

BOS Wealth Management Malaysia Berhad Anti-Bribery & Corruption Policy

1. Purpose

- BOS Wealth Management Malaysia Berhad (“BOSWM MY”) is committed to conducting its business in accordance with the highest ethical standards in full compliance with all applicable laws, regulations and standards in all locations and jurisdictions in which it operates.
- The Policy applies to BOSWM MY, its directors, employees and external parties who have dealings with BOSWM MY.
- BOSWM MY takes a **ZERO-TOLERANCE APPROACH** against any form of bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever BOSWM MY operates. BOSWM MY expects all external parties who conduct business for and on behalf of BOSWM MY to share the same commitment and to have in place an appropriate anti-bribery and corruption (“ABC”) compliance policy and programme which is consistent with the principles set out in the Policy.
- BOSWM MY prohibits the commission of any form of bribery and corruption to anyone nor the acceptance of any form of bribery and corruption from anyone for any purpose by its employees and external parties who conduct business for or on behalf of BOSWM MY.
- BOSWM MY has implemented a robust ABC Programme supplemented by various policies and procedures to ensure that bribery and corruption risks identified by BOSWM MY are appropriately mitigated.

2. Facilitation Payments

- BOSWM MY strictly prohibits the offering or giving of any form of facilitation payments (including the provision of any service, gift or entertainment whether in cash or anything of value) for any reason, including any activity or action that may lead or suggest that a facilitation payment is offered, made or received.

3. Conflict of Interest

- Employees must act in good faith in carrying out their duties and responsibilities and keeping the interests of BOSWM MY paramount to all other interests as part of any decision-making process.
- All employees must ensure that their personal or business interests does not conflict, or appear to conflict, with the interests of BOSWM MY, its shareholders, customers and other stakeholders.

4. Gifts and Entertainment

- BOSWM MY strictly prohibits the acceptance and provision of gifts and entertainment to and from existing or prospective customers, external parties or business acquaintance that may influence or can be perceived to be able to influence the employee's judgement in a decision-making process or put the employee in a position of conflict.

5. Charitable Donations, Sponsorships and Political Contributions

- As a matter of general policy, BOSWM MY does not make political contributions whether in cash or in-kind as this can be perceived as an attempt to gain an improper business advantage. Employees are strictly prohibited to make any political contribution on behalf of BOSWM MY for whatever reason.
- Particular care must be taken when considering any requests for charitable donations and sponsorships to ensure that the requests are legitimate, and the payment will not be used to facilitate and conceal acts of bribery.
- Due diligence must be carried out on the potential recipient/ external party prior to any provision of charitable donations and sponsorships.

6. Dealing with External Parties

- Prior to entering into or continuing a business relationship with any prospective or existing external parties for the performance of work for or on behalf of BOSWM MY, an appropriate counterparty due diligence must be performed on the external party to assess its integrity and exposure to bribery and corruption risks. BOSWM MY will not enter or continue a business relationship with any external party reasonably suspected of engaging in bribery or unethical business practices unless those suspicions are investigated and resolved.
- Employees are required to ensure that appropriate due diligence and controls are applied to any external party engaged by BOSWM MY, to ensure that they comply with the Policy and any applicable ABC legislation and regulation throughout the external party's business relationship with BOSWM MY.

7. Dealing with Public Officials

- When dealing with Public Officials, employees are strictly prohibited from offering, directly or indirectly, anything of value including gifts, entertainment, charitable contributions and sponsorships in order for that Public Official to act (or omit to act) in a way that differs from the Public Official's proper duties, obligations and standard of conduct. Due care and diligence must be exercised at all times when dealing with Public Officials.

8. Reporting Known or Suspected Violations

- The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for or on behalf of BOSWM MY.
- It is the responsibility of all employees and external parties who act for or on behalf of BOSWM MY to report all incidents of bribery and corruption that may come to his or her attention via OCBC's whistleblowing channels ([OCBC Whistleblowing Programme | OCBC Bank](#)).
- All reports of known or suspected bribery and corruption incidents lodged with BOSWM MY by any source will be treated with requisite confidentiality and will not be disclosed or discussed with parties other than those charged with investigation and management of such reports.
- Appropriate actions will be instituted against those found responsible for bribery and corruption incidents, including disciplinary actions, termination of employment or termination of contract and reporting to the relevant authorities.

9. Training and Communication

- BOSWM MY requires all employees to undergo periodic ABC training to enhance the awareness and understanding of BOSWM MY's ABC commitment.
- BOSWM MY's zero-tolerance approach to bribery and corruption is communicated to all external parties at the outset of our business relationship with them and as appropriate thereafter.

10. Record Keeping

- All records and documentation relating to the various policies and procedures which address specific areas of bribery and corruption risk must be properly maintained and retained.

11. Review of the Policy

- BOSWM MY Head of Compliance reviews the Policy biennially, or as and when necessary, whichever is earlier to ensure it remains relevant and accurate.

Definitions

Bribery

Inducement or reward accepted or offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage through improper performance.

Charitable Donation

A voluntary contribution of anything of value, monetary or nonmonetary, with the express purpose of business development or business preservation and made based on strategies developed by BOSWM MY.

Corruption

The abuse of public or private office for personal gain.

Conflict of Interest

A situation where an individual's private/ personal interest interferes with the individual's objectivity in acting in the best interest of his/ her employer and potentially impeding the individual's ability to impartially carry out his/ her duties and responsibilities.

Employees

Employees include permanent, temporary, casual, part time or on fixed term contracts employees of BOSWM MY as well as other persons (not directly employed by BOSWM MY) permitted to perform duties or functions in BOSWM MY, for example seconded employees, interns, trainees and persons hired under agency contracts.

Entertainment

Any benefit received from or offered to any external parties where donor is present.

Examples include but not limited to the following:

- meals, drinks, visits to theatres, other venues, etc;
- tickets to events (e.g. invitations to concerts, exhibitions, sporting events);
- personal events at discounted rates (e.g. travel or accommodation arrangements, etc.); and/or
- any other activities being given or received to initiate or develop relationships with external parties.

External parties

External parties are those who are retained to perform services or conduct business for and on behalf of BOSWM MY or those conducting business together with BOSWM MY (including but not limited to partners, agents, representatives,

intermediaries, introducers, brokers, contractors, suppliers, consultants and joint venture entities) and its employees.

Facilitation Payment

An unofficial payment made to secure or speed up a routine or necessary process by a government agency, government official or person of authority to which the payer is entitled. Facilitation payment can sometimes be known as “grease payment” or “expediting payment”. This definition of facilitation payment does not include the payment of fees to expedite, fast track or speed up a service in accordance with an official and published price list.

Gift

Any benefit other than Entertainment which also includes all kinds of services and the procurement of goods at a price below market value. However, Gifts do not include any items that are one of a number of identical items that are widely distributed (e.g. token souvenirs, desk items or mementos, such as stationery, key chains, calendars, promotional materials, tickets to OCBC Group including BOS Group and BOSWM MY – sponsored events, special mementos normally sent to all clients, items marked with a corporate logo, etc.)

Political Contribution

Anything of value provided for the purpose of supporting any political process, campaigning, political party, politician, political candidate or any political causes. This may include sponsorship, gift, provision of services, promotional activities endorsing a political party, loans, property, personnel time to undertake political campaigning and any other in-kind benefits.

Public Officials

Individuals holding legislative, administrative, or judicial positions; carrying out a public function on behalf of a country or the country’s public agencies or enterprises; or officials / agents of public international organisations.

Include those in government departments, government owned or controlled commercial enterprises, supranational organisations (such as International Monetary Fund, United Nation), political parties, political candidates, Member of Parliament or member of any public bodies (eg. statutory boards, town councils, national educational and healthcare centres etc.)

Sponsorship

A contribution of anything of value, monetary or non-monetary, with an External Party in order to achieve business goals for BOSWM MY such as for branding, marketing and business development. Generally, a sponsorship arrangement involves a partnership between BOSWM MY and an external party for the mutual benefit of both parties.

