

CIMB GROUP

Anti-Bribery and
Corruption Policy

CIMB GROUP ANTI-BRIBERY AND CORRUPTION POLICY STATEMENT

CIMB is committed to the highest standards of ethical conduct and integrity in our business activities. We are also fully committed to comply with all laws and regulations which govern our business and operations.

CIMB takes a zero-tolerance approach towards bribery and corruption and is committed to acting professionally, fairly and with integrity in all business dealings and relationships in all jurisdictions in which it operates. We are committed to implementing and enforcing effective measures to counter bribery and corruption which are punishable offences in accordance with the anti-bribery and corruption laws.

CIMB has put in place an Anti-Bribery and Corruption framework which includes the policies, procedures, risk assessments, due diligence on third parties and associated persons, and employee training programme.

The CIMB Group Anti-Bribery and Corruption Policy sets out the guiding principles for CIMB to address and manage bribery and corruption risks in all its dealings and related issues that may arise in the course of business. It reiterates our commitment to full compliance by our employees and associated person with the Malaysian Anti-Corruption Commission (MACC) Act 2009 and the MACC (Amendment) Act 2018 and any other local anti-bribery or anti-corruption laws that may be applicable. This Policy complements and should be read in conjunction with CIMB's Code of Ethics and Conduct and our Whistleblowing Policy, copies of which can be obtained from our website at www.cimb.com

GIFTS, ENTERTAINMENT AND HOSPITALITY

CIMB has adopted a "NO GIFT" Policy whereby all employees and their immediate family members are prohibited from, directly or indirectly, receiving or providing gifts. We require our employees to abide by this policy to avoid conflict of interest or the appearance of conflict of interest for either party in on-going or potential business dealings between CIMB and external parties as gifts can be seen as a bribes that may tarnish our reputation or be in violation of anti-bribery and corruption laws.

However, we recognise that the exchange of business courtesies, such as modest gifts, hospitality and entertainment (including meals, invitations to attend promotional events or corporate functions) particularly during festive periods is customary and legitimate to create goodwill, and/or strengthen business and commercial relationships. Such courtesies are allowed if they are not lavish, appropriate and reasonable in the light of

accepted business practices of the relevant businesses that the Group operates in and is not intended to improperly influence the decisions of the person involved.

In deciding on whether to receive or accept a gift, consideration will be given to the following key guiding principles:

- Value of the gift;
- Purpose for the giving/receipt of the gift;
- Nature of the gift;
- Transparency in the giving/receipt of the gift;
- Perception in the giving/receipt of the gift.

CIMB's employees or associated person must not give or request favours or offer or accept gifts or any personal benefit or privilege of any kind with a value that could in any way influence (for example, by causing the person to act or fail to act in violation of a legal duty, by causing the person to abuse or misuse their position, by securing an improper advantage, contract or concession, etc.) the judgment of the recipients or a third party in their business dealings with or on behalf of CIMB or any other party.

As a general rule, a reasonable amount of entertainment is allowed for the purpose of business networking, fostering relationships with external parties or showing hospitality and occur sparingly.

The key guiding principles in ensuring the entertainment given or received are appropriate are as follows:

- It is for bona fide purpose;
- The activity will not create any obligation or expectation on the recipient;
- The expenditure will not be seen as intended for or capable of achieving undue influence in relation to a business transaction;
- The value and nature of the expenditure is not disproportionate to the occasion;
- It is not overly frequent;
- The expense will be fully documented including purpose, approvals, attendees.

FACILITATION PAYMENTS & KICKBACKS

“Facilitation Payments” is defined as payments made to secure or expedite the performance by a person performing a routine or administrative duty or function. “Kickbacks” are typically payments made in return for a business favour or advantage.

CIMB prohibits all its employees from making or accepting facilitation payments or “kickbacks” of any kind. Associated persons must avoid any activity that might lead to a facilitation payment or kickback being made or accepted.

Any request for a facilitation payment **MUST** be refused and the matter **MUST** be reported immediately to the Group through the Whistleblowing Policy and Procedures.

CHARITABLE CONTRIBUTIONS / DONATIONS AND SPONSORSHIP

As a responsible corporate citizen, CIMB is committed to contributing to the wellbeing of the people and nation in countries where it operates. It is however important that all donations and sponsorships are made in accordance with CIMB’s policies and receive prior authorization by CIMB’s Management or the Board.

Employees must ensure that all sponsorships and donations are not used as a subterfuge for bribery or used to circumvent or avoid any of the provisions on bribery. Due diligence must be performed to ensure that donations and sponsorship are not used to facilitate and conceal acts of bribery and that the donations and sponsorships made are appropriate, legal and ethical under local laws and practices and that it will not result in any conflict of interest.

Generally, all sponsorships and donations must comply with the following:

- ensure such contributions are allowed by applicable laws;
- obtain all the necessary internal and external authorisations;
- be accurately stated in the company’s accounting books and records;
not to be used as a means to cover up an illegal payment or bribery.

POLITICAL CONTRIBUTIONS

As a matter of general policy, CIMB does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office.

If any contribution is made, it must be permissible under applicable laws and must be approved by the Board of Directors and accurately reflected in CIMB ’s accounting records.

RECORD KEEPING

The Group and the respective business units will keep financial records and have appropriate internal controls in place which will evidence the business reasons for making payments to, and receiving payments from, any person.

Employees must ensure that all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the payment authority of CIMB's delegated authority and specifically record the reason for the expenditure. Employees shall further ensure that all expense claims shall comply with the terms and conditions of this policy.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness.

All employees are reminded that no accounts shall ever be kept "off-book" or considered "off-record" to facilitate or conceal improper payments.

RAISING A CONCERN OR COMPLAINT

Our success in combating all forms of bribery and corruption hinges on the employees' commitment to adhere to this Policy. Therefore, it is the responsibility of all employees to promptly report any suspected contraventions of this Policy.

If any employee has any suspicions or concerns regarding conduct to which this Policy applies, or if the employee becomes aware of any action in conflict with this Policy, he must report those concerns or actions to his HOD, or report their concerns, confidentially, by following the procedure set out in the Whistleblowing Policy made available via the Company's website www.cimb.com

Any report made will be treated with utmost confidentiality. No employee or associated persons acting in good faith will suffer adverse consequences to his employment or retaliation for reporting or for refusing to engage in prohibited conduct, even if such refusal results in loss of business opportunities to the Group.

If the employee believe that he had suffered any detrimental treatment as a result of refusing to take part in bribery, or because of reporting concerns under this policy in good faith, the employee should raise the matter by following the procedure set out in the Whistleblowing Policy made available via the Company's website www.cimb.com

TRAINING & COMMUNICATIONS

Our employees will be provided with regular Anti-Corruption and Bribery compliance training programmes to educate them about the requirements and obligations of anti-bribery and corruption laws and this Policy.

For successful compliance of this policy, we will be responsible to ensure continuous efforts to communicate, train and educate all our employees and associated persons.

RESPONSIBILITY FOR THE POLICY

The CIMB Management team sets the tone at the top providing leadership and support for the Policy and take responsibility for its effectiveness within their business units. CIMB Management is responsible for the implementation and all communication and training activities to ensure every employee understood and complied with this Policy.

MONITORING, REVIEW AND DUE DILIGENCE

CIMB recognise that managing an anti-bribery and corruption programme is a continuous process and a systematic review and monitoring process is necessary to ensure its objectives are being met. Internal control systems and procedures will be subjected to regular review to ensure the effectiveness and compliance to the anti-bribery and corruption programme and policy.

EFFECTIVE DATE

1 July 2020.