



ANTI BRIBERY & CORRUPTION POLICY

DIGITAL EDITION





Guiding Principles & Minimum Standards

MCIS Life (The Company) values our reputation for ethical behavior, financial probity and reliability. We recognise that any involvement in bribery and corruption will also reflect adversely on our image and reputation. As part of our commitment, we have adopted **zero tolerance** against all forms of bribery and corruption, whether it is committed by the directors, partners, employees of the Company or third parties who are acting for or on behalf of the Company.

The Company will take appropriate disciplinary action against any employee whose actions are found to violate the laws and/or this Policy. Employees, directors, third parties, including joint venture or other business partners, brokers, consultants, or agents of the Company shall immediately notify the Compliance Department if they know or suspect any persons or transactions involving bribery and corruption. All communications will be treated as confidential.

Gifts, Entertainment & Corporate Hospitality

In business, it's common to build goodwill and express appreciation through gifts, entertainment, and hospitality including travel. However, gifts, entertainment, and hospitality including travel must never be used to improperly influence business decisions. Employees should refrain from giving or receiving any gifts which may be perceived to or actually influence a business decision.

When dealing with gifts and entertainment, whether given or received, appropriate gifts must:



Comply with local laws & have legitimate business purpose



Not be lavish or excessive



Comply with the Company's Code of Conduct & Conflict of Interest – Gift & Acceptance Process



Not be solicited. Never ask for gifts, entertainment or favours



Be avoided if the government official or third party has any pending matters with MCIS Life



Be duly reported and documented

If the gift or entertainment does not meet the above criteria, you should politely decline. However, for customary gifts or where declining the gift might offend the giver or be harmful to the business relationship, accept the gift on behalf of the Company and report the gift accordingly. Handling of the gift will be determined by your Head of Department.

Any gifts and entertainment regardless of any amount, whether or not involving a Government Official/PEP (Politically Exposed Person) will be required to be properly documented and notified to Human Resource Department via the Gifts Acceptance Disclosure Form for record purpose.

The Compliance Team will monitor and review the Gifts Acceptance Disclosure Form and also report to the Management and Board should there be discrepancies on a quarterly basis.

Charitable & Political Contributions



While donations to charitable organisations ordinarily are regarded as good corporate citizenship, those made to organisations in which PEPs, their family members or close associates have a role, such as trustee, cause concerns under anti-corruption laws.

Corporate Social Responsibility (CSR) projects and the use of Sponsorships (collectively “contributions”), are part of our contribution to the wellbeing of the communities and the environment in which we operate. Such contributions, however, can never be promised, offered or made to secure a business advantage or for any other improper purpose such as to bribe or self-enrich.

The Company has taken the position that a donation made to a charity associated with a PEP is considered a benefit for that PEP. The Company shall require all employees to obtain the approval of Head of Compliance before making any donation to a charity associated with a PEP.

Political parties are associations of PEPs and candidates for public office are potentially PEPs and, therefore, no contributions to political parties or campaigns can be offered or made by or on behalf of the Company. Employees who wish to make personal contributions should be careful to do so in ways that will not give rise to any appearance of impropriety on the part of the Company.



Dealing with Third Parties

MCIS Life will never provide, offer or promise bribes through third parties such as agents and / or consultants. The Company will select and assess the third parties from the perspective of anti-bribery compliance before starting business transactions. All agency consulting and similar agreements should contain provisions expressly prohibiting the making of any such payments on behalf of MCIS Life.

When contemplating investment activities, joint ventures, mergers, selecting vendors, hiring interns, trainees and employees, the Company should bear in mind the risks of entering into those types of relationships with PEPs, their family members and/or close associates and will perform appropriate due diligence on the counterparties.

Third parties, including joint venture or other business partners, brokers, consultants, or agents of the Company are strictly prohibited from engaging in bribery, being bribed, or other corrupt activity. Third-parties who act improperly on behalf of the Company may expose the Company to liability. Therefore, for every engagement involving a new or renewal contract, employees shall carry out the steps as stipulated in the Standard Operating Procedure on Anti-Bribery and Corruption (SOP).

Due Diligence

The Company will conduct appropriate due diligence prior to engaging the following:



Appointment of key positions



Medium to high bribery risk for any transactions, projects or activities

While the list is not exhaustive, and warning signs will vary by the nature of the transaction, expense/payment requests, geographical market or business line, common warning signs that should be considered as part of any due diligence include:



a customer or government official recommends or insists on the use of a certain business partner or service provider;



a service provider, supplier or business partner refuses to agree to anti-corruption contractual terms, uses a shell company or other unorthodox corporate structure, insists on unusual or suspicious contracting procedures, refuses to divulge the identity of its owners, or requests that its agreement be backdated or altered in some way to falsify information;



a service provider or supplier does not have an office, staff or qualifications adequate to perform the required services;



an expense/payment request by a service provider, supplier or business partner is unusual, is not supported by adequate documentation, is unusually large or disproportionate to products to be acquired, does not match the terms of a governing agreement, involves the use of cash or an off-the-books account, is in a jurisdiction outside the country in which services are provided or to be provided, or is in a form not in accordance with local laws.

Records and documentations must be retained as part of the Company's internal controls and record keeping measures.

Reporting Requirement Related to Suspected Bribery

The Company depends on its employees to ensure the highest standards of ethical conduct are maintained in all its business dealings. Employees are requested to assist the Company and to remain vigilant in preventing, detecting and reporting Bribery.

It is mandatory for all employees to report any concerns that they may have to Compliance Department as soon as possible. Issues that should be reported include:



Any suspected or actual attempts at bribery.



Concerns that other employees may be receiving bribes from vendors, clients, etc.



Concerns that other employees or associated persons (third parties, including joint venture or other business partners, brokers, consultants, or agents of the Company) may be bribing third parties, such as clients or government officials.

Employees should make these reports directly to their supervisors. However, if that is not practical or likely to be ineffective, employees may report by utilising the means of the Whistle-blowing Policy.

Potential Breach, Investigation and Discipline

Actual or perceived violations of anti-bribery and corruption under the MACC Act 2009 could cause serious damage to the Company's reputation. Breach of the MACC Act 2009 and this policy may also result in severe criminal, civil and regulatory penalties for the Company and employees, including imprisonment and monetary fines.

The Internal Audit Department shall conduct the internal investigations and will report the necessary investigations and final outcomes to the Audit Committee.

Any employee whose actions are found to violate the law and/or this Policy is subject to disciplinary action, up to and including termination. Violations of the MACC Act 2009 and other applicable laws will be reported to appropriate authorities.





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