



Anti-Bribery and Corruption Policy

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1. Introduction

Asia Asset Finance PLC is fully committed to conducting its business in an ethical, legal, and transparent manner. This Anti-Bribery and Corruption (ABC) Policy applies to all employees, directors, officers, contractors, consultants, agents, and any other third parties working on behalf of the company. This policy is designed to guide and govern the behavior of Personnel in order to prevent bribery and corruption in all business dealings.

2. Purpose

The objective of this Anti-Bribery and Corruption Policy is to set forth clear guidelines for preventing bribery and corruption, as well as managing associated risks within Asia Asset Finance Plc. The company mandates that both its employees and external partners fully commit to opposing bribery and corruption in all its forms, particularly in transactions connected to or involving the company. This policy underscores the company's zero-tolerance stance on any form of bribery or corruption, viewing any potential occurrences as significant risks to its integrity and reputation.

3. Zero Tolerance Policy

Any instances of bribery or corrupt conduct, whether involving the company's personnel or third parties representing it, will be handled with the highest level of seriousness. Swift and appropriate actions, including disciplinary measures and legal proceedings, will be implemented to resolve such matters.

4. Legal Compliance and Policy Commitment

This policy has been formulated in line with applicable laws and regulations related to anti-bribery and corruption. It emphasizes the company's dedication to ethical behavior and adherence to legal requirements. Asia Asset Finance Plc strives to foster a culture of compliance, encouraging all employees to actively participate in preventing and minimizing the risks of bribery and corruption.

5. Scope of the Policy

This Anti-Bribery and Corruption (ABC) Policy applies to all areas of Asia Asset Finance Plc's operations, with an emphasis on preventing and managing bribery and corruption risks tied to the company's internal and external dealings. It does not cover customer transactions, which are regulated by the Company's Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) Policy. The AML/CFT Policy specifically tackles the risks of money laundering, terrorism financing, and fraud or corruption related to customers.

Definitions Accountable Person – An individual or entity accountable for identifying, reducing, and managing bribery and corruption risks linked to transactions involving the Company. Includes all Directors, Consultants, Management, Officers, and Employees (whether permanent, on probation, temporary, or contract staff) of the Bank, as well as individuals (such as trainees, seconded staff, casual workers, agency staff, and interns) acting in a capacity where they are responsible for the Company.

Breach – Failure to comply with any of the provisions outlined in this Policy, unless such non-compliance has been authorized by the Manager of Human Resource Management or the Compliance Officer.

Bribery - Under the law, the definition of bribes and bribery is quite broad. Bribery includes the improper act of offering, authorizing, giving, agreeing to give, promising, soliciting, providing, receiving, or agreeing to receive any benefit or something of value (such as gratification) to or from a public official (this includes any executive, official, or employee of a governmental authority, political party member, political candidate, executive or employee of an international public organization, or director, officer, employee, or agent of a fully or partially state-owned or controlled entity, etc.), a businessperson, an employee or director of a private sector company, or a close relative of such individuals (either directly or indirectly). The purpose of such actions is to secure or maintain business, gain an unfair advantage, or to influence, induce, or reward improper behavior or decisions.

While gratification may include a monetary payment or offer, it also encompasses anything of value, such as.:

- i. Cash or cash equivalents (eg: gift vouchers, tickets to an event or loans);
- ii. Some gifts, hospitality, entertainment or travel;
- iii. Donations or scholarships;
- iv. Offers of employment favoring a hiring decision
- v. The provision of favours (eg: discounted or 'free' use of services of the Bank, facilities or property);
- vi. Training;
- vii. Sexual favours;
- viii. Anything else that is of value to the recipient.

Corruption - Corruption is the misuse of entrusted authority, position, and/or trust to obtain an improper benefit or advantage. It involves giving or receiving any form of gratification or reward, regardless of value, for carrying out a task related to an individual's job role or responsibilities.

Third Parties - This encompasses, but is not limited to, customers, business associates, contractors, consultants, third-party agents, third-party introducers, referrers, individuals acting in a fiduciary role, suppliers, and joint venture partners involved in any of the Company's operations.

6. Responsibilities

All personnel at Asia Asset Finance Plc are expected to understand and follow the guidelines set forth in this policy. They must act with integrity, steer clear of any involvement in bribery or corruption, and report any suspected breaches of this policy. The company also requires that all third parties representing it adhere to this policy as a prerequisite for their engagement with the company.

7. Reporting and Compliance

Personnel are required to report any suspected or actual bribery or corruption to their direct supervisor, the Compliance Officer, or through the company's designated whistleblowing channels. Reports may be made anonymously and will be kept confidential. Asia Asset Finance Plc is dedicated to thoroughly investigating all reported issues and taking suitable action against anyone or any entity found to be violating this policy.

8. Training and Awareness

Asia Asset Finance Plc will provide regular training and resources to ensure that all Personnel are aware of the ABC Policy and understand their roles in preventing bribery and corruption. This training will be mandatory and designed to equip employees with the knowledge and skills to identify and manage bribery and corruption risks effectively.

9. Record Keeping

Precise record-keeping is crucial for adhering to this policy. All financial records, transaction documents, and other pertinent materials must be kept in a way that accurately and clearly represents the true nature of the transactions. Personnel are expected to adhere to the company's internal controls and procedures to prevent and identify any instances of bribery or corruption.

10. Review and Amendment

This policy will be reviewed periodically and updated as necessary to ensure its effectiveness and alignment with legal requirements and best practices. Any amendments will be communicated to all Personnel and relevant third parties.

11. Related Policies

This Policy should be read in conjunction with the other policies, key documents and guidelines.

- AML/CFT Policy
- Compliance Policy
- Risk Management Policies
- Code of Conduct
- Conflicts of Interest
- HR Policy
- Whistleblower

12. Obligations

The Company ensures compliance with anti-corruption laws and protects its reputation from being compromised. The Company explicitly forbids the use of company funds for making or facilitating any political contributions. Employees must adhere to the relevant policies, guidelines, and circulars when engaging in any of the following activities on behalf of the Company.

1. providing or receiving any advantages, such as gifts, entertainment, meals, travel/accommodation, training, or any other items of value;
2. interacting with and overseeing Third Parties
3. acquiring goods and services;

All Employees must not:

- provide, offer, pledge, or receive, either directly or indirectly, any bribe, kickback, hidden commission, or other type of improper payment (no matter how minor) to secure any undue business or advantage for the Company, for oneself, or for others.
- offer or receive advantages such as gifts, hospitality, entertainment, meals, travel/accommodation, training, or other valuable items that go against the standards outlined in the related policies.
- give or offer any gifts or advantages in situations where it is known or suspected that the recipient is prohibited from accepting them due to legal constraints or any duties/obligations they have toward others.
- establish or maintain a business relationship with a third party if there is no assurance that the third party will act in accordance with this Policy.;
- contract with or provide payment to a business partner or any other third party, if it is known or suspected that the partner or third party might use or offer all or part of the payment, either directly or indirectly, as a bribe, kickback, hidden commission, or other type of improper payment.
- alter or inaccurately represent any book, record, or account related to the Company's business. All receipts and expenditures must be backed by documentation that accurately and appropriately describes them.
- participate in a corrupt activity involving the giving, receiving, or soliciting, either directly or indirectly, of anything of value to improperly sway the actions of another individual.

participate in deceitful conduct by either acting or failing to act in a way that involves misrepresenting or misleading someone to gain a financial or other advantage or to evade a responsibility.

- participate in an obstructive action by intentionally destroying, falsifying, altering, or hiding evidence relevant to an investigation, or by making false statements to investigators.
- participate in a coercive practice that would directly or indirectly damage, threaten, or harm any person or their property to improperly influence their actions.

Review, Monitor and Update of the Policy

As the owner of the policy, Compliance officer shall be responsible to review the policy at least annually or more frequently as necessary. Any changes and amendments should be documented with rationale and to be presented to the Nominations and Governance committee for review and approval.