

Asia Business Wealth Management Sdn Bhd
(640442-W)

Anti-Corruption & Bribery

Policies & Procedures

As at 31 May 2020

Version 1.0

UPDATE HISTORY

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SECTION OF POLICIES

1 Abbreviations

Term	Descriptions
Associate(s)	A person that refers to directors, senior managers, officers, employees, consultants, contractors, trainees, agency staff, volunteers, interns, agents, sponsors or any person associated with the Company where the engagement has relation in between the commercial organisation and its business associates which shall have the same meaning per MACC Act.
Board of Directors	Means the Board of Directors of Asia Business Wealth Management Sdn Bhd.
Company	Means all the individuals working with Asia Business Wealth Management Sdn Bhd.
MACC	Malaysia Anti-Corruption Commission.
MACC Act	Malaysia Anti-Corruption Commission Act 2009.
P&P	Anti-Corruption & Bribery Policies & Procedures
Third party(ies)	Means any individual or organization that an associate shall come in contact with in the course of work or engagement with the Company and includes existing clients, potential clients, suppliers, distributors, third party vendors, service providers, agents, advisers, business associates and government / regulatory bodies including their advisors, representatives and officials, politicians and political parties.
Top level management	The Board of Directors of the Company, unless specifically stated otherwise.

2 Policy Statement

We are committed to conduct our business with **integrity**. With such a commitment, we have developed our P&P and as our clients and service provider, you must comply with the terms as contained herein for your activities with us.

We take a **zero tolerance** approach to bribery and corruption, regardless of the amounts involved and at whatever level of the organization. Clients and service providers shall take all and any measures to prevent corrupt practices in its dealings with us. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

Clients and service providers are prohibited from engaging in any bribery or bribery attempt which includes but not limited to payments through third parties.

Clients and service providers shall not offer or provide, either directly or indirectly any bribe, gift, reward, consideration, favor or any advantage (material or otherwise) to any of our representatives for the purpose of influencing them to act in contrary of our P&P or obtain any rewarding treatment with respect of any terms, conditions or price of a contract.

Clients and service providers shall not collude with other parties to compromise or instigate any third party to perform any such actions.

This P&P aims to set out our responsibilities to comply with the laws against bribery and corruption and to provide guidance on how to identify and deal with issues relating to bribery and corruption.

Periodical risk assessment shall be undertaken and such assessment shall be documented and periodically reviewed. The Board of Directors shall be updated on a yearly basis in accordance with applicable laws and regulations.

3 Applicability

This P&P is applicable to the Company at all levels and grades, which includes associates and third parties.

4 Bribery

Bribery is the corrupt solicitation, acceptance, or transfer of value in exchange for official action.

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Bribery refers to the offering, giving, soliciting, or receiving of any item of value as a means of influencing the actions of an individual holding a public or legal duty. Bribery constitutes a crime and both the offeror and the recipient can be criminally charged. Bribery not only refers to direct payments but also includes the authorizing or permitting an associate or third party to commit any of the acts or take part in any actions identified below.

It includes:-

- i) The offer, promise or receipt of any gift, hospitality, loan, fee, reward or other advantage to induce or reward behavior which is dishonest, illegal or a breach of trust, duty, good faith or impartiality in the performance of one's functions or activities (whether public, or in their employment or connected with the business); or
- ii) The offer or promise of any gift, hospitality, loan, fee, reward or other advantage to a public official with the intention of influencing / obtaining a business advantage.

5 Unacceptable Practices

It is **NOT** acceptable to:

- i) Give, promise to give, offer a payment, gift or hospitality to secure or award an improper business advantage;
- ii) Give, promise to give, offer a payment, gift or hospitality to a government official, agent or representative to facilitate, expedite or reward any action or procedure;
- iii) Accept payment from a third party knowing or suspecting it is offered with the expectation that it will obtain a business advantage from them;
- iv) Induce another individual or associate to indulge in any prohibited acts;
- v) Give or accept any gift which could be reasonably perceived to be in contravention of this P&P or applicable laws and regulations; or
- vi) Engage in any activity that may lead to the breach of this P&P.

Conflict of interest means a situation in which a person is in a position to derive personal benefit from actions or decisions made in their official capacity, or when a party has competing interests or loyalties because of their duties to more than one person or organization. When a situation of conflict of interest occurs, the employee involved must report it to the Board of Directors.

6 Facilitation Payments and Kickbacks

The Company prohibits making or accepting any facilitation payments or kickbacks of any kind. Small payments made to secure or expedite a routine action is considered a facilitation payment whilst payments made in return for a business favor or advantage would constitute a kickback.

7 Company Making Donations

The Company may make donations so long as it does not contravene any applicable laws or regulations. All donations are to be approved by an Executive Director, representing the Board of Directors.

8 Dealing with Third Parties

Appropriate **due diligence** to be conducted when dealing with third parties to avoid the Company from being exposed to risks of third parties not following ethical business practices. The Company takes care in its dealing with third parties and requires all third parties to be ethical and comply with Anti-Bribery Laws.

The Company to have in place adequate procedures to vet third parties. Should it become likely during the course of relationship that a third party is engaging in inappropriate actions, then the Board of Directors must be contacted for guidance.

9 Gifts and Entertainment

The Company shall not accept gifts and entertainment if they are likely to be seen to conflict with any duties owed to clients.

Gifts and entertainment should only be given as a purely personal matter and must not be likely to induce the recipient to give anything in return. If the Company receives any proposal or suggestion to make (or indeed receive) any such payment, it has to be reported immediately to the Board of Directors.

Types of entertainment that must be reported and approved before being incurred or received:

- i) Significant travel expenses, particularly foreign travel costs;
- ii) Overnight accommodation;
- iii) Unaccompanied entertainment; and
- iv) Entertainment received on a regular basis from one person or organisation.

10 Associates' Responsibilities

Associates dealing with the Company are expected to read and understand the requirements under this P&P posted on the Company's website and must at all times adhere with the terms and conditions contained herein.

Associates are responsible to prevent, detect and report corruption of all those working for us or under our control and to avoid any activity which may lead to, or suggest a breach of any term in this P&P.

Associates are to immediately notify to the Company if he/she become aware or suspect or have reason to believe that a breach of any term of this P&P has happened or is likely to take place.

Any associate in breach of this P&P will face appropriate disciplinary action, which could result in termination for breach. The Company reserves the right to terminate a contractual relationship with other associates should they breach any of the terms of this P&P.

11 Record Keeping

The Company to maintain proper and complete financial records and have in place sufficient internal controls to evidence payments made to or received from third parties.

12 Raising Concern and Protection for Raising Concern

12.1 Raising Concern

Associates are encouraged to raise concerns of potential or current suspicion of malpractices to their own immediate superior or in the event of uncertainty of chain of reporting, to Company immediately. Please see **Schedule 1** for the potential risk scenarios as a reference.

12.2 Protection for Raising Concern

We take responsibility to ensure we act with integrity and encourage openness and will support anyone who raises a genuine concern in good faith. The Company assures that we are committed to ensuring no unfair or detrimental treatment for reporting in good faith.

13 On Going Training

Communication / dissemination of this P&P shall be made available to everyone within the Company. The Company's stand on zero policy toward bribery and corruption should be communicated to all and to this end the employees and business associates are required to access to the Company's website to ensure their thorough understanding of the Company's anti-corruption and anti-bribery position.

14 Monitoring and Review

The Board of Directors shall monitor the effectiveness and review the implementation of this P&P. Regular checks on the effectiveness of this P&P including but not limited to reporting and escalation should be reviewed from time to time and where necessary make the necessary changes to be inclusive. The top level management shall assist in the implementation of this P&P.

15 Stakeholder of Policies & Procedures and Prevailing Law

15.1 Stakeholder

The Board of Directors shall be overall responsible to ensure the P&P is adequate and effective and is in line with prevailing rules and regulations i.e. the MACC Act.

15.2 Prevailing Law on MACC Act (Act 694) :

1. Soliciting/Receiving Gratification (Bribe) [section 16 & 17(a) MACC Act 2009].
2. Offering/Giving Gratification (Bribe) [section 17(b) MACC Act 2009].
3. Intending to Deceive (False Claim) [Section 18 MACC Act 2009].
4. Using Office or Position for Gratification (Bribe) (Abuse of Power/Position) [Section 23 MACC Act 2009].

The Board of Directors is also to ensure that the Company has in place Adequate Procedures pursuant to the MACC Guidelines on Adequate Procedures **(T.R.U.S.T)** which encompass the following:-

- (i) Top Level Commitment;
- (ii) Risk Assessment;
- (iii) Undertake Control Measures;
- (iv) Systematic Review, Monitoring & Enforcement; and
- (v) Training & Communication

SECTION OF PROCEDURES

The Adequate Procedures [T.R.U.S.T]

The Adequate Procedures are established in accordance to the MACC guidelines on adequate procedures. Following are the Adequate Procedures on T.R.U.S.T.

1 Top Level Commitment

1.1 The top level management is primarily responsible for ensuring that the Company:

Requirements per MACC guidelines on adequate procedures	Company Practices
(i) Practices the highest level of integrity and ethics.	The top level management will practise a sound anti-corruption and anti-bribery practices at Company's level, to give a confident to the shareholders and build a greater investors relationship for the Company.
(ii) Complies fully with the applicable laws and regulatory requirement on anti-corruption.	The top level management will take responsibility at his/her best knowledge to comply with the applicable laws and regulatory requirement on anti-corruption. Any gap(s) in the knowledge to comply with the anti-corruption's laws and regulations, external advocates & solicitors consulted for reference.
(iii) Effectively manages the key corruption risks of the Company.	Any corruption risk(s) identified, the top level management will make decision for an action taken accordingly.

1.2 The top level management must be:

Requirements per MACC guidelines on adequate procedures	Company Practices
Able to provide assurance to its internal and external stakeholders that the	This P&P forms part of an initiative by the Company to provide assurance to the

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Requirements per MACC guidelines on adequate procedures	Company Practices
Company is operating in compliance with its policies and any applicable regulatory requirements. This may include establishing the Company's "tone from the top" (i.e. the Company's general stance against the use of corrupt practices in relation to the business activities), and spearheading the Company's efforts to improve upon the effectiveness of its corruption risks management framework, internal control system, review and monitoring, and training and communication.	stakeholders, as contents in this P&P are outlined to perform with the best in fulfilling MACC requirements. The consideration of establishing the Company's tone from the top are deem incorporated in this P&P, as top level management will emphasise "no corruption" at Company level, to strengthen the Company's stance against corruption practices. The assessment, review and controls outlined in this P&P will push the practice of anti-corruption to be enforced, to spearheading the Company's efforts to improve any inadequacies in anti-corruption program.

1.3 The Company should carry out the following:

Requirements per MACC guidelines on adequate procedures	Company Practices
(i) Establish, maintain, and periodically review an anti-corruption compliance program which includes clear policies and objectives that adequately address corruption risks.	Requirements been outlined in this P&P. Any related formal training for compliance purposes, section 5.2 of this P&P shall be referred.
(ii) Promote a culture of integrity within the Company.	The Company has put in place this P&P to promote a culture of integrity within the Company.

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Requirements per MACC guidelines on adequate procedures	Company Practices
(iii) Issue instructions on communicating the Company's policies and commitments on anti-corruption to both internal and external parties.	Requirements been outlined per section 5.1 of this P&P, on the communicating the Company's policies, and per Policy Statement of this P&P, on commitments on anti-corruption to both internal and external parties.
(iv) Encourage the use of any reporting (whistleblowing) channel in relation to any suspected and/or real corruption incidents or inadequacies in the anti-corruption compliance program.	Per Company's policies and procedures on Whistleblowing.
(v) Assign and adequately resource a competent person or function (which may be external to the Company) to be responsible for all anti-corruption compliance matters, including provision of advice and guidance to personnel and business associates in relation to the corruption program.	The competent person(s) shall be one of the Executive Directors or any other designated personnel upon decided and appointed by the Board of Directors ("Assigned Personnel"). The Assigned Personnel will be responsible for all anti-corruption compliance matters, including provision of advice and guidance to personnel and business associates in relation to the corruption program.
(vi) Ensure that the lines of authority for personnel tasked with responsibilities for overseeing the anti-corruption compliance program are appropriate.	The lines of authority are outlined in this P&P per section 3.3 (vi) & (vii) & (viii).
(vii) Ensure that the results of any audit, reviews of risk assessment, control	The outcomes / output on anti-corruption matter(s) will be reported to Board of

Requirements per MACC guidelines on adequate procedures	Company Practices
measures and performance are reported to all top level management, including the full Board of Directors, and acted upon.	Directors. Those outcomes are such as the updates or amendments to this P&P which will be circulated for approval by Board of Directors including any corruption risk identified.

2 Risk Assessment

2.1 To form the basis of the Company's anti-corruption efforts, the Company should:

Requirements per MACC guidelines on adequate procedures	Company Practices
Conduct corruption risk assessments periodically.	The corruption risk assessment will be conducted by any designated personnel(s) as decided and appointed by the Board of Directors (the "Risk Assessment Personnel". In this case, as we are a small company, the Risk Assessment Personnel is the same with the Assigned Personnel. The corruption risk assessment will be conducted at least once in every three (3) years. An ad-hoc assessment may be conducted upon requested by Board of Directors, or other specific requirements relevant to anti-corruption that specifically required to conduct a corruption risk assessment at a more frequent period as defined thereafter.

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Requirements per MACC guidelines on adequate procedures	Company Practices
When there is a change in law or circumstance of the business to identify, analyse, assess and prioritise the internal and external corruption risks of the Company.	The Risk Assessment Personnel will identify, analyse, assess and prioritise the internal and external corruption risks of the Company, and summarise into the Risk Register accordingly.
This risk assessment should be used to establish appropriate processes, systems and controls approved by the top level management to mitigate the specific corruption risks the business is exposed to.	This risk assessment will form part of the P&P approved by top level management to mitigate the corruption risk.

- 2.2 It is recommended that a comprehensive risk assessment is done every three years with intermittent assessments conducted when necessary, the assessment may include the following:

Requirements per MACC guidelines on adequate procedures	Company Practices
(i) Opportunities for corruption and fraud activities resulting from weaknesses in the Company's governance framework and internal systems / procedures.	To assess the following: • With reference to this P&P, to assess whether the corruption risk has properly mitigated. • To assess on business activities, any weaknesses in the Company's measures that will expose to the risk of corruption, to highlight the risk in risk register or inform Committee for further action. • Any other criteria which can be considered.
(ii) Financial transactions that may disguise corrupt payments.	To assess whether has any financial transaction breaches ALL of the following: • A single transactions; • Accepted by someone under the employment of the Company;

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Requirements per MACC guidelines on adequate procedures	Company Practices
	- Given by someone at a threshold of RM 25K and above; - Transaction not clearly stated / not appear in the Company's account statement / balance sheet. If meets ALL the criteria above, to conduct an assessment on the transaction to define whether has involved in any corruption payments, if yes, highlight the risk in risk register or inform Committee for further action.
(iii) Business activities in countries or sectors that pose a higher corruption risk.	To assess on the following: - To assess whether has any business activities in other country(ies) with high corruption risk, the risk level and the impact to the Company, etc. - To assess whether has any business activities in a particular sector that pose a higher corruption risk, the risk level and the impact to the Company, etc. - Any other criteria which can be considered.
(iv) Non-compliance of external parties acting on behalf the Company regarding legal and regulatory requirements related to anti-corruption. Note that, a Company can be liable for the acts of such third parties.	To assess on the following: - To determine whether has any existing external parties acting on behalf the Company has any issues or legal cases on corruption, if yes, report to the Committee for further action. - To further explore on the impact to the Company, if any external parties having non-compliance to anti-corruption. - Any other criteria which can be considered.
(v) Any relationship with third parties in its supply chain (e.g. agents, vendors, contractors, and suppliers) which are likely expose the Company to corruption.	To assess on the following: - Check all vendors and suppliers in the Company on the rationale and nature of engagement, whether has any unlikely exposure to corruption, etc. - Ensure a documented black and white in place prior establishment of business relationship, whether in an agreement, a letter, or any other types of document that is recognizable. - Person involve on the signing of black and white documentation, and the nature of signing, to

Requirements per MACC guidelines on adequate procedures	Company Practices
	assess whether such engagement is pure arrangement for business purposes or there is additional arrangement for certain benefits. To assess on any other matter besides the above mentioned, to ensure the engagement with third parties are sound practical on the business needs, and logical sense on the establishment of such relationship with the selected third parties.

Refer Assessment Sheet per **Appendix 1** on the assessment as abovementioned.

2.3 Risk Register

Requirements per MACC guidelines on adequate procedures	Company Practices
The risk assessment for corruption can be done on a stand-alone basis, but is recommended that the assessment be incorporated into the general risk register of the Company.	Unless specifically informed by the Board of Directors on the assessment to be done on a stand-alone basis, otherwise, any corruption risk(s) identified will be mentioned in the general risk register per recommended.

3 Undertake Control Measures

Requirements per MACC guidelines on adequate procedures	Company Practices
Put in place the appropriate controls and contingency measures which are reasonable and proportionate to the nature and size of the Company, in order to address any corruption risks arising from weaknesses in the Company's governance framework, processes and procedures.	The required measures will be practised in accordance to the criteria as set out in the subsequent of this section per 3.1 to 3.4.

3.1 Due Diligence

Requirements per MACC guidelines on adequate procedures	Company Practices
Establish key considerations or criteria for conducting due diligence on any relevant parties or personnel (such as Board members, employees, agents, vendors, contractors, suppliers, consultants and senior public officials) prior entering into any formalised relationships.	The key considerations or criteria for conducting due diligence are as per methods of due diligence at “item (ii)” below. The Board of Directors will conduct due diligence on any recruitment of the employee for the Company. For Board members, due diligence on executive director will be conducted by other existing Board members, or conducted by any other designated personnel as appointed by the Board of Directors. On vendors, suppliers, consultants, or senior public officials, the respective Directors who deals with them will conduct a due diligence on them accordingly. Any unsuccessful due diligence, will not be entered into any formalised relationships.
Methods may include background checks on the person or entity, a document verification process, or conducting interviews with the person to be appointed to a key role where corruption risk has been identified.	Note: the following are “item (ii)”: A background checks for due diligence shall include the following: • To do a Google search and check whether there is any information related to them on corruption or bribery cases (if any). • To find out from social media e.g. LinkedIn / twitter / Facebook / YouTube

Requirements per MACC guidelines on adequate procedures	Company Practices
	/ etc. whether there is any sharing or post or has linked with few political persons which are tended to the behavior or having a higher risk on corruption or bribes (if any). • To check on their work behavior with their previous employment or engagement of the company, to assess whether their behavior has tend to a higher risk on corruption or bribery (if obtainable). • To observe if there is any information provided by any person within the Company, about their background related to corruption & bribery matters (if applicable). • Any other methods besides the above mentioned. For document verification process, shall include the following: • The identity document provided (photos in NRIC or passport or Certificate of Incorporation for Entity) match with the face of actual person or match with the actual physical of business for Entity. • Document from previous company or engagement (e.g. pay slip or letter, etc.) is tallyper observed, without bad records on corruption and bribery cases (if observable). • Document on financial means e.g. account statement / etc. match with their current status / position without any suspect on having corruption or bribes (if obtainable). • Any other methods besides the above mentioned. For conducting interviews with the person to be appointed, shall include the following:

Requirements per MACC guidelines on adequate procedures	Company Practices
	• To obtain few alternate contact details i.e. e-mail address and/or contact numbers on the spot, to assess whether has many contacts in hand which may lead to a higher risk on corruption. • To enquire their living lifestyle against current status, whether their ways of living has any loopholes that relates to corruption and bribes. • To ask on the ideas on problem solving in deal with the government servant or third parties for faster solution, to assess whether any potential in offer counterparty to accept bribes. • To raise a question on how to deal with the incoming high demands from contractors on an open tender, to assess whether any potential in offer counterparty to give bribes. • Any other methods besides the above mentioned. The due diligence shall be performed in various methods as much as possible, to ensure corruption risk been identified. Any unsuccessful due diligence, will not be entered into any formalised relationships.

Refer Due Diligence Checklist per **Appendix 2** on the criteria as abovementioned.

3.2 Reporting Channel

Requirements per MACC guidelines on adequate procedures	Company Practices
(i) Establish an accessible and confidential trusted reporting channel (whistleblowing channel).	Per Company policies and procedures on Whistleblowing.

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Requirements per MACC guidelines on adequate procedures	Company Practices
(ii) Encourage persons to report any corruption incidents in good faith.	Per Company policies and procedures on Whistleblowing, it is encourage persons to report any matters or incidents (which indirectly includes for corruption incidents) in good faith.
(iii) Establish a secure information management system to protect whistleblower's identity and information reported.	Per Company policies and procedures on Whistleblowing. As the reporting are via e-mail, therefore a standard secure information management system per Company policies and procedures on ICT will be applied.
(iv) Prohibit retaliation on whistleblower.	Per Company policies and procedures on Whistleblowing.

3.3 This P&P should cover the following areas:

Requirements per MACC guidelines on adequate procedures	Company Practices
(i) A general anti-bribery and corruption policy or statement.	Per section of policies in this P&P on the Policy Statement.
(ii) Conflict of Interest.	Per section of policies in this P&P.
(iii) Gifts, entertainment, hospitality and travel.	Per section of policies in this P&P.
(iv) Donations and sponsorships, including political donations.	Per section of policies in this P&P.
(v) Facilitation payments.	Per section of policies in this P&P.
(vi) Financial controls, such as separation of duties and approving powers or multiple signatories for transactions.	Each payment is prepaid by the Admin & Accounts Personnel and approved by an Executive Director.

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Requirements per MACC guidelines on adequate procedures	Company Practices
(vii) Non-financial controls, such as a separation of duties and approving powers or a pre-tendering process.	Directors will manage and approve non-financial matters within their authority per respective role and job functions.
(viii) Managing and improving upon any inadequacies in the anti-corruption framework.	Director(s) are to work together in manage the anti-corruption framework. Any inadequacies raised and/or any updates from the relevant laws and regulations on anti-corruption and bribery, the Assigned Person will prepare paper work on the changes in this P&P and submit for Board Resolution prior implementation on the improvement.
(ix) Record keeping for managing documentation related to the adequate procedures.	Documentation on this P&P (the adequate procedures) will be maintained by the Admin & Accounts Personnel.

3.4 This P&P should be:

Requirements per MACC guidelines on adequate procedures	Company Practices
(i) Endorsed by top level management.	This P&P will be submitted for Board Resolution prior formalisation. Any updates or amendments to this P&P will also be submitted for Board Resolution prior enforcement.

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Requirements per MACC guidelines on adequate procedures	Company Practices
(ii) Kept up-to-date.	This P&P will be updated: (i) Once in every 3 years, or (ii) To be updated when there's substantial changes from any relevant laws and regulations on anti-corruption, subject to the review period of not more than 3 years; or (iii) To be updated at a more frequent basis (e.g. annual review / etc.) upon request by top level management; or (iv) There's requirement by relevant authority which requires to review this P&P at a more frequent basis (e.g. annual review / etc.).
(iii) Publicly and/or easily available.	This P&P is publicly and easily available by access to the internet and go to the official website of Asia Business Wealth Management Sdn Bhd.
(iv) Suitable for use where and when needed.	This P&P are interpreted in basic English language, to make it applicable and suitable for use by all level of staff. All staff are able to go to the official website of Asia Business Wealth Management Sdn Bhd and read this P&P for better understanding when needed.

4 Systematic Review, Monitoring & Enforcement

4.1 The Assigned Personnel who perform the review (the “reviewer”) should:

Requirements per MACC guidelines on adequate procedures	Company Practices
Ensure that regular reviews are conducted to assess the performance,	The reviewer is to perform a regular review per their respective reviewer's plan.

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Requirements per MACC guidelines on adequate procedures	Company Practices
efficiency and effectiveness of the anti-corruption program.	
Ensure the program is enforced .	During the review, the reviewer is to review and to ensure the anti-corruption program is enforced. Any anti-corruption program not properly enforced, the reviewer is to raise the concern to Board of Directors for their decision to give instruction to the senior management on action taken, to ensure the necessary anti- corruption program is enforced per relevant laws and regulations on anti-corruption & bribery.
Reviews may take the form of an internal audit , or an audit carried out by an external party.	The Assigned Personnel as decided and appointed by the Board of Directors (the “reviewer”), will carry out the reviews on the anti-corruption per their scheduled plan.
The reviews should form the basis of any efforts to improve the existing anti-corruption controls in place in the Company.	From the review, the reviewer is to raise the concerns (if any) to the Board of Directors for action taken, to improve the existing anti-corruption controls accordingly.

4.2 The Company should consider to:

Requirements per MACC guidelines on adequate procedures	Company Practices
(i) Plan, establish, implement and maintain a monitoring program, which covers the scope, frequency, and methods for review.	The planning, establishment, implementation and maintaining of monitoring program that covers the scope, frequency and methods of review will based on the schedule per top level management.

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Requirements per MACC guidelines on adequate procedures	Company Practices
(ii) Identify the competent person(s) and/or establish a compliance function to perform an internal audit, in relation to the Company's anti-corruption measures.	The identified competent person(s) shall be the Assigned Person or any other designated personnel upon decided and appointed by the Board of Directors. A compliance function to perform an internal audit in relation to the anti-corruption measures shall be performed by the Assigned Person upon decided by the Board of Directors.
(iii) Conduct continual evaluations and improvements on this P&P.	The Assigned Person is to conduct continual evaluations and improvements on this P&P periodically.
(iv) Consider an external audit (example: MS ISO 37001 auditors) by a qualified and independent third party at least once every 3 years to obtain assurance that is P&P is adequate.	At the discretion of the Board of Directors with decision and approvals given, a qualified independent third party external auditor(s) with MS ISO 37001 may be assigned to ensure this P&P is adequate, at once in every 3 years, subject to affordability of the Company.
(v) Monitor the performance of personnel in relation to this P&P to ensure their understanding and compliance with the Company's stance in their respective role and functions.	The top level management or other assigned reviewer decided by Board of Directors will monitor the performance of the personnel to ensure understand and compliance with the Company's stance in their respective role and functions. Any personnel who does not understand the compliance to anti-corruption and bribery, will be directed to relevant personnel to read this P&P again, to ensure the respective personnel fully understand and comply with the requirements.
(vi) Conduct disciplinary proceedings against personnel found to be non-compliant to the program.	Any personnel found to be non-compliant to the anti-corruption program, the Board of Directors will take action against the personnel.

5 Training & Communication

Per MACC guidelines on adequate procedures, the training and communication on anti-corruption and bribery will cover 4 areas as below:

1. Policy
2. Training
3. Reporting Channel
4. Consequences of Non-Compliance

5.1 Policy

The policy herein refers to this P&P. This P&P is publicly available at the Company website, by access to the internet and go to the official website of Asia Business Wealth Management Sdn Bhd.

The communication of policies is appropriately communicated, by way of access to the Company website and read the P&P by the associates and third parties. The P&P to the employees for compulsory reading. **After which employees are to sign a declaration that they have read and understood the P&P and will at all times abide by it.**

5.2 Training

A training on anti-corruption and bribery are given to the company's directors and employees in one (1) of the following manner:

- Course or seminar organized internally or by external training provider; or
- Self-directed learning via circulation of reading materials from regulators. Reading materials are to be circulated via e-mail to the directors and employees for reading; or
- Video show on Anti-Corruption and Bribery Awareness on MACC website.

5.3 Reporting Channel

Any reports on anti-corruption and bribery, will be reported via whistleblowing channel per Company's Whistleblowing Policies and Procedures. Below is the summary:

Criteria	Company Practices
Key point should be communicated	To provide the following: • Person involved (by given his/her name & designation). • Matters that relates to (e.g. few quotations but select a vendor with higher price / business interest / etc.). • Amount involves in MYR (an estimated amount to be involved).
Whom should be communicated	Communicated to the Assigned Person per Whistleblowing Policies & Procedures.
How to communicate	Via e-mail to the Assigned Person per Whistleblowing Policies & Procedures.
Time-frame for conducting the communication plan	As soon as practical not more than five (5) business days, subject to any unforeseen circumstance which may occurs (if any).
Language of the material to be communicated	English.

Report can be made anonymously via Whistleblowing Channel:

Name	:	Dato' Chua Tia Guan
Designation	:	Executive Director
Address	:	Asia Business Wealth Management Sdn Bhd Suite C-05-05, 5 th Floor Sunway Nexus Tower No. 1 Jalan PJU 5/1, Kota Damansara 47810 Petaling Jaya, Selangor, Malaysia [mark "STRICLY CONFIDENTIAL"]
Telephone no.	:	603-7620 1560
Email address	:	tia.guan.chua@asiabusinesscentre.com

5.4 Consequences of Non-Compliance

A training or a communication to alert Directors and employees on the consequences of non-compliance will be appropriately delivered per 5.1 or 5.2 above, that any non-compliance to MACC Act, will subject to the penalties by MACC per following:

- A fine not less than 10 times of the sum or value of the gratification or RM 1 million whichever is higher; or
- To imprisonment for a term not exceeding 20 years; or
- Both of the above.

APPENDIX 1

Anti-Corruption & Bribery: Comprehensive Risk Assessment done on _____

[To be conducted once in every 3 years, with an intermittent assessments to be conducted when necessary i.e. upon requested by BOD / Regulator(s)]

(i)	Opportunities for Corruption and Fraud Activities resulting from weaknesses in the Company's Governance Framework and Internal Systems / Procedures.
(a)	With reference to the Anti-Corruption & Bribery Policies & Procedures, to assess whether the corruption risk has properly mitigated. <i>(Kindly use attachment if the space provided not sufficient)</i> Comment: _____ _____ _____
(b)	To assess on business activities, any weaknesses in the Company's measures that will expose to the risk of corruption, to highlight the risk in risk register or inform the Board of Directors for further action. <i>(Kindly use attachment if the space provided not sufficient)</i> Comment: _____ _____ _____
(c)	Any other criteria which can be considered. <i>(Kindly use attachment if the space provided not sufficient)</i> Comment: _____ _____ _____
(ii)	Financial Transactions that may disguise Corrupt Payments.
(a)	To assess whether has any financial transaction breaches ALL of the following: - A single transactions; - Accepted by someone under the employment of the Company; - Given by someone at a threshold of RM 25K and above; - Transaction not clearly stated / not appear in the Company's account statement / balance sheet. If meets ALL the criteria above, to conduct an assessment on the transaction to define whether has involved in any corruption payments, if yes, highlight the risk in risk register or inform the Board of Directors for further action. <i>(Kindly use attachment if the space provided not sufficient)</i> Comment: _____ _____ _____ _____

APPENDIX 1

Anti-Corruption & Bribery: Comprehensive Risk Assessment done on _____

[To be conducted once in every 3 years, with an intermittent assessments to be conducted when necessary i.e. upon requested by BOD / Regulator(s)]

(iii)	Business Activities in Countries or Sectors that pose a higher Corruption Risk.
(a)	To assess whether has any business activities in other country(ies) with high corruption risk, the risk level and the impact to the Company, etc. <i>(Kindly use attachment if the space provided not sufficient)</i> Comment: _____ _____ _____
(b)	To assess whether has any business activities in a particular sector that pose a higher corruption risk, the risk level and the impact to the Company, etc. <i>(Kindly use attachment if the space provided not sufficient)</i> Comment: _____ _____ _____
(c)	Any other criteria which can be considered. <i>(Kindly use attachment if the space provided not sufficient)</i> Comment: _____ _____ _____
(iv)	Non-compliance of External Parties acting on behalf the Company regarding Legal and Regulatory Requirements related to Anti-corruption. Note that, a Company can be liable for the acts of such third parties.
(a)	To determine whether has any existing external parties acting on behalf the Company has any issues or legal cases on corruption, if yes, report to the Board of Directors for further action. <i>(Kindly use attachment if the space provided not sufficient)</i> Comment: _____ _____
(b)	To further explore on the impact to the Company, if any external parties having non-compliance to anti-corruption. <i>(Kindly use attachment if the space provided not sufficient)</i> Comment: _____ _____
(c)	Any other criteria which can be considered. <i>(Kindly use attachment if the space provided not sufficient)</i> Comment: _____ _____

APPENDIX 1

Anti-Corruption & Bribery: Comprehensive Risk Assessment done on _____

[To be conducted once in every 3 years, with an intermittent assessments to be conducted when necessary i.e. upon requested by BOD / Regulator(s)]

(v)	Any Relationship with Third Parties in its Supply Chain (e.g. agents, vendors, contractors, and suppliers) which are likely expose the Company to corruption.
(a)	Check all vendors and suppliers in the Company on the rationale and nature of engagement, whether has any unlikely exposure to corruption, etc. <i>(Kindly use attachment if the space provided not sufficient)</i> Comment: _____ _____ _____
(b)	Ensure a documented black and white in place prior establishment of business relationship, whether in an agreement, a letter, or any other types of document that is recognizable. <i>(Kindly use attachment if the space provided not sufficient)</i> Comment: _____ _____ _____
(c)	Person involve on the signing of black and white documentation, and the nature of signing, to assess whether such engagement is pure arrangement for business purposes or there is additional arrangement for certain benefits. <i>(Kindly use attachment if the space provided not sufficient)</i> Comment: _____ _____ _____
(d)	To assess on any other matter besides the above mentioned, to ensure the engagement with third parties are sound practical on the business needs, and logical sense on the establishment of such relationship with the selected third parties. <i>(Kindly use attachment if the space provided not sufficient)</i> Comment: _____ _____ _____

APPENDIX 2

Anti-Corruption & Bribery: Due Diligence Checklist

Person subjected to : _____ **Date :** _____

[For any relevant parties or personnel i.e. Board members, employees, agents, vendors, contractors, suppliers, consultants and senior public officials prior entering into any formalised relationships]

Descriptions		Tick “√” one only	
		YES (Supporting Documents to be attached)	NO (Pls. provide justification in a separate sheet)
1. Background Checks			
1.1	Google Search [To check whether there is any information related to them on corruption or bribery cases (if any)].		
1.2	Find out from Social Media [E.g. LinkedIn / twitter / Facebook / YouTube / etc. whether there is any sharing or post or has linked with few political persons which are tended to the behavior or having a higher risk on corruption or bribes (if any)].		
1.3	Check on their Work Behavior [From their previous employment or engagement of the company, to assess whether their behavior has tend to a higher risk on corruption or bribery (if obtainable)].		
1.4	To Observe [If there is any information provided by any person within the Company, about their background related to corruption & bribery matters (if applicable)].		
1.5	Any other methods besides the above mentioned. [Pls. specify in a separate sheet (if any)]		
2. Document Verification Process			
2.1	The Identity Document Provided [Photos in NRIC or passport or Certificate of Incorporation for Entity match with the face of actual person or match with the actual physical of business for Entity].		
2.2	Document from Previous Company or Engagement [E.g. pay slip or letter, etc. is tally per observed, without bad records on corruption and bribery cases (if observable)].		
2.3	Document on Financial Means [E.g. account statement / etc. match with their current status / position without any suspect on having corruption or bribes (if obtainable)].		

APPENDIX 2

Anti-Corruption & Bribery: Due Diligence Checklist

Person subjected to : _____ **Date :** _____

[For any relevant parties or personnel i.e. Board members, employees, agents, vendors, contractors, suppliers, consultants and senior public officials prior entering into any formalised relationships]

Descriptions		Tick “√” one only	
		YES (Supporting Documents to be attached)	NO (Pls. provide justification in a separate sheet)
2.4	Any other methods besides the above mentioned. [Pls. specify in a separate sheet (if any)]		
3. Interviews with the Person to be Appointed			
3.1	Obtain few Alternate Contact details [i.e. e-mail address and/or contact numbers to be obtained on the spot, to assess whether has many contacts in hand which may lead to a higher risk on corruption].		
3.2	Enquire their Living Lifestyle against Current Status [Whether their ways of living has any loopholes that relates to corruption and bribes].		
3.3	Ask on the Ideas on Problem Solving [In deal with the government servant or third parties for faster solution, to assess whether any potential in offer counterparty to accept bribes].		
3.4	Raise A Question [On how to deal with the incoming high demands from contractors on an open tender, to assess whether any potential in offer counterparty to give bribes].		
3.5	Any other methods besides the above mentioned. [Pls. specify in a separate sheet (if any)]		

Prepared By:

Reviewed By:

 Name:
 Designation:
 Date:

 Name:
 Designation:
 Date:

SCHEDULE 1

Potential Risk Scenarios – “RED FLAGS”

This Schedule contains a list of possible risk scenarios which may arise during the course of business.

This is not an exhaustive list and is for illustrative purpose only.

Please report immediately (per Whistleblowing Policies & Procedures) should you encounter any of the possible risk scenarios below:

- (a) Being aware that a third party is engaged in or has been accused of engaging in improper business activities / practices;
- (b) Discovering that a third party pays bribes or requires bribes to be paid to them for business dealings with them;
- (c) A third party insists on receiving commission or fee for payment before committing to sign up to a contract with us or carrying out a government function with us;
- (d) A third party requests payment in cash or refuses to sign a formal agreement or to provide an invoice or receipt for a payment made;
- (e) Requests from a third party to make payments to a country or jurisdiction different from where the third party resides or conducts its business;
- (f) A third party requests unexpected additional fees or commission to facilitate a service;
- (g) Demands of lavish entertainment or gifts before commencing or continuing with the contractual agreement or provision of service;
- (h) Requests from third party to overlook potential legal / regulatory violations;
- (i) Requests to provide employment or some advantage to the third party's friend or relative;
- (j) Receiving an invoice from a third party which appears to be not customized to company standards;
- (k) Refusal by the third party to put terms in writing;
- (l) Invoice not reflecting the service provided;
- (m) Requests to use the services of an agent, intermediary, consultant or supplier not typically known or used by the Company; and/or
- (n) The offer of an unusual generous gift or lavish hospitality by a third party.