

Anti-Bribery & Anti-Corruption Statement



The Institute of Corporate Directors Malaysia ("ICDM") advocates and upholds the highest standards of ethics, integrity, good governance and transparency in our relationships and all aspects of our operations, in line with applicable anti-corruption laws including the Malaysian Anti-Corruption Commission Act 2009 ("MACC Act 2009").

Importantly, ICDM adopts a zero-tolerance approach against all forms of corruption. Recognising that a strong corporate culture of ethics and integrity is imperative, ICDM is committed to establishing a conducive environment for its stakeholders, including employees, members, directors, officers and service providers ("Representatives") to carry out their business and services ethically and with integrity.

In line with this commitment, ICDM has made available the following policies and procedures which are part of our anti-bribery and anti-corruption commitment:

- (1) Speak Up Policy;
- (2) Conflict Management Policy;
- (3) No Gift and Donation Policy;
- (4) Related Party Transactions Policy; and
- (5) Procurement Policy (including Vendors Code of Conduct).

These policies and procedures in summary require our Representatives to comply with the following principles in the performance of any services for or on behalf of ICDM:

- (a) The following are strictly prohibited:
 - (i) offering, promising, soliciting, giving or receiving bribes or participating in any form of corruption;
 - (ii) actual or potential conflict of interest which could result in bribery or corruption risk to ICDM; and
 - (iii) corruptly induce, obtain or retain business or advantage e.g., to influence a government or regulatory decision for ICDM or to seek an illegal personal gain.
- (b) Representatives who refuse to pay or receive bribes or participate in any act of corruption will not be penalised even if such refusal may result in ICDM losing business or not meeting business targets.
- (c) Any Representative or any other person aware of suspected corruption involving ICDM or that there has been a breach of the policies above should report the matter *via* our *'Speak Up'* whistleblowing channel. All information provided will be treated with strict confidentiality.

ICDM may update, revise or amend the policies and procedures by posting the same on our website.