

Document Information

Country : MALAYSIA

Title : MAYBANK GROUP ANTI-BRIBERY AND CORRUPTION POLICY

Document No : MAL/REGULATORY/COMPLIANCE/385/5

Classification : Restricted

Priority for Review : High

Issued To : ALL (incl COUNTRY and SUBSIDIARIES)

Issued By : Group Financial Crime Compliance (GFCC), Group Compliance

Main Owner : Group Financial Crime Compliance (GFCC), Group Compliance

Co-Owner : Not Applicable

Last Reviewed Date : 3/4/2023

Issued Date : 3/4/2023

Main Category : Regulatory

Sub-Category : Compliance

Document Access

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HIGHLIGHTS

- 1) This Policy has been revised to update the following:

Affected Areas	Change Category	Descriptions
DEFINITION OF TERMS	REVISED	Added 'entity' in the Associated Person definition.
Para 4.3.2 (b)	REVISED	This section should be read together with the Maybank Group Anti-Money Laundering and Countering Financing of Terrorism Policy and Procedures.
Sub-section 4.4 (c), 4.5 (e), 4.6 (f)	REVISED	Updated the document references name.
HELP DESK	REVISED	Updated the help desk details.

- 2) This Policy is to be read together with the following references and its subsequent updates (the list may not be exhaustive) for completeness:

No	Document Number	Document Title
1	MAL/REGULATORY/COMPLIANCE/1160	MAYBANK GROUP ANTI-BRIBERY AND CORRUPTION PROCEDURES
2	MAL/REGULATORY/COMPLIANCE/978	MAYBANK GROUP ANTI-MONEY LAUNDERING AND COUNTERING FINANCING OF TERRORISM POLICY
3	MAL/REGULATORY/COMPLIANCE/398	MAYBANK GROUP ANTI-MONEY LAUNDERING AND COUNTERING FINANCING OF TERRORISM PROCEDURES
4	MAL/REGULATORY/COMPLIANCE/1147	MAYBANK GROUP SANCTIONS POLICY
5	MAL/REGULATORY/COMPLIANCE/1243	MAYBANK GROUP SANCTIONS PROCEDURES
6	MAL/REGULATORY/COMPLIANCE/418	MAYBANK GROUP WHISTLEBLOWING POLICY
7	MAL/HC/ADMIN/907	MAYBANK GROUP PEOPLE POLICIES
8	MAL/FWK/COMPLIANCE/402	MAYBANK GROUP COMPLIANCE FRAMEWORK
9	MAL/ADMIN/PROCURE/411	GROUP PROCUREMENT MANUAL

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DEFINITION OF TERMS

The table below sets out the definitions and acronyms used throughout this Policy:

Common Terms	Description
AB&C PP	Collectively refers to the Maybank Group Anti-Bribery and Corruption Policy and Maybank Group Anti-Bribery and Corruption Procedures.
Associated Person (AP)	<p>A person/entity is associated with Maybank if the person/entity is a partner or agent of Maybank or if the person/entity performs services for or on behalf of Maybank.</p> <p>AP among others includes business partners, joint venture partners, distributors, brokers, professional advisors, service providers and other intermediaries.</p>
Bribery	<p>The act of promising, offering, soliciting, giving, accepting or receiving gratification, directly or indirectly, as an inducement or reward to or not to do an act.</p> <p>Gratification includes:</p> <ul style="list-style-type: none"> • money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage; • any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity; • any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part; • any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage; • any forbearance to demand any money or money's worth or valuable thing; and • any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty.
Conflict of Interest	An activity that competes or conflicts with Maybank's interest.
Corruption	An abuse of entrusted power for the advantage of Maybank or personal gain and may include Bribery. Corruption may also take the form of nepotism, embezzlement or any acts related to abuse of power.
Customer	An individual or a legal entity that is, or intends to become, a Maybank customer. This includes depositors and borrowers.
Director(s)	A director of Malayan Banking Berhad and its subsidiaries.
Employee(s)	A person employed on a permanent or contract basis by Maybank. This can include full time positions, part time positions, graduate

Common Terms	Description
	scheme places, internships, work experience placements, apprenticeships, contract based roles and any other job position that Maybank may offer.
Foreign Public Official	Includes a person who satisfies one of the following criteria: <ul style="list-style-type: none"> Any person who holds a legislative, executive, administrative or judicial office of a foreign country whether appointed or elected. Any person who exercises a public function for a foreign country, including a person employed by a board, commission, corporation, or other body or authority that is established to perform a duty or function on behalf of the foreign country. Any person who is authorised by a public international organisation to act on behalf of that organisation.
Maybank	Malayan Banking Berhad, its subsidiaries and foreign branches.
Personal Gain	In the context of this Policy, personal gain includes an advantage or benefit for that person or another person from acts of Bribery and Corruption.
Public Official(s)	Includes any person who is a member, an officer, a staff or a servant of a public body, and includes a member of administration, a member of Parliament, State Legislative Assembly, a judge of the Courts in Malaysia, and any person receiving any remuneration from public funds, and, where the public body is a corporation sole, includes the person who is incorporated as such. <p>Public body includes:</p> <ol style="list-style-type: none"> the Government of Malaysia; the Government of a State; any local authority and any other statutory authority; any department, service or undertaking of the Government of Malaysia, the Government of a State, or a local authority; any society registered under subsection 7 (1) of the Societies Act 1966 [Act 335]; any branch of a registered society established under section 12 of the Societies Act 1966; any sports body registered under section 17 of the Sports Development Act 1997 [Act 576]; any co-operative society registered under section 7 of the Co-operative Societies Act 1993 [Act 503]; any trade union registered under section 12 of the Trade Unions act 1959 [Act 262]; any youth society registered under section 9 of the Youth Societies and Youth Development Act 2007 [Act 668]; any company and subsidiary company over which or in which any public body as is referred to in paragraph (a), (b), (c), (d), (e), (f), (g), (h), (i) or (j) has controlling power or interest; or Any society, union, organisation or body as the Minister may prescribe from time to time by order published in the Gazette. <p>The definition for Public Officials only applies to Malaysian Public Officials. Foreign Public Officials has been defined separately in this section.</p>

Common Terms	Description
Third Party(ies)	A person (other than the AP and Customer) who has official dealings/ business relationship with Maybank, including Public Officials, Foreign Public Officials, regulators and other parties which this Policy may be extended to cover in circumstances relating to Bribery and Corruption.

1.0 INTRODUCTION

Maybank is committed to conduct its business dealings with integrity. To achieve this commitment Maybank has adopted a **zero tolerance** approach against all forms of Bribery and Corruption in carrying out its daily operations.

1.1 Objectives of the Policy

The objectives of this Policy are to:

- a) Set out the minimum standards of conduct in respect of Bribery and Corruption for Directors and Employees and complements the core principles of the Maybank Group Code of Ethics and Conduct Policy;
- b) Provide high level guiding principles on how to address Bribery and Corruption risks and issues which may arise in the business activities of Maybank;
- c) Protect the reputation of Maybank by preventing and/or detecting Bribery and Corruption risks;
- d) Ensure that Directors and Employees understand:
 - i) Their responsibilities in ensuring compliance with this Policy;
 - ii) The consequences of non-compliance with this Policy; and
 - iii) The relevant laws and regulations relating to Bribery and Corruption in Malaysia.

1.2 Key Principles of the Policy

- a) This Policy sets out the guiding principles for Maybank to address and manage Bribery and Corruption risks in all its dealings within and outside Maybank. Compliance to this Policy is mandatory and Maybank, its Directors and Employees and APs (where applicable) are to strictly comply with the following principles:
 - i) Giving or receiving bribes or participate in any form of Bribery and Corruption in its business dealings is strictly prohibited;
 - ii) The engagements of APs and dealings with Customer and Third Party must not be for the purpose of inducing or obtaining or retaining business, gaining an unfair advantage or influencing a government or regulatory decision for Maybank or for Personal Gain;
 - iii) The giving and receiving of gifts and entertainment, including donations and sponsorships, whether directly or indirectly with the intention to bribe, to retain or gain a business advantage, or for Personal Gain is strictly prohibited; and
 - iv) Actual or potential Conflict of Interest which could result in actual or potential Bribery and Corruption risk to Maybank is prohibited.
- b) This Policy is supported by the Maybank Group Anti-Bribery & Corruption Procedures (“Procedures”) which further elaborates on the principles of this Policy and provides detailed steps and procedures on how to address and assess Bribery and Corruption risks and issues that may arise in the course of Maybank’s business.

1.3 Scope and Applicability

- a) This Policy applies to Maybank, its Directors and Employees. For the purpose of this Policy, the Shariah Committee Members of any Maybank Group entities shall follow the same Policy requirements which are applicable to the Directors.
- b) APs performing services for or on behalf of Maybank are also expected to comply with the relevant parts of this Policy and the Procedures when performing such services.
- c) Legal entities where Maybank holds a non-controlling interest are encouraged to adopt this Policy or equivalent standards.
- d) This Policy is not intended to be a substitute for personal discretion and Directors and Employees are expected to exercise sound judgment to meet the objectives of this Policy.
- e) In the event applicable laws and regulations in a jurisdiction where the subsidiaries or overseas branches are more stringent than this Policy, the more stringent requirements shall apply. Subsidiaries and overseas branches may apply for variations to this Policy by escalating to Group Compliance for review and thereafter to the Board for approval.

1.4 Policy, Approval and Subsequent Review

This Policy is owned by Group Compliance and must be reviewed at least annually, and as and when there are changes to relevant laws and regulations. Subsequent material amendments to this Policy must be approved by the Board, where required in accordance with the framework set out in the Maybank Group Compliance Framework.

1.5 Escalation or Breaches to this Policy

- a) Any non-compliance of this Policy must be escalated to Group Internal Audit (“GIA”) for further investigation. The outcome of the investigation shall be tabled to the Internal Audit Committee and Audit Committee of the Board and shared with Group Human Capital (“GHC”) for the appropriate disciplinary actions to be taken against Employees.
- b) In the event that a wrongdoing is established, Directors and Employees may also be subject to civil proceedings and/or may be prosecuted for a criminal offence.

2.0 TOP LEVEL COMMITMENT

2.1 Roles and Responsibilities of the Board

The Board is responsible for ensuring that:

- a) Appropriate policies and procedures to address Bribery and Corruption risks are established, maintained and periodically reviewed; and
- b) A culture of ethics and integrity is promoted within Maybank.

2.2 Roles and Responsibilities of Senior Management (Group Executive Committee, “Group EXCO”):

The senior management as represented by the Group EXCO is responsible for:

- a) Communicating the provisions of the AB&C PP and Maybank’s zero tolerance approach against Bribery and Corruption to Directors, Employees, APs and Third Parties;
- b) Ensuring proper implementation of the AB&C PP to address, detect and mitigate Bribery and Corruption risks;
- c) Ensuring that the AB&C PP include clear guiding principles, effective procedures, processes and controls to identify, assess, monitor, manage and mitigate Bribery and Corruption risks;
- d) Encouraging the use of the available whistleblowing channels for reporting of Bribery and Corruption incidents;
- e) Ensuring that the lines of authority for personnel tasked with responsibility for designing, executing and overseeing the compliance of AB&C PP requirements are appropriate;
- f) Assigning adequate and accountable resources to ensure compliance with the requirements of AB&C PP;
- g) Ensuring that Directors and Employees have been provided with the appropriate and adequate level of AB&C training and awareness to understand the requirements of the AB&C PP; and
- h) Ensuring that Bribery and Corruption risks and AB&C PP matters are reported to the Board on a scheduled basis.

3.0 BRIBERY AND CORRUPTION RISK ASSESSMENT

- a) Maybank must perform an annual Bribery and Corruption risk assessment to identify, analyse and assess the internal and external Bribery and Corruption risks of entities within Maybank. The risk assessment results will determine the appropriate processes and controls to mitigate the identified Bribery and Corruption risks.
- b) To achieve this objective, Group Compliance has established a Bribery and Corruption risk assessment approach, which will require each department/unit in Maybank to identify, analyse and assess internal and external Bribery and Corruption risks related to that entity/department.
- c) The guidelines and procedures applicable to this section of the Policy are set out in Section 2.0 of the Procedures.

4.0 SPECIFIC REQUIREMENTS TO ADDRESS BRIBERY AND CORRUPTION RISK

4.1 Facilitation Payments

In line with Maybank's zero tolerance against Bribery and Corruption, Directors, Employees and APs are strictly prohibited from making facilitation payments. Facilitation payments are payments for "routine governmental action", such as processing papers, issuing permits, and other actions of an official, in order to secure or expedite performance of duties. Facilitation payments exclude payments for legitimate 'express services' that are permitted by law e.g. express visa services.

4.2 Duress Payments

In exceptional circumstances, where a payment is made under duress as a direct result of violence or threats to the personal safety of Directors or Employees, the incident must be immediately reported to Group Compliance and Group EXCO for deliberation. Any such incidents must subsequently be reported to the Board.

4.3 Dealings with Third Party, AP and Customer

4.3.1 Dealings with Third Party

- a) Maybank being a financial institution will have business dealings with Third Party such as Public Officials & Foreign Public Officials, regulators and other parties which this Policy may be extended to cover in circumstances relating to Bribery.
- b) Directors, Employees and APs when dealing with Third Party must strictly adhere to the key principles as stated in Sub-section 1.2 of this Policy.
- c) The risk of Bribery and Corruption is typically higher when dealing with Public Officials & Foreign Public Officials because of:
 - i) Their ability to exercise influence over government policies and procedures;
 - ii) Their ability to abuse their position of power for Personal Gain; or
 - iii) Their access to public funds.
- d) Public Officials & Foreign Public Officials might also engage others to conceal funds or assets resulting from the abuse of their official positions. As such, Maybank has to exercise extra caution when dealing with Public Officials/ Foreign Public Officials.
- e) The procedures applicable to this section are set out in the Procedures.

4.3.2 Engaging AP

- a) The engagement of an AP must not be for the purpose to induce, obtain or retain business, to gain an unfair business advantage or for Personal Gain or to influence a government or regulatory decision for Maybank.
- b) APs must be risk-rated to determine the level of Bribery and Corruption risk they pose to Maybank prior to their engagement. The AP risk assessment process, the level of due diligence and decision making matrix

for the engagement of APs are set out in Section 3.0 of the Procedures to this Policy. This section should also be read together with the Maybank Group Anti-Money Laundering and Countering Financing of Terrorism Policy and Procedures.

4.3.3 Dealing with Customer

- a) Directors, Employees and APs (where applicable), when dealing with Customer, must strictly adhere to the key principles as stated in Sub-section 1.2 of this Policy.
- b) In addition, the guidelines and procedures to assess and address Bribery and Corruption risks for Customer are set out in the Maybank Group Anti-Money Laundering and Countering Financing of Terrorism Policy including the frequency of assessments required.

4.4 Giving Gifts and Entertainment

- a) Directors, Employees and APs must not, whether directly or indirectly, provide gifts or entertainment with the intent of bribing another person (includes but not limited to AP, Customer and Third Party), or which may give rise to such a perception.
- b) When deciding whether to give gifts or entertainment, Directors, Employees and APs must consider whether this could directly influence a specific business decision, serve as an inducement to obtain or retain business, to gain an unfair business advantage or for Personal Gain or to influence a government or regulatory decision.
- c) Directors and Employees are to be guided by the thresholds and procedures set out in Section 4.0 of the Procedures and the Maybank Group Corporate Gifts and Business Entertainment Policy.

4.5 Receiving Gifts or Entertainment

- a) Directors and Employees and APs must not, whether directly or indirectly, ask for or solicit gifts or entertainment under any circumstances or receive gifts or entertainment in exchange for granting favours or benefits to another person (includes but not limited to AP, Customer and Third Party), or which may give rise to such a perception.
- b) When deciding whether to receive gifts or entertainment, Directors and Employees and APs must consider whether this could directly influence a specific business decision, serve as an inducement to obtain or retain business, to gain an unfair business advantage or for Personal Gain or to influence a government or regulatory decision.
- c) Receiving gifts or entertainment in a purely personal capacity is not within the scope of this Policy, as long as the gift or entertainment:
 - i) Is not connected to the person's directorship or employment with Maybank; and
 - ii) Is purely social and not related to Maybank's business.

- d) Directors, Employees and APs must not abuse the 'personal capacity' exemption to circumvent the Policy requirements on gifts and entertainment. Receiving of gifts or entertainment that give rise to actual or potential Conflict of Interest must be avoided.
- e) Directors and Employees are to be guided by the thresholds and procedures set out in Section 5.0 of the Procedures and the Maybank Group Corporate Gifts and Business Entertainment Policy.

4.6 Donations and Sponsorships

- a) Maybank, its Directors and Employees must not provide donations or sponsorships with the intent of bribing another person, or which may give rise to such a perception.
- b) When deciding whether to provide donations or sponsorships, Maybank, its Directors and Employees must consider whether:
 - i) The donation or sponsorship could directly or indirectly influence a specific business decision, serve as an inducement to obtain or retain business, to gain an unfair business advantage or for Personal Gain or to influence a government or regulatory decision; or
 - ii) The donation or sponsorship may be used to hide or disguise acts of Bribery committed for the benefit or advantage of Maybank.
- c) Gifts or entertainment received in return for donations or sponsorships provided by Maybank must be treated in accordance with the Sub-section 4.5 of this Policy.
- d) Donations and sponsorship in this context, does not include service fees paid to charitable organisations in return for service or products provided to Maybank as part of a commercial arrangement.
- e) Directors and Employees must not abuse the 'personal capacity' exemption to circumvent the Policy requirements on donations and sponsorships. Donations that give rise to actual or potential Conflict of Interest must be avoided, in line with Maybank Group Code of Ethics and Conduct Policy.
- f) The guidelines and procedures for this section is set out in the Procedures. This section should also be read together with the Maybank Group Sanctions Policy & Procedures and the Maybank Group Anti-Money Laundering and Countering Financing of Terrorism Policy & Procedures.

4.7 Managing Conflict of Interest

- a) Actual or potential Conflict of Interest must be avoided.
- b) Directors and Employees must:
 - i) Not accept or receive personal benefits arising from their position, role or employment capacity;
 - ii) Not handle matters on behalf of Maybank in situations where they have an interest that conflicts with Maybank or its various stakeholders; and
 - iii) Inform GHC of any interests and situations that they know of, which could give rise to actual or potential Conflict of Interest.

- c) The guidelines and procedures applicable to this section of the Policy are set out in Section 7.0 of the Procedures and in the Maybank Group Code of Ethics and Conduct Policy.

4.8 Mergers, Acquisitions and Joint Ventures

- a) Maybank must undertake due diligence to ensure compliance with the relevant laws and regulations when engaging in:
 - i) Mergers and acquisitions;
 - ii) Joint ventures; and
 - iii) Proprietary investments under the Maybank name.
- b) The level of due diligence performed on the investment target must correspond to the level of Bribery and Corruption risk it poses to Maybank.
- c) The guidelines and procedures applicable to this section of the Policy are set out in Section 8.0 of the Procedures and the Maybank Group Business Development Process Framework under Group Strategy & Business Development.

4.9 Employment and Hiring

- a) Maybank, its Directors and Employees must not provide directorships, employment opportunities, or similar offers to any person including to a Third Party, AP or Customer or to any person related to an AP, Customer or Third Party as an inducement to obtain or retain business, to gain an unfair business advantage or for Personal Gain.
- b) The offering of directorships, employment opportunities or similar offers, are only permissible where the following criteria have been satisfied:
 - i) The offer is supported by a genuine and legitimate business need;
 - ii) Candidate selection is merit-based; and
 - iii) Candidates are subject to the same selection process and checks regardless of sourcing channel (e.g. referrals, external applications).
- c) Hiring decisions which could give rise to actual or potential Conflict of Interest must be avoided.
- d) This section of the Policy must be read together with Section 9.0 of the Procedures and the following policies which are stipulated in the Maybank Group People Policies:
 - i) Close Relatives Working within Maybank Policy;
 - ii) Resourcing Policy; and
 - iii) Fit and Proper Policy.

5.0 MONITORING AND ENFORCEMENT

5.1 Monitoring

- a) Group Compliance must monitor the processes and controls in the Procedures on a regular basis and establish a testing approach to validate the operating effectiveness of the same.
- b) The frequency of monitoring and testing must correspond to the level of Bribery and Corruption risks.
- c) Appropriate remedial action must be taken to address deficiencies that have been identified through the monitoring and testing performed.
- d) This guidelines and procedures applicable to this section of the Policy are set out in Section 10.0 of the Procedures.

5.2 Management Information Reporting

- a) Information on the management of Bribery and Corruption risks and compliance with AB&C PP must be provided to the Board and Group EXCO in an appropriate and timely manner to:
 - i) Facilitate their oversight and monitoring the effectiveness of existing processes and controls; and
 - ii) Ensure continued compliance with the relevant AB&C laws and regulations.
- b) This guidelines and procedures applicable to this section of the Policy are set out in Section 11.0 of the Procedures.

5.3 Record Keeping

- a) Complete and accurate records to demonstrate adherence to provisions of the AB&C PP must be developed and maintained.
- b) Documentation must be kept for a minimum period of 15 years and properly stored so they are readily available for review when required.
- c) If a longer retention period for documents is set out in a separate Policy or Procedures document, the longer retention period must apply.
- d) This guidelines and procedures applicable to this section of the Policy are set out in Section 12.0 of the Procedures.

5.4 Reporting

- a) Incidences regarding actual or suspected violations of this Policy can be reported in complete confidence as set out in the Maybank Group Whistleblowing Policy. Any repercussion against a whistleblower is strictly prohibited.
- b) Reported incidents of Bribery or Corruption must be investigated thoroughly and in a timely manner.

- c) Confirmed incidents of Bribery or Corruption are considered operational risk incidents, and are subject to the provisions of Incident Management Data Collection reporting as stipulated in the relevant Maybank Group Operational Risk Policies.
- d) This section of the Policy must be read with the Maybank Group Whistleblowing Policy.

6.0 TRAINING AND AWARENESS

- a) Maybank must establish and maintain a training and awareness programme to educate Employees on:
 - i) Bribery and Corruption risks of Maybank; and
 - ii) The AB&C PP.
- b) Employees must complete Anti-Bribery and Corruption trainings that is appropriate to their role, operating environment and jurisdictions in a timely manner.
- c) Employees must be assessed on their understanding of the AB&C PP and related requirements after attending the trainings.
- d) Group Compliance must monitor training attendance of Employees, assessment results and evaluate the adequacy and effectiveness of the trainings at least annually, to ensure that it remains current and achieves its primary objectives.
- e) Directors shall be provided with adequate information on the requirements in the Policy upon appointment.
- f) The guidelines and procedures applicable to this section are set out in Section 13.0 of the Procedures.

HELP DESK

Name	Purpose	Email Address
Group ABCWB	AB&C and Whistleblowing-related enquiries	abcwb@maybank.com
AB&C Screening Team	AP name screening request (for Malaysia-based entities only)	abcscreeningteam@maybank.com