

SUMMARY OF BIMB HOLDINGS BERHAD'S ("BHB") ANTI-BRIBERY AND CORRUPTION POLICY (ABCP)

Introduction

This policy serves as a guide to BHB and its subsidiaries in regard to prohibition of any bribery and corruption activities. It is formulated in accordance with the provisions under the Malaysian Anti-Corruption Commission ("MACC") Act 2009: Act 694, Section 17A of the MACC (Amendment) Act 2018: Act A1567 and all other relevant laws. This policy sets out BHB's zero-tolerance approach against all forms of bribery, corruption and any other non-regulatory compliance related risks.

Purpose

This ABCP is intended to:

- a. Guide BHB to ensure that all opportunities on corruption and any action in relation to bribery, conflict of interest, malpractice, abuse of power could be effectively and efficiently addressed; and
- b. Ensure compliance with all applicable anti-corruption regulatory requirements when conducting business.

Applicability

This ABCP applies to BHB and its stakeholders which include the directors, employees, business associates and all parties involved directly or indirectly in the affairs of the Company and they are required to strictly adhere to this policy in carrying out and discharging their responsibilities. The policy also applies to members of the public, where relevant.

Policy Statement

- a. BHB holds a **zero-tolerance approach against all forms of bribery and corruption**. All employees, business associates and individuals acting on behalf of BHB should be responsible for maintaining the Company's reputation by conducting the business honestly and ethically as well as observing the Company's shared value, "**Act with Integrity**".
- b. BHB will not tolerate bribery, kickbacks or corruption directly or indirectly through third parties, whether or not explicitly prohibited by this policy or by laws. BHB's employees are not permitted to give or offer anything of value including gifts, hospitality, or entertainment except otherwise governed by this policy to anyone for the purpose of improperly obtaining or retaining a business or personal advantage.

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Types of Bribery and Corruption in ABCP and its control measures

No	Types of Bribery & Corruption	Control Measures
1	Conflict of Interest	<ul style="list-style-type: none"> • Pre-employment screening; • Self-declaration by staff, vendor and other stakeholders; and • Abiding with the Company's Code of Conduct and Code of Ethics.
2	Gift, Entertainment & Hospitality	<ul style="list-style-type: none"> • Only permissible gifts are allowed; • Acceptance of all permissible gifts must first be declared and approval from appropriate authorities must be sought prior to usage; and • Limited in terms of value, frequency, customary and lawful.
3	Sponsorships & Donations	<ul style="list-style-type: none"> • Must be in accordance to procedures as provided in relevant internal manuals; • Refuse or decline professionally if the external parties offer any sponsorships or donations (e.g. sponsoring staff activities i.e. teambuilding, annual dinner, family day, etc.); and • Ensure that it is genuine and not for business related matters or dealings i.e. personal donations for charity purposes or religious events.
4	Political Contribution	<ul style="list-style-type: none"> • Political participation/contribution must not have any connection with position in the Company; • Any personal contribution should not be for the purpose to obtain/retain business or business advantage and not intended to influence any decision in favour of the Company; • Contribution and/or expenditure using the Company's resources for the benefit of

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		<p>political campaign, party or politician is not allowed;</p> <ul style="list-style-type: none"> • Shall not use BHB's facilities, equipment and resources for political campaign or functions.
5	Facilitation Payments	<ul style="list-style-type: none"> • Be cautious and consider the purpose of such payment and whether the payment amount is reasonable for those goods or services; • Request a receipt that describes the purpose of payment; and • Escalate or report it to immediate supervisor.
6	Money Laundering	<ul style="list-style-type: none"> • Adhere to requirements under AML/CFT Operational Guideline especially on Red Flag transactions; • Conducting due diligence, i.e. Know Your Customer (KYC), Due Diligence and Enhanced Due Diligence; and • Reporting on suspicious transactions.

Dealings with Business Associates

Due Diligence (DD) assessment* will be conducted to the Business Associates (BA) by the respective stakeholders **prior to any dealings** to review BA's background, reputation and business capability before engaging or contracting any on-boarding BA in particular, where there is significant exposure to bribery and corruption risk. The DD assessment will be conducted to the Company's BA i.e vendors, contractors, consultants, agents, outsourcing providers, solicitors (excluding ad-hoc solicitors) and valuers**.

*NB: *The DD questionnaires for the assessment is developed based on MS ISO 37001: 2016.*

*** DD assessment will be excluded for customers and investors as Customer Due Diligence (CDD) and Enhance Customer Due Diligence (ECDD) will be conducted for them.*

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Staff Declaration

All existing employees must

- ✓ Read and understand the ABCP;
- ✓ Complete the Acknowledgment and Compliance Form
- ✓ Agrees to abide to the ABCP and will put the policy into practice; and
- ✓ Agrees to report on any potential violations of the ABCP to the authorised parties.

For all new recruitment, pre-employment screening is to be performed through Pre-Employment Form and Statutory Declaration by Group Human Resources.

Reporting

If an employee receives a request for bribe or is offered a bribe or know of any possible act of bribery and/or corruption, he/she must report this incident to his/her immediate supervisor or lodge a complaint to the Whistleblower Coordinator via the following channels:

- i. Email to whistle@bankislam.com.my;
- ii. Bank Islam Integrity Hotline: 1-800-22-0091;
- iii. Write-in or meet in person with the Whistleblower Coordinator at Level 30, Menara Bank Islam, No. 22, Jalan Perak, 50450 Kuala Lumpur; or
- iv. Online submission through Bank Islam Staff Portal:
Bank Islam Staff Portal > Whistleblowing Policy > Whistleblower Disclosure Form

Important

All employees of BHB are required to strictly adhere to the procedures outlined in the ABCP when discharging their duties and responsibilities.