

Anti-Corruption Policy

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

Arising from the BBB Board of Directors' direction on measures to manage anti-corruption, BBB's Anti-Corruption Policy is designed to guide Anti-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's Anti-Corruption Policy is proprietary to the Bank. An executive summary of the Policy is provided in the following sections. As such, where clarification is needed, members of the public may email to compliance.kl@bangkokbank.com

As a wholly-owned subsidiary of Bangkok Bank Public Company Limited (BBL), BBB also adopts and localise BBL's Anti-Corruption Policy and Anti-Corruption Manual. BBL has joined Thailand's Private Sector Collective Action Coalition against Corruption and has set up an anti-corruption policy to prohibit directors, executives and employees from requesting or accepting bribes or benefits for corrupt purposes to the benefit of themselves or others.

Corruption entails severe consequences for you, for your family, for BBB, BBL and Malaysia. Dismissal, fines, imprisonment, financial and reputational damages are grave consequences. The Board of Directors of BBB hereby sets a strong Anti-Corruption stance at BBB through this Anti-Corruption Policy.

Chairman, Board of Directors

1.0 KEY PRINCIPLES

- 1.1 The Bank, its employees and the Board of Directors will comply with local and international anti-corruption laws and undertake the following:
- (i) avoid improper business advantage;
 - (ii) avoid improper conduct by employees; and
 - (iii) avoid improper conduct by third parties of which the Bank does business.
- 1.2 The Bank will control gifts and benefits **to/from** an existing or prospective client, contractor, consultant, service provider and other business partner if it is:
- (i) inconsistent with customary business practice;
 - (ii) excessive in value or frequent in nature;
 - (iii) can be construed as an inducement, bribe or payoff;
 - (iv) may improperly influence an employee's judgment; or
 - (v) violates any laws or regulation.
- 1.3 This 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.

Corrupt acts and impact of corruption are controlled at BBB by translating the five key principles throughout sections of this BBB Anti-Corruption Policy.

2.0 NO GIFT POLICY

BBB does not encourage giving and/or acceptance of gifts to/from the Bank and its employees. In a situation where a gift cannot be denied from external parties, the Bank will manage the gift in accordance to principles of anti-corruption.

3.0 FACILITATION PAYMENTS

The Bank 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.

4.0 SPONSORSHIP AND DONATIONS

The Bank prohibits employees individually considering sponsorship and donation on behalf of the Bank. The decision to consider sponsorship and donation will be undertaken centrally at the Bank.

5.0 THIRD PARTY

The Bank and its employees will not engage a third party (contractors, consultants, service providers and other business partners) until they have been pre-cleared according to the relevant policies and procedures at the Bank.

6.0 EMPLOYMENT DECISIONS

The Bank does not offer employment to prospective employees in return for previous favour/in exchange of improper favour. Any employment decisions within the Bank will be guided by the Bank's recruitment procedures.

7.0 MANAGEMENT OF POSSIBLE ANTI-CORRUPTION SITUATIONS

The Bank 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. The Bank is committed to non-retaliation and non-reprisals for any reporting of corrupt acts/possible corrupt acts from any party where it is done in good faith.

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