

Anti-Bribery & Anti-Corruption Policy and Framework

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Prepared by:
COMPLIANCE DEPARTMENT

ARIM	ANTI-BRIBERY AND ANTI- CORRUPTION POLICY AND FRAMEWORK	Version	1
		Policy Date	

Table of Contents

1.0	INTRODUCTION.....	3
2.0	DEFINITIONS.....	3
3.0	POLICY STATEMENT.....	4
4.0	OBJECTIVES	5
5.0	SCOPE	5
6.0	FRAMEWORK	5
6.3	Leadership and Governance.....	7
6.4	Internal Culture.....	8
6.5	Operational Strategies	9
6.6	Management Environment	11
7.0	GIFTS AND HOSPITALITY.....	13
8.0	ENTERTAINMENT.....	13
9.0	CONFIDENTIALITY	13
10.0	POLICY CHANGES	13
	APPENDIX 1.....	14
	APPENDIX 2.....	17

ARIM	ANTI-BRIBERY AND ANTI- CORRUPTION POLICY AND FRAMEWORK	Version	1
		Policy Date	

1.0 INTRODUCTION

- 1.1 This anti-bribery policy exists in line with the Malaysian Anti-Corruption Commission Act 2009 ("MACC Act" or the "Act") to set out the responsibilities of AmanahRaya Investment Management Sdn. Bhd. ("ARIM" or the "Company") and those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption.
- 1.2 It also exists to act as a source of information and guidance for those working for ARIM. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.
- 1.3 In 2018, MACC (Amendment) Act 2018 have been gazetted and the principle of commercial organisation's criminal liability (corporate liability) was introduced in Section 17A of the Act. The Malaysian Anti-Corruption Commission has stated that the corporate liability provision of the MACC Act will be enforced on 1 June 2020.
- 1.4 Pursuant to Guidelines on Adequate Procedures issued by the Government, the ARIM Anti-Bribery & Anti-Corruption Policy and Framework ("ARIM ABAC Policy" or the "Policy") has been designed to provide company with a framework to establish the necessary measures to prevent the occurrence of corrupt practices in relation to our business activities. ARIM encourage the use of the Amanah Raya Berhad's ("ARB") whistleblowing channel to raise concerns in relation to real or suspected corruption incidents (please refer to ARB's Whistleblowing Policy).
- 1.5 The ARIM ABAC Policy is link to other ARIM policies, guidelines and procedures and it seeks to ensure that ARIM's employees, businesses and anyone acting for and on behalf of ARIM comply with applicable laws and the provisions of this Policy.

2.0 DEFINITIONS

"Appointed Officer"	means authorised person appointed to receive reports on Whistleblowing matters.
"Bribery"	is defined in Appendix 1 of this Policy.
"Business Partner"	refers to a third party with which any of the company within the Group of Companies has a business arrangement, such as a joint venture (either incorporated or contractual) or a partnership. These include third parties, other than the suppliers that the relevant company enters into relationships with in order to satisfy local content requirements or regulations.
"Corruption"	is defined in Appendix 1 of this Policy.
"Disciplinary Offence"	means any action or omission which constitutes a breach of discipline in the Company as provided by law or the Company's code of conduct, code of ethics, policies and/or a contract of employment, as the case maybe.
"Gratification"	is defined in Appendix 1 of this Policy.
"Governing Body"	refers to ARIM Board of Directors.

ARIM	ANTI-BRIBERY AND ANTI- CORRUPTION POLICY AND FRAMEWORK	Version	1
		Policy Date	

"Improper Conduct"	is any conduct which if proved, constitutes a Disciplinary Offence or a criminal offence. The definition is further defined in the ARB's Whistleblowing Policy.
"ARIM" or the "Company"	refers to AmanahRaya Investment Management Sdn. Bhd.
"ARB"	Refers to Amanah Raya Berhad.
"Personnel"	refers to the Company's directors, committee members, executives, employees, temporary staff, trainees and interns.
"third party"	refers to any individual or organisation the Company meets and works with.
"Top Management"	refers to the Managing Director, Chief Executive Officer, Chief Investment Officer, Chief Operating Officer and Head of Departments.
"Whistleblower"	means any person who makes a disclosure of Improper Conduct.

3.0 POLICY STATEMENT

- 3.1 ARIM is committed to conduct business in an ethical and honest manner, and is committed to implement and enforce systems to ensure bribery is prevented. ARIM has zero-tolerance for bribery and corrupt activities. ARIM is committed to acting professionally, fairly, and with integrity in all business dealings and relationships.
- 3.2 ARIM will constantly uphold all laws relating to anti-bribery and corruption at all times. We are bound by the laws of Malaysia, including the MACC Act, in regards to our conduct both within or outside of Malaysia.
- 3.3 ARIM recognise that bribery and corruption are punishable under the laws of Malaysia. If ARIM is discovered to have taken part in corrupt activities, it may be subjected to the punishment as stipulated under the MACC Act. It is with this in mind that ARIM commit to preventing bribery and corruption in its business, and take its legal responsibilities seriously.
- 3.4 This Anti-Bribery and Anti-Corruption Policy Statement is complementary to and is to be read together with the following:
- MACC Act and its amendments.
 - ARIM's No Gift Policy.
 - ARB Group's Code of Business Ethics (COBE).
 - ARB Group's Enterprise Risk Management Policy.
 - ARIM's Supplemental Enterprise Risk Management Policy.

ARIM	ANTI-BRIBERY AND ANTI- CORRUPTION POLICY AND FRAMEWORK	Version	1
		Policy Date	

4.0 OBJECTIVES

The objectives of the ARIM ABAC Policy are to:

- i. implement an Anti-Bribery and Anti-Corruption management for the Company.
- ii. determine and provide the resources needed to establish, implement, maintain and ensure continuous improvement of the Anti-Bribery and Anti-Corruption management.
- iii. enhance the current controls of the Company bribery and corruption risks.
- iv. eliminate any form of bribery and corruption or prevent the occurrence and potential recurrence of bribery or corruption within the Company.
- v. provide a defence against corporate liability as introduced by the MACC (Amendment) Act 2018.

5.0 SCOPE

- 5.1 ARIM ABAC Policy applies to every personnel, consultant, contractor, agent, sponsor or any other person or persons associated with ARIM, including third parties, within or outside of Malaysia.
- 5.2 Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and anti-corruption.

6.0 FRAMEWORK

- 6.1 ARIM's anti-bribery and anti-corruption framework is based on the Guidelines on Adequate Procedures ("GAP") issued by the Prime Minister's Department. There are five (5) guiding principles under the GAP which are as follows:
 - i. Top Level Commitment;
 - ii. Risk Assessment;
 - iii. Undertake Control Measures;
 - iv. Systematic Review, Monitoring and Enforcement; and
 - v. Training and Communication.

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ARIM	ANTI-BRIBERY AND ANTI-CORRUPTION POLICY AND FRAMEWORK	Version	1
		Policy Date	

6.2 Figure 1 below provides an overview of ARIM's anti-bribery and anti-corruption framework.

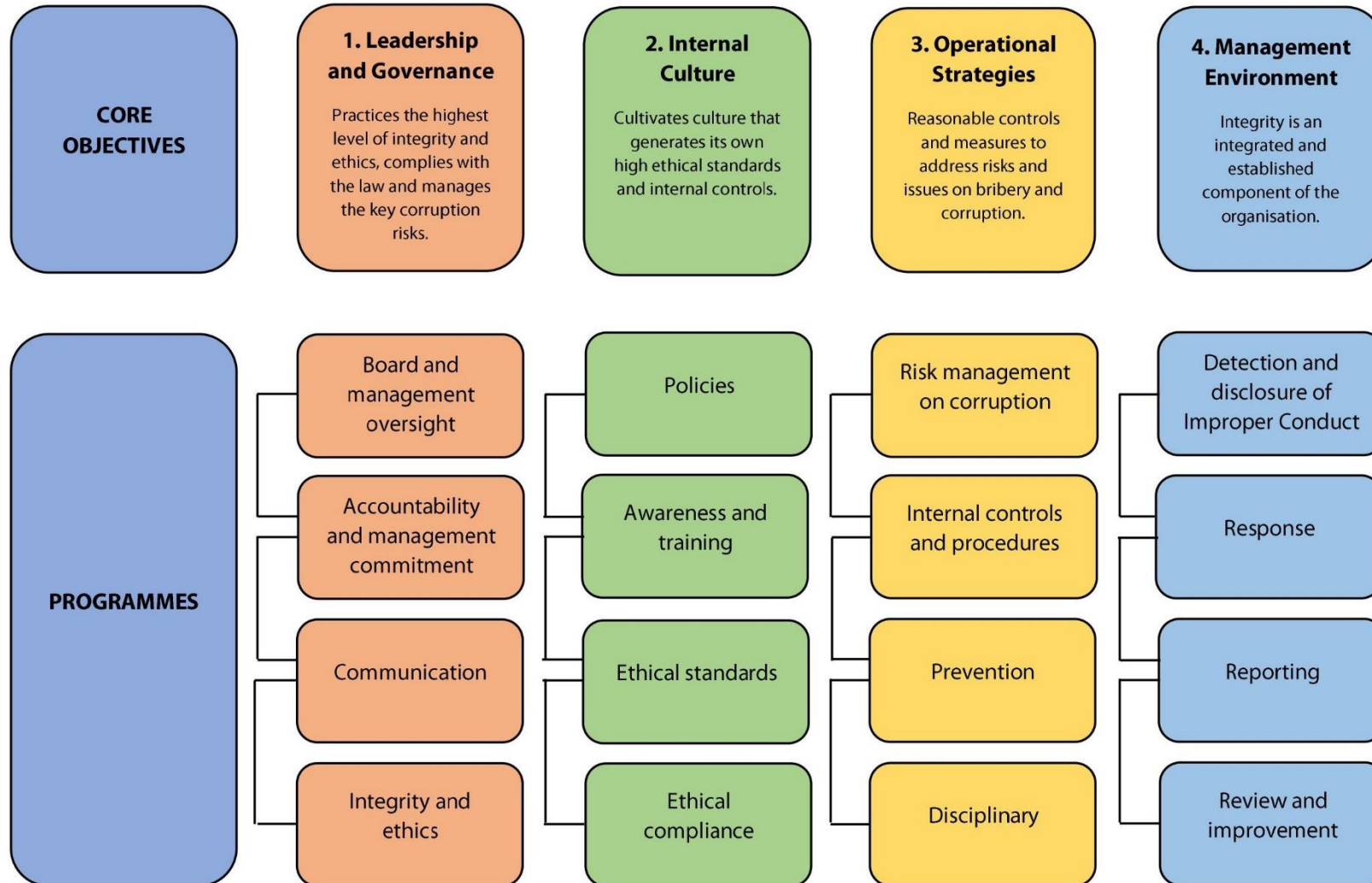


Figure 1: ARIM's Anti-Bribery and Anti-Corruption Framework

ARIM	ANTI-BRIBERY AND ANTI- CORRUPTION POLICY AND FRAMEWORK	Version	1
		Policy Date	

6.3 Leadership and Governance

6.3.1 Oversight – Governing Body

The Governing Body is responsible for establishing, governing, maintaining and reviewing the contents and operation of the ARIM ABAC Policy. The Governing Body shall exercise discretion and reasonable oversight with respect to the adequacy, communication, effectiveness and implementation of the ARIM ABAC Policy.

6.3.2 Accountability and management commitment – Top Management

The Top Management is accountable towards the implementation of the ARIM ABAC Policy. In this respect, the Top Management’s responsibilities include the following:

- a. Implementing the ARIM ABAC Policy to all level of organisation within the Company and set the right “tone at the top”.
- b. Deploying adequate resources and assigned to person(s) who have the appropriate competence towards the effective implementation and operation of the ARIM ABAC Policy.
- c. Review the anti-bribery and anti-corruption implementation program and propose for improvement as and when necessary.
- d. Putting in place the appropriate controls and contingency measures which are reasonable and proportionate, in order to address risks and issues on bribery and corruption.
- e. Providing anti-bribery and anti-corruption awareness training to its employees and communicate the program.
- f. Ensuring overall oversight and assurance on compliance with the ARIM ABAC Policy.

6.3.3 Communication

The ARIM ABAC Policy shall be made available to all Personnel within the Company. For the third party, ARIM will publish its stand and commitment on anti-bribery and anti-corruption throughout the relevant Company’s communication channel.

6.3.4 Integrity and ethics enforcement

a. ARIM’s Compliance Department (“CD”)

CD is the custodian of the ARIM ABAC Policy and shall take the reasonable and proportionate measures to ensure the implementation of the ARIM ABAC Policy and programmes throughout the Company.

CD core functions under the ARIM ABAC Policy are:

- i. Integrity Strengthening
 1. Plan, implement, and coordinate integrity strengthening programs to enhance the practice of integrity in the organisation.
 2. Providing advice, guidance and communicate to Personnel on the ARIM ABAC Policy and issues relating to bribery and corruption.
 3. Providing adequate and appropriate anti-bribery and anti-corruption training and awareness to Personnel.
 4. Reporting on the performance of the ARIM ABAC Policy to the Governing Body and Top Management on yearly and/or ad hoc basis.

ARIM	ANTI-BRIBERY AND ANTI- CORRUPTION POLICY AND FRAMEWORK	Version	1
		Policy Date	

- ii. Governance
 - 1. Update the ARIM ABAC Policy to reflect relevant new changes as and when necessary.
 - 2. Conduct checks and research on policies, systems and work procedures and to suggest improvements.
 - 3. Coordinate the improvement of the organisation’s relevant procedures and systems.

b. GRMD

GCIRMD is the custodian of the ARB’s Whistleblowing Policy and shall manage the overall system, process, and implementation of the ARB’s Whistleblowing Policy. ARIM shall utilise the whistleblowing channel under the ARB’s Whistleblowing Policy.

GRMD core functions under the ARIM ABAC Policy are:

- i. Complaints Management
 - 1. Supervise, monitor, and manage the receiving of information/complaints through the whistleblowing channel on improper conducts, bribery and corruption related to ARIM in an appropriate and timely manner.
 - 2. Ensure action is taken on information/complaint on bribery and corruption.
- ii. Detection and Verification
 - 1. Detecting and verifying information/complaints related to on improper conducts, bribery and corruption in the Company.
 - 2. Facilitate due and fair investigation process, any person who discovers or suspects any improper conduct within the Company.
 - 3. If necessary, the Chief Integrity Officer will inform the Whistleblower on the action taken against the report and the investigation result.

6.4 Internal Culture

6.4.1 Policies and framework

The purpose of the policies and framework is to provide a foundation to support the culture of good corporate governance and integrity throughout the Company. This includes but not to limited to:

- a. **ARIM’s Compliance Manual** sets out the duties and functions of the Company and its Personnel to ensure the Company complies with all applicable laws, rules, and regulations. The ARIM’s Compliance Manual also established bright-line rules to help all Personnel carry out their day-to-day functions and responsibilities.
- b. **ARIM’s Board and Committees Terms of Reference** set out the Board and Committees’ strategic intent and outline the Board and Committees’ role and functions, composition, operation and processes.
- c. **ARB Group’s Code of Business Ethics (“COBE”)** outlines the Company’s commitment to appropriate and ethical practices. It sets out the principles, practices and standards of personal and corporate behaviour. All Personnel are required to comply with the COBE. Failure to comply with the COBE is a serious breach, and appropriate action will be taken for its non-compliance.

ARIM	ANTI-BRIBERY AND ANTI- CORRUPTION POLICY AND FRAMEWORK	Version	1
		Policy Date	

- d. **ARB Group’s Whistleblowing Policy** provides an avenue for all Personnel and third parties to make good-faith disclosure and report instances of unethical, unlawful or undesirable conduct without fear of reprisal. The identity of the Whistleblower and the concerns raised are treated with utmost confidentiality.

6.4.2 Employee awareness and training

The ARIM ABAC Policy aims to safeguard the Company core values by informing employees of the obligations, duties and commitments within their roles, the risks of corruption in their work and any changing circumstances which may be relevant to the employees. The awareness and training programmes shall be periodically updated as and when necessary to reflect relevant new information.

6.4.3 Ethical standards and compliance

Every Personnel within the Company is expected to understand and comply with the relevant company policies and standards. Every Personnel are responsible to ensure that their personal and business conduct demonstrates honesty, integrity, leadership, professionalism, loyalty, responsibility and trustworthiness towards fellow employees, customers, business partners, authorities and the public.

6.5 Operational Strategies

6.5.1 Corruption Risk Management (“CRM”).

- a. Bribery and corruption risks identification and assessment are an integral part of this Policy. The CRM shall be conducted by GRMD. CRM process helps the company to identify structural weakness that may facilitate bribery or corruption and provide a framework for all staff to take part in identifying risk factors and treatments and embeds bribery and corruption prevention within a well-established governance framework (refer Figure 2).

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ARIM	ANTI-BRIBERY AND ANTI- CORRUPTION POLICY AND FRAMEWORK	Version	1
		Policy Date	

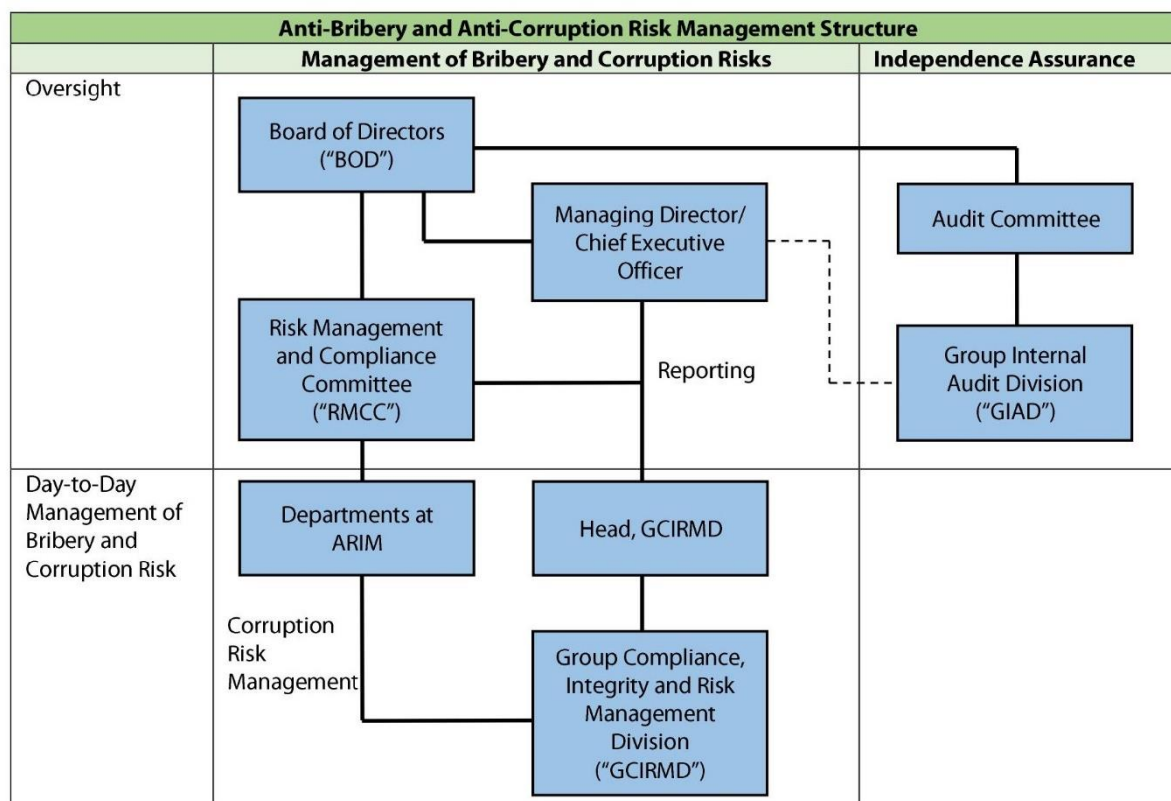


Figure 2: Anti-Bribery and Anti-Corruption Risk Management Structure.

- b. The Company should conduct bribery and corruption risk assessments annually and 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.
- c. The risk assessment for bribery and corruption shall be incorporated into the existing Enterprise Risk Management processes.
- d. The Managing Director / Chief Executive Officer shall be responsible to oversee the day-to-day corruption risk management identified by GRMD.
- e. GRMD shall report the risks to both the Risk Management and Compliance Committee and Board of Directors on quarterly basis. The Managing Director / Chief Executive Officer shall also responsible to ensure that risks are reported to the Board of Directors.
- f. The Board of Directors then noted the reports so that they are aware of bribery and corruption risks within the Company and ensure that appropriate actions are taken by the Top Management to mitigate the risks.
- g. Internal Audit Reviews, which are undertaken according to Annual Group Internal Audit Plan, provides independent assurance on the adequacy, existence and effectiveness of the governance, risk management and control processes.
- h. Type of corruption and an act of corruption is further defined in **Appendix 1**.

ARIM	ANTI-BRIBERY AND ANTI- CORRUPTION POLICY AND FRAMEWORK	Version	1
		Policy Date	

6.5.2 Internal controls and procedures

The Company has strict internal controls to restrict and prevent any instances of bribery and corruption. There are clear and documented policies in respect of activities that may be vulnerable to bribery and corruption or in kind:

- a. **Finance Policy Manual** establishes the policies regarding the administration of finance matters which include the capital expenditure, cheque payment, office expenses, travel, staff expenses claim and money market placement.
- b. **Equity & Fixed Income Investment Policy** sets out the clear rules governing the equity and Fixed Income investment including the selection of panel list of brokers and distribution of business, execution of client trades and orders, and also cross trades.
- c. Clear role and responsibilities of each job position.

6.5.3 Prevention

Preventive measures shall be taken with the aim to identify and resolve weaknesses in practices, systems and work procedures and continue to increase the level of efficiency by eliminating opportunities for bribery and corruption or in kind.

6.5.4 Disciplinary action

- a. The Company has a clear framework to deal with instances where employees are not in compliance with the code of conduct as stipulated in COBE. It seeks to ensure prompt, consistent and fair treatment for all employees and to assist in enabling both the employee and the Company to be clear about the expectations of both parties.
- b. The Company have the rights to take disciplinary action against any employee found to have committed a breach of the company policies and procedures.
- c. Further to disciplinary actions taken by the Company, any employee who commits an act of bribery or corruption risks violating the MACC Act and shall on conviction, be liable to penalty as stipulated under the Act.

6.6 Management Environment

6.6.1 Detection and disclosure of improper conduct, response, and report

- a. The Company shall not tolerate any improper conduct by any employee, any agent, person or entity engaged under a contract for service or engaged by ARIM which can lead to any act of corruption as outlined under Appendix 1 to the Policy herein and/or under any applicable laws.
- b. An Improper Conduct includes committing any act of corruption as outlined under Appendix 1 to the Policy herein and/or under any applicable laws.
- c. The success of the Company's anti-bribery and anti-corruption measures depends on all Personnel, including any person or entity engaged by the Company, adhering to the ARIM's

ARIM	ANTI-BRIBERY AND ANTI- CORRUPTION POLICY AND FRAMEWORK	Version	1
		Policy Date	

ABAC Policy & Framework. In this respect, all relevant parties are under an obligation to report or disclose any Improper Conduct, including acts of corruption, in accordance with the procedures set out in the Policy to enable the Company to take prompt action to investigate the reports and take further actions.

- d. The Company shall provide a transparent and secure disclosure process upon discovery of any Improper Conduct to ensure anonymity of the Whistleblower without compromising the confidentiality of the report or security of the Whistleblower.
- e. Any improper conduct that is discovered or genuinely suspected by the Whistleblower may be reported through the following channels:
 - i. A disclosure of Improper Conduct may be made in writing to the ARB's Head Group Compliance, Integrity & Governance Department and the disclosure shall be marked as 'Private & Confidential' to the following address:

Head Group Compliance, Integrity & Governance Department
Group Risk Management Division
Level 34, Vista Tower, The Intermark
348, Jalan Tun Razak
50400 Kuala Lumpur
 - ii. Meet personally with ARB's Head Group Compliance, Integrity & Governance Department or its officer(s).
 - iii. Call the following telephone number(s):
 1. Direct Line:
Head Group Compliance, Integrity & Governance Department
(03 – 2055 7554)
 2. Manager of Integrity Unit
(03-2055 7534)
 - iv. Disclosures of Improper Conduct may also be reported directly via electronic e-mail to **ethics_center@arb.com.my**
- f. Any Personnel who knows and fails to report an act of giving and offering of bribes or any other acts of corruption is liable to a misconduct under this Policy and risks committing an offence under the MACC Act. If the person is convicted under the Act, he/she is liable to the penalties stipulated under the MACC Act 2009.
- g. The Company shall not penalise or hold any Personnel accountable for refusing to accept any gratification (defined under Appendix 1 herein) even if the refusal results in the Company suffering financial or non-financial losses.

ARIM	ANTI-BRIBERY AND ANTI- CORRUPTION POLICY AND FRAMEWORK	Version	1
		Policy Date	

6.6.2 Review & Improvement

The Top Management should ensure that regular reviews are conducted to assess the performance, efficiency and effectiveness of the anti-bribery and anti-corruption programme, and ensure the programme is enforced. The reviews should form the basis of any efforts to improve the existing anti-bribery and anti-corruption controls in place in the Company. ARIM may also consider to appoint an external auditor at least once every three (3) years to obtain assurance that the organization is operating in compliance with its polices and procedures in relation to anti-corruption.

7.0 GIFTS AND HOSPITALITY

- a. ARIM's Personnel shall not offer or accept any gifts, rebates or benefits in connection with his/her official duties, and/or, where the form, amount or worth of the gift does not commensurate with the intent of the gift.
- b. However, there are certain limited situations whereby a Personnel could offer or receive the gift as stated in the ARIM's No Gift Policy Manual. For example, a Personnel may accept or receive the gift provided that it shall not give any influence to the Personnel's decision-making process.

8.0 ENTERTAINMENT

- a. Any Personnel may accept entertainment that is reasonable and moderate in the context of the business. However, the Personnel must ensure that his/her superior is informed and it advances the Company's interest.
- b. Entertainment that is lavish or frequent may appear to influence a Personnel's judgment while carrying his/her official duties. If an invitation seems inappropriate, the Personnel must turn down the offer or pay the true value of the entertainment himself/herself. A Personnel should discuss with his/her superior before accepting any entertainment that may appear inappropriate.

9.0 CONFIDENTIALITY

This Policy is intended for the internal use of ARIM only and shall not be reproduced in any form or be transmitted electronically or through other means or quoted or referred to in any public document or media without the prior written consent of the Company.

For any enquiries, please contact the Compliance Officer at 03-2687 5340.

10.0 POLICY CHANGES

This Policy may be reviewed and/or amended at least once every three (3) years from the date this Policy is approved or whenever necessary to ensure its effective implementation. Any amendment to this Policy shall be affected by the Governing Body.

The Company shall notify the employees if any changes is made to the ARIM ABAC Policy.

ARIM	ANTI-BRIBERY AND ANTI- CORRUPTION POLICY AND FRAMEWORK	Version	1
		Policy Date	

APPENDIX 1

TYPE OF CORRUPTIONS

The Malaysian Anti-Corruption Commission (“**MACC**”) defined corruption as the act of giving or receiving any “gratification” or reward in the form of cash or in-kind value for performing a task in relation to his/her job description.

Gratification is defined as:

- i. 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 or value;
- ii. any office, dignity, employment, contract of employment or services and agreement to give employment or render services in any capacity;
- iii. any payment, release, discharge or liquidation of any loan, obligation, or other liability, whether in whole or in part;
- iv. any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- v. any forbearance to demand any money or money’s worth or valuable thing;
- vi. any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceeding of a disciplinary, civil or criminal nature, whether or not already insinuated, and including the exercise or the forbearance from the exercise of any right or any official power of duty; and
- vii. any offer, undertaking or promise, whether conditional or unconditional, of any Gratification within the meaning of any of the preceding paragraphs (i) to (vi).

Further to the foregoing, the following acts shall constitute an act of Corruption:

1. **Petty Corruption**
Also known as administrative corruption, it involves the exchange of very small amounts of money and the granting of small favours. These, however, can cumulatively result in considerable public losses.
2. **Grand Corruption**
It spreads through the highest levels of organization, bringing about major abuses of power, disobedience of the rule of law, economic instability and the breakdown of good governance.
3. **Active and Passive Corruption**
The former refers to the act of offering or paying a bribe (where the payment of a bribe has taken place) and the latter refers to the request or receiving of a bribe.
4. **Bribery**
Bribery is the most common form of corruption. It is described as the act of offering, promising, giving, accepting or soliciting of an undue advantage of any value ((which could be financially or non-financially), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person duties.
5. **Embezzlement, Theft and Fraud**
Embezzlement, theft and fraud involve stealing by an individual exploiting his or her position of employment. Fraud involves the use of false or misleading information to induce the owner of a property to part with it voluntarily. Theft is universally regarded as falling within corruption definitions where it occurs, carrying with it as it does, a breach of a fiduciary duty.

ARIM	ANTI-BRIBERY AND ANTI- CORRUPTION POLICY AND FRAMEWORK	Version	1
		Policy Date	

6. **Extortion**
Extortion relies on coercion to induce cooperation, such as threats of violence or the exposure of sensitive information.
7. **Abuse of Function**
The abuse of function or position is the performance of or failure to perform an act by a Personnel, in violation of the law, with a view to obtain an undue advantage for himself/herself or for another person or entity.
8. **Favouritism and Nepotism**
Favouritism, nepotism and clientelism involve abuses of discretion. Such abuses can either involve a direct personal benefit or does not involve a direct personal benefit to the Personnel. Such abuses happen when a person or an organization is selected, regardless of qualifications, merit, or entitlement, for a job or benefit because of affiliations or connections.
9. **Creating and Exploiting Conflicting Interest**
Creation or exploitation of some conflict between the individual's professional responsibilities and his or her private interest. The offering of a bribe creates such a conflict where none may have existed hitherto. In both the public and private sectors, employees and officials are routinely confronted with circumstances in which their personal interests conflict with their responsibility to act in the best interests of the state or their employer.
10. **Improper Political Contribution**
Political donations that are made in contravention of anti-corruption laws and regulations.
11. **Kickbacks**
These are bribes fulfilled after an enterprise has awarded a contract to a customer. They take place in purchasing, contracting, or other departments responsible for decisions to award contracts. The supplier provides the bribe by kicking part of the contract fee back to the buyer, either directly or through an intermediary.
12. **Facilitation payments**
These are typically payments made to secure or expedite the performance of a routine or necessary action to which the payer is entitled, legally or otherwise.
13. **Charitable donations, sponsorship, travel, and promotional expenses**
These are legitimate activities for entities but can be abused as a subterfuge for bribery. There are risks attached to such transactions where it may be perceived that an advantage has been given to obtain or retain business.
14. **Conflict of interest**
A conflict of interest occurs where a person or entity with a duty to the enterprise has a conflicting interest, duty, or commitment. Having a conflict of interest is not in itself a corruption, but corruption can arise where a Personnel the duty due to the enterprise by acting in favour to a separate interest to the detriment of the enterprise.
15. **Collusion**
This can take various forms, of which the most common include bid rigging, cartels, and price-fixing.
16. **Bid rigging**
The way that conspiring competitors effectively raise prices in situations where purchasers acquire goods or services by soliciting competing bids. Essentially, competitors agree in advance who will submit the winning bid on a contract through a competitive bidding process. As with price fixing (see below), it is not necessary that all bidders participate in the conspiracy.

ARIM	ANTI-BRIBERY AND ANTI- CORRUPTION POLICY AND FRAMEWORK	Version	1
		Policy Date	

17. **Price fixing**
An agreement among competitors to raise, fix, or otherwise maintain the price at which their goods or services are sold. It is not necessary that the competitors agree to charge exactly the same price, or that every competitor in a given industry join the conspiracy. Price fixing can take many forms, and any agreement that restricts price competition may violate applicable competition laws.
18. **Cartels**
A secret agreement or collusion between enterprises to commit illicit actions or fraud. Typically, this will involve price fixing, information sharing, or market rigging by setting quotas for production and supply.
19. **Illegal information brokering:**
The brokering of corporate confidential information obtained by illegal methods.
20. **Insider trading**
Any securities transaction made when the person behind the trade is aware of non-public material information and is hence violating his or her duty to maintain confidentiality of such knowledge.
21. **Tax evasion**
The illegal non-payment of tax to the government of a jurisdiction to which it is owed by a person, enterprise, or trust who should be a taxpayer in that jurisdiction.

ARIM	ANTI-BRIBERY AND ANTI- CORRUPTION POLICY AND FRAMEWORK	Version	1
		Policy Date	

APPENDIX 2

PENALTIES FOR BRIBERY AND CORRUPTION

MACC AMENDMENT ACT 2018	UK BRIBERY ACT 2010	US FOREIGN CORRUPT PRACTICES ACT ("FCPA") 1977
Up to twenty (20) years of imprisonment.	Up to ten (10) years imprisonment – accounting offences may be prosecuted under other statues.	Up to five (5) years imprisonment for bribery, twenty (20) years for accounting offences.
Minimum fine of RM1,000,000 or not less than ten (10) times the sum or value of gratification; whichever is the higher.	Unlimited fine ; additionally, Serious Crime Prevention Orders, Winding up proceedings, debarment, director disqualification and regulatory / disciplinary action.	Criminal fines for entities of up to USD2 million (bribery) or USD25 million (violation of accounting provisions), or twice the benefit sought, and debarment, for individuals, fines of up to USD100,000 (bribery) or USD5 million (accounting offences).
Or both penalties of the fine and jail.	Civil Recovery Orders – no criminal conviction required (lower threshold of proof).	Civil penalties of up to USD10,000 per (bribery) violation or USD500,000 per (corporate accountancy) violation.