

## Malayan Banking Berhad (Hong Kong) Anti-Bribery and Corruption Policy Statement

Malayan Banking Berhad and its overseas branches, including Malayan Banking Berhad, Hong Kong Branch (“Maybank Hong Kong”), is committed to conduct its business dealings with integrity. To achieve this commitment, Maybank Hong Kong adopts a zero-tolerance approach against all forms of bribery and corruption in carrying out its daily operations. Maybank Hong Kong complies with the Malaysian Anti-Corruption Commission Act 2009, Hong Kong Prevention of Bribery Ordinance, as well as other applicable anti-bribery laws and regulations.

Maybank Hong Kong has put in place an Anti-Bribery and Corruption (“AB&C”) framework which includes policies, procedures, pre-approval processes, risk assessments, due diligence on third parties and associated persons<sup>1</sup>, and employee training programme.

The Maybank Group Anti-Bribery & Corruption Policy (“AB&C Policy”) sets out the guiding principles for Maybank Group to address and manage bribery and corruption risks in all its dealings within and outside Maybank Group. Compliance to the AB&C Policy is mandatory and Maybank Group, its directors and employees are to strictly comply with the following principles:

- Giving or receiving bribes or participating in any form of bribery and corruption in its business dealings is strictly prohibited;
- The engagements of third parties and associated persons, and dealings with customers and third parties and associated persons must not be for the purpose of inducing or obtaining or retaining business, gaining and taking unfair advantage of influencing a government or regulatory decision for Maybank or for personal gain;
- The giving and receiving of gifts and entertainment, including donations and sponsorships, whether directly or indirectly with the intention to bribe, to retain or gain a business advantage, or for personal gain is strictly prohibited;
- Actual or potential conflict of interest which could result in actual or potential bribery and corruption risk to Maybank is prohibited; and
- Directors and employees are strictly prohibited from making facilitation payments. Associated persons performing services for or on behalf of Maybank are also required to comply with the above principles where relevant.

Customers and Associated Persons should not offer improper advantage<sup>2</sup> to Maybank's staff concerning banking services. As a corruption prevention safeguard, customers should adopt good practices in protecting their funds and accounts from being subject to bribery or corruption-related use (e.g. not to pre-sign blank forms or provide identity documents for bank staff to keep, promptly update personal information).

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<sup>1</sup> A person is associated with Maybank if the person is a partner or agent of Maybank or if the person performs services for or on behalf of Maybank.

<sup>2</sup> Advantage includes money, gifts, loans, commissions, offices, contracts, services, favours and discharge of liability in whole or in part, but does not include entertainment.