



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

1 Purpose

- 1.1 OCBC Bank (Malaysia) Berhad and its subsidiaries (hereinafter referred to as “OCBC Bank” in this document) are committed to conducting its business in accordance with the highest ethical standards in full compliance with all applicable laws, regulations and standards in all locations and jurisdictions in which it operates.
- 1.2 The Policy applies to OCBC Bank, its directors, employees and external parties who have dealings with OCBC Bank.
- 1.3 OCBC Bank takes a **ZERO-TOLERANCE APPROACH** against any form of bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever OCBC Bank operates. OCBC Bank expects all external parties who conduct business for and on behalf of OCBC Bank to share the same commitment and to have in place an appropriate anti-bribery and corruption (“ABC”) compliance policy and programme which is consistent with the principles set out in the Policy.
- 1.4 OCBC Bank prohibits the commission of any form of bribery and corruption to anyone nor the acceptance of any form of bribery and corruption from anyone for any purpose by its employees and external parties who conduct business for or on behalf of OCBC Bank.
- 1.5 OCBC Bank has implemented a robust ABC Programme supplemented by various policies and procedures to ensure that bribery and corruption risks identified by OCBC Bank are appropriately mitigated.

2 Facilitation Payments and Kickbacks

- 2.1 OCBC Bank strictly prohibits the offering or giving of any form of facilitation payments or kickbacks (including the provision of any service, gift or entertainment whether in cash or anything of value) as well as accepting of kickbacks for any reason, including any activity or action that may lead or suggest that a facilitation payment or kickback is offered, made or received.

3 Conflict of Interest

- 3.1 Employees must act in good faith in carrying out their duties and responsibilities and keeping the interests of OCBC Bank paramount to all other interests as part of any decision-making process.
- 3.2 All employees must ensure that their personal or business interests does not conflict, or appear to conflict, with the interests of OCBC Bank, its shareholders, customers and other stakeholders.

4 Gifts and Entertainment

- 4.1 OCBC Bank strictly prohibits the acceptance and provision of gifts and entertainment to and from existing or prospective customers, external parties or business acquaintance that may influence or can be perceived to be able to influence the employee’s judgement in a decision-making process or put the employee in a position of conflict.

5 Charitable Donations, Sponsorships and Political Contributions

- 5.1 As a matter of general policy, OCBC Bank does not make political contributions whether in cash or in-kind as this can be perceived as an attempt to gain an improper business advantage. Employees are strictly prohibited to make any political contribution on behalf of OCBC Bank for whatever reason.
- 5.2 Particular care must be taken when considering any requests for charitable donations and sponsorships to ensure that the requests are legitimate, and the payment will not be used to facilitate and conceal acts of bribery.
- 5.3 Due diligence must be carried out on the potential recipient/ external party prior to any provision of charitable donations and sponsorships.



6 Dealing with External Parties

- 6.1 Prior to entering into or continuing a business relationship with any prospective or existing external parties for the performance of work for or on behalf of OCBC Bank, an appropriate counterparty due diligence must be performed on the external party to assess its integrity and exposure to bribery and corruption risks. OCBC Bank will not enter or continue a business relationship with any external party reasonably suspected of engaging in bribery or unethical business practices unless those suspicions are investigated and resolved.
- 6.2 Employees are required to ensure that appropriate due diligence and controls are applied to any external party engaged by OCBC Bank, to ensure that they comply with the Policy and any applicable ABC legislation and regulation throughout the external party's business relationship with OCBC Bank.

7 Dealing with Public Officials

- 7.1 When dealing with Public Officials, employees are strictly prohibited from offering, directly or indirectly, anything of value including gifts, entertainment, charitable contributions and sponsorships in order for that Public Official to act (or omit to act) in a way that differs from the Public Official's proper duties, obligations and standard of conduct. Due care and diligence must be exercised at all times when dealing with Public Officials.

8 Reporting Known or Suspected Violations

- 8.1 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for or on behalf of OCBC Bank.
- 8.2 It is the responsibility of all employees and external parties who act for or on behalf of OCBC Bank to report all incidents of bribery and corruption that may come to his or her attention via OCBC Bank's whistleblowing channels.
- 8.3 All reports of known or suspected bribery and corruption incidents lodged with OCBC Bank by any source will be treated with requisite confidentiality and will not be disclosed or discussed with parties other than those charged with investigation and management of such reports.
- 8.4 Appropriate actions will be instituted against those found responsible for bribery and corruption incidents, including disciplinary actions, termination of employment or termination of contract and reporting to the relevant authorities.

9 Training and Communication

- 9.1 OCBC Bank requires all employees to undergo periodic ABC training to enhance the awareness and understanding of OCBC Bank's ABC commitment.
- 9.2 OCBC Bank's zero-tolerance approach to bribery and corruption is communicated to all external parties at the outset of our business relationship with them and as appropriate thereafter.

10 Record Keeping

- 10.1 All records and documentation relating to the various policies and procedures which address specific areas of bribery and corruption risk must be properly maintained and retained.

11 Review of the Policy

- 11.1 Chief Compliance Officer reviews the Policy annually, or as and when necessary, whichever is earlier to ensure it remains relevant and accurate.



Definitions

Bribery	Inducement or reward accepted or offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage through improper performance.
Charitable Donation	A voluntary contribution of anything of value, monetary or non-monetary, with the express purpose of business development or business preservation and made based on strategies developed by OCBC Bank.
Corruption	The abuse of public or private office for personal gain.
Conflict of Interest	A situation where an individual's private/ personal interest interferes with the individual's objectivity in acting in the best interest of his/ her employer and potentially impeding the individual's ability to impartially carry out his/ her duties and responsibilities.
Employees	Employees include permanent, temporary, casual, part time or on fixed term contracts employees of OCBC Bank as well as other persons (not directly employed by OCBC Bank) permitted to perform duties or functions in OCBC Bank, for example seconded employees, interns, trainees and persons hired under agency contracts.
Entertainment	<p>Any benefit received from or offered to any external parties where donor is present.</p> <p>Examples include but not limited to the following:</p> <ul style="list-style-type: none">- meals, drinks, visits to theatres, other venues, etc;- tickets to events (e.g. invitations to concerts, exhibitions, sporting events);- personal events at discounted rates (e.g. travel or accommodation arrangements, etc.); and/or- any other activities being given or received to initiate or develop relationships with external parties.
External parties	External parties are those who are retained to perform services or conduct business for and on behalf of OCBC Bank or those conducting business together with OCBC Bank (including but not limited to partners, agents, representatives, intermediaries, introducers, brokers, contractors, suppliers, consultants and joint venture entities) and its employees.
Facilitation Payment	An unofficial payment made to secure or speed up a routine or necessary process by a government agency, government official or person of authority to which the payer is entitled. Facilitation payment can sometimes be known as "grease payment" or "expediting payment". This definition of facilitation payment does not include the payment of fees to expedite, fast track or speed up a service in accordance with an official and published price list.



Gift	Anything of value that is given to and received from any person or organization who have, who may have, or who may facilitate the creation of a business relationship and/ or employment with any entity within OCBC Bank.
Kickback	A payment made in return for a business favour or advantage. These payments are considered as inducements or incentives as the payer is legally entitled to the action even if the payment was not made.
Political Contribution	Anything of value provided for the purpose of supporting any political process, campaigning, political party, politician, political candidate or any political causes. This may include sponsorship, gift, provision of services, promotional activities endorsing a political party, loans, property, personnel time to undertake political campaigning and any other in-kind benefits.
Public Officials	Include those in government, state government or local authority departments, government or state government owned or controlled commercial enterprises, supranational organisations (such as International Monetary Fund, United Nation), political parties, local or statutory authorities, society registered under Societies Act 1966 or branch of that registered society, sports body registered under Sports Development Act 1997, co-operative society registered under Co-Operative Societies Act 1993, trade union registered under Trade Unions Act 1959, youth society registered under Youth Societies and Youth Development Act 2007, company or subsidiary company over which or in which any of the aforementioned public body has controlling power or interest, political candidates, Member of Parliament, member of state legislative assembly, member of any public bodies, or any society, union, organisation or body as the Minister may prescribe from time to time by order published in the Gazette.
Sponsorship	A contribution of anything of value, monetary or non-monetary, with an External Party in order to achieve business goals for OCBC Bank such as for branding, marketing and business development. Generally, a sponsorship arrangement involves a partnership between OCBC Bank and an external party for the mutual benefit of both parties.

Management of OCBC Bank

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