

# Anti-Bribery and Corruption Policy

Financial Industry Collective Outreach  
(Company No. 201701026533)

*Last Reviewed May 2026*

## Version History

Issue Date	Summary of Changes	Revision by	Approved by
6 August 2021	Initial Document	Clare Walker	Board 11 October 2021
June 2026	Clause 6.7, 9, 10, 11, 12 & 13 Updated	Clare Walker	Board 11 June 2026

## 1. Anti-Bribery and Corruption Policy Statement

- 1.1 FINCO is committed to the highest standards of ethical conduct, good governance and transparency in carrying out its business and has established an ABAC Policy to uphold its zero tolerance position on bribery and corruption.
- 1.2 The Board of Directors and Senior Management are committed to implementing and enforcing these measures to counter bribery and corruption which are punishable offences under the Malaysian anti-bribery and corruption laws.
- 1.3 All policies apply to FINCO and its stakeholders who include the directors, employees, business associates, members of the public (where relevant) and all parties involved directly or indirectly in FINCO's operations. These policies are aligned to the Guidelines on Adequate Procedures issued pursuant to Section 17A(5) of the MACC Act 2009.
- 1.4 Any breach of this Policy by an Associated Person may give rise to disciplinary action which could include the termination of employment and/or business relationship (as the case may be), apart from criminal liabilities resulting from the contravention of relevant laws.

## 2. Purpose

- 2.1 This Policy is intended to:
  - 2.1.1 set out guidance on how to manage bribery and corruption risks and ensure that any action in relation to bribery, conflict of interest, malpractice or abuse of power can be effectively addressed; and
  - 2.1.2 ensure compliance with all applicable anti-corruption regulatory requirements when conducting business.
- 2.2 This document should be read alongside FINCO's policies on Whistleblowing, Procurement and Limits of Authority for further guidance on disclosures and control measures.

## 3. Responsibilities

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### Board of Directors

- Establish the required commitment to corporate integrity and oversee compliance with applicable bribery and corruption laws.
- Approve the ABAC policy.
- Review risk assessment reports and monitor follow up action by senior management.
- Oversee Whistleblowing cases.

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### Senior Management

- Promote a culture of integrity within the organisation.
  - Ensure compliance with all applicable bribery and corruption laws.
  - Assess and effectively mitigate and manage bribery and corruption risks within the Company, ensuring appropriate policies and procedures are in place.
  - Encourage the use of Whistleblowing to disclose suspected or actual misconduct.
  - Develop and implement an anti-bribery and corruption communication plan, training and declarations for relevant internal and external Associated Persons.
  - Report assessments, reviews and control measures to the Board.
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**Associated Person**


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- Comply with FINCO's ABAC policy.
  - Raise concerns about misconduct in line with FINCO's Whistleblowing policy.
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## 4. Risk Assessment

- 4.1 FINCO shall undertake a corruption/bribery risk assessment of overall operations annually, or as necessary, to identify, analyse, assess and prioritise actions needed to mitigate internal and external corruption/bribery risks identified.
- 4.2 The resulting report will be reviewed by FINCO's Audit Committee and presented to the Board of Directors.
- 4.3 Senior Management are responsible for taking the action required to mitigate identified risks.

## 5. Definitions

- 5.1 "ABAC Policy" refers to this Anti-Bribery and Corruption Policy.
- 5.2 "Associated Person" means all directors, employees, seconded staff, volunteers, interns and those performing work or services on behalf of FINCO including partners, consultants, vendors and suppliers.
- 5.3 "Bribery and Corruption" under the MACC Act means any action which would be considered as an offence of offering, giving, promising, receiving or soliciting 'gratification' or something of value in an attempt to illicitly influence the decisions or actions of a person with a position of trust within an organisation.
- 5.4 "Company" means Financial Industry Collective Outreach (FINCO).
- 5.5 "Gratification" is defined in the MACC Act to mean the following:
- 5.5.1 money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
  - 5.5.2 any offence, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
  - 5.5.3 any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
  - 5.5.4 any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
  - 5.5.5 any forbearance to demand any money or money's worth or valuable thing;
  - 5.5.6 any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a

disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and

5.5.7 any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).

5.6 Bribery and corruption may be in a variety of forms, many of which are detailed in this policy with a non-exhaustive list of examples summarised below:

Types of Bribery & Corruption	Control Measures
Gifts, Entertainment & Hospitality	<ul style="list-style-type: none"> <li>• Only permissible gifts are allowed. Acceptance of all permissible gifts from a third party must first be declared and approval from FINCO Management must be sought prior to usage;</li> <li>• It is limited in terms of value (threshold of RM50), frequency, customary and lawful; and</li> <li>• Proper care and judgement must be carried out before providing and receiving entertainment and corporate hospitality as it may result in undue influence on a party in exchange for some future benefit or result.</li> </ul>
Sponsorship & Donations	<ul style="list-style-type: none"> <li>• Must be in accordance with procedures as laid out in FINCO's finance SOPs; and</li> <li>• Refuse or decline professionally if the external parties offer any sponsorship or donations (e.g. sponsoring staff activities such as team building, annual dinner, family day, etc.).</li> </ul>
Facilitation Payments	<ul style="list-style-type: none"> <li>• Be cautious and consider the purpose of such payments and whether the payment amount is reasonable for those goods or services; and</li> <li>• Request a receipt that describes the purpose of the payment.</li> </ul>

## 6. Gifts, Entertainment and Hospitality

6.1 A gift connotes the giving or receiving of gifts with intention to influence the recipient's judgement and/or decision or with the expectation of an exchange for a favour and/or benefit.

6.2 Good judgement should be exercised to ensure that the acceptance of a gift or entertainment will not result in a conflict of interest when seen in the context of employment or association with FINCO.

6.3 We recognise that the exchange of business courtesies, such as modest gifts, hospitality and entertainment particularly during festive periods, may strengthen legitimate business relationships.

6.4 When deciding whether gifts or hospitality are reasonable, the recipient should consider the nature and purpose of the gift, transparency in the giving of the gift and how it may be perceived by others.

- 6.5 Gifts either given or received by FINCO above the value of RM50 should be declared to the CEO using the [Gift and Hospitality Form](#) (FINCO employees and Education Partners only) and should be returned if not approved.
- 6.6 The receipt of more than six (6) gifts under the value of RM 50 per calendar year from a single or multiple source should be declared using the Gift and Hospitality Form (FINCO employees and Education Partners only) and should be returned if not approved.
- 6.7 In no circumstances should Associated Persons solicit or give gifts or entertainment of a value that could influence third parties in their business dealings with FINCO.
- 6.8 Employees or Associated Persons should not give or receive gifts to public officials in accordance with Pekeliling Perkhidmatan Bilangan 3 Tahun 1998 to avoid conflicts of interest, bribery, or the perception of compromised impartiality. In circumstances where gifts are deemed appropriate, such as ceremonies, they should not exceed the value of RM50, as per FINCO policy.
- 6.9 The following provides broad guidance on permissible and non-permissible gifts.

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#### Examples of permissible gifts

- Gift token of nominal value bearing the organisation's logo and deemed to be part of the organisation's branding or promotional activities;
- Gifts such as flowers or food hampers especially during festive seasons;
- Meals or entertainment that serve as legitimate business activities and are infrequent, and of a reasonable value;
- Complimentary invitation by business associates for conferences, seminars and training which relates to business activities; and
- Corporate gifts or documented honorariums from FINCO in relation to Corporate Social Responsibility (CSR) programmes.

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#### Examples of non-permissible gifts

- Cash or cash equivalents (cheques, money orders, and gift vouchers);
- Travel-related expenses or accommodation except for justified legitimate business travel;
- Paid holidays including transport, accommodation or a holiday package;
- Items for personal use including jewellery, bags, clothing, IT equipment; and
- Paid club membership, sports activities or complimentary tickets.

## 7. Facilitation Payments and Kickbacks

- 7.1 "Facilitation Payments" are 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.
- 7.2 FINCO prohibits facilitation payments or kickbacks and any attempts at solicitation of such from third parties must be reported through the Whistleblowing policy.

## 8. Donations and Sponsorship

- 8.1 Associated Persons of FINCO are prohibited from making donations or sponsorship that could be perceived as bribery or payments to gain an improper business advantage.
- 8.2 Due diligence must be carried out on Associated Persons who are recipients of donations and sponsorship to ensure that they do not act as a platform for illegal activities and that funds are not used as a cover for bribery or to circumvent or avoid any of the Malaysian bribery and corruption laws. Due Diligence may include background checks and verification of company status, track record and documentation.
- 8.3 If at any point during the due diligence process, there are conflicts of interest or 'red flags' are raised (including close ties with decision makers, poor references, convoluted payment arrangements, inadequate documentation) these must be investigated before further engagement with third parties.
- 8.4 All donations and sponsorships must receive the necessary authorisations and be evidenced and supported by relevant documents, including a request letter and/ or agreement.
- 8.5 No monetary or in-kind political donations are permitted.

## 9. Due Diligence

- 9.1. Third party service providers should be made aware of FINCO's stance on ABAC, with those whose services amount to more than RM10k per annum, completing a full due diligence form. The due diligence form shall include a link to the ABAC Policy, and service providers are required to read the policy and declare that they have completed the reading. Completion of declarations should be documented in a tracker available in "Contract & Vendor Database" document.
- 9.2. FINCO should avoid doing business with, or having any affiliation with, parties who fail to accept the organisation's core values and policies, or parties who may harm the company's reputation.

## 10. Record Keeping

- 10.1. FINCO shall ensure that financial records and other key documentation, including ABAC-related policies and documentation are retained for a minimum of seven (7) years, and kept in compliance with internal controls and as evidence of the business reasons for any payment made or received.
- 10.2. Associated Persons should ensure that expense claims for gifts, entertainment or hospitality provide detailed reasons for expenditure and evidence of the required approvals by an authorised person.
- 10.3. All accounts, invoices and other documents relating to business engagements with third parties, must be prepared and maintained with strict accuracy and completeness.

## 11. Updates and Review

- 11.1. FINCO recognises the importance of ongoing review and assessment of this policy to identify gaps, strengthen control measures and ensure compliance with new laws and regulations.

- 11.2. Reviews shall be undertaken as follows:
- 11.2.1 on an annual basis by FINCO Senior Management with the review date documented on the policy, and reported to the FINCO Audit Committee.
  - 11.2.2 As agreed with the Audit Committee, by Internal Auditors, reporting to the FINCO Audit Committee.
- 11.3. Audit results must be reported to the Board to ensure they are fully informed of the processes and control measures implemented by the Company.
- 11.4. The Company may take disciplinary action against any Associated Person found to be non-compliant with the ABAC policy.
- 11.5. This policy should be reviewed annually and may be updated from time to time, with new clauses communicated to the relevant parties and approved by the Board of Directors . Review and approval dates to be recorded on this document.

## 12. Training and Communication

- 12.1. New staff shall be provided with anti-bribery and corruption training within the first month of their employment.
- 12.2. Employees and other relevant parties shall be provided with annual anti-bribery and corruption training to ensure familiarity with this policy and the associated laws and regulations.
- 12.3. After each training, Employees and other relevant parties should be asked to sign a Declaration of Understanding Form.
- 12.4. Associated Persons should be made aware of their obligations of anti-bribery and corruption laws and of the appropriate channels for making disclosures relating to misconduct.
- 12.5. An Anti-Bribery and Anti-Corruption (ABAC) policy statement and a direct link to the policy shall be permanently published on the FINCO website ([www.finco.my](http://www.finco.my)), with the Communications Team responsible for ensuring these are updated on an annual basis.
- 12.6. A physical ABAC poster must be prominently displayed within the FINCO office for staff reference, with the ABAC Compliance Officer responsible for ensuring the statement is reviewed, printed, and replaced annually or as required.
- 12.7. All FINCO staff email signatures must include a mandatory tagline affirming FINCO's commitment to its ABAC policy, alongside a direct link to the policy for stakeholder reference.
- 12.8. The above list is not exhaustive and FINCO's annual Communication Plan shall contain a section on internal and external ABAC communications.

## 13. Compliance Officer

- 13.1. In accordance with MACC principles, an ABAC Compliance Officer (CO) shall be appointed to oversee and report on FINCO's compliance with ABAC laws, policies and procedures. The appointment may be a person from within or external to FINCO but should not be FINCO's CEO to avoid a concentration of power.
- 13.2. The CO shall have a direct line of reporting to FINCO's Audit Committee and be authorised to bypass the CEO in matters relating to the CEO.
- 13.3. The Compliance Officer shall have an annual KPI specific to the CO role and performance against this KPI should be assessed by the Audit Committee.
- 13.4. The CO's roles and responsibilities, detailed in Appendix A, shall be approved by the Board and reviewed on an annual basis.

## **Appendix A**

### **Compliance Officer Role Profile**

**Last Updated/Reviewed:** June 2026

**Approved by:** Board on 11 June 2026

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### **1. Purpose**

To ensure FINCO maintains an effective, proportionate anti-corruption programme that promotes integrity, prevents misconduct, and complies with applicable laws and good practice.

## **2. Role Overview**

- I. The Compliance Officer is responsible for designing, implementing, monitoring, and improving FINCO's anti-bribery and corruption (ABAC) framework, in a manner appropriate to the size of the organisation and nature of its business.
- II. The role may be held by a designated person from within the organisation who should have a good understanding of FINCO's operations and policies and the potential corruption risks.
- III. Decisions regarding the appointment, appraisal and resignation of the Compliance Officer shall be decided by the Board of Directors or a designated Committee.
- IV. The Compliance Officer shall report directly to the Audit Committee and the Board and be free from interference from top management.
- V. The Compliance Officer should undertake a certified course to ensure adequate knowledge of best practice and the ability to carry out the role effectively.

## **3. Key Responsibilities & Duties**

### **a) Overseeing the design and development of FINCO's ABAC programme**

- Conduct an annual risk assessment and corruption risk assessment (CRA) exercise and document outcomes.
- Define proportionate controls for identified risks and monitor application of controls by responsible staff.

### **b) Developing or approving core/programme procedure documents**

- Draft/update key policies including, but not limited to: ABAC Policy, Conflict of Interest (COI) Policy, Whistleblowing Policy.
- Document key forms and processes either within the policy or as additional documents, including, but not limited to, COI Declaration, Whistleblowing form.
- Review and approve any programme-level procedures to ensure consistency with the main policy.

### **c) Overseeing implementation of the programme**

- Roll out policies via staff or onboarding briefings.
- Ensure required forms and declarations are completed in a timely manner.
- Track completion of basic compliance actions.

### **d) Overseeing compliance by personnel**

- Coordinate or perform periodic spot checks to ensure compliance with policies and procedures by staff and third parties.

- Ensure an appropriate behavioural and compliance-related indicator is included into the performance evaluation framework.
- Follow up on late/missing submissions as part of the performance management process.

#### **e) Ensuring consistency with good practice and laws**

- Benchmark policies against local guidance (e.g., Malaysia MACC guidelines for organisations).
- Adjust policies when regulations or standards change.

#### **f) Providing advice and guidance**

- Act as a go-to contact for staff queries.
- Support managers in handling potential conflicts of interest following a declaration.

#### **g) Monitoring effectiveness of the programme**

- Track basic KPIs (e.g., % staff trained, % COI forms submitted, number of incidents reported).
- Review incidents or near-misses to identify control gaps.

#### **h) Recommending and ensuring improvements**

- Propose targeted improvements following annual review of policies and procedures or on an ad-hoc basis.
- Follow through to confirm changes are implemented and understood.

#### **i) Communicating with Board and Committees**

- Provide quarterly updates to the Audit Committee, Steering Committee and Board, including key risks, incidents and actions taken.

#### **j) Leading or coordinating internal compliance investigations**

- Conduct initial fact-finding including document reviews and initial interviews.
- Escalate cases to the Audit Committee or Board, bypassing the CEO if there is a corruption concern relating to the CEO, as required by policy and support the investigation process.
- Maintain confidentiality and proper documentation of cases.

### **4. Documentation & Record Keeping**

- Be authorised to make declarations, in non-legal documents, related to FINCO's compliance with ABAC laws and best practices.
- Maintain records of policies, training documents, declarations, and investigations.
- Ensure secure and confidential storage for a minimum of 7 years.

### **5. Review Cycle**

These roles and responsibilities shall be reviewed annually or as required.

