



Organisational Anti-Corruption Plan

Pelan Antirasuah Organisasi

Rise with
Integrity

OACP

Organisational Anti-Corruption Plan

RHB's Statement of Commitment

Dear Stakeholders,



On behalf of the Board of Directors, I am pleased to present the RHB Banking Group (the “Group”) Organisational Anti-Corruption Plan (“OACP”) which reflects our determination in eliminating corruption within the financial industry.

As one of the leading financial institutions in the country, we view the act of corruption as a corrosive practice that undermines an organisation’s credibility and ethical values. The Group has put in place various Policies and Guidelines that anchor our anti-corruption efforts, such as the Group Anti-Bribery & Corruption Policy, Group Whistleblowing Policy, Group Gifts & Hospitality Guideline, Group Corporate Sponsorship & Donation Policy, and the Group Fit & Proper Policy, emphasising strong internal controls towards creating a healthy and conducive business environment.

As such, the OACP is a statement of intent from the Group, and represents an extension of our on-going anti-corruption efforts to deter and abhor possible acts of bribery and corrupt practices. This document serves as a point of reference to the Group’s employees and business partners on the minimum standard of ethical business conduct that is expected of them. Through this, we identify the ‘pain-points’ and provide our commitment to resolve the gaps identified within the targeted timelines.

The OACP highlights our support towards the Government’s efforts in combating corruption through the National Anti-Corruption Plan 2019-2023 (“NACP”). Initiative 6.2.1 of the NACP details the requirements of Statutory Bodies, State-Owned Enterprises, Company Limited by Guarantee and **private sector regulated by regulatory bodies**, including RHB, **to develop their own OACP**. In support of this, we have undergone various due processes over the past 11 months to develop and formulate our inaugural OACP, with assistance and collaboration from various internal and external parties.

Policies and procedures can only accomplish their intended purpose if all RHBians work together as a team and carry out our duties with integrity and diligence across all levels. Hence, the OACP must be driven by the whole organization from the Board of Directors and Senior Management to all RHBians at branch level. It is also our duty to ensure that our service providers and business partners adopt high levels of integrity and diligence in their provision of service for RHB.

Let us work together in our fight against corruption and promote a corruption-free work culture.

Rasuah Dihina!
Maruah Dibina!

Tan Sri Ahmad Badri Mohd Zahir
Chairman, RHB Banking Group
14 November 2022

RHB'S OACP Journey

APPROVAL FROM THE GROUP MANAGING DIRECTOR ON DEVELOPMENT OF OACP

CRM and OACP WORKSHOP

START

AUGUST 2021

- Approval by the Group Managing Director / Group Chief Executive Officer (GMD/GCEO) to develop the Group's OACP
- Establishment of the OACP Taskforce
- Appointment of Independent Subject Matter Expert to facilitate CRM and OACP Workshops
- A group-wide survey on integrity, governance and anti-corruption was conducted

SEPTEMBER – OCTOBER 2021

- 10 workshops were conducted involving 168 participants from various SBGs/SFGs/entities
- Feedback received on key issues relating to integrity, governance and corruption
- Data gathered from various parties were analyzed

CRM and OACP REVIEW 1.0

NOVEMBER - DECEMBER 2021

- CRM and OACP drafts were reviewed by the Taskforce on 17 November, 2 December and 16 December 2021

CRM and OACP DRAFT

NOVEMBER 2021

- First skeleton of OACP and CRM were drafted

CRM & OACP REVIEW 2.0

JANUARY – FEBRUARY 2022

- CRM & OACP drafts were reviewed by appointed consultants on 13 January and 7 February 2022
- Brainstorming sessions among subject matter experts were conducted on 9, 11, 17 and 24 February 2022

CRM & OACP BRIEFING FOR GROUP BOARDS & SENIOR MANAGEMENT

MARCH – APRIL 2022

- A knowledge sharing session on CRM and OACP was conducted for the Group's Board of Directors and Senior Management team on 9 March 2022, facilitated by the consultants

APPROVAL FROM THE BOARD
END

MAY - JUNE 2022

ORGANISATIONAL ANTI-CORRUPTION PLAN (OACP) 2022 – 2026 (5 years)

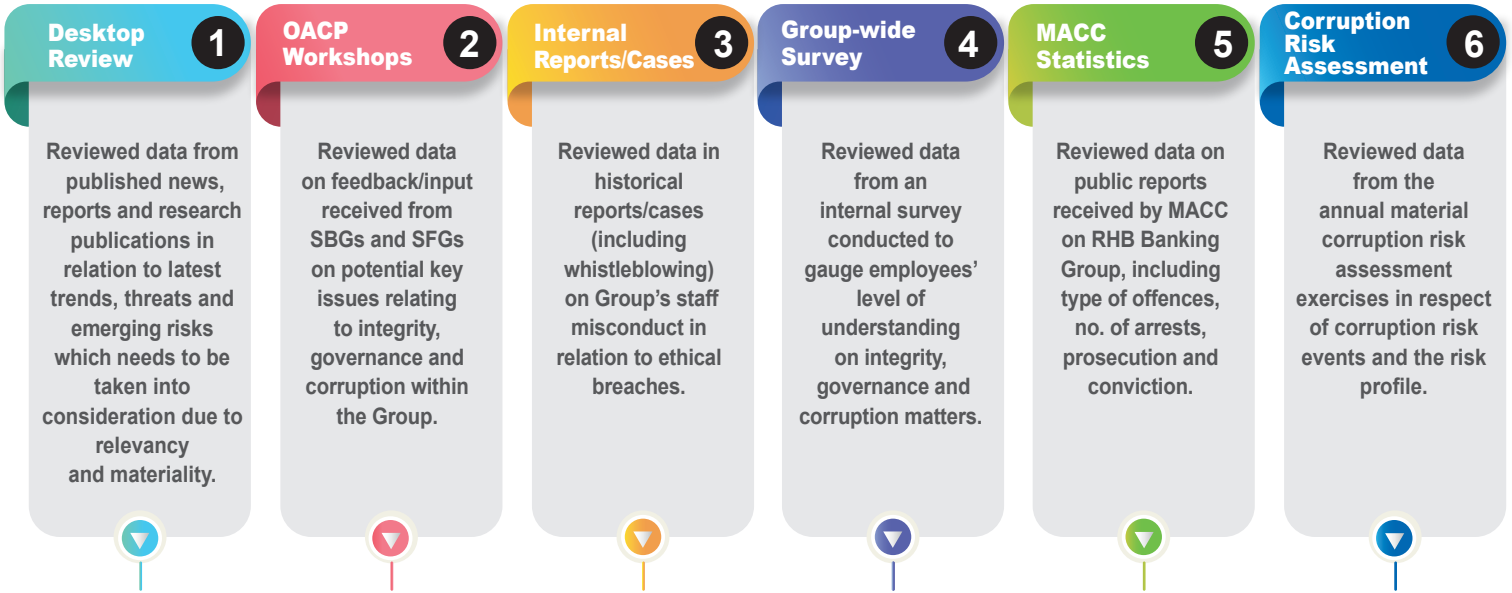
Note:

- CRM** - Corruption Risk Management
- OACP** - Organisational Anti-Corruption Plan
- GIG** - Group Integrity & Governance
- MACC** - Malaysian Anti-Corruption Commission
- SBG/SFG** - Strategic Business Group/Strategic Functional Group



Data Sources

Identifying the key issues relating to integrity, governance and corruption are pivotal in ensuring proper strategies can be crafted and targeted action plans can be carried out effectively. This is to ensure the right actions, including appropriate mitigating mechanisms, are put in place to combat the root causes of bribery and corruption.

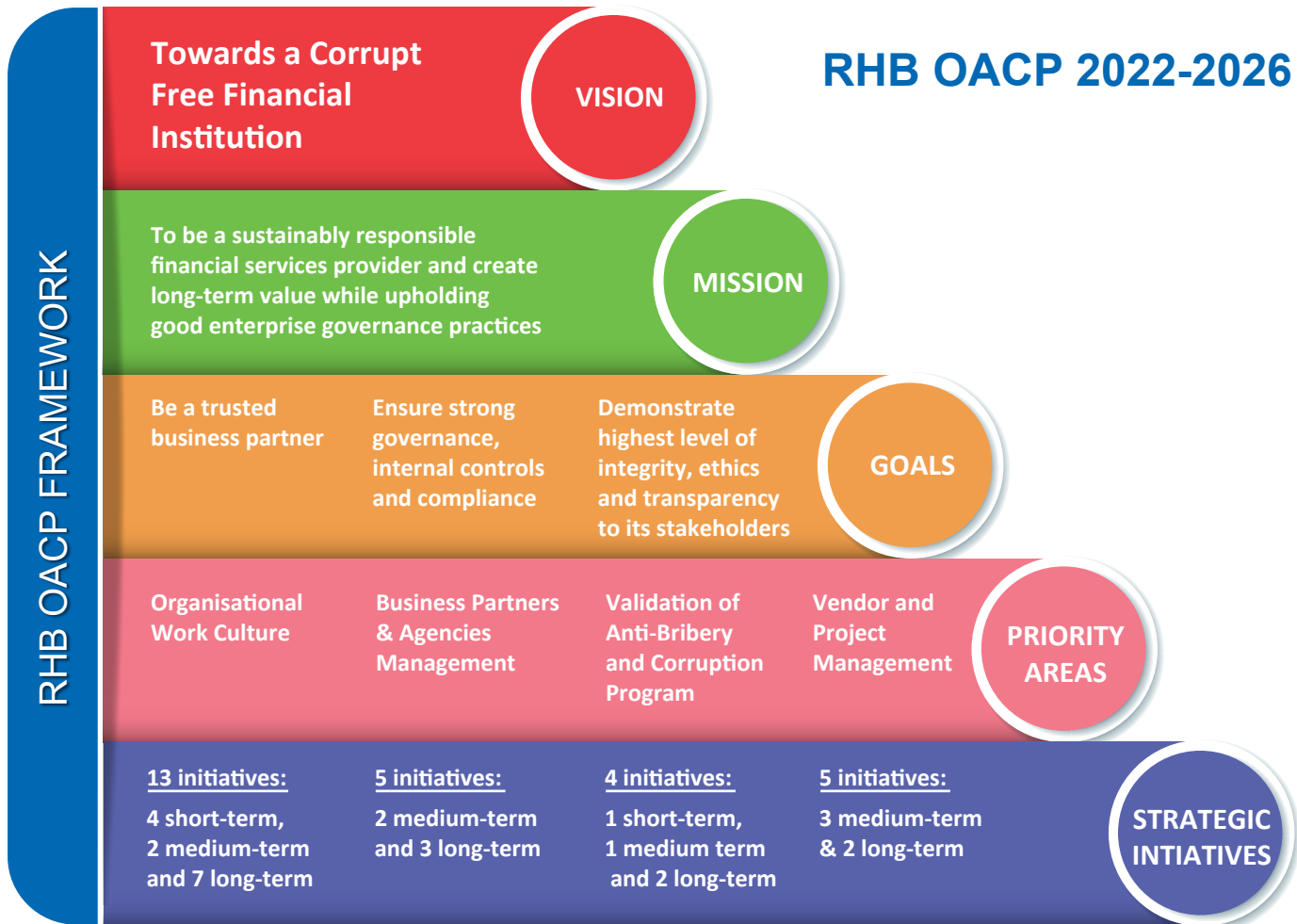


Areas of Concern



RHB's Organisational Anti-Corruption Plan Framework

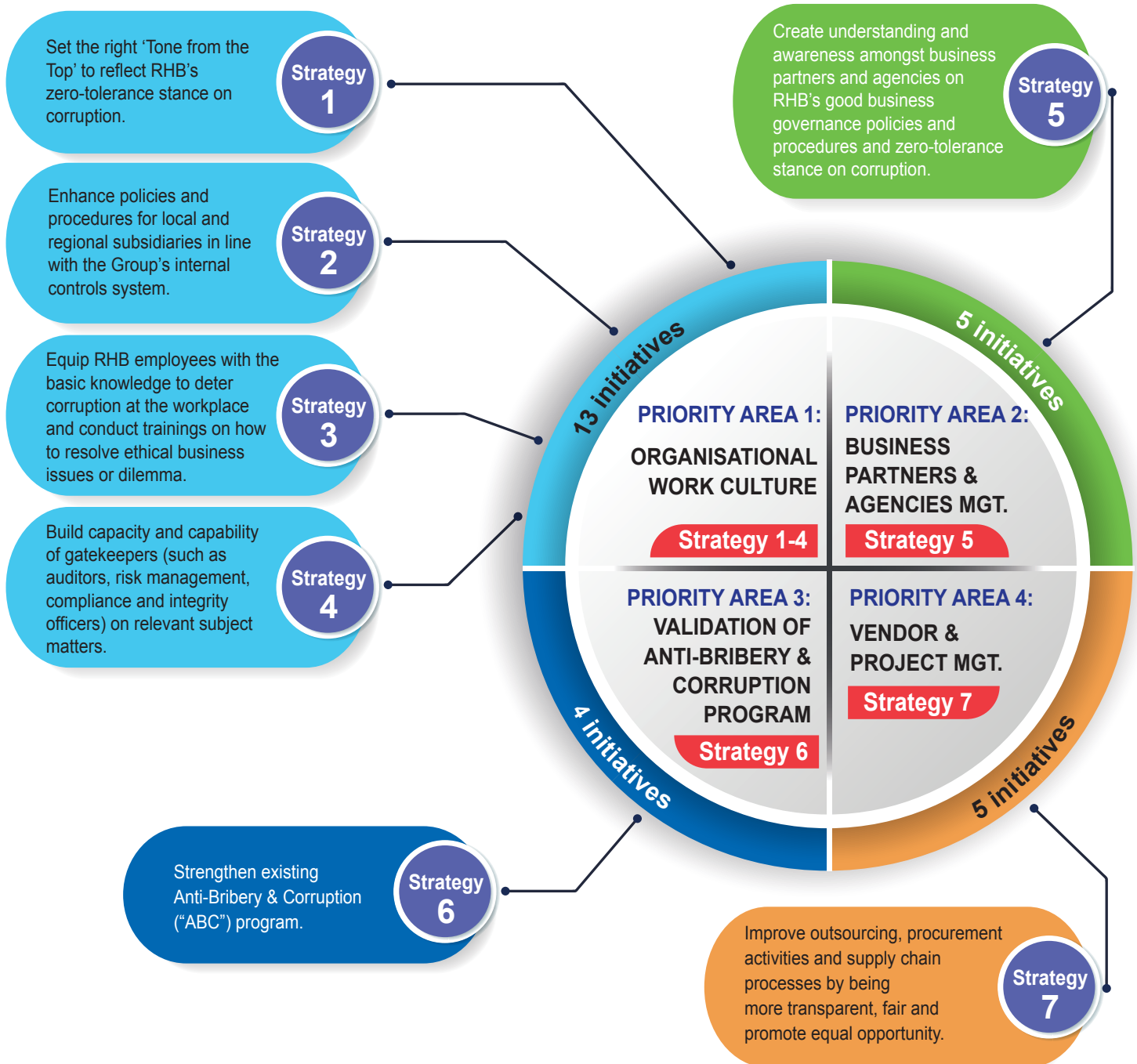
The Group's Organisation Anti-Corruption Plan ("OACP") Framework is developed in line with the Guidelines on Adequate Procedures issued by the Prime Minister's Department pursuant to Subsection 17A(5) under the Malaysian Anti-Corruption Commission Act 2009. This is illustrated as follows:



The implementation of the Group's OACP will be a strategic reference for the Group's employees and business partners in fostering ethical business practices. This in turn ensures a positive impact on the deliverables and services of the Group, in particular, to the customers and service providers, while supporting the country's aspiration in inculcating an efficient, responsive, ethical and corruption-free society.

As such, three (3) main goals of OACP have been identified as integral in asserting the commitment towards combating corruption and enhancing good governance over the next five years.

Formulation of Key Strategies



Implementation Framework

The Group Integrity and Governance team will oversee the implementation of the overall action plan as stated in the OACP. The Board Audit Committee will be updated on a half-yearly basis on the progress of the agreed implementation actions.

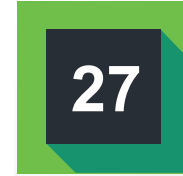
RHB OACP 2022 - 2026



PRIORITY AREAS



STRATEGIC OBJECTIVES



INITIATIVES

The OACP's key priority areas are narrowed down to four main components, namely Organisational Work Culture, Business Partners and Agencies Management, Validation of Anti-Bribery and Corruption Program, as well as Vendors and Project Management. These four priority areas are supported by seven strategic objectives and 27 initiatives, as depicted below:

Priority Areas



Organisational Work Culture

- 4 strategies
- 13 Initiatives



Business Partners & Agencies Management

- 1 strategy
- 5 Initiatives



Validation of Anti-Bribery & Corruption Program

- 1 strategy
- 4 Initiatives

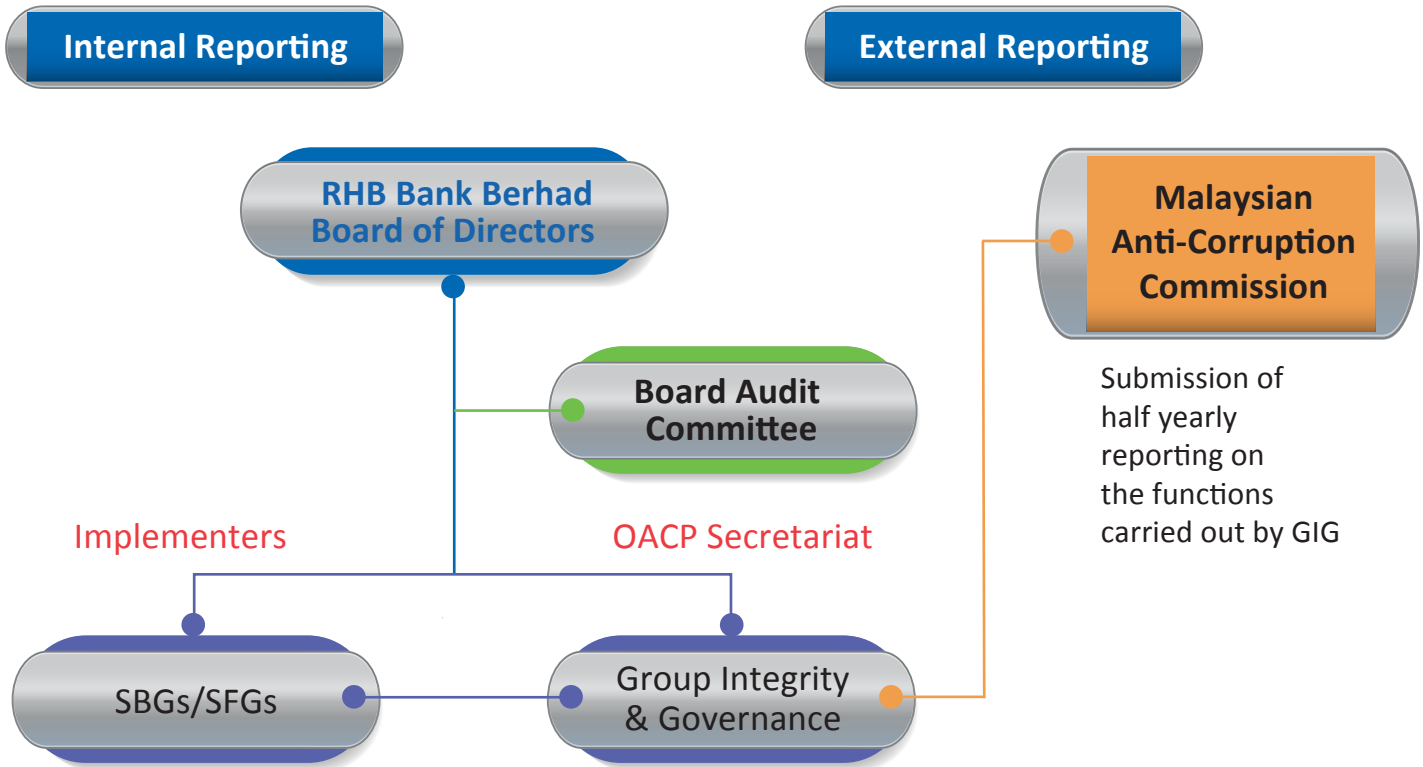


Vendor & Project Management

- 1 strategy
- 5 Initiatives

Coordination, Monitoring & Evaluation

Once the OACP has been established, the diagram below illustrates the governance structure for implementation and monitoring of the management's action plans that have been set:

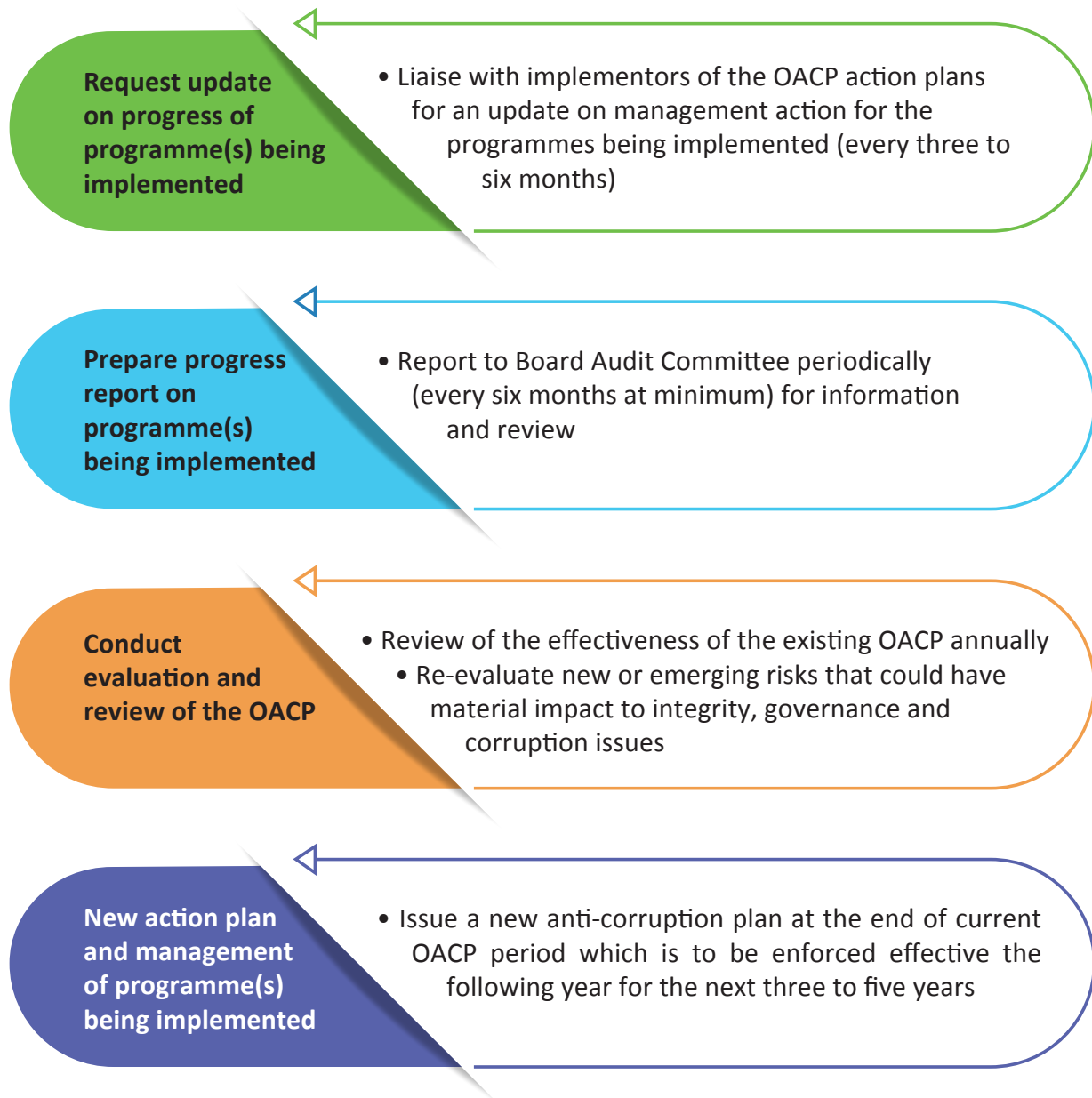


With the Group Integrity & Governance (“GIG”) tasked as the Secretariat, all action plans will be implemented by the respective SBG/SFG/BG/FG identified. All status progress will be reported back to GIG for coordination and monitoring and subsequent reporting to the Board Audit Committee (“BAC”) on a half-yearly basis.

The Board, assisted by BAC, will be guided by the OACP to oversee and monitor the progress of implementation of all the action plans set to ensure all goals and objectives under the OACP are achieved and enhancements of the internal controls are being carried out to safeguard the company from corporate liability under Section 17A of the MACC Act 2009.

The Board has placed strong emphasis on culture and values as they are the bedrock of nurturing integrity and ethical conduct. Through the OACP, the Board is tasked to ensure the required controls and enhancements are carried out over the next five years to protect the company and combat corruption of any kind from RHB Banking Group.

In summary, the implementation of the OACP will be coordinated, monitored and evaluated as detailed below:



ACKNOWLEDGEMENT

Our deepest appreciation and many thanks to the Board of Directors, Senior Management, Advisors, Heads of Department, Representatives of various Sectors and Entities, the Task Force team for this special project, as well as all RHBians who were involved, directly or indirectly, for their significant contribution, commitment and dedication to ensure the success of developing and formulating RHB Banking Group Organisational Anti-Corruption Plan 2022 – 2026.

Pelan Antirasuah Organisasi

Pernyataan Komitmen RHB

Pemegang-Pemegang Taruh Sekalian,



Bagi pihak Lembaga Pengarah, saya dengan sukacitanya memperkenalkan Pelan Antirasuah Organisasi (“OACP”) Kumpulan Perbankan RHB (“Kumpulan” atau “RHB”) yang merujuk kepada komitmen kami untuk menghapuskan rasuah di dalam industri kewangan.

Sebagai salah satu institusi kewangan utama di negara ini, kami melihat perbuatan rasuah sebagai satu budaya berbahaya yang meranapkan nilai etika dan kredibiliti sesuatu organisasi. RHB telah mengusulkan pelbagai dasar serta garis panduan yang menunjangi usaha-usaha pambanteras rasuah, seperti Polisi Anti-Sogokan & Rasuah Kumpulan, Polisi Pemberian Maklumat Kumpulan, Garis Panduan Hadiah & Layanan Kumpulan, Polisi Penajaan & Sumbangan Korporat Kumpulan dan Polisi ‘Layak & Sesuai’ Kumpulan bagi mengukuhkan kawalan dalaman ke arah membina persekitaran perniagaan yang lebih sihat serta kondusif.

Oleh kerana itu, OACP ini adalah pernyataan pendirian daripada RHB, dan rakaman kesinambungan usaha-usaha pencegahan rasuah yang berterusan untuk membanteras dan membenci perbuatan tersebut. Dokumen ini akan menjadi rujukan bagi pekerja-pekerja dan rakan-rakan perniagaan RHB di dalam ketetapan standard minimum tatalaku etika perniagaan yang diharapkan daripada mereka. Melalui dokumen ini, kami telah mengenal pasti ‘punca-punca utama’ serta memberi komitmen untuk mengatasi segala kelemahan yang telah dikenal pasti dalam kerangka masa yang telah ditetapkan.

Pelan ini menekankan sokongan kami terhadap usaha Kerajaan dalam menangani rasuah melalui Pelan Antirasuah Kebangsaan 2019-2023 (“NACP”). Inisiatif 6.2.1 di dalam NACP berkenaan menyarankan keperluan badan-badan berkanun, enterpris milikan negeri, syarikat-syarikat terhad dengan jaminan serta **sektor swasta yang dikawal selia oleh badan-badan kawal selia**, termasuk RHB, **untuk membangunkan OACP masing-masing**. Sebagai mendokong usaha tersebut, kami telah melalui pelbagai proses sepanjang 11 bulan lepas bagi membangun dan merencanakan OACP kami yang julung kali, dengan kolaborasi dan bantuan pelbagai pihak, dalaman mahupun pihak luar.

Segala dasar dan prosedur hanya akan dapat mencapai objektif yang dikehendaki sekiranya warga RHB bekerjasama sebagai sebuah pasukan, dan menjalankan tugas dengan penuh integriti dan iltizam di setiap peringkat. Justeru, OACP ini perlu dipacu oleh seluruh organisasi, daripada pihak Lembaga Pengarah dan Pengurusan Kanan Kumpulan, sehinggakan kepada setiap warga kerja RHB di peringkat cawangan. Adalah juga kewajipan kami untuk memastikan penyedia-penyedia perkhidmatan dan rakan-rakan perniagaan RHB menerima pakai tahap integriti dan iltizam yang tinggi sewaktu memberi perkhidmatan bagi pihak RHB.

Marilah kita berganding bahu di dalam usaha RHB memerangi rasuah dan mempromosikan budaya kerja sihat dan bebas rasuah.

Rasuah Dihina!
Maruah Dibina!

Tan Sri Ahmad Badri Mohd Zahir
Pengerusi Kumpulan Perbankan RHB
14 November 2022

Perjalanan 'OACP' RHB

KELULUSAN DARIPADA PENGARAH URUSAN KUMPULAN BAGI PEMBANGUNAN 'OACP'

BENGKEL 'CRM & OACP'

MULA

OGOS 2021

- Kelulusan daripada Pengarah Urusan Kumpulan untuk membangunkan OACP Kumpulan
- Penubuhan Petugas Khas OACP
- Pelantikan Pakar Bidang Subjek Bebas untuk memudah cara Bengkel 'CRM & OACP'
- Kaji Selidik Kumpulan mengenai integriti, tadbir urus dan antirasuah telah dijalankan

SEPTEMBER – OKTOBER 2021

- 10 bengkel telah diadakan melibatkan 168 peserta daripada pelbagai 'SBGs/SFGs/entiti'
- Maklum balas diterima terhadap isu-isu utama berkaitan integriti, tadbir urus dan rasuah
- Data yang dikumpul daripada pelbagai pihak telah dianalisa

SEMAKAN 'CRM & OACP' 1.0

NOVEMBER - DISEMBER 2021

- Draf 'CRM & OACP' telah disemak oleh Petugas Khas pada 17 November, 2 Disember & 16 Disember 2021

DRAF CRM & OACP

NOVEMBER 2021

- Draf 'CRM & OACP' pertama telah siap dirangka

SEMAKAN 'CRM & OACP' 2.0

JANUARI – FEBRUARI 2022

- Draf 'CRM & OACP' telah disemak semula oleh perunding luar yang dilantik pada 13 Januari & 7 Februari 2022
- Sesi Sumbang Saran di kalangan pakar bidang subjek masing-masing telah dijalankan pada 9, 11, 17 & 24 Februari 2022

TAKLIMAT 'CRM & OACP' UNTUK LEMBAGA PENGARAH & PENGURUSAN KANAN KUMPULAN

MAR – APRIL 2022

- Sesi perkongsian pengetahuan mengenai 'CRM & OACP' telah diadakan untuk Lembaga Pengarah & Pengurusan Kanan Kumpulan pada 9 Mac 2022, dimudah cara oleh perunding luar

KELULUSAN LEMBAGA PENGARAH TAMAT

MEI - JUN 2022

PELAN ANTIRASUAH ORGANISASI (OACP) 2022 – 2026 (5 tahun)

Nota:

CRM	- Corruption Risk Management
OACP	- Organisational Anti-Corruption Plan
GIG	- Group Integrity & Governance
SPRM	- Suruhanjaya Pencegahan Rasuah Malaysia
SBG/SFG	- Strategic Business Group/Strategic Functional Group



Sumber Data

Usaha untuk mengenal pasti isu-isu utama berkaitan integriti, tadbir urus dan rasuah adalah penting bagi memastikan strategi-strategi yang sesuai dapat dibangunkan serta pelan-pelan tindakan yang khusus dapat dilaksanakan secara efektif. Ini adalah untuk memastikan tindakan-tindakan yang sewajarnya, termasuk mekanisme mitigasi yang sesuai, diadakan atau diletakkan di tempat yang sepatutnya bagi memerangi punca berlakunya sogokan dan rasuah.

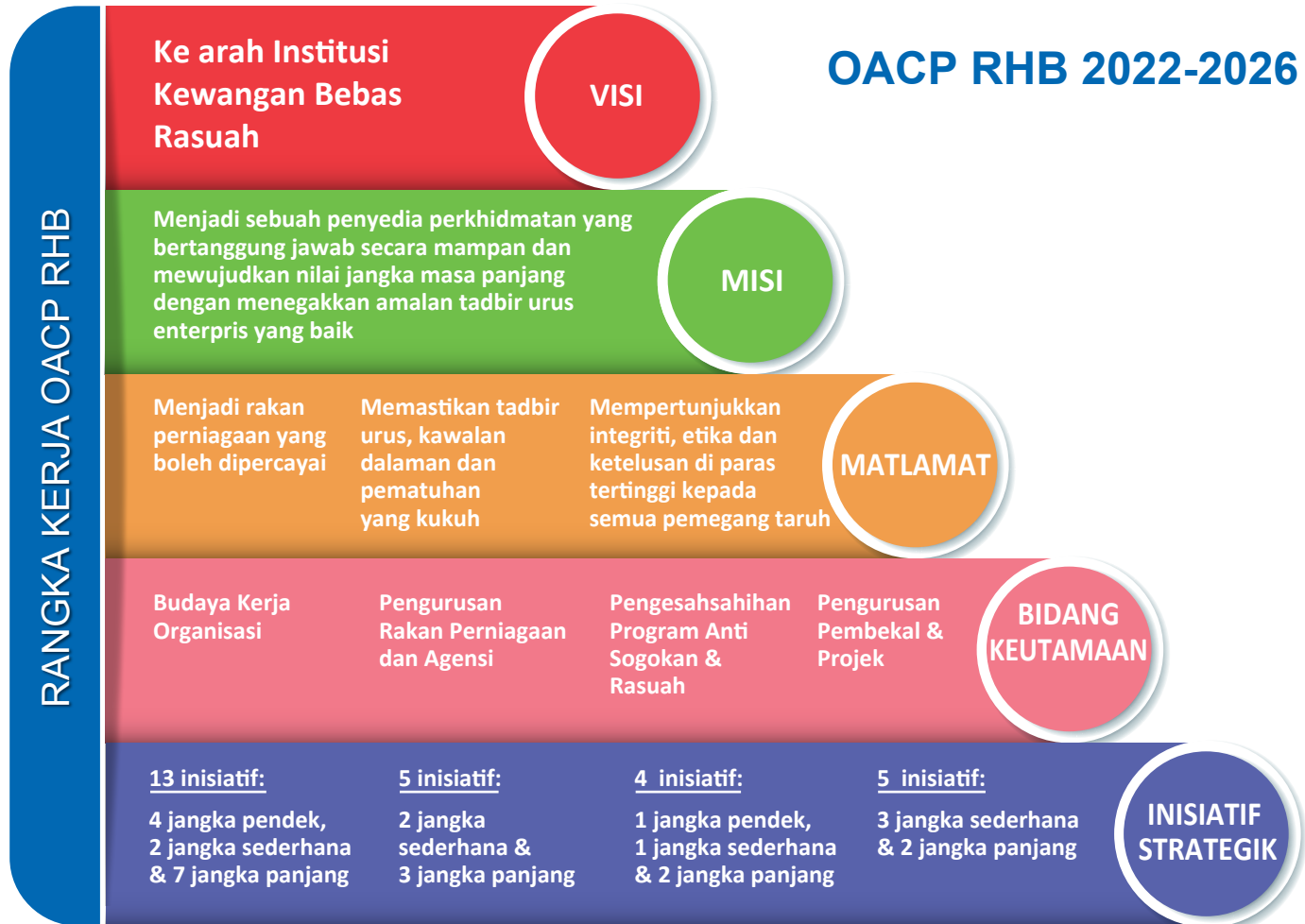


Perkara-Perkara Yang Dibimbangi



Rangka Kerja Pelan Antirasuah Organisasi (“OACP”) RHB

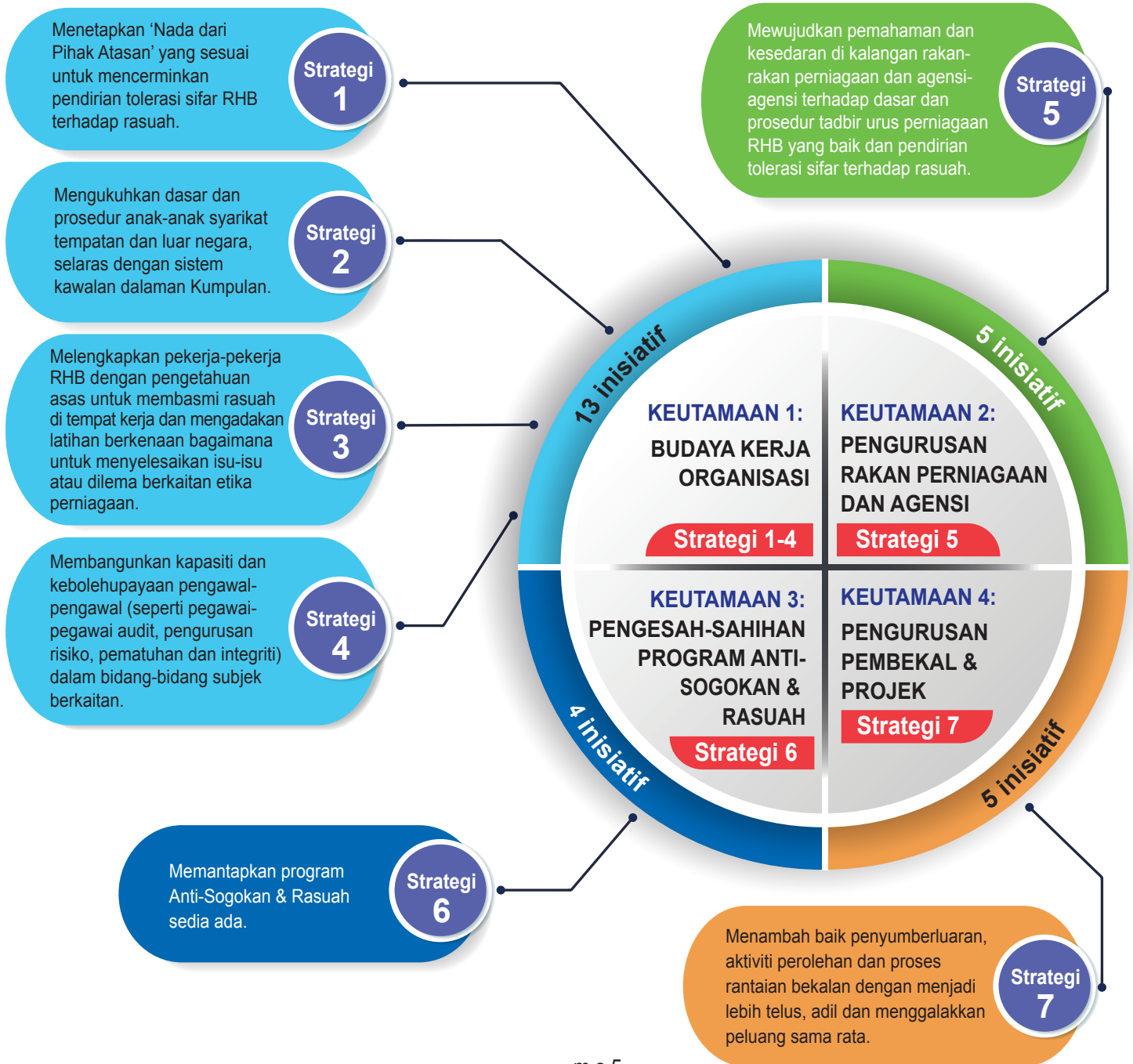
Rangka Kerja OACP Kumpulan telah dibangunkan sejajar dengan Garis Panduan Tatacara Mencukupi yang dikeluarkan oleh Jabatan Perdana Menteri selaras dengan peruntukan Subseksyen 17A(5) di bawah Akta Suruhanjaya Pencegahan Rasuah Malaysia 2009. Ini dapat digambarkan melalui ilustrasi di bawah:



Pelaksanaan OACP Kumpulan akan menjadi rujukan strategik kepada para pekerja dan rakan perniagaan RHB dalam memupuk amalan perniagaan beretika. Ini justeru memastikan impak yang positif terhadap serahan dan perkhidmatan Kumpulan, khususnya kepada pelanggan-pelanggan dan penyedia-penyedia perkhidmatan, di samping menyokong aspirasi negara dalam menyemai masyarakat yang cekap, responsif, beretika dan bebas rasuah.

Oleh itu, tiga matlamat utama OACP telah dikenal pasti sebagai asas penting dalam menegakkan komitmen ke arah memerangi rasuah dan mempertingkatkan tadbir urus yang baik bagi tempoh 5 tahun akan datang.

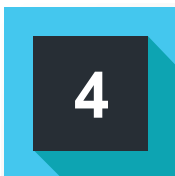
Penghasilan Strategi-Strategi Utama



Rangka Kerja Pelaksanaan

Pasukan Integriti dan Governans Kumpulan ('Group Integrity and Governance') akan memantau pelaksanaan keseluruhan pelan tindakan seperti yang tercatat dalam OACP. Jawatankuasa Audit Lembaga akan dimaklumkan setiap setengah tahun mengenai status kemajuan pelaksanaan pelan tindakan yang telah dipersetujui.

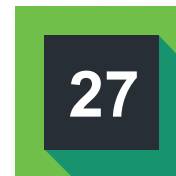
OACP RHB 2022 - 2026



BIDANG KEUTAMAAN



OBJEKTIF STRATEGIK



INISIATIF

Bidang-bidang keutamaan OACP telah disimpulkan menjadi 4 komponen utama, iaitu Budaya Kerja Organisasi, Pengurusan Rakan Perniagaan dan Agensi, Pengesahsahihan Program Anti-Sogokan dan Rasuah serta Pengurusan Pembekal dan Projek. Keempat-empat bidang keutamaan ini disokong oleh 7 objektif strategik dan 27 inisiatif, seperti berikut:

Bidang Keutamaan



Budaya Kerja Organisasi

- 4 strategi
- 13 Inisiatif



Pengurusan Rakan Perniagaan & Agensi

- 1 strategi
- 5 Inisiatif



Pengesahsahihan Program Anti-Sogokan & Rasuah

- 1 strategi
- 4 Inisiatif

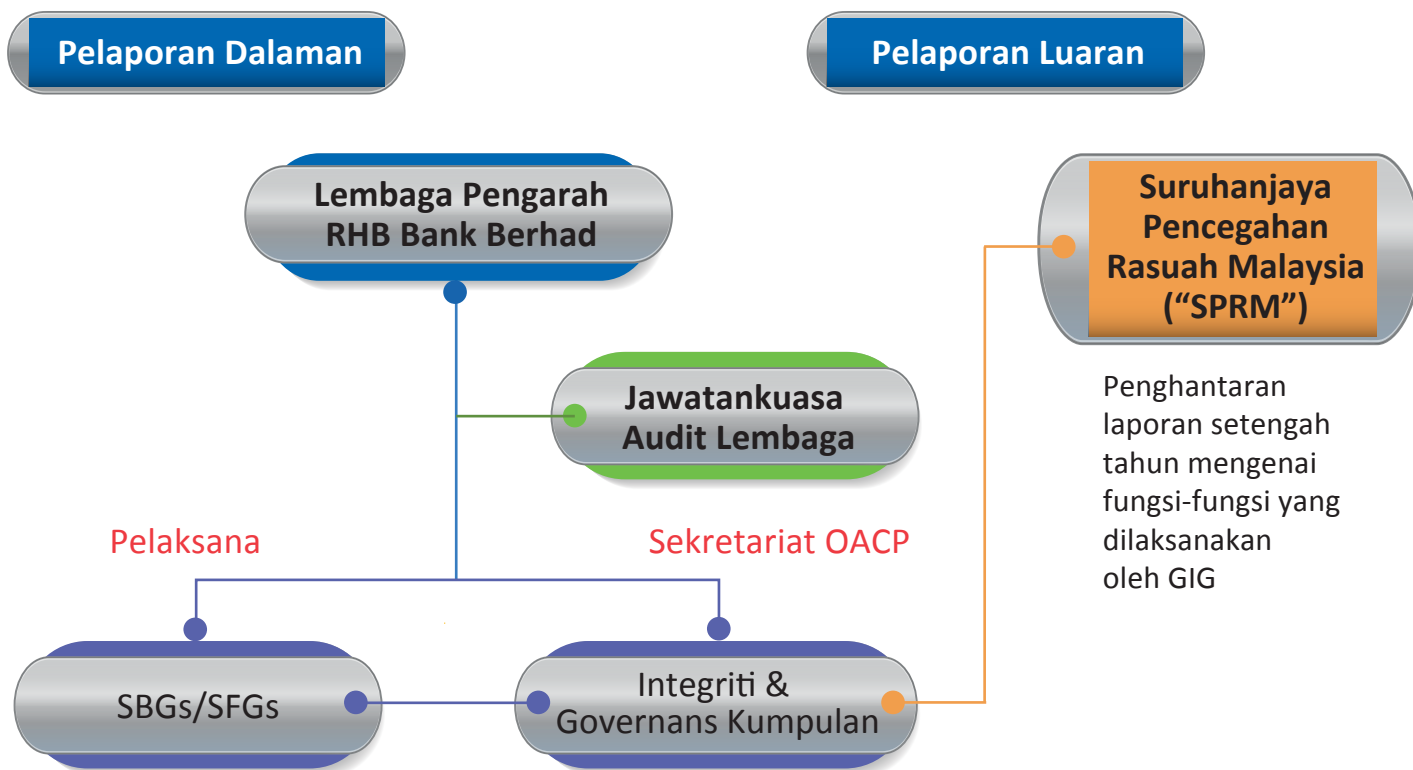


Pengurusan Pembekal & Projek

- 1 strategi
- 5 Inisiatif

Penyelarasan, Pemantauan dan Penilaian

Apabila OACP telah diperbangunkan, diagram berikut menggambarkan struktur tadbir urus bagi pelaksanaan dan pemantauan pelan tindakan pengurusan yang telah ditentukan:



Selain daripada Integriti & Governans Kumpulan ('Group Integrity & Governance') ("GIG") yang ditugaskan sebagai Sekretariat OACP, segala pelan tindakan akan dilaksanakan oleh SBG/SFG/BG/FG berkaitan yang telah dikenal pasti. Kesemua status kemajuan akan disalurkan kembali kepada GIG bagi tujuan penyelarasan dan pemantauan serta pelaporan seterusnya kepada Jawatankuasa Audit Lembaga pada setiap setengah tahun.

Lembaga Pengarah, dibantu oleh Jawatankuasa Audit Lembaga, akan berpandukan OACP bagi menyelia dan memantau kemajuan pelaksanaan kesemua pelan tindakan yang dirangka bagi memastikan segala matlamat dan objektif OACP akan tercapai dan pengukuhan kawalan dalaman dilaksanakan bagi melindungi syarikat daripada liabiliti korporat di bawah Seksyen 17A, Akta SPRM 2009.

Lembaga Pengarah telah memberi penekanan yang kuat terhadap budaya dan nilai kerana kedua-duanya adalah batu asas kepada pemupukan integriti dan kelakuan beretika. Melalui OACP ini, Lembaga Pengarah telah ditugaskan untuk memastikan penambahbaikan dan kawalan yang diperlukan akan dilaksanakan dalam masa 5 tahun akan datang untuk melindungi syarikat dan memerangi apa jua rasuah dalam Kumpulan Perbankan RHB.

Kesimpulannya, pelaksanaan OACP ini akan diselaras, dipantau dan dinilai semula seperti berikut:



PENGHARGAAN

Setinggi penghargaan dan ribuan terima kasih diucapkan kepada Lembaga Pengarah, Pengurusan Kanan, Penasihat-Penasihat, Ketua-Ketua Jabatan, Wakil-Wakil Pelbagai Sektor dan Entiti, Pasukan Petugas khas bagi projek istimewa ini serta seluruh warga kerja RHB yang terlibat, secara langsung atau tidak langsung, di atas sumbangan, kesungguhan dan iltizam bagi menjayakan dan menghasilkan Pelan Antirasuah Organisasi 2022 – 2026 bagi Kumpulan Perbankan RHB ini.

**For additional information or queries,
you may contact:**
***Untuk maklumat atau pertanyaan lanjut,
anda bolehlah menghubungi:***

Group Integrity & Governance
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