



RHB BANK BERHAD

COMPANY REGISTRATION NO: 196501000373 (6171-M)

# Group Anti-Bribery & Corruption Policy

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## **1. INTRODUCTION**

### **1.1 BACKGROUND**

- 1.1.1 In promoting ethical business practices, the Group is committed to design and institute appropriate policies and procedures to support the Group's business operations and assist its Employees to understand their obligations in upholding corporate integrity and the Group's reputation.
- 1.1.2 The Group does not condone any act of bribery and corruption, which are criminal acts in nature as well as indictable offences.

### **1.2 OBJECTIVE**

- 1.2.1 The Group is committed to conducting its business in accordance with all applicable laws, rules and regulations and the highest ethical standards. This commitment is embodied in the Group Code of Ethics and Conduct for Employees.
- 1.2.2 The purpose of this policy is to reiterate commitment to full compliance by the RHB Banking Group, its subsidiaries and affiliates, and its officers, directors, employees and agents (if applicable) to the Malaysian Anti-Corruption Commission (MACC) Act 2009 and similar Acts in relation to countering bribery and corruption.
- 1.2.3 It is imperative that the Group is seen as an Organization that does not tolerate bribery and corruption involving its employees, suppliers, contractors and agents. The Group has a holistic anti-bribery and corruption program to fight against dishonest claims, breaches of trust, kickbacks, unfair favours, obstructions of justice, embezzlement, money laundering and any other forms of bribery and corruption that are non-exhaustive.
- 1.2.4 The policy will be updated as the Law and Regulations changes to incorporate the latest standards in anti-bribery and corruption.

### **1.3 SCOPE**

- 1.3.1. All Employees shall understand, adopt and adhere to the contents in the Group Anti-Bribery and Corruption Policy (ABC Policy) as well as other procedures referred to herein.
- 1.3.2. All Employees shall observe the relevant rules and regulation in relation to anti-bribery and corruption that governs business and day-to-day operations of the Group.

### **1.4 APPLICATION**

- 1.4.1 This policy is applicable to all entities within the Group, including overseas branches and subsidiaries.
- 1.4.2 Should the application of the policy requires adjustment to suit local regulations or environment at overseas branches or subsidiaries, such details must be incorporated and formalized as Addendum to this policy, with the appropriate approvals in order to be effective.

### **1.5 APPROVAL**

- 1.5.1 This Policy shall be adhered to at all times by the Group's Employees. Any amendments to the Policy must be concurred by Group Human Capital Committee (GHCC), endorsed by Board Nomination and Remuneration Committee (BNRC) & Board Risk Committee (BRC) and approved by the Boards of the Group.

## **1.6 REGULATORY REQUIREMENTS**

- 1.6.1 The Group and its Employees remain bound by the respective jurisdiction laws, including the MACC Act 2009 for Malaysian operations, and similar agencies in other jurisdictions, in respect to their conducts both at home and abroad.
- 1.6.2 Whenever applicable, the Policy should be read together with:
- a. Group Code of Ethics and Conduct for Employees Policy
  - b. Group Whistle Blower Policy
  - c. Circular on Disclosure of Customer Documents or Information
  - d. Guidelines on Filing, Retention, Storage and Destruction of Group's Records
  - e. Gifts and Hospitality Guidelines
  - f. Group Corporate Communications Operations Manual
  - g. Group Brand Marketing Operations Manual
  - h. Other regulatory reference materials:
    - Circulars, policies and guidelines issued by BNM or any other relevant statutorybodies/host country regulators and Operations & Methods ("O&M") from time to time.

## **1.7 PENALTY**

- 1.7.1 Any employee who breaches the policy will be liable to stern disciplinary actions, including dismissal.

## 2. GOVERNING PRINCIPLES

### 2.1 KEY PRINCIPLES

#### **2.1.1 Principle 1: Zero Tolerance for Bribery and Corruption**

The Group has zero tolerance on bribery and corruption, in line with its core shared values and Group Code of Ethics & Conduct for Employees.

#### **2.1.2 Principle 2: Reporting Actual or Potential Violations**

All employees must report any request for an improper payment, or any indication that a person might be making corrupt payments or that a person has an inclination or plan to violate Anti-Bribery Laws, immediately to the approved formal channels and avenues as provided by the Group.

#### **2.1.3 Principle 3: Sponsorship, Donation and Contribution**

The Group and its employees are prohibited from political contributions and donations or bribes with intentions to induce a party to engage in improper conducts.

#### **2.1.4 Principle 4: Gifts, Hospitality and Entertainment**

Employees must ensure compliance to Gifts and Hospitality Guidelines and Guidelines for festive & non-festive Gifts prior to offering, promising or receiving any of the above-mentioned.

#### **2.1.5 Principle 5: Extortion and Request to Carry Out Improper Payment Activity**

The Group and its employees must actively resist extortion and all other demands for improper payments made under duress.

### 3. POLICY STATEMENTS

#### 3.1 **PRINCIPLE 1 : ZERO TOLERANCE FOR BRIBERY AND CORRUPTION**

***The Group has zero tolerance on bribery and corruption in line with its core shared values and Group Code of Ethics & Conduct for Employees.***

- 3.1.1 Employees are to stay away from bribery and corruption, never offer, promise or give anything of value in order to influence someone's professional objectivity or to reward any act for the benefit of themselves or the Group. Equally employees are to never request or accept anything of value that might influence one's objective in doing their job.
- 3.1.2 The Group may be held accountable not only for acts of bribery or corruption by its employees but by those acting for or on behalf of the Group. So, when using Third parties for legitimate reasons, it is crucial to ensure that such Third parties apply the same standards as those that the Group uses itself.
- 3.1.3 The general rule is that gifts, travel, lodging and modest entertainment can be paid for out of Group funds only in connection with good faith promotion, demonstration, or explanation of the Group's products or services, or the execution or performance of a contract, and must be reasonable in amount. Always ask yourself, before making such offers, whether or not what you are considering to do could be viewed as having a wrongful purpose. If the answer is yes, you must not proceed.

#### 3.2 **PRINCIPLE 2 : REPORTING ACTUAL OR POTENTIAL VIOLATIONS**

***Employees must report any request for an improper payment, or any indication that a person might be making corrupt payments or that a person has an inclination or plan to violate Anti-Bribery Laws, immediately the approved formal channels and avenues as provided by the Group.***

- 3.2.1 Employees have a similar obligation to promptly report any information or knowledge of any hidden fund or asset, of any false or artificial entry in the books and records of the Group, or any payment that circumvents the Group's internal financial controls immediately to the approved formal channels and avenues as provided by the Group

#### 3.3 **PRINCIPLE 3 : SPONSORSHIP, DONATION AND CONTRIBUTION**

***The Group is prohibited from political contributions and donations or bribes with intentions to induce a party to engage in improper conducts.***

- 3.3.1 Political contributions or donations, and support of any political parties or candidates are prohibited.
- 3.3.2 Charitable donations made with the intention to induce a party to engage in improper or unlawful conduct are considered as bribes and are prohibited.
- 3.3.3 Contributions to any public local or international non-governmental organizations are only allowed with the prior written approval of the Group Managing Director (GMD).

#### 3.4 **PRINCIPLE 4 : GIFTS, HOSPITALITY AND ENTERTAINMENT**

***Employees must ensure compliance to Gifts and Hospitality Guidelines and Guidelines for Festive & Non-Festive Gifts prior to offering, promising or receiving any of the above- mentioned.***

- 3.4.1 Providing or receiving reasonable **gifts, hospitality** and **entertainment** is often an appropriate way to reflect esteem or gratitude or to build stronger business relationship. Nonetheless, **gifts, hospitality** and **entertainment** require careful consideration to ensure that they are consistent with the law and the Group standards.

- 3.4.2 Before offering, promising or receiving any **gifts, hospitality or entertainment**, employees must ensure compliance to Gift and Hospitality Guidelines and the relevant operations manual.

**3.5 PRINCIPLE 5 : EXTORTION AND REQUEST TO CARRY OUT IMPROPER PAYMENT ACTIVITY**

***The Group and its employees must actively resist extortion and all other demands for improper payments made under duress.***

- 3.5.1 In exceptional circumstances if payment must be made in order to secure personal health or safety, such payment must be accounted for by Heads of Strategic Business Group ("SBG")/ Strategic Functional Group ("SFG") and/or Strategic Business Sector ("SBS")/ Strategic Functional Sector ("SFS").
- 3.5.2

No employees should ever engage in improper payment activity because instructed to do so by their manager or co-worker.