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## HIGHLIGHTS

1) This eSPI has been revised to update on the following changes:

Affected Areas	Change Category	Brief Description
DEFINITION OF TERMS	REVISED	<ul style="list-style-type: none"> <li>Added 'entity' in the Associated Person definition.</li> <li>Added Close Relatives, Customer, Third Party(ies) and Non-Third Party(ies) definition.</li> </ul>
Sub-section 3.2 (b) (vi)& (vii)	REVISED	Revised and added engagements that do not fall under Maybank's AP definition.
Para 3.2.1 (a), (c)	REVISED	Provided clarity on the requirements to perform due diligence for APs.
Para 3.2.2 (a)	REVISED	Added a requirement to perform Close Relatives verification and validation against the Close Relatives list maintained by Group Human Capital ("GHC") to assess if there are any potential Conflict of Interest between AP and a staff of Maybank / Maybank.
Para 3.2.2 (d)	NEW	Provided clarity on the escalation process if there is any actual or potential Conflict of Interest identified.
Para 3.2.2 (e)	NEW	Due diligence for Maybank Securities Solutions' Sub-Custodian & Global Markets' Money Broker will be guided by a separate screening process flow.
Para 3.2.2 (f)	NEW	This section should also be read together with the Maybank Group Anti-Money Laundering and Countering Financing of Terrorism Policy and Procedures.
Para 3.2.4 (a)	REVISED	Amended the Low Risk AP review frequency from During Contract Renewal to Every 5 years.
Para 3.2.9 (a), (c)	REVISED	<ul style="list-style-type: none"> <li>Provided clarity on the maintenance of centralised AP register and the supporting documents in relation to the AP engagement.</li> <li>Included new AP register (<b>Appendix 3</b>) in the Appendices.</li> </ul>
Section 4.0	REVISED	Updated Gifts and Entertainment thresholds.
Sub-section 4.1 (a) & Sub-section 5.1 (a),	REVISED	Provided clarity on gifts of cash and cash equivalents.

Affected Areas	Change Category	Brief Description
Sub-section 4.1 (c)	REVISED	Provided clarity on approval for entertainments hosted in-house by Maybank, or at corporate events.
Sub-section 4.1 (g)	NEW	For recording in the G&E register, entertainment and gift among family members received on the same day is considered as a single event and aggregated for approval purposes to the primary recipient.
Sub-section 4.1 (j)	REVISED	Provided clarity on the recording requirement for giving gifts and entertainment (except token and corporate gifts of no resale value) based on threshold.
Section 5.0 (e )	REVISED	Updated Gifts and Entertainment thresholds.
Section 5.0 (f )	NEW	For overseas branches and subsidiaries, please refer to the respective country Gifts and Entertainment Thresholds.
Sub-section 5.2 (g)	REVISED	Updated the amount stated per latest Gifts & Entertainment thresholds.
Section 6.0 & 6.1	REVISED	Updated the name from 'Group External Communications' to 'Group Corporate Affairs'.
Section 6.0 (a)	REVISED	All donations and sponsorships must be escalated to Group Corporate Affairs for review and approval prior to the event.
Sub-section 12.0 (c)	NEW	Added requirement on the record keeping of supporting documents in relation to the AP assessment and review assessment
List of Appendices	REVISED	<ul style="list-style-type: none"> <li>• <b>Appendix 1</b> - Associated Person Assessment Template</li> <li>• <b>Appendix 2(a)</b> - Associated Person Onboarding flowchart</li> <li>• <b>Appendix 2 (b)</b> - Associated Person Ongoing Due Diligence flowchart</li> <li>• <b>Appendix 6</b> - Gifts and Entertainment Register</li> <li>• <b>Appendix 12</b> - Frequently Asked Questions (FAQs) (previously Appendix 11)</li> </ul>
List of Appendices	NEW	<ul style="list-style-type: none"> <li>• <b>Appendix 3</b> - Associated Person Register</li> <li>• <b>Appendix 11</b> - Donation and Sponsorship Register</li> </ul>

- 2) This eSPI is to be read together with the following references and its subsequent updates:

No.	Document Number	Document Title
1	MAL/REGULATORY/COMPLIANCE /385	MAYBANK GROUP ANTI-BRIBERY AND CORRUPTION POLICY
2	MAL/FWK/COMPLIANCE/402	MAYBANK GROUP COMPLIANCE FRAMEWORK
3	MAL/REGULATORY/COMPLIANCE /978	MAYBANK GROUP ANTI-MONEY LAUNDERING AND COUNTERING FINANCING OF TERRORISM POLICY
4	MAL/REGULATORY/COMPLIANCE /398	MAYBANK GROUP ANTI-MONEY LAUNDERING AND COUNTERING FINANCING OF TERRORISM PROCEDURES
5	MAL/ARC/COMPLIANCE/32	CONTROL, PRESERVATION AND DESTRUCTION OF BANKS DOCUMENTS AND RECORDS

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## DEFINITION OF TERMS

Unless otherwise defined, capitalised terms defined and used in Maybank Group Anti-Bribery and Corruption Procedures (“Procedures”), shall have the same meaning as the definition of terms used in the Maybank Group Anti-Bribery and Corruption Policy (“Policy”). In the event of any inconsistency between the Policy and this Procedures, the terms of this Procedures shall prevail.

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

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>
Beneficial Owner(s)	Beneficial owner refers to an individual who is entitled to exercise control or has control of 25% or more of the shares/voting rights of a company. This also includes situations in which ownership or control is exercised through a chain of ownership or by means of control other than direct control.
Close Relatives	<p>Close relatives encompass a spectrum of biological, non-biological and legal adoptive relationships, which include:</p> <ul style="list-style-type: none"> <li>• Spouses;</li> <li>• Grandparents;</li> <li>• Parents and Step-Parents;</li> <li>• Uncles &amp; their Aunties (limited to Parents’ / Step-Parents’ siblings and their spouses);</li> <li>• Siblings &amp; their spouses (including legally adopted brothers and sisters); and</li> </ul> <p>Children, Children of Siblings &amp; their Spouses, Children of Uncles and Aunties (including legally adopted children).</p>
Customer	An individual or a legal entity that is, or intends to become, a Maybank customer. This includes depositors and borrowers.
Politically Exposed Person (“PEP”)	An individual who is or who have been entrusted with prominent public function by the local government, a foreign country, or by an international organisation.
Third Party(ies)	A person (other than the AP and/or Customer) who has official dealings/ business relationship with Maybank, including Public Officials, Foreign Public Officials, regulators and other parties which

Common Terms	Description
	the Policy may be extended to cover in circumstances relating to Bribery and Corruption.
Non-Third Party(ies)	A person who has no official dealings/business relationship with Maybank.

## **1.0 OVERVIEW**

### **1.1 Objective of the Procedures**

- a) This Procedures supports the Policy in setting out detailed steps to guide Directors, and Employees on how to deal with Bribery and Corruption risks and issues that may arise in the course of Maybank's business.
- b) This Procedures is not intended to be a substitute for personal discretion and readers are expected to exercise sound judgment to meet the objectives of the Policy and this corresponding Procedures.

### **1.2 Procedures Approval and Subsequent Review**

- a) This Procedures is owned by Group Compliance and must be reviewed at least annually, and as and when there are changes to the Policy.
- b) Subsequent material amendments to this Procedures must be approved by the Board, where required in accordance with the framework set out in the eSPI of **MAL/FWK/COMPLIANCE/402 - MAYBANK GROUP COMPLIANCE FRAMEWORK** and its subsequent updates.

### **1.3 Procedures Exceptions**

- a) Departments/entities that are unable to comply, in whole or in part, with the requirements of this Procedures, or may be required to adhere to a different locally mandated requirement must apply for an exception.
- b) Any such exception must be escalated in writing to the Head of Group FCC and the Group Chief Compliance Officer ("GCCO"), who will determine whether an exception should be granted, or whether further escalation is required.

## **2.0 BRIBERY AND CORRUPTION RISK ASSESSMENT**

### **2.1 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 Maybank.
- b) The risk assessment results will determine the appropriate processes and controls to mitigate the identified Bribery and Corruption risks.

### **2.2 Accountability & Methodology**

- a) Group Compliance is accountable for the planning, execution and reporting of a Bribery and Corruption risk assessment, which should be carried out at least once a year.
- b) Department/entity must provide information to Group Compliance on the inherent Bribery and Corruption risks they face, through the completion of the risk assessment template provided by Group Compliance.
- c) In addition, additional risk assessment is required whenever there is a material trigger event including, but not limited to, the following:
  - i) significant changes in business activities, structure and/or operations;



- ii) significant increase in AB&C breaches reported;
  - iii) ad-hoc request from supervisory authority to perform intermittent risk assessment;
  - iv) changes in regulatory requirements; or
  - v) external auditor's recommendations.
- d) Group Compliance must ensure that the methodology, approach and template underpinning Maybank's Bribery and Corruption risk assessment is appropriate and fit for purpose, taking into consideration:
- i) recent developments in internal and external environment including regulatory developments; and
  - ii) readiness of processes, controls and availability of data to support the assessment.
- e) The risk assessment must, at a minimum, consider:
- i) country or sectors in which Maybank has dealings or operations;
  - ii) parties Maybank interacts with (e.g. Customer and AP);
  - iii) products offered; and
  - iv) specific activities or transactions undertaken which pose higher AB&C risks (e.g. gifts and entertainment, donations and sponsorships, employment and hiring).
- f) Group Compliance must report the outcome of the Bribery and Corruption risk assessments, as well as the proposed remedial actions to manage the identified risks, to the Group EXCO and the Board.

### **3.0 DEALINGS WITH THIRD PARTY AND AP**

#### **3.1 Dealings with Third Party**

- a) When dealings with Third Party, the department/entity must assess the nature or purpose of the official dealings/ business relationship. Where it involves gifts and entertainment to/from Third Party, the department/entity shall refer to Sections 4.0 and 5.0 for guidance.
- b) The nature or purpose of the dealings with the Third Party must align with the Key Principles of the Policy.

#### **3.2 Engaging APs**

- a) The department/entity engaging the AP is responsible for performing the procedures defined in this section. The types of APs are as follows:
  - i) Type A - APs that fall under the categories below are deemed to have a high possibility of exposing Maybank to Bribery and Corruption risk:
    - performing a service in Maybank's name i.e. outsourcing service providers;
    - representing Maybank in any of its dealings with other parties;
    - acting on behalf of Maybank; or
    - strategic business partners, collaboration partners, joint-venture partners.

- ii) Type B - All other APs, which do not fall under categories specified under Sub-section 3.2 (a) (i).
- b) The following engagements **DO NOT** fall under Maybank's AP definition:
  - i) A Maybank entity providing/receiving services to/from another Maybank entity;
  - ii) Non-recurring and non-contractual expenses of small amount e.g. purchase of stationery, caterers providing food/refreshments for department events, topping up of fuel tank for company cars etc.;
  - iii) Statutory payments to government bodies such as inland revenue, employee provident funds contribution etc.;
  - iv) Payment of utility bills;
  - v) Payment for professional membership fees;
  - vi) Payment for subscription services (i.e. Bloomberg, Wall Street Journal, Bernama, The Economist, Experian, SSM, etc.); and
  - vii) Maybank is the party providing the services for or on behalf of another party.

Please escalate to Group FCC for any services that are to be deemed out-of-scope but not listed in the above section.

### 3.2.1 Requirements to Perform Due Diligence for APs

- a) Department/entity must assess the AP using the Associated Person Assessment Template as set out in **Appendix 1**, to determine the level of Bribery and Corruption risk of the AP and if there is any potential or actual Conflict of Interest they would pose to Maybank based on the type of engagement. If the AP is an existing active customer of Maybank or there is an existing AP engagement with Maybank, the department/entity may rely on the due diligence results (i.e. identification and screening results) as long as the due diligence remains within the validity period of 3 months from the last screening conducted.
- b) All APs must be assessed at engagement level, as the Bribery and Corruption risks for the same AP may vary based on the type of engagement with Maybank.
- c) For sector who engaged the same AP with the same scope of work and referred to the same Master Agreement/ contract signed, they may rely on the AP assessment conducted by the primary contract owner.
- d) Please refer to Appendices for Associated Person Assessment Template (**Appendix 1**) and Associated Person Onboarding flowchart (**Appendix 2 (a)**).

### 3.2.2 Due Diligence for AP Onboarding

- a) Department/entity must ensure that the AP assessment is performed prior to the AP being approved by Maybank for engagement.

Due Diligence	Type A	Type B
Name Screening		
Parties to be screened	<ul style="list-style-type: none"><li>• AP;</li><li>• Beneficial Owners;</li><li>• Immediate and intermediate corporate shareholder which owns 25% or more of the shares;</li><li>• Directors, Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, or any equivalent positions/roles</li></ul>	<ul style="list-style-type: none"><li>• AP;</li><li>• Beneficial Owners;</li><li>• Executive Directors</li></ul>
Screening Database/search engines to be used	<ul style="list-style-type: none"><li>• Any screening database used by the department/entity (e.g. OCISS) which should include:<ul style="list-style-type: none"><li>○ individuals/entity listed under internal black list;</li><li>○ PEPs;</li><li>○ Sanctions; and</li><li>○ Adverse News</li></ul></li><li>• Department/entity should also perform adverse news check via internet searches to ascertain if the AP or its Beneficial Owners (as per screening requirements) has any material adverse news or media.</li><li>• Department/entity should also perform the Close Relatives verification and validation against the Close Relatives list maintained by Group Human Capital (GHC) to assess if there are any potential or actual Conflict of Interest between AP and a staff of Maybank / Maybank.</li></ul>	
Validity Period of the screening results	The validity period for name screening is 3 months. In the event a review was conducted and the screening validity has lapsed for more than 3 months, a re-screening is required.	
Assessment of Proposed Fees		

Due Diligence	Type A	Type B
Steps to be performed	Perform checks to ensure that the proposed fees and remuneration payable to the AP is commensurate to the nature and extend of services provided.	

- b) An AP should be classified as High Risk if one or more of the below risk factors is identified for the AP. Otherwise, the AP will be classified as Standard Risk or Low Risk:
- i) There is one or more PEP(s)/ Public Official(s)/ Foreign Public Official(s) in the AP ownership structure who has an ultimate controlling ownership interest and/or can exercise control or decision making over AP;
  - ii) A PEP/ Public Official/ Foreign Public Official/ customer is able to exert significant influence on the engagement or retention of the AP;
  - iii) AP has previously worked in the government, or is closely connected with a PEP;
  - iv) Material adverse news or media on the AP, its directors, Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, or any equivalent positions/ roles or Beneficial Owners is identified. Please refer to Maybank Group Anti-Money Laundering and Countering Financing of Terrorism Policy for definition of materiality of adverse news;
  - v) Alleged Bribery or Corruption concerns on the AP, its directors, Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, or any equivalent positions/ roles or Beneficial Owners is identified;
  - vi) AP in the course of doing work for Maybank, will have frequent interaction with government officials, government agencies, government controlled agencies and/or other agencies or organisations which are deemed as higher risk by department/entity involved in engaging the AP;
  - vii) AP has limited capability or experience in providing the required services;
  - viii) The scope of work or activities undertaken is unusual or unnecessarily complex;
  - ix) The AP requests payment through unusual means (e.g. to be paid to an account owned by a different party); or
  - x) The contractual terms proposed by the AP deviates significantly from Maybank's AP related contractual safeguards.
- c) Where it is noted that the AP has an adverse media or a true match to the name screening database, the department/entity must escalate the case to the Head of Department for approval, prior to getting Group Compliance's concurrence.
- d) Where it is noted that the AP has a true match to the Close Relatives listing maintained by GHC, the department/entity must provide the following

information prior to seeking consultation from Group Compliance and Group Human Capital:

- i) Name, position, department of the close relative identified;
- ii) whether the individual has the approving authority of the AP engagement
- iii) whether the individual involves in the AP engagement; and
- iv) whether the individual can exercise control or decision making over the AP.

The AP should not be onboarded until advice being obtained from Group Compliance and Group Human Capital for any actual or potential Conflict of Interest identified.

- e) Maybank Securities Solutions' Sub-Custodian & Global Markets' Money Broker due diligence will be guided by a separate screening process flow. Further details, please consult Global Banking Know-Your-Customer (GB KYC) team.
- f) This section should also be read together with the **MAL/REGULATORY/COMPLIANCE/978 - MAYBANK GROUP ANTI-MONEY LAUNDERING AND COUNTERING FINANCING OF TERRORISM POLICY** and **MAL/REGULATORY/COMPLIANCE/398 - MAYBANK GROUP ANTI-MONEY LAUNDERING AND COUNTERING FINANCING OF TERRORISM PROCEDURES** and their subsequent updates.

### 3.2.3 Approval for AP Onboarding/ Ongoing Due Diligence

Department/entity is required to obtain the approval from the relevant approving authority prior to the onboarding of AP or continuing the engagement with the AP.

Type of AP	Approver
<b>Low and Standard Risk AP</b> - Onboarding - On-going due diligence	Section /Business Head
<b>High Risk AP</b> - Onboarding - On-going due diligence	Section/Business Head and Head of Department

### 3.2.4 Ongoing Due Diligence for APs

- a) Department/entity engaging the AP is responsible for reviewing the existing AP engagement and perform ongoing due diligence based on the below schedule:

Risk Rating	High Risk AP	Standard Risk AP	Low Risk AP
Next Due Diligence Review	Annually	Every 3 years	Every 5 years

- b) Ongoing due diligence shall be initiated 30 calendar days before the expiry of the previous due diligence or before the expiry of the contract (except for Low Risk APs), whichever is earlier to avoid any delay in assessing the potential Bribery and Corruption risk involved in engaging the APs. The due diligence performed should be completed within 30 calendar days.
- c) In addition to the ongoing due diligence, there may be trigger events that warrant a review of the AP, such as:
- i) significant changes in the ownership or engagement structure of the AP;
  - ii) adverse media news or reports (e.g. Bribery, Corruption, money laundering) involving the AP, its directors, Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, or any equivalent positions/ roles or Beneficial Owners;
  - iii) concerns surrounding the effectiveness of the AP's AB&C compliance programme; or
  - iv) changes in the nature of services provided by the AP.
- d) The following procedures must be performed on existing APs as part of the ongoing due diligence review:
- i) screening and assessment of proposed fees in line with Para 3.2.2. For corporate APs, the department/entity must identify if there is any change to the Beneficial Owners to ensure that screening is performed accordingly;
  - ii) review of the contract to identify changes in the services provided by the AP or contractual terms governing the relationship with the AP;
  - iii) re-evaluate the risk rating, taking into consideration the outcomes of the checks described in (d) (i); and
  - iv) High Risk APs must submit a fresh declaration (**Appendix 4 a)** and **Appendix 4b)** declaring their compliance with Maybank's summary AB&C Policy during each due diligence refresher exercise.
- e) The due diligence results must be considered when determining whether to accept, maintain or terminate the relationship with the APs. If the department/entity decides to maintain the relationship and where there are Bribery and/or Corruption concerns and/or potential or actual Conflict of Interest identified, the department/entity must escalate the

case to Group Compliance for discussion, prior to requesting approval from the relevant business head.

- f) If the department/entity decides to terminate the relationship, Group Compliance must be notified to update the AP in the Maybank screening database (AP Blacklist) maintained by Group Compliance to prevent re-onboarding of the AP.
- g) Remisiers in Maybank Investment Banking Group shall make a declaration stating their compliance to the Key Principles of Maybank Group AB&C Policy, as part of the periodic fit-and-proper check exercise.
- h) The contractual agreement between Etiqa and the insurance agents shall include clauses requiring the insurance agents to adhere to the Key Principles of Maybank Group AB&C Policy.
- i) Please refer to **Appendix 2 (b)** - Associated Person Ongoing Due Diligence Flowchart.

### **3.2.5 AB&C Contractual Safeguards**

- a) Standard and non-standard contracts between Maybank and the APs (“Contracts”) must include the following AB&C contractual safeguards:
  - i) a requirement to have appropriate AB&C policies, processes and controls (or equivalent) in place. If this is not available, there must be a requirement on the part of the AP to maintain adequate internal controls and procedures to ensure compliance with the laws and regulations concerning Bribery and Corruption;
  - ii) a prohibition on the AP committing Bribery and Corruption in the course of performing the agreed services or carrying out the strategic or collaborative activities with Maybank; and
  - iii) a termination clause allowing Maybank to immediately terminate the contract with the AP, where acts of Bribery and Corruption have been identified.
- b) The contract should also require the AP to indemnify Maybank against losses, costs, claims, demands, expenses (including reasonable legal fees) and liabilities of nature arising from or relating to acts of Bribery or Corruption committed by the AP (“Indemnity”). This requirement should survive tenure of the contract with Maybank.
- c) Any deviation to AB&C contractual safeguards set out herein must be approved by the Head of Department of the unit that is the contracting party in consultation with Group Legal/respective legal unit supporting the business, as the case may be and Group Compliance.

### **3.2.6 Declaration of Compliance**

- a) All High Risk APs must submit a declaration stating their compliance with Maybank’s AB&C Policy Key Principles.
- b) Please refer to Appendices for Associated Person Letter of Declaration [(Appendix 4(a) & 4(b))].

### **3.2.7 Termination of AP Relationship with Bribery or Corruption Concerns**

- a) In the event that a department/entity decides to terminate the relationship with any AP for Bribery or Corruption concerns, the department/entity must notify Group Compliance within **2 working days from the date of the decision**.
- b) Group Compliance must then update the Maybank screening database within 2 working days of the notification to ensure that such AP does not get re-onboarded by other department/entity.

### **3.2.8 Payments to APs**

- a) Fees and remuneration payable to the AP must commensurate to the nature and extent of services provided by the AP. Invoices must be supported by detailed calculations (e.g. payment schedules, man-hour records, expenses tracker) to ensure that the fees paid to the AP are in accordance to the agreed payment schedule stated in the contract/agreement.
- b) Finance must put in place control measures to ensure that:
  - i) payment made to AP must not be in the form of physical cash;
  - ii) payment must be made to an account that bears the name of the AP; and
  - iii) payment must be made in accordance to the agreed payment schedule stated in the contract or agreement.

### **3.2.9 Maintaining AP Records**

- a) Each department/entity shall maintain a centralized AP register at sector level of all APs engaged. It is also the responsibility of the department/entity to maintain and keep all supporting documents in relation to the AP engagement. This is including but not limited to AP assessment template, AP screening results, approvals, company profile, etc.
- b) The details of APs must be updated in the AP register no later than 10 working days after:
  - i) New APs are onboarded;
  - ii) Existing APs are terminated;
  - iii) Changes to the status or details of existing APs are identified; and
  - iv) After the ongoing due diligence refresh is completed.
- c) Please refer to Appendices for Associated Person (AP) Register (**Appendix 3**).

## **4.0 GIVING GIFTS AND ENTERTAINMENT**

- a) Each department/entity shall maintain a centralized register to keep the records for all gifts and entertainments.
- b) The Head of Department shall review the Gift and Entertainment Register on a monthly basis.



- c) Directors are to be guided by Section 7.0 Benefits received by a Director of the Policy on Directors Conflict of Interest prepared by Group Corporate Secretarial.
- d) A summary of the thresholds for giving gifts and entertainment is shown below. The values are considered on a per person per event basis.
- i) All Maybank Employees

Giving Gifts and Entertainment Thresholds for All Maybank Employees				
Category or Value	Recording Required	*Approval from EXCO-1/SMC-1	**Approval from EXCO/SMC <sup>1</sup>	Approval from Group EXCO
Cash and cash equivalents	<b>PROHIBITED</b>			
Entertainment involving illegal or unethical activities				
Token gifts with no resale value	Allowable. No recording or approvals required			
Corporate gifts with no resale value				
≤ RM200	×	×	×	×
RM200.01 - RM500	✓	×	×	×
RM500.01 - RM1,000	✓	✓	×	×
>RM1,000 - RM9,999	✓	✓	✓	×
≥RM10,000	✓	✓	✓	✓

\*The authority holder must be at least of Band D

\*\*The authority holder must be at least of Band C

<sup>1</sup> SMC refers to the Senior Management Committee

- ii) Business EXCO Heads (Group CEO CFS, Group CEO GB, Group CEO Islamic Banking, Group CEO Insurance & Takaful)

Giving Gifts and Entertainment Thresholds for Business EXCO Heads		
Category or Value	Recording Required	Approval from PGCEO
≤ RM200	X	X
≤ RM1,000	✓	X
>RM1,000	✓	✓

- e) For overseas branches and subsidiaries, please refer to the respective country Gifts and Entertainment Thresholds.

- f) Please refer Appendices for Gift and Entertainment Request form (**Appendix 5**) and Gift and Entertainment Register (**Appendix 6**).

#### 4.1 Giving Gifts and Providing Entertainment

- a) **Gifts of cash and cash equivalents are strictly prohibited.** This includes but not limited to cash, bonds, negotiable securities, personal loans, guarantees, other forms of security in which benefits are derived, vouchers (e.g. Touch 'n Go voucher), digital currencies and prepaid cards which can be directly (or partially) exchanged for cash are considered as cash equivalents.
- b) Gifts that do not require approval or recording include token and corporate gifts of no resale value, such as:
  - i) gifts provided during Maybank's official functions, events and celebrations (e.g. commemorative gifts or door gifts offered to guests attending the event);
  - ii) gifts bearing Maybank's logo (e.g. t-shirts, pens, diaries, calendars and other small promotional items) that are given out equally to members of the public, delegates, customers, partners and key stakeholders attending events and deemed as part of the company's brand building or promotional activities; and
  - iii) corporate gifts, including gifts which are centrally managed, sourced and distributed by Maybank.
- c) Entertainments hosted in-house by Maybank, or at corporate events, **are subject** to the respective Business' approval or Group Corporate Marketing/Communication process and requirements.
- d) It is strictly prohibited to provide entertainment which is illegal or unethical (e.g. drug consumption, prostitution, and other activities that violate the Maybank Group Code of Ethics and Conduct Policy).
- e) Additional caution must be exercised when giving gifts or providing entertainment to PEPs/ Public Officials/ Foreign Public Officials, especially those who have the capacity to influence/make policy level decisions.
- f) Multiple entertainments provided during a single occasion event are to be considered as a singular event and must be aggregated for approval purposes.
- g) If the entertainment provided includes partner, spouse, family member, close associate or entertainment/ gift delivered to same recipient of same day, this will be considered as a singular event and must be aggregated for approval purposes to the primary recipient. The details must be clearly indicated during the submission of G&E request and recorded in the G&E Register.
- h) If the entertainment occurs outside of the home country where the Directors and Employees are based, the limits of the location where the entertainment occurs shall apply.
- i) If the actual amount spent exceeds 120% of the pre-approved amount, or if it is not feasible to obtain pre-approval e.g. unplanned post meeting lunches, post approval must be obtained by the Directors and Employees no later than 10 working days after the date of the event. If the post-approval request is denied by the authorised approver, this will be recorded as an incident of non-compliance.

- j) The Directors and Employees must declare and record all gifts and entertainment (except token and corporate gifts of no resale value) based on the thresholds, immediately or no later than 10 working days after the request was approved or rejected, whichever is earlier. These include gifts which have been rejected by the recipients. For gifts and entertainment that does not required any approval, it needs to be recorded no later than 10 working days after the event date.
- k) The Directors and Employees are responsible for ensuring the timeliness and accuracy of the recording of their own gifts and entertainment declaration.
- l) If the Employee who provides the G&E is also the person holding the authority as stated in the approval matrix, the Employee should then seek approval from his/her line manager.

#### **4.2 Inviting External Parties to Maybank-Organised Events**

- a) Maybank may pay speaker fees to, and cover reasonable expenses for, external parties who are invited to Maybank-organized events, subject to the following conditions:
  - i) pre-approval is obtained based on the G&E thresholds matrix;
  - ii) there is an invitation letter addressed to the invitee, clearly setting out the agenda of the event, the topic to be discussed by the speaker or panelist;
  - iii) the amount is not excessive and is similar to expenses generally paid in similar situations; and
  - iv) there is no potential or actual Conflict of Interest.
- b) Reasonable expenses may include:
  - i) registration or other event charges, including meals provided during the event;
  - ii) meals outside the event;
  - iii) travel costs;
  - iv) accommodation cost; and
  - v) speaker fees (for speakers or panelists only).
- c) The class of travel or accommodation provided to external parties must commensurate with the class of travel provided to Directors or Employees of equivalent level or seniority.

#### **5.0 RECEIVING GIFTS OR ENTERTAINMENT**

- a) Each department/entity shall maintain a centralized register to keep the records for all gifts and entertainments.
- b) The Head of Department shall review the Gift and Entertainment Register on a monthly basis.
- c) Directors are to be guided by Section 7.0 Benefits received by a Director of the Policy on Directors Conflict of Interest prepared by Group Corporate Secretarial.
- d) A summary of the permissibility for receiving gifts is shown below:

Category or value	Receiving Gifts
Cash or cash equivalents	<b>PROHIBITED</b>
Token gifts with no resale value	Allowable. No recording or approvals required
Other gifts	Gift received must be handled as below: <ul style="list-style-type: none"> <li>• Decline;</li> <li>• Donate;</li> <li>• Distribute; or</li> <li>• Retained as Maybank property</li> </ul>

e) A summary of the thresholds for receiving entertainment is shown below. The values are considered on per person per event basis:

i) All Maybank Employees

Receiving Entertainment Thresholds for All Maybank Employees				
Category and Value	Recording Required	*Approval from EXCO-1/SMC-1	**Approval from EXCO/SMC <sup>1</sup>	Approval from Group EXCO
Illegal or unethical activities	<b>PROHIBITED</b>			
≤ RM200	×	×	×	×
RM200.01 - RM500	✓	×	×	×
RM500.01 - RM1,000	✓	✓	×	×
>RM1,000 - RM9,999	✓	✓	✓	×
≥RM10,000	✓	✓	✓	✓

\*The authority holder must be at least of Band D

\*\*The authority holder must be at least of Band C

<sup>1</sup> SMC refers to the Senior Management Committee

ii) Business EXCO Heads (Group CEO CFS, Group CEO GB, Group CEO Islamic Banking, Group CEO Insurance & Takaful)

Receiving Entertainment Thresholds for Business EXCO Heads		
Category or Value	Recording Required	Approval from PGCEO
≤ RM200	X	X
≤ RM1,000	✓	X
>RM1,000	✓	✓

- f) For overseas branches and subsidiaries, please refer to the respective country Gifts and Entertainment Thresholds.
- g) Entertainment received from non-customers and non-Third Parties/APs need not be recorded in the Gifts and Entertainment Register by the entertainment recipient.
- h) If the Employee who receives the G&E is also the person holding the authority as stated in the approval matrix, the Employee should then seek approval from his/her line manager.

## 5.1 Receiving Gifts

- a) **Gifts of cash or cash equivalents is strictly prohibited.** This includes but not limited to cash, bonds, negotiable securities, personal loans, guarantees, other forms of security in which benefits are derived, vouchers (e.g. Touch 'n Go voucher), digital currencies and prepaid cards which can be directly (or partially) exchanged for cash are considered as cash equivalents.
- b) Token gifts of no resale value do not require approval or recording. This includes:
  - i) gifts received during official functions, events and celebrations (e.g. commemorative gifts or door gifts offered to guests attending the event); and
  - ii) door gifts (e.g. t-shirts, pens, diaries, calendars and other small promotional items) that are given out equally to members of the public, delegates, customers, partners and key stakeholders attending events and deemed as part of the provider's brand building or promotional activities.
- c) Directors and Employees are discouraged from receiving gifts in other circumstances. In situations where the Directors and Employees are unable to decline the gift, they must take one of the following actions:
  - i) distribute the gift as long as such practice does not cause improper influence, bribe or corrupt any party;
  - ii) nominate a charity to have the gift redirected as a donation, and have the donation made under Maybank's name. Where possible, the recipient should notify the person(s) who offered the gift that the gift has been donated to a charity;
  - iii) donate an equivalent amount to charity if the recipient opts to retain the gift; or
  - iv) accept the gift on behalf of Maybank. In such cases, the gift is the property of Maybank (e.g. for display at its premises).
- d) Gifts received must be recorded in the Gifts and Entertainment Register (**Appendix 6**) by the recipient within 10 working days from the date of receipt of the gifts.
- e) The Directors and Employee are responsible for ensuring the timeliness and accuracy of the recording of the gifts they received.

## **5.2 Receiving Entertainment from Customers, Third Parties or APs**

- a) Receiving entertainment which is illegal or unethical is strictly prohibited.
- b) The value of entertainment received must be estimated based on market rates where available. If market rates are not available, the value must be estimated based on the value of similar types of entertainment.
- c) If the entertainment occurs outside of the home country where the Directors and Employees are based, the limits of the location where the entertainment occurs shall apply.
- d) Approvals must be obtained by the recipient prior to the event date.
- e) In situations where pre-approval is not possible, post-approval must be obtained within 10 working days after the event date.
- f) If the post-approval request is rejected by the authorised approver, this will be recorded as an incident of non-compliance.
- g) Estimated per person entertainment spend above RM200 that is accepted must be recorded in the Gifts and Entertainment Register (**Appendix 6**) by the entertainment recipient within 10 working days of receiving the entertainment.

## **5.3 Attending Events Organised by or Paid for by External Parties as a Speaker or Panelist**

- a) Invitation received by the Director or Employee in their personal capacity, to be a speaker or panelist, is not prohibited under this Procedures and not subject to the requirements stipulated in b), c) and d) below, provided that there is no potential or actual Conflict of Interest.
- b) Directors and Employees invited as speakers or panelists at third party events are allowed to be reimbursed for reasonable expenses subject to the following conditions:
  - i) pre-approval is obtained based on the G&E thresholds matrix;
  - ii) there is an invitation letter addressed to the Director or Employee clearly setting out the agenda of the event, the topic for speaker or panelist and expenses to be covered by the third party;
  - iii) the amount is not excessive and similar to expenses generally paid or received in similar situations; and
  - iv) there is no potential or actual Conflict of Interest.
- c) The requirements specified above still apply even in situations where expenses are not reimbursed by the third party.
- d) Directors and Employees are allowed to accept speaker fees which is deemed reasonable and in accordance with the industry rate. The speaker fees must be declared to Group Human Capital prior to the event.

## **5.4 Attending Events Organised by or Paid for by External Parties as an Attendee**

- a) Attendance at third party events in the Director or Employee's personal capacity is not prohibited under this Procedures, and not subject to the requirements stipulated in b) and c) below, provided that there is no potential or actual Conflict of Interest.

- b) If the event has a fee which is waived or paid for by an external party, the Directors and Employees are allowed to attend the event, but subject to the following conditions:
  - i) pre-approval is obtained based on the G&E thresholds matrix;
  - ii) the nature and subject of the event is relevant to the Director or Employee role at the bank;
  - iii) the fees paid or waived is not excessive; and
  - iv) there is no potential or actual Conflict of Interest.
- c) Travel and accommodation costs must be borne by Maybank, the Directors or Employees.
- d) Please refer to Appendices for Gift and Entertainment Request Form (**Appendix 5**) and Gift and Entertainment Register (**Appendix 6**).

## **6.0 DONATION AND SPONSORSHIP**

- a) All donations and sponsorships must be escalated to Group Corporate Affairs for review and approval prior to the event, except for the following:
  - i) Maybank Foundation initiatives and scholarship awards, which should be escalated to Maybank Foundation Board of Trustees for approval; and
  - ii) Zakat payments to Asnaf and initiatives managed by Shariah Management team, which are subject to separate guidelines issued by Maybank Islamic Berhad.
- b) Group Corporate Affairs is responsible for reviewing and approving donation or sponsorship requests, in line with the procedures defined in this section.
- c) In addition, sponsorship events are also subject to internal guidelines issued by Group Corporate Marketing.
- d) Please refer to Appendices for Donation and Sponsorship Flowchart (**Appendix 10**).

### **6.1 Assessing Donation or Sponsorship Requests**

- a) Requests must be made in writing directly to Group Corporate Affairs, and at a minimum, include the following details:
  - i) Request letter from the recipient or requestor;
  - ii) identity of the recipient and the requestor (if different);
  - iii) purpose, including the following (if applicable):
    - activities which will be funded by the donation or sponsorship;
    - activities that can be linked to the donation or sponsorship (e.g. appreciation dinner); and
    - names of other organisations, or groups of organisations involved in the donation or sponsorship drive.
  - iv) amount required;
  - v) breakdown of planned fund usage (for fund requests);
  - vi) expected impact on the intended beneficiaries;



- vii) number of sponsors involved in the sponsorship other than Maybank;
  - viii) existing relationship of recipient, their senior management or Beneficial Owners with Maybank, Directors or Employees.
  - ix) other potential relationships that may cause a Conflict of Interest.
- b) Group Corporate Affairs must ensure that due diligence checks have been performed on the recipient and the requestor:
- i) Where the recipient or requestor is not an existing customer, Group Corporate Affairs must perform the necessary due diligence checks, which include background (e.g. identification) and screening checks (e.g. adverse media, sanctions) on the recipient and requestor, their Senior Management or Beneficial Owners; or
  - ii) Where the recipient or requestor is an existing customer, existing AML customer due diligence checks can be relied on as long as the latest refresh occurred or the customer was onboarded within the past 12 months. If this is not the case, Group Corporate Affairs must ensure that customer due diligence is completed and approved by the respective business owning the customer relationship prior to making a decision on the request, or Group Corporate Affairs is to undertake the checks as defined in this section.
- c) Request with the following triggers must be escalated to Group Compliance for their review and comments:
- i) originates from a Customer, AP or Third Party who is currently (re)negotiating contracts with Maybank;
  - ii) originates from or involves a PEP/ Public Official/ Foreign Public Official;
  - iii) is made on behalf of a PEP/ Public Official/ Foreign Public Official;
  - iv) can influence government action or decision;
  - v) involves activities or transfer of funds to a high risk country, as specified in AML high risk country list;
  - vi) involves sums of money and/or activities which could lead to actual or potential acts of Bribery or Corruption; or
  - vii) red flags detected, for example:
    - the recipient refuses to provide adequate documentation or suggests that the donation or sponsorship may only be made anonymously;
    - the donation or sponsorship is directed to a bank account in a third country (other than a country where a recipient is based or carrying out activities);
    - the recipient is providing gifts or travel, lodging, meals, or entertainment to PEPs/ Public Officials/ Foreign Public Officials in connection with its charitable activities;
    - the funds will be used, in whole or in part, to hire third parties who have connections with PEPs/ Public Officials/ Foreign Public Officials or who have been identified or suggested by a PEP/ Public Official/ Foreign Public Official;



- requests for donations or sponsorships are made by the same recipient more than once over the span of one year;
  - conditions attached to a donation or sponsorship mean that Maybank would be a vehicle for transferring funds from one individual or organisation to another without Maybank being able to satisfy ourselves that the funds have been used as intended;
  - there is a risk that a commercial transaction could be influenced, as a result of the provision of the donation or sponsorship; or
  - there is a risk that the funds can be regarded as an inducement or reward for a deal or transaction.
- d) Department/ entity which initiates the donation or sponsorship request must issue a letter to the requestor containing Maybank's decision to accept or reject the request. For accepted requests, award letters must contain, at a minimum, the following provisions:
- i) funds will solely be used for the intended lawful purpose specified within the formal written request, and evidence of such can be provided to Maybank upon request;
  - ii) the recipient has adequate processes and controls to govern and monitor the proper administration of the funds, including checks on persons involved in administering the funds;
  - iii) the provision of the funds will not result in potential or actual improper advantage to Maybank; and
  - iv) the provision of the funds will not act as an inducement or reward, and cannot influence the outcomes of Maybank's commercial transactions with others.
- e) Requests, including those which were rejected must be recorded in the Donations and Sponsorship Register (**Appendix 11**) by the department/entity and Group Corporate Affairs no later than 10 working days after the decision on the request is made.
- f) Please refer to Appendices for Donation and Sponsorship Request Form [**Appendix 7(a) & Appendix 7(b)**] and Donation and Sponsorship Assessment Template (**Appendix 8 & Appendix 9**).

## **7.0 MANAGING CONFLICT OF INTEREST**

- a) Directors and Employees must consult with Group Human Capital where there is actual or potential Conflict of Interest, if it is unavoidable.
- b) Based on consultation with Group Human Capital, appropriate action must be taken, including:
  - i) the Director or Employee should request to be removed from the situation causing the Conflict of Interest;
  - ii) it may be appropriate to disclose the Conflict of Interest to the parties involved; and
  - iii) details of the Conflict of Interest must be recorded, as well as actions taken to manage the Conflict of Interest.

## 8.0 MERGERS, ACQUISITIONS AND JOINT VENTURES

- a) The department/entity acquiring the investment target must undertake the following procedures prior to the completion of the transaction:
  - i) to identify and understand the investment target's ownership and management structure;
  - ii) to perform name screening (e.g. material adverse news or media) on the investment target's Senior Management and Beneficial Owners;
  - iii) to identify apparent significant exposure or risks related to Bribery or Corruption; and
  - iv) to assess the existence and adequacy of the investment target's AB&C Policy.
- b) The department/entity acquiring the investment target must assess the need to perform the additional procedures as defined below, and undertake these as necessary, prior to the completion of the transaction:
  - i) to undertake more extensive due diligence assessment, including audits, to further assess the adequacy of the investment target's AB&C programme e.g.:
    - assess the investment target's tone from top including commitment towards preventing Bribery and Corruption;
    - understand the investment target's AB&C programme, which can include assessing the design and operating effectiveness of processes and controls which support, manage or monitor activities where Bribery or Corruption could arise; and
    - understand how the investment target manages and monitors its AP relationships.
  - ii) to undertake remedial actions to manage deficiencies in the investment target's AB&C programme, which could include requiring the investment target to adopt an adequate AB&C programme which is equivalent to that of Maybank;
  - iii) to report Bribery or Corruption-related activities identified to Group Compliance for appropriate action;
  - iv) require written representations of the investment target's Anti-Bribery compliance prior to the completion of the transaction (e.g. acquisition), and on an ongoing basis where deemed necessary (e.g. joint venture); and
  - v) where appropriate, include warranties or indemnity provisions in the purchase agreement so Maybank is compensated for damages, penalties or remediation costs arising from deficiencies in the investment target's existing AB&C programme.
- c) Group Compliance must be consulted in circumstances where red flags related to Bribery and Corruption are detected.

## **9.0 EMPLOYMENT AND HIRING**

Group Human Capital is responsible for performing the procedures defined in this section.

### **9.1 Employee Selection**

- a) Candidates applying for employment with Maybank must be assessed based on selection criteria defined by the recruiting unit.
- b) Group Human Capital is required to perform background checks on the candidate by obtaining written references from his or her previous employers.
- c) Candidates applying for employment are required to declare actual or potential Conflict of Interest that could arise from their employment with Maybank, including, but not limited to:
  - i) family members and/or close relatives who are existing Employees of Maybank, in line with the Maybank Group Close Relatives Working within Maybank Policy;
  - ii) existing relationships with Directors or Employees;
  - iii) other reasons that could cause a Conflict of Interest in their employment (e.g. relationship with major customer or APs who have ongoing contracts or business relationship with Maybank); or
  - iv) connections to PEPs, as these may give rise to increased Bribery and Corruption risk.
- d) Referrals from Directors and Employees are permissible. However:
  - i) the person being referred must be subject to the same selection process and criteria as other candidates; and
  - ii) the Director or Employee who referred the person must not be involved in the hiring or selection process.
- e) The compensation offered must be within the standard range for the position. The offering of excessive or extra benefits to the candidate is strictly prohibited.

### **9.2 Screening on Prospective Directors and Employees**

- a) Prospective Directors and Employees must be subject to initial screening as per Bank Negara Malaysia Employee Screening requirements prior to joining Maybank. Screening must include checks to identify and assess potential Bribery and Corruption risks, such as:
  - i) criminal charges, conviction and allegations;
  - ii) bankruptcy;
  - iii) litigation and disputes;
  - iv) connections to PEPs; and
  - v) other potential indicators of Bribery and Corruption.
- b) Where a hit is identified during the screening process, Group Human Capital must review and ascertain if the hit(s) are true or false positives:

- i) where the hit is determined to be a false positive, the rationale for discounting the hit must be recorded on the prospective Director or Employee's file; and
- ii) where the hit is determined to be a true positive, these results must be escalated to the respective hiring decision maker(s) to take into consideration when making the hiring decision. If Bribery and Corruption-related hits are identified, this must be escalated to Group Compliance for advice and thereafter to the hiring decision maker(s).

### 9.3 Ongoing Screening

- a) Name screening must be re-performed in the following situations:
  - i) the Employee transitions into a High Risk role;
  - ii) whistleblowing concerns have been raised or upon detection of adverse news against the Employee; or
  - iii) Information received from law enforcement agencies pertaining to the Employee.
- b) Re-screening process must be performed in accordance to the screening check as defined above in Sub-section 9.2 a). Screening records must be documented in the respective Employee personnel files.
- c) In the event there are hits during the re-screening process, Group Human Capital must take action as described in Sub-section 9.2 b) above.

## 10.0 MONITORING AND ENFORCEMENT

- a) Group Compliance must monitor and test processes and controls which support the following activities:
  - i) AP on-boarding and ongoing due diligence;
  - ii) payments (e.g. to AP, donation or sponsorship recipients etc.);
  - iii) gifts and entertainment;
  - iv) donations and sponsorship; and
  - v) training and awareness.
- b) The approach to monitoring and testing must be aligned with the governance framework and the 'three lines of defense' model as defined under the Maybank Group Compliance Framework:

Line of Defense (LOD)	Organisation Units)	Description
First (1LoD)	Business and support units	1) Monitor and test the adequacy and effectiveness of their AB&C processes and controls on an ongoing basis (self-assessment), in line with the testing procedures and scheduled self-defined by 1LoD and communicated to Group Compliance.

Line of Defense (LOD)	Organisation Units)	Description
		<p>2) 1LoD can undertake the following actions:</p> <ul style="list-style-type: none"> <li>• to identify gap via self-assessment and it must be performed by appropriate personnel other than those involved in executing the processes and controls;</li> <li>• to report the outcomes of the self-assessment performed (gaps identified and proposed remedial action) to Group Compliance and the accountable EXCO member; and</li> <li>• to consult Group Compliance on proposed changes to processes and controls, at a minimum, in the following circumstances: <ul style="list-style-type: none"> <li>✓ as a result of the self-assessment performed;</li> <li>✓ when designing new products, channels or business pursuits; or</li> <li>✓ proposed departure from the requirements contained in this Procedures must be documented and referred for review and approval.</li> </ul> </li> </ul>
<b>Second (2LoD)</b>	Group Compliance	<ol style="list-style-type: none"> <li>1) provide consultative advice and education on AB&amp;C compliance matters and regulatory requirements;</li> <li>2) undertake risk assessments and independent monitoring on compliance to AB&amp;C regulatory requirements;</li> <li>3) evaluate the adequacy of controls in place to mitigate Bribery and Corruption risks, which includes performing periodic independent review and testing of records to ensure that the requirements contained in the AB&amp;C PP are adhered to;</li> <li>4) review AB&amp;C related records to, at a minimum ensure that these are complete and accurate, and allow Maybank to demonstrate compliance with the requirements contained in the AB&amp;C PP;</li> <li>5) follow up with relevant 1LoDs on the completion of 1LoD remedial actions (e.g.</li> </ol>

Line of Defense (LOD)	Organisation Units)	Description
		<p>to fix identified gaps or in accordance with the dispensation request action plan), based on established deadlines;</p> <p>6) report to the Board and Senior Management on Bribery and Corruption-compliance related matters including gaps identified and mitigation activities; and</p> <p>7) 2LoD must at a minimum, report the outcomes of their evaluation (gaps identified and proposed remedial action) to the accountable EXCO member of the business subject to monitoring and the CCB.</p>
<b>Third (3LoD)</b>	Group Internal Audit (“GIA”)	<p>1) conduct independent reviews to assess and report on the adequacy and effectiveness of Maybank’s AB&amp;C programme, which includes the effectiveness of AB&amp;C processes and controls. Internal audit reviews on AB&amp;C must be conducted on a periodic basis, as deemed appropriate; and</p> <p>2) at a minimum, report the outcomes of the GIA reviews to the accountable EXCO member of the audited department, Group Compliance and the Board.</p>

- c) Maybank must consider the need for an independent review by a qualified and independent third party at least once every three years to obtain assurance that Maybank is operating in compliance with its Policies and Procedures that supports its AB&C framework.

## 11.0 MANAGEMENT INFORMATION REPORTING

- a) AB&C management information requirements must be defined by Group Compliance and approved by the Head of Group Financial Crime Compliance. This must include, at a minimum:
- i) AB&C metrics, its associated definitions and data requirements;
  - ii) thresholds associated with each AB&C metric, taking into consideration Maybank’s risk appetite;
  - iii) frequency of distribution of AB&C management information;
  - iv) target audience; and
  - v) presentation format.

- b) The AB&C management information reported must cover, at a minimum the following activities:
  - i) AP on-boarding and ongoing due diligence;
  - ii) payments (e.g. to AP, donation or sponsorship recipients etc.);
  - iii) employment and hiring;
  - iv) gifts and entertainment;
  - v) donations and sponsorship; and
  - vi) training.
- c) Group Compliance must communicate management information requirements to Business Units, who will be expected to:
  - i) establish processes and controls that can provide the required information to calculate the defined AB&C metrics; and
  - ii) provide accurate and timely information to Group Compliance, as and when required.
- d) Group Compliance shall consolidate the G&E submission by the Group EXCO and review the information.
- e) Business Units shall report G&E breaches to the respective Group EXCO with the proposed management action plan to resolve the breach.
- f) In instances where additional management information is requested by Group EXCO, the Board or regulators for a legitimate reason, information must not be withheld or delayed without reasonable cause.

## 12.0 RECORD KEEPING

- a) Records must be properly retained for a minimum period of 15 years and in a format that can be accessed when required.
- b) If a longer retention period for documents is set out in a separate policy or procedures document, the longer retention period must apply.
- c) The following records must be developed and retained for the necessary period defined above:

AB&C Process	Minimum documentation required	Process owner
AB&C risk assessment	i) Approach and methodology used ii) Key assumptions and limitations iii) Results of assessment, including required remedial action, action owner and implementation plans iv) Board acceptance of risk assessment results	Group Compliance

AB&C Process	Minimum documentation required	Process owner
AP management	i) Identity and service provided by AP ii) Due diligence procedures performed and associated outcomes iii) Approvals received including rationale for acceptance or refusal of relationship iv) Signed agreements or contracts containing AB&C contract clauses or contractual safeguards v) Evidence of AP monitoring and outcomes vi) Supporting documents in relation to the AP assessment and to substantiate the details as specified above	Departments/ entities which manage AP engagement
Gifts and entertainment	i) Sufficient details to enable identification of the gifts, entertainment provided, received or respectfully declined <ul style="list-style-type: none"> <li>Involved parties</li> <li>Nature and value of underlying items</li> <li>Approvals received</li> </ul> ii) Supporting documents to substantiate the details as specified above	Departments or entities
Donations and sponsorships	i) Sufficient details to enable identification of the donations or sponsorship provided or received <ul style="list-style-type: none"> <li>Involved parties</li> <li>Activity undertaken or funded</li> <li>Approvals received</li> </ul> ii) Supporting documents to substantiate the details as specified above	Group Corporate Affairs  Department/ entities  Maybank Foundation
Employment and hiring	i) Screening results performed upon hiring, and on an ongoing basis (where available) ii) Training records	Group Human Capital
Breaches log	i) Sufficient details of the breach identified	Departments/ entities



AB&C Process	Minimum documentation required	Process owner
	ii) Resulting actions taken to report and resolve the breach identified	
Review assessments	i) Scope, approach and procedures performed ii) Documents reviewed and persons interviewed iii) Results of assessment including required remedial action, action owner and implementation plans iv) Supporting documents to substantiate the details as specified above	Departments/ entities
Mergers, acquisitions, and joint ventures	i) Due diligence procedures performed and associated outcomes ii) Approvals received including rationale for acceptance or refusal of relationship iii) Signed agreements or contracts containing AB&C contract clauses or contractual safeguards	Group Strategy & Business Development

- d) Please refer to eSPI **MAL/ARC/COMPLIANCE/32 - CONTROL, PRESERVATION AND DESTRUCTION OF BANKS DOCUMENTS AND RECORDS** and its subsequent updates for details.

### 13.0 TRAINING AND AWARENESS

- a) Directors shall be provided with adequate information on the Maybank Group AB&C Policy and Procedures upon appointment.
- b) Employees must complete mandatory AB&C training within 60 days of starting the role, and on an annual basis.
- c) The training must cover the following, at the very minimum:
  - i) an understanding of AB&C requirements;
  - ii) key developments in AB&C laws and regulations;
  - iii) an understanding of domestic and international Bribery and Corruption laws and regulations, including what is strictly prohibited, and the consequences and risks of breaching the law at an individual and organisational level;
  - iv) an awareness and understanding of the requirements of the AB&C Policy and Procedures, including their roles and responsibilities in preventing or detecting Bribery or Corruption;
  - v) red flags that Employees may encounter in their day to day work that may be indicative of Bribery and Corruption risk; and

- vi) the escalation channel or process for escalating Bribery and Corruption related concerns.
- d) Role or business specific comprehensive training must be provided to the Employees who perform activities that may be exposed to greater Bribery and Corruption risk, which is in addition to the mandatory AB&C training. Refresher training must be conducted as often as necessary.
- e) The Business Compliance Control Office (BCCOs) and respective entity Compliance Officers are responsible for ensuring that customized refresher training modules are rolled out to, and completed by all employees.
- f) Attendance for all AB&C training must be recorded and tracked by the respective department/entity.

## HELP DESK

Name	Purpose	Email Address
Group ABCWB	AB&C and Whistleblowing-related enquiries	<a href="mailto:abcwb@maybank.com">abcwb@maybank.com</a>
AB&C Screening Team	AP name screening request (for Malaysia-based entities only)	<a href="mailto:abcscreeningteam@maybank.com">abcscreeningteam@maybank.com</a>
GHC FROSI	Close Relative screening request (for Malaysia-based entities only)	<a href="mailto:radmin@maybank.com">radmin@maybank.com</a>

## LIST OF APPENDICES

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2 (b)	Associated Person Ongoing Due Diligence flowchart
3	Associated Person Register
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5	Gifts and Entertainment Request Form
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