker’s relative in exchange for business
- A payment to an official to release a permit, licence or clearance faster than the normal process
- Talent, artist or crew bookings routed through a party chosen to reward someone rather than to do the work

It is bribery whether the benefit goes to the person deciding or to a family member, friend or nominated third party. It is bribery whether we offer it or accept it. And it is still bribery if it is common practice, if a competitor is doing it, or if the amount is small.

5. Gifts, hospitality and entertainment

This is the part that needs real rules, because our business *is* hospitality. We build parties for a living. A blanket ban would be unworkable and quietly ignored, which is worse than having no rule at all.

The test is intent and timing, not the price tag. A gift is acceptable if it is modest, occasional, given openly, and could not reasonably be seen as buying a decision.

Acceptable

- Festive gifts of nominal value — a hamper, a diary, seasonal snacks — given and received openly and, where practical, shared with the team
- Reasonable meals and refreshments in the ordinary course of doing business
- Attending an event we produced, or a client’s own function

- Branded items of nominal value

Not acceptable

- Anything in cash or cash-equivalent — vouchers, transfers, credit, e-wallet top-ups
- Anything given or received while a tender, pitch or contract negotiation is live
- Travel or accommodation for a client's staff not tied to a genuine working agenda
- Anything given to a family member or nominee instead of the person themselves
- Anything the giver asks us to keep quiet about — that request is itself the warning
- Any gift, of any value, to a public official or to the staff of a government-linked client

Approval and recording. Anything given or received with a value above **RM500** must be approved in advance by **both the Managing Director and the Finance Manager**, and recorded in the gifts and hospitality register. If advance approval is not possible — it arrives unannounced, refusing would cause genuine offence — accept it, declare it **within one week**, and let them decide whether it is kept, shared or returned.

If you are unsure, the honest test is this: would you be comfortable if the client's finance director, our whole team, or a journalist knew about it? If the answer needs explaining, don't.

6. Facilitation payments

Facilitation payments — small unofficial payments to speed up a routine action someone is already obliged to perform — are bribes under Malaysian law. We do not make them.

We work in a business of permits, venue clearances, licences, customs on inbound production kit and immigration for foreign talent. Delays are real and they cost money. The answer is to build the lead time into the schedule, not to pay to skip the queue.

If you are pressured for one, do not pay. Record what was asked, by whom and when, and report it. If refusing ever puts your personal safety at risk, protect yourself first, then report it immediately.

7. Donations, sponsorships and political contributions

- **Charitable donations** go to registered organisations only, approved by **both the Managing Director and the Finance Manager**, and never at the request of, or for the benefit of, someone in a position to award us work.
- **Sponsorships** must have a genuine commercial rationale, be documented in a written agreement, and be recorded.
- **Political contributions.** Jiggee does not make political donations or contributions of any kind, in cash or in kind, in any market we operate in.

8. Suppliers, freelancers and production partners

Most of our exposure sits here, because most of the people on a Jiggee job on any given night do not work for Jiggee.

Before we engage a supplier, agent, consultant or production partner on a material engagement, we:

- Run proportionate due diligence — who owns it, who else they work for, whether any ownership or family connection touches the client's decision-makers
- Require the engagement to be documented, with fees stated in writing and paid to the contracting entity, never to an individual's personal account
- Include an anti-bribery clause giving Jiggee the right to terminate for breach
- Decline agents paid a success fee with no defined, verifiable scope of work

We disclose supplier rebates and commissions to the client where they affect what the client pays. We do not take an undisclosed margin on a cost we present as a pass-through.

9. Records

Every transaction is recorded accurately in the books, with its true purpose described. No off-book accounts, no fictitious entries, no invoices describing something other than what was supplied, no “miscellaneous” line covering something we would not want to name. Falsifying a record to conceal a payment is treated the same as making the payment.

10. Speaking up

If you see something, or you are asked for something, or you did something and want to correct it — tell us.

Report to: jon@jiggee.com

You may report anonymously. You do not need proof, and you do not need to be certain.

A good-faith concern that turns out to be mistaken is not a problem, and reporting one will never be held against you.

No retaliation. Nobody at Jiggee will be demoted, dismissed, sidelined, dropped from projects or paid less for raising a concern in good faith, or for refusing to pay a bribe — including where refusing costs us the work. Retaliating against someone who reports is itself a disciplinary matter.

Serious matters can also be reported directly to the **Malaysian Anti-Corruption Commission** — including any concern that involves the Managing Director. Nothing in this policy prevents anyone from doing so.

11. If this policy is breached

For employees, a breach is a disciplinary matter and may result in dismissal, plus referral to the authorities where a criminal offence may have occurred.

For suppliers, freelancers and partners, a breach entitles Jiggee to terminate the engagement immediately and to decline future work.

12. How we keep this real

Malaysia’s Guidelines on Adequate Procedures set out five principles. Here is how each one lands at Jiggee.

- **Top-level commitment.** The Managing Director owns this policy and is accountable for it.
- **Risk assessment.** We assess corruption risk across our operations at least once every three years, and whenever we enter a new market or a materially different type of engagement.
- **Undertake control measures.** The approvals, registers, due diligence and contract clauses set out above.
- **Systematic review, monitoring and enforcement.** This policy is reviewed at least once every three years, and sooner if the law changes or an incident shows a gap.
- **Training and communication.** Everyone who joins Jiggee is briefed on this policy. It is published openly at jiggee.com/anti-bribery-policy so that clients, suppliers and partners can hold us to it.

DOCUMENT CONTROL

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