ANTI-BRIBERY & CORRUPTION POLICY STATEMENT

Bangkok Bank Berhad (BBB) places importance on conducting business with honesty, transparency and social responsibility in accordance with good corporate governance. BBB's Anti-Bribery & Corruption (ABC) Policy elaborates on principles of anti-bribery & corrupt acts and other corrupt practices that may arise in the course of business.

This policy is designed to guide Anti-Bribery & Corruption practices based on principles laid out in the Guideline of Adequate Procedures issued by the Prime Minister's Department pursuant to the amendment of Section 17A (4) and Section 17A (5) of the Malaysian Anti-Corruption Commission Act, in 2018.

BBB has adopted a ZERO TOLERANCE APPROACH towards bribery and corruption, and this policy is not intended to be the one-stop reference for all definitive answers, rather it is intended as guidance on BBB's commitment to combat corrupt or potentially corrupt practices.

BBB also expects its "associated person" such as consultants, contractors, sub-contractors, suppliers, service providers, vendors, representatives and others performing services or work for or on behalf of BBB or any other person associated with BBB, to comply with the Anti-Bribery & Corruption Policy when performing such services or work.

1.0 KEY PRINCIPLES

This ABC Policy adopts the “Adequate Procedures Principles” namely “T.R.U.S.T”, was introduced by the Malaysian Anti-Corruption Commission (“MACC”) and in line with section 17A of the MACC Act 2009 (Amendment 2018).

The “T.R.U.S.T” principle is guided by the “Guidelines on Adequate Procedure” which was issued by the Prime Minister’s Department of Malaysia to assist organisations to put in place the necessary procedures to prevent the occurrence of potential bribery and corruption practices which majority of banks in Malaysia has adopted and to comply with this principle to protect the respective banks from Corporate Liability.

This ABC Policy adopts five key principles, namely “T.R.U.S.T”, in line with the requirements of sub-section 17A(5) of the Malaysian Anti-Corruption Commission Act 2009 (2018 Amendment).

T: Top Level Commitment

Top level management to be able to provide assurance on a commercial organisation’s compliance with the anti-corruption requirements.

R: Risk Assessment

Periodic corruption risk assessment to identify, analyse, assess and prioritise corruption risk of the organization.

U: Undertake Control Measure

Commercial organisations to establish anti-corruption framework, policy, controls across major activities such as gifts and procurement.

S: Systematic Review, Monitoring, and Enforcement

Anti-corruption programme which covers monitoring, evaluation, improvements and non-compliance response.

T: Training and Communication

Provision of adequate training to employees and third parties on the organisation’s anti-corruption stance.

2.0 RECEIVING OR OFFERING GIFTS (INCLUDING HOSPITALITY AND ENTERTAINMENT)

- BBB does not encourage the practice of receiving or offering gift(s) and/or entertainment to/from existing or prospective client, contractor, consultant, service provider and other business partner (hereinafter referred as 'Third Parties').

- BBB's employees must exercise good judgment and ensure that the receiving or offering of gifts (including hospitality and entertainment) will not result in a potential conflict between personal interest and interest of BBB. The gift(s) also must not be excessive in nature and does not create influence in business decisions or preferential treatment.

3.0 SPONSORSHIP AND DONATIONS

BBB prohibits employees individually granting sponsorship and donation on behalf of BBB. Additionally, sponsorship and donation for political purposes are strictly prohibited.

4.0 FACILITATION PAYMENTS

BBB will not give, promise, offer, solicit, receive, agree to receive facilitation payments. Facilitation payments typically include the provision of a payment or other benefit to public officials or employees in the private sector to expedite a routine administrative action.

5.0 CONTRACTORS, CONSULTANTS, SERVICE PROVIDERS AND OTHER BUSINESS PARTNERS ("THIRD PARTIES")

Due diligence must be performed, in order to ensure that BBB is dealing with honourable third parties during establishment of relationship.

6.0 EMPLOYMENT DECISION

BBB does not offer employment to identified candidate(s) in return for previous favour/in exchange of improper favour. Any employment decisions will be guided by BBB's Recruitment Procedures stated in BBB's Human Capital Manual.

7.0 TRAINING & COMMUNICATION

All employees of BBB are required to read and understand the required procedures in this ABC Policy. On annual basis, all employees must undergo Anti-Bribery & Corruption awareness training and assessment assigned.

BBB recognise that managing an anti-bribery and corruption is a continuous process and a systematic review and monitoring process is necessary to ensure its objectives are being met.

BBB commits to hear all reports on the matter of corrupt acts / possible corrupt acts with transparency, care and fairness, and subject suspected acts of corruption to a proper investigation, which will be carried out in a confidential manner to ensure confidentiality of identity / identities.

Members of the public and BBB's counterparties as well as third party providers may report corrupt acts / possible corrupt acts related to BBB and / or its employees through BBB's whistleblowing channel: (https://bangkokbank.com.my/whistleblowing)