

BAC EDUCATION GROUP

Brickfields Asia College | IACT College | Reliance College | Veritas University College | UNIMY

SUSTAINABLE FUNDING AND DONATIONS POLICY

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1	BAC Education Group (Group Level)	Group Chief Executive Officer	01/07/2025
2	Brickfields Asia College	Principal / Chief Executive	01/07/2025
3	IACT College	Principal / Chief Executive	01/07/2025
4	Reliance College	Principal / Chief Executive	01/07/2025
5	Veritas University College	Vice Chancellor / President	01/07/2025
6	UNIMY	Vice Chancellor / President	01/07/2025

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PART A: PRELIMINARY

1. PREAMBLE AND INTRODUCTION

BAC Education Group (the 'Group') is committed to ensuring the long-term financial sustainability of its five institutions — Brickfields Asia College, IACT College, Reliance College, Veritas University College and UNIMY — while upholding the highest standards of integrity, transparency and social responsibility in the way it raises, receives and manages funds.

This Sustainable Funding and Donations Policy ('Policy') establishes the principles, criteria and procedures that govern how the Group and its institutions source, accept, manage and report on funding and donations. It ensures that all funding relationships serve the Group's academic mission, comply with Malaysian law and regulation, and are free from undue influence or reputational risk.

This Policy is grounded in the recognition that private higher education institutions occupy a position of public trust. Funding decisions have the potential to affect academic freedom, institutional independence, the integrity of research, and the reputation of the institutions. This Policy therefore applies a sustainable, ethical and risk-based lens to all funding activities.

This Policy is to be read alongside the BAC Education Group Ethics Policy (BAC-EP-2025-001), the Sustainable Investing Policy (BAC-SIP-2025-003), and all applicable Malaysian laws and regulatory requirements.

2. VISION, MISSION AND GUIDING PRINCIPLES

2.1 Vision

To build a financially resilient, diversified and ethically governed funding base that enables the Group to fulfil its academic mission for generations to come.

2.2 Mission

To raise, accept and manage funds transparently, sustainably and in full alignment with the Group's values — ensuring that no funding relationship compromises academic independence, institutional integrity or the welfare of students and staff.

2.3 Guiding Principles

Principle	Description
Mission Alignment	All funding must support and be consistent with the Group's educational mission and strategic objectives.
Independence	No funder or donor shall exercise undue influence over academic content, research outcomes, admissions, staffing or governance.
Transparency	All significant funding sources and donations shall be disclosed in accordance with this Policy and applicable law.

Sustainability	Funding strategies shall be diversified, long-term and resilient to ensure financial stability across all institutions.
Ethical Integrity	No funding shall be accepted from sources that are illegal, reputationally damaging or incompatible with the Group's values.
Accountability	All funds received shall be managed prudently, reported accurately and applied for their intended purpose.
Inclusivity	Funding and donations shall not create conditions that disadvantage or discriminate against any student or group.

3. SCOPE AND APPLICATION

This Policy applies to:

- All institutions within the Group: Brickfields Asia College, IACT College, Reliance College, Veritas University College and UNIMY.
- All staff involved in fundraising, donor relations, grant applications, fee setting or financial management.
- All members of the Board of Directors, Board of Governors and Academic Boards.
- All third parties acting as fundraising agents or intermediaries on behalf of any institution.

This Policy applies to all categories of funding including tuition fees, government grants, corporate sponsorships, private donations, endowments, research grants, zakat contributions, waqf funds and any other form of financial support received by the Group or any of its institutions.

4. DEFINITIONS

Term	Definition
Donation	A voluntary gift of money, property, securities or in-kind contribution made to an institution without expectation of commercial return.
Endowment	A donation or accumulated fund the principal of which is maintained in perpetuity and the income from which is applied for specified purposes.
Grant	Funding provided by a government body, foundation or other organisation for a specific project, programme or purpose, usually subject to conditions.
Restricted Donation	A donation the use of which is limited by the donor to a specific purpose, programme or activity.
Unrestricted Donation	A donation the use of which is at the discretion of the institution for any purpose consistent with its mission.
Naming Rights	The right granted to a donor to have their name or a nominated name associated with a building, facility, scholarship, chair or programme.
Donor Due Diligence	The process of assessing the identity, source of funds and reputation of a prospective donor.
Waqf	An Islamic endowment of property, funds or assets dedicated in perpetuity for charitable or religious purposes.
Zakat	Mandatory Islamic charitable giving; when received by an institution as a donation, subject to the conditions of this Policy.
AML	Anti-Money Laundering — measures to prevent the proceeds of crime being introduced into legitimate financial systems.

Fundraising	Any activity undertaken by the Group or its agents to solicit or attract donations, sponsorships or philanthropic support.
Sustainable Funding	A diversified, ethically sound and long-term approach to financing the Group's operations and strategic ambitions.

5. LEGISLATIVE AND REGULATORY FRAMEWORK

Legislation / Guideline	Relevance
Private Higher Educational Institutions Act 1996 (Act 555) & Amendments	Financial management, governance and regulatory oversight of private HEIs.
Malaysian Qualifications Agency Act 2007 (Act 679)	Quality assurance requirements including financial sustainability for programme delivery.
Companies Act 2016 (Act 777)	Corporate governance, financial reporting and director duties for Group entities.
Income Tax Act 1967 (Act 53) — Section 44	Tax exemption for approved institutions; conditions for deductibility of donations.
Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (AMLATFPUAA)	Obligations to conduct donor due diligence and report suspicious transactions.
Malaysian Anti-Corruption Commission Act 2009 (Act 694)	Prohibition of corrupt donations; gifts and hospitality rules.
Wakaf (State) Enactments / Waqf Legislation	Requirements applicable to waqf funds and Islamic charitable endowments.
Personal Data Protection Act 2010 (Act 709)	Data protection obligations in respect of donor information.
Financial Reporting Standards (MFRS / MPERS)	Accounting and disclosure standards for donated assets and endowments.
MOHE / MQA Financial Sustainability Guidelines	Regulatory expectations for financial stability and diversity of income for private HEIs.

PART B: SUSTAINABLE FUNDING

6. SUSTAINABLE FUNDING STRATEGY

6.1 Funding Philosophy

The Group adopts a diversified, mission-aligned approach to sustainable funding. No single source of funding shall be so dominant as to create financial dependency or expose any institution to undue influence. The Group shall maintain a funding portfolio that is balanced, resilient and oriented toward long-term institutional health.

6.2 Income Diversification Framework

Income Stream	Target Portfolio Range	Notes
Tuition Fees and Student Charges	50% – 70%	Core revenue; to be managed with fee transparency and student affordability in mind.
Government Grants and Subsidies	5% – 15%	Including PTPTN, JPA, MARA, research grants and MoE allocations.
Corporate Sponsorships and Partnerships	5% – 15%	Subject to independence safeguards in this Policy.
Private Donations and Endowments	5% – 10%	Subject to donor due diligence and acceptance criteria.
Research Grants (local and international)	5% – 10%	Including competitive research funding.
Ancillary / Commercial Revenue	2% – 8%	Rental income, executive education, consultancy, events.
Islamic Financing (Waqf, Zakat, Sukuk)	2% – 5%	Subject to Shariah compliance review where applicable.

The Board of Directors, on the recommendation of the Group Finance Committee, shall review and adjust the target portfolio ranges as part of the Group's annual strategic and financial planning cycle.

6.3 Long-Term Financial Sustainability

Each institution shall maintain sufficient financial reserves to sustain at least six (6) months of operating expenditure. The Group shall conduct an annual financial sustainability assessment, with results reported to the Board, MOHE and MQA as required.

7. PERMISSIBLE AND IMPERMISSIBLE FUNDING SOURCES

7.1 Permissible Funding Sources

The Group and its institutions may accept funding from the following sources, subject to the due diligence and approval requirements of this Policy:

- Students' tuition fees, programme fees, examination fees and other student charges.

- Malaysian government ministries, agencies and statutory bodies (e.g. MOHE, MoF, MARA, JPA).
- State government bodies and state development corporations.
- Recognised private corporations and businesses, provided independence conditions are met.
- Foundations, trusts and philanthropic organisations with verifiable good standing.
- Individual donors — subject to donor due diligence.
- International organisations, development banks and foreign foundations (e.g. UN agencies, World Bank, British Council) — subject to foreign funding review.
- Competitive research grants from recognised domestic and international funding bodies.
- Waqf and zakat institutions duly constituted under Malaysian law.

7.2 Impermissible Funding Sources

The Group shall not accept, solicit or retain funding from:

Category	Rationale
Individuals or entities subject to sanctions under Malaysian or international law	Legal compliance; AML/CFT obligations.
Entities or persons known to be involved in criminal activity, corruption or terrorism	Reputational and legal risk; AMLATFPUAA obligations.
Tobacco, gambling, alcohol or weapons industries (direct funding)	Incompatible with institutional values and educational mission.
Donors who seek to control, direct or unduly influence academic content, research outcomes or admissions decisions	Preservation of academic independence.
Anonymous donors giving more than RM 50,000 in a single transaction	AML/CFT compliance; inability to conduct adequate due diligence.
Politically partisan donors who attach political conditions to funding	Institutional independence and neutrality.
Entities under investigation for financial crime or fraud	Reputational and legal risk.

7.3 Grey-Area Funding

Where a proposed funding source does not clearly fall within either category above, the Head of Finance shall refer the matter to the Sustainable Funding and Donations Committee (SFDC) for determination. The SFDC shall apply a risk-based assessment using the Donor Due Diligence framework in Section 14 of this Policy.

8. TUITION FEES AND STUDENT FINANCING

8.1 Fee Setting

1. Tuition fees shall be set by the Board of Directors on the recommendation of the Group Finance Committee, in accordance with MOHE/MQA requirements and market benchmarking.

2. Fee structures shall be transparent, published in advance and applied consistently.
3. Any proposed fee increase of more than 5% shall require Board approval and advance notice to enrolled students of at least one (1) academic year.

8.2 Student Financial Assistance

Each institution shall maintain a portfolio of financial assistance mechanisms including:

- Merit-based and need-based scholarships funded by the institution.
- PTPTN loan facilitation and information services.
- JPA, MARA, state government and corporate bursary programmes.
- Flexible instalment payment plans.
- Emergency hardship funds for students in genuine financial difficulty.

8.3 Affordability Commitment

The Group commits to ensuring that financial hardship is not a barrier to accessing quality higher education. Each institution shall annually review the accessibility of its fee structure and financial assistance portfolio and report findings to the Board.

9. GOVERNMENT GRANTS AND PUBLIC FUNDING

1. All applications for government grants shall be approved by the Head of Finance and the Head of Institution prior to submission.
2. Grant applications shall accurately represent the institution's capacity, plans and use of funds.
3. Government grants shall be applied strictly for their designated purpose; any proposed variation in use shall be communicated to the granting authority and documented.
4. All conditions and reporting obligations attached to government grants shall be fulfilled accurately and on time.
5. Government grant income and expenditure shall be separately tracked and reported in the institution's financial accounts.

10. COMMERCIAL REVENUE AND ANCILLARY INCOME

Ancillary and commercial income streams (including rental of facilities, executive education programmes, consultancy services, and events) are permitted provided they:

- Do not interfere with the primary academic mission of the institution.
- Are conducted at arm's length on commercial terms.
- Do not create conflicts of interest or reputational risk.
- Are properly accounted for and reported.

Corporate partnerships that include research collaboration, curriculum co-development or placement programmes shall be governed by a written agreement approved by the Head of Institution and the Group Legal Advisor, incorporating academic independence safeguards.

11. INTERNATIONAL AND CROSS-BORDER FUNDING

Funding from foreign sources — including foreign governments, international foundations, overseas corporations and non-resident individuals — shall be subject to the following additional requirements:

- Compliance with all Malaysian laws governing foreign funding to educational institutions.
- Disclosure to MOHE where required under applicable regulations.
- Enhanced donor due diligence (Level 2 — see Section 14).
- SFDC approval for any single foreign donation exceeding RM 100,000.
- Assessment of whether any foreign funding conditions could compromise the Group's obligations under Malaysian law or regulatory requirements.

PART C: DONATIONS, ENDOWMENTS AND PHILANTHROPY

12. DONATIONS POLICY — GENERAL PRINCIPLES

The Group welcomes philanthropic support for its institutions, programmes, scholarships, research and facilities. All donations shall be managed in accordance with the following principles:

Principle	Application
Voluntary	No person shall be coerced, pressured or misled into making a donation.
Purposeful	Each donation shall be directed toward a clear institutional purpose that is agreed with the donor.
Independent	No donation shall grant a donor the right to direct academic decisions, influence governance or determine outcomes.
Transparent	All significant donations shall be disclosed in accordance with this Policy.
Accountable	Donated funds shall be applied for their stated purpose; donors shall receive appropriate stewardship reports.
Sustainable	Donations shall be invested or applied in ways that generate long-term benefit for the institution and its students.

13. CATEGORIES AND TYPES OF DONATIONS

Category	Description	Minimum Threshold for Formal Process
Cash Donation	Direct monetary gift by bank transfer, cheque or electronic payment.	Any amount (Form DGAF-001 required for RM 1,000 and above)
In-Kind Donation	Non-cash gifts including equipment, books, software, artwork, laboratory materials.	Fair value RM 1,000 and above
Scholarship / Bursary Fund	Donation restricted for provision of student financial assistance.	RM 5,000 and above (minimum to establish a named fund)
Research Grant (Philanthropic)	Donation to support a specific research project or programme — distinct from competitive grants.	Any amount; formal agreement required
Capital / Infrastructure Donation	Donation for construction, renovation, purchase or upgrade of physical facilities.	Any amount; capital acceptance process applies
Endowment	Donation the principal of which is maintained in perpetuity; income applied for designated purpose.	RM 50,000 minimum to establish a named endowment
Waqf	Islamic perpetual endowment; subject to Shariah advisory review.	As specified by the relevant Waqf authority
Planned / Legacy Gift	Bequest, life insurance nomination or trust arrangement in favour of the institution.	As agreed in estate or trust documents
Corporate Sponsorship (Philanthropic)	Corporate donation without commercial quid pro quo (distinguished from commercial sponsorship).	RM 5,000 and above

14. DONOR DUE DILIGENCE

14.1 Requirement

All prospective donors shall be subject to due diligence before any donation is formally accepted. The level of due diligence required is risk-tiered as follows:

Level	Applicable Donors	Minimum Due Diligence Steps
Level 1 — Standard	Individual donors giving less than RM 50,000; established Malaysian public companies or government agencies.	Verify identity (IC/passport); confirm source of gift is personal/business income; screen against sanctions lists.
Level 2 — Enhanced	Individual donors giving RM 50,000 – RM 500,000; private companies; foreign donors; foundations; donors with political connections.	Level 1 steps PLUS: source of wealth declaration; beneficial ownership verification; adverse media check; SFDC review.
Level 3 — Intensive	Donors giving more than RM 500,000; anonymous donors (refused above RM 50,000); donors from high-risk jurisdictions; donors in sensitive industries.	Level 2 steps PLUS: independent legal / compliance review; Board approval; formal legal agreement; enhanced monitoring.

14.2 Screening

All donors shall be screened against:

- The United Nations Security Council Consolidated Sanctions List.
- Bank Negara Malaysia's list of designated entities under AMLATFPUAA.
- MACC and other domestic enforcement databases (where accessible).
- Adverse media searches via reputable databases.

14.3 Red Flags

The following shall trigger escalation to Level 3 due diligence or outright refusal:

- Donor insists on anonymity for a gift exceeding RM 50,000.
- Source of funds is unclear or inconsistent with known donor profile.
- Donation is structured as multiple smaller payments to avoid disclosure thresholds.
- Donor attaches conditions that could compromise academic or institutional independence.
- Donor is subject to regulatory investigation, sanctions or adverse media.

15. NAMING RIGHTS AND RECOGNITION

15.1 Policy

The Group recognises that naming rights — the association of a donor's name with a building, facility, scholarship, professorial chair or programme — are a meaningful form of recognition and a valuable tool for major gift fundraising. Naming rights shall be governed by the following:

Type of Naming	Minimum Donation Threshold	Approval Authority	Agreement Required
Scholarship / Award / Prize	RM 10,000	Head of Institution	NRRA-003
Professorial Chair or Lectureship	RM 250,000	Board of Governors + SFDC	NRRA-003 + Legal Agreement
Laboratory / Teaching Space / Room	RM 100,000	Board of Governors	NRRA-003
Building / Major Facility	RM 1,000,000	Board of Directors	NRRA-003 + Legal Agreement
Programme / Faculty / School	RM 5,000,000	Board of Directors + MOHE (if regulatory approval required)	NRRA-003 + Legal Agreement

15.2 Conditions on Naming Rights

- Naming rights do not confer any governance role, academic influence or decision-making authority.
- The institution reserves the right to remove or suspend naming recognition if the donor's conduct becomes incompatible with institutional values.
- Naming rights agreements shall specify a duration (typically 10–25 years for facilities) after which renewal may be negotiated.

16. RESTRICTED AND UNRESTRICTED DONATIONS

16.1 Restricted Donations

A restricted donation shall be used only for the purpose agreed with the donor and documented in the relevant form or agreement. If the agreed purpose becomes impractical, impossible or contrary to institutional policy, the institution shall notify the donor and seek their consent to redirect the funds to a cognate purpose. If consent cannot be obtained, the institution shall seek legal advice on the appropriate disposition.

16.2 Unrestricted Donations

Unrestricted donations provide the institution with the greatest flexibility to apply funds where they are most needed. The SFDC, on the recommendation of the Head of Finance, shall determine the application of unrestricted donations in alignment with institutional strategic priorities.

16.3 Stewardship

All donors of RM 5,000 and above shall receive:

- A formal receipt and tax exemption letter (where applicable under Section 44 of the Income Tax Act 1967).
- An annual stewardship report on the use of their donation.
- Appropriate recognition in institutional publications (unless the donor has requested anonymity).

17. ENDOWMENT FUND MANAGEMENT

17.1 Establishment

An endowment fund may be established upon receipt of a minimum gift of RM 50,000, subject to Board approval and the execution of an endowment agreement specifying the purpose, investment mandate and distribution policy.

17.2 Investment

Endowment funds shall be invested in accordance with the BAC Education Group Sustainable Investing Policy (BAC-SIP-2025-003). Investment decisions shall be made by the Group Finance Committee with advice from the appointed investment manager. The principal of each endowment shall be preserved; only the investment return (subject to a spending policy) shall be distributed.

17.3 Spending Policy

The annual distribution from each endowment shall not exceed five percent (5%) of the average fund value over the preceding three years, unless the Board approves an exception in extraordinary circumstances. Any undistributed return shall be reinvested to protect the real value of the endowment against inflation.

17.4 Reporting

An annual endowment report shall be provided to each endowment donor, the Board and, where required, to MOHE. The report shall include the fund's market value, investment return, distributions made and cumulative impact.

18. REFUSAL AND RETURN OF DONATIONS

The Head of Institution, with SFDC endorsement, may refuse any proposed donation at any stage of the process. The Group may return a donation already received where:

- Due diligence reveals that the donor does not meet the acceptance criteria.
- The donation was made on the basis of false or misleading representations.
- Acceptance or retention of the donation would violate Malaysian law.
- The donor subsequently attempts to impose conditions that compromise institutional independence.
- Retaining the donation would cause significant reputational harm.

The return of a donation shall be documented and the reasons noted in the SFDC minutes. Legal advice shall be obtained where the return of the donation may give rise to a legal dispute.

PART D: GOVERNANCE AND ACCOUNTABILITY

19. GOVERNANCE STRUCTURE

19.1 Sustainable Funding and Donations Committee (SFDC)

The Board of Directors shall establish a Sustainable Funding and Donations Committee (SFDC) with the following composition:

Position	Role
Board Member (Non-Executive) — Chair	Independent oversight and final decision authority on donations above RM 100,000.
Group Chief Executive Officer	Strategic oversight; institutional perspective.
Group Chief Financial Officer (or equivalent)	Financial assessment; stewardship.
Group Legal Advisor / Compliance Officer	Legal due diligence; AML compliance.
Head of Finance (each institution, rotating)	Institutional representation.
Independent Member (external appointment)	Philanthropic sector expertise; objectivity.

The SFDC shall meet at least quarterly and shall be responsible for: approving donations above defined thresholds; overseeing donor due diligence; managing the endowment portfolio; reviewing funding strategy; and reporting to the Board on the Group's funding sustainability.

19.2 Institutional Funding Officers

Each institution shall designate a Funding Officer (typically the Head of Finance or equivalent) responsible for day-to-day management of donations, grant administration, donor relations and compliance with this Policy at the institutional level.

20. FINANCIAL MANAGEMENT AND TRANSPARENCY

1. All donations and funding receipts shall be recorded in the institution's financial accounts in accordance with applicable Malaysian Financial Reporting Standards (MFRS / MPERS).
2. Donated assets shall be valued at fair value at the date of receipt and recognised as income (or deferred income for restricted donations) in accordance with MFRS.
3. Endowment funds shall be maintained as separate investment portfolios and reported separately in the Group's consolidated financial statements.
4. No donation or funding receipt shall be received in cash in excess of RM 10,000; payments above this threshold shall be by bank transfer, cheque or other traceable means.
5. The Group's external auditors shall have full access to all donation and funding records.

21. REPORTING AND DISCLOSURE

Report	Content	Frequency	Recipients
SFDC Activity Report	Donations received, refused or returned; due diligence outcomes; endowment performance.	Quarterly	Board of Directors
Annual Funding Sustainability Report	Income diversity; funding portfolio analysis; endowment report; stewardship summary.	Annual	Board, MOHE, MQA (where required)
Donor Stewardship Reports	Individual reports to donors of RM 5,000 and above on use of their donation.	Annual	Individual Donors
Tax Exemption Letters	Confirmation for Section 44 deductibility where applicable.	Per donation	Relevant Donors
AML Suspicious Transaction Reports	Reports of suspicious transactions as required under AMLATFPUAA.	As required	Bank Negara Malaysia

22. ANTI-MONEY LAUNDERING COMPLIANCE

The Group is committed to ensuring that its fundraising activities are not used to launder the proceeds of crime or finance terrorism. In accordance with AMLATFPUAA 2001:

- All donations above RM 1,000 shall be received by bank transfer or other traceable means.
- All donors shall be identified and their identity verified before a donation is accepted.
- The Group shall maintain records of all donations, donor identification and due diligence for a minimum of seven (7) years.
- Any suspected money laundering or terrorism financing activity shall be reported to the Financial Intelligence Unit of Bank Negara Malaysia without tipping off the donor.
- Staff involved in fundraising and donations management shall receive annual AML/CFT awareness training.

PART E: STANDARD OPERATING PROCEDURES AND FORMS

SOP 1: DONATION RECEIPT AND PROCESSING PROCEDURE

SOP Reference	BAC-SOP-DON-001
Applies To	All Staff Involved in Donations — All Institutions
Owner	SFDC / Group Finance Office
Version	1.0 Effective 01 July 2025

Purpose

To establish a consistent, compliant and auditable procedure for receiving, processing, recording and acknowledging donations across all institutions within the Group.

Step	Action	Responsible	Timeline	Document
1	Prospective donor expresses interest in making a donation (by phone, email, meeting or referral).	Funding Officer	Upon contact	—
2	Funding Officer provides donor with an overview of the institution's funding priorities and donation categories, and issues Form DGAF-001 for completion.	Funding Officer	Within 3 working days	DGAF-001
3	Donor completes and returns Form DGAF-001 together with supporting due diligence documents (Form DDDD-002 for donations ≥ RM 10,000).	Donor	Per donor's timeline	DGAF-001, DDDD-002
4	Funding Officer conducts initial due diligence screening (Level 1, 2 or 3 as applicable — see Section 14). Any red flags escalated to SFDC immediately.	Funding Officer + Compliance Officer	Within 5 working days of receipt	Due Diligence Report
5a	Donation below RM 100,000 and due diligence clear: Head of Institution approves acceptance.	Head of Institution	Within 5 working days	Approval Record
5b	Donation RM 100,000 – RM 500,000: SFDC review and approval required.	SFDC	Within 15 working days	SFDC Minutes
5c	Donation above RM 500,000 or naming rights involved: Board approval required.	Board / Board Committee	Within 30 working days	Board Resolution
6	Upon approval, formal acceptance communicated to donor in writing.	Funding Officer	Within 3 working days of approval	Acceptance Letter
7	Donation received by bank transfer to designated institutional account. Cash prohibited above RM 1,000.	Finance Office	Per donor	Bank Records
8	Donation recorded in financial accounts; receipt and tax	Finance Office	Within 5 working days of receipt	Official Receipt / Tax Letter

	exemption letter issued to donor (if applicable).			
9	For restricted donations: separate fund code created; use restricted per agreed purpose.	Finance Office	Immediately upon receipt	Fund Ledger
10	Stewardship: annual report on donation use sent to donor.	Funding Officer	Annual	Stewardship Report

SOP 2: DONOR DUE DILIGENCE PROCEDURE

SOP Reference	BAC-SOP-DDD-002
Applies To	Funding Officers and Compliance Officers — All Institutions
Owner	SFDC / Group Compliance Office
Version	1.0 Effective 01 July 2025

Purpose

To provide detailed guidance on the conduct of donor due diligence at each risk level, ensuring compliance with AMLATFPUAA and the Group's Sustainable Funding and Donations Policy.

Step	Level 1 (Standard)	Level 2 (Enhanced)	Level 3 (Intensive)
Identity Verification	Copy of NRIC / Passport; Company registration (for entities).	All Level 1 steps.	All Level 2 steps.
Source of Funds	Confirmation that gift is from personal/business income; no further documentation required.	Signed Source of Wealth Declaration; bank statement excerpt; latest financial statements for entities.	Independent verification of source of wealth; legal opinion; full AML audit trail.
Beneficial Ownership	N/A (individual) or basic company search.	Beneficial ownership register; declaration of ultimate beneficial owner.	Full beneficial ownership verification including offshore structures.
Sanctions Screening	UNSC and BNM lists.	UNSC, BNM, MACC, Interpol and adverse media search.	All Level 2 screening PLUS specialist AML service provider report.
Political Exposure	N/A	Check if donor is a Politically Exposed Person (PEP) or associate.	Enhanced PEP review; source of wealth for PEPs is mandatory.
Approval Required	Head of Finance	SFDC	Board of Directors + Legal Review
Monitoring	Standard stewardship.	Annual re-screening for ongoing relationships.	Ongoing monitoring; bi-annual re-screening.

Where a donor declines to provide information necessary for due diligence, the donation shall be declined. Where a suspicious transaction is identified during due diligence, the Compliance Officer shall file a Suspicious Transaction Report (STR) with Bank Negara Malaysia's Financial Intelligence Unit without delay and without tipping off the donor.

BAC EDUCATION GROUP*Brickfields Asia College | IACT College | Reliance College | Veritas University College | UNIMY***DONATION / GIFT OFFER AND ACCEPTANCE FORM**

Form Reference	DGAF-001 Version 1.0
Version / Date	01 July 2025
Institution	☐ Brickfields Asia College ☐ IACT College ☐ Reliance College ☐ Veritas University College ☐ UNIMY

SECTION A: DONOR DETAILS**Full Name / Organisation Name:** _____**NRIC / Passport No. / Company Registration No.:** _____**Address:** _____**Contact Email:** _____**Contact Phone:** _____**Type of Donor:**

- ☐ Individual
☐ Private Company
☐ Public Listed Company
☐ Foundation / Trust / Association
☐ Government / Statutory Body
☐ Foreign Entity / International Organisation
☐ Other: _____

SECTION B: DONATION DETAILS**Type of Donation:** _____**Category (refer to Section 13 of Policy):**

- ☐ Cash Donation
☐ In-Kind Donation (specify below)
☐ Scholarship / Bursary Fund
☐ Research Grant (Philanthropic)
☐ Capital / Infrastructure Donation
☐ Endowment
☐ Waqf
☐ Planned / Legacy Gift
☐ Corporate Sponsorship (Philanthropic)

Amount / Estimated Fair Value: RM _____

Description of In-Kind Donation (if applicable):

Donation Type:

- ☐ Unrestricted — I wish the institution to apply this donation at its discretion.
- ☐ Restricted — I wish this donation to be applied for the following specific purpose:

Proposed Donation Date / Schedule:**SECTION C: NAMING AND RECOGNITION**

Do you wish to be recognised for this donation?

- ☐ Yes — please acknowledge my/our donation as follows: _____
- ☐ No — I/we prefer to remain anonymous.

Do you wish to apply for naming rights (see Section 15 of Policy)?

- ☐ Yes — please contact me to discuss (Form NRRA-003 will be required).
- ☐ No.

SECTION D: SOURCE OF FUNDS DECLARATION

I confirm that the funds or assets offered as a donation are from legitimate sources and are not derived from any unlawful activity. I understand that the Group is required by law to conduct donor due diligence and to report suspicious transactions to the relevant authorities.

Source of Funds: (e.g. personal savings, business income, inheritance, sale of property)**SECTION E: DECLARATION AND SIGNATURE**

I/We declare that the information provided in this form is true and accurate. I/We understand and agree that the Group reserves the right to refuse or return this donation in accordance with its Sustainable Funding and Donations Policy.

Signature

Designation

Name (Block Letters)

Date

FOR OFFICIAL USE ONLY:

Date Received	Due Diligence Level	Approval Authority	Decision	Date of Decision
	L1 / L2 / L3		Accepted / Declined	

BAC EDUCATION GROUP*Brickfields Asia College | IACT College | Reliance College | Veritas University College | UNIMY***DONOR DUE DILIGENCE DECLARATION**

Form Reference	DDDD-002 Version 1.0
Version / Date	01 July 2025
Institution	☐ Brickfields Asia College ☐ IACT College ☐ Reliance College ☐ Veritas University College ☐ UNIMY

This form must be completed by all donors making a donation of RM 10,000 or above, or as otherwise required under the Group's donor due diligence framework.

SECTION A: DONOR IDENTITY

Full Legal Name: _____

Date of Birth / Date of Incorporation: _____

Nationality / Country of Incorporation: _____

NRIC / Passport / Company Registration No.: _____

Registered Address: _____

SECTION B: BENEFICIAL OWNERSHIP (for entities)

Please list all persons who ultimately own or control more than 25% of the donating entity:

Name of Beneficial Owner	Nationality	% Ownership / Control	NRIC / Passport No.

SECTION C: SOURCE OF WEALTH

Please describe the source of the funds or assets being donated:

- ☐ Business income / profits (specify business): _____
☐ Employment income
☐ Investment returns / dividends
☐ Sale of property or assets
☐ Inheritance or gift
☐ Other (specify): _____

Supporting Documentation Attached: _____

SECTION D: POLITICAL EXPOSURE

Are you, or is any beneficial owner, a Politically Exposed Person (PEP) — i.e. a person who holds or has held a prominent public function (e.g. government minister, senior official, judge, military officer, political party officer)?

☐ No

☐ Yes — please provide details: _____

SECTION E: DECLARATION

I/We declare that the information provided is true and complete. I/We confirm that the funds or assets to be donated are from legitimate sources and are not the proceeds of any unlawful activity. I/We consent to the Group verifying this information through independent checks as part of its due diligence process.

Signature

Designation

Name (Block Letters)

Date

FOR OFFICIAL USE ONLY — Due Diligence Outcome:

Screened By	Date	Sanctions Clear?	PEP Check	Outcome	Escalated to SFDC?
		☐ Y ☐ N	☐ Y ☐ N	Pass / Refer / Fail	☐ Y ☐ N

BAC EDUCATION GROUP*Brickfields Asia College | IACT College | Reliance College | Veritas University College | UNIMY***NAMING RIGHTS AND RECOGNITION AGREEMENT**

Form Reference	NRRA-003 Version 1.0
Version / Date	01 July 2025
Institution	☐ Brickfields Asia College ☐ IACT College ☐ Reliance College ☐ Veritas University College ☐ UNIMY

This agreement records the terms under which naming rights are granted by the Institution to the Donor in recognition of a significant philanthropic contribution.

SECTION A: PARTIES

Institution: _____

Donor / Naming Party: _____

Donation Amount: RM _____

SECTION B: NAMING DETAILS

Name to be Applied: _____

Type of Naming:

- ☐ Scholarship / Prize / Award
- ☐ Professorial Chair / Lectureship
- ☐ Laboratory / Teaching Space
- ☐ Building / Major Facility
- ☐ Programme / School / Faculty

Specific Facility / Programme / Award to be Named:

Duration of Naming Rights: From: _____ To: _____ (or perpetual if endowment)

SECTION C: CONDITIONS AND RESERVATIONS

The parties agree to the following conditions:

1. The naming rights granted under this agreement do not confer on the Donor any right to participate in or influence the governance, academic decisions, admissions, hiring or research activities of the Institution.
2. The Institution reserves the right to remove or suspend the naming recognition if the Donor's conduct becomes materially incompatible with the Institution's values, as determined by the Board.
3. In the event that the named facility is substantially modified, relocated or decommissioned, the Institution shall consult the Donor and use reasonable efforts to find an appropriate alternative recognition.

4. The Donor's name and details may be used in institutional publications, websites and promotional materials for recognition purposes.
5. This agreement is governed by the laws of Malaysia.

SECTION D: SIGNATURES

Signed on behalf of the Institution:

Signature

Designation

Name (Block Letters)

Date

Signed by the Donor:

Signature

Designation

Name (Block Letters)

Date

BAC EDUCATION GROUP*Brickfields Asia College | IACT College | Reliance College | Veritas University College | UNIMY***ANNUAL FUNDING AND DONATIONS DISCLOSURE**

Form Reference	AFDD-004 Version 1.0
Version / Date	01 July 2025
Institution	☐ Brickfields Asia College ☐ IACT College ☐ Reliance College ☐ Veritas University College ☐ UNIMY

This form shall be completed by the Head of Finance of each Institution and submitted to the Group Finance Office by 31 March each year for the preceding financial year.

SECTION A: INSTITUTION DETAILS

Institution Name: _____

Financial Year: 1 January _____ to 31 December _____

Prepared By: _____

Date of Preparation: _____

SECTION B: FUNDING SUMMARY

Income Stream	Budgeted (RM)	Actual (RM)	% of Total Income	Notes
Tuition Fees and Student Charges				
Government Grants and Subsidies				
Corporate Sponsorships / Partnerships				
Private Donations (cash)				
In-Kind Donations (fair value)				
Research Grants (philanthropic)				
Endowment Income				
Ancillary / Commercial Revenue				
Islamic Financing (Waqf / Zakat)				
Other				
TOTAL			100%	

SECTION C: SIGNIFICANT DONATIONS (RM 5,000 AND ABOVE)

Donor Name / Anonymous	Amount (RM)	Type	Restricted/Unrestricted	Purpose (if Restricted)	SFDC/Board Approved?

SECTION D: DONATIONS REFUSED OR RETURNED

Donor (or 'Anonymous')	Amount (RM)	Reason for Refusal / Return	Date

SECTION E: ENDOWMENT FUND SUMMARY

Fund Name	Purpose	Opening Value (RM)	Contributions (RM)	Investment Return (RM)	Distributions (RM)	Closing Value (RM)

SECTION F: DECLARATION

I declare that the information provided in this Annual Funding and Donations Disclosure is true and accurate to the best of my knowledge, and that the Institution has complied with the BAC Education Group Sustainable Funding and Donations Policy during the period covered.

 Signature

 Designation

 Name (Block Letters)

 Date

REVIEWED AND ENDORSED BY:

 Signature

 Designation

 Name (Block Letters)

 Date

POLICY APPROVAL AND SIGN-OFF

This **Sustainable Funding and Donation Policy** was reviewed, approved and adopted by the Board of Directors of BAC Education Group as well as all related Public Higher Education Institution (PHEI) and shall be open for review on **1 July 2027**