

Policy Statement and Objective

1. The Malaysian Insurance Institute (“MII”) is committed to conducting its business, to the best of our knowledge and belief, in accordance with all applicable laws, rules and regulations and the highest ethical standards.
2. The purpose of this Anti-Bribery and Anti-Corruption Policy is to reiterate MII’s commitment to full compliance by it, and its officers, directors, employees and agents with all laws relating to anti-bribery and anti-corruption in Malaysia, in particular, the Malaysia Anti-Corruption Commission Act 2009. (“MACC Act”).

Scope

1. The principles and obligations outlined in this policy apply to all employees of MII, including senior management and to members of our Board of Directors (collectively referred to as “MII personnel”), and reflects the standards to which MII expects its business associates, partners, agents, contractors, and consultants to adhere when acting on MII’s behalf.
2. This policy sets forth MII’s minimum compliance standards concerning interactions with third parties. However, where local law and regulations require more stringent controls, then such stricter controls must be followed.

Definition of Bribery

1. A bribery is the act of “offering, promising, giving, receiving or soliciting of undue advantage/gratification of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), to/from a person in authority, in violation of applicable law, as an inducement or reward for a person to do or not to do an act in relation to the performance of that person’s duties”.
2. This also refers to undertaking the act of corruption.

Fighting Bribery, Corruption and Unethical Practices

1. **Solicitation, Bribery and Corruption** – MII Personnel are prohibited from, directly or indirectly, soliciting, accepting or obtaining or agreeing to accept or attempting to obtain, from any party for themselves or for any other party, any bribe or gratification as an inducement or a reward for doing or forbearing to do, or for having done or forborne to do, any act in relation to MII's affairs or business, or for showing favour or forbearing to show disfavour to any party in relation to MII' affairs or business.
2. **Receiving Facilitation Payments** -- MII Personnel are prohibited from, directly or indirectly, accepting or obtaining or attempting to accept or obtain facilitation payments from any person for themselves or for any other person subject to this policy. The term "facilitation payments" generally means payments made to secure or expedite the performance by a person performing a routine or administrative duty or function.
3. **Prohibition on Commissions, Discounts and Secret Profits** - MII Personnel must not, directly or indirectly, receive or obtain, in respect of any goods or services purchased or other business transacted (whether or not by them) by or on behalf of MII, any discount, rebate, commission, service, interest, consideration of value or other benefit or payments of any kind (whether in cash or in kind) which is not authorised by MII's policies or procedures.
4. **Receiving Gifts and Entertainment** - MII Personnel are required to comply with the Code of Ethics (COE) or any other policy and procedures relating to the receipt of gifts and entertainment.
5. **Political Contributions, Sponsorships and Donations**
 - **Political Contributions** - MII does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office.
 - **Sponsorships and Donation**
 - i. MII Personnel 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 of the COE, including in particular, the prohibition on bribery.

- ii. In accordance with MII's commitment to contribute to the community coupled with its values of integrity and transparency, all sponsorships and donations must comply with the following:
 - Ensure such contributions are allowed by applicable laws;
 - Obtain all the necessary approval/authorisations;
 - Be made to well-established entities with an adequate organisational structure to guarantee the proper administration of the funds;
 - Be accurately stated in the company's accounting books and records; and
 - Not to be used as a means to cover up an undue payment or bribery;

6. Reporting of a Concern and Whistleblowing - Recognising the aforementioned values, MII provides an avenue for all MII Personnel, members of the public and stakeholders to disclose any improper conduct within MII.

Disclosures

All disclosures of improper conduct within MII are to be channelled in accordance with the established MII's Whistleblowing Policy.

Waiver

Any deviation or waiver from this policy must be approved either by the Board Risk Management Committee and the Audit Committee or the Board of Directors.

Discipline

1. Any employee who violates the terms of this Policy will be subject to disciplinary action.
2. Any employee who has direct knowledge of potential violations of this Policy but fails to report such potential violations to MII's management will be subject to disciplinary action.
3. Any employee who misleads or hinders investigators inquiring into potential violations of this Policy will be subject to disciplinary action. In all cases, disciplinary action may include termination of employment.

4. Any third party agent who violates the terms of this Policy, who knows of and fails to report to MII's management potential violations of this Policy, or who misleads investigators making inquiries into potential violations of this Policy, may have their contracts re-evaluated or terminated.
5. Any employee or third party agent with knowledge of potential violations of this Policy shall report same to the Chief Executive Officer or designate.

Administration of Policy

1. The Policy is effective **December 2019**.
2. Requests for additional guidance or interpretation regarding this Policy can be directed to the Chief Executive Officer or designate.