

GROUP ANTI-BRIBERY & CORRUPTION POLICY FOR RHB BANK WEBSITE

RHB BANKING GROUP'S ANTI-BRIBERY & CORRUPTION POLICY

POLICY STATEMENT

RHB Banking Group ("Group") firmly supports the national anti-corruption efforts by strengthening its corporate governance and continuously inculcating good ethical business practices among its employees, clients, vendors, suppliers, service providers and other business partners.

In promoting ethical business practices, the Group is committed to design and institute appropriate policies and procedures to support the Group's business operations and assist its Employees to understand their obligations in upholding corporate integrity and the Group's reputation. The Group does not condone any act of bribery and corruption, which are criminal acts in nature as well as indictable offences. The Group is committed to conducting its business in accordance with all applicable laws, rules and regulations and the highest ethical standards. This commitment is embodied in the Group Code of Ethics and Conduct for Employees.

OBJECTIVES OF THIS POLICY

The purpose of this policy is to reiterate commitment to full compliance by RHB Banking Group, its subsidiaries and affiliates, and its officers, directors, employees and agents (if applicable) to the requirements of Malaysian Anti-Corruption Commission (MACC) Act 2009 and similar legal or regulatory promulgation in relation to countering bribery and corruption.

SCOPE

The Policy provides a holistic anti-bribery and corruption program to fight against dishonest claims, breaches of trust, kickbacks, unfair favours, obstructions of justice, embezzlement, money laundering and any other forms of bribery and corruption which are non-exhaustive.

All Group Employees shall understand, adopt and adhere to the contents, observe the relevant rules and regulations in relation to anti-bribery and corruption that govern businesses and day-to-day operations of the Group. The policy is to be updated in tandem with the changes to the Law and Regulations to incorporate the latest standards in anti-bribery and corruption.

KEY PRINCIPLES

The key principles of the Group Anti-Bribery & Corruption Policy are:

<p>Principle 1: Zero Tolerance for Bribery and Corruption</p>	<p>The Group has zero tolerance on bribery and corruption, in line with its core shared values and Group Code of Ethics & Conduct for Employees.</p> <p>Employees of RHB Banking Group are prohibited from engaging in any form of bribery or corruption. This includes offering, soliciting or accepting bribes whether directly or indirectly through any third parties.</p>
<p>Principle 2: Reporting Actual or Potential Violations</p>	<p>All Employees must report any request for an improper payment, or any indication that a person might be making corrupt payments or that a person has an inclination or plan to violate Anti-Bribery Laws¹, immediately to the approved whistleblowing channels and avenues as provided by the Group.</p>
<p>Principle 3: Sponsorship, Donation and Contribution</p>	<p>The Group and its Employees are prohibited from making any sponsorship, donation and contribution with intention to induce a party to engage in improper conducts.</p>
<p>Principle 4: Gifts, Hospitality and Entertainment</p>	<p>Employees must ensure compliance to Gifts and Hospitality Guideline prior to offering, promising or receiving any of the above-mentioned.</p>
<p>Principle 5: Extortion and Request to Carry Out Improper Payment Activity</p>	<p>The Group and its Employees must actively resist extortion and all other demands for improper payments made under duress.</p>

Updated June 2022

¹ Anti-Bribery Laws covers any legislations relating to corrupt practices, locally and abroad and not confined to the MACC ACT 2009. In Malaysian context, this refers to the MACC Act 2009, Penal Code, AMLA, Police Act, Customs Act, Prison Act, Evidence Act, General Election Offences Act, CPC etc.