



# Bank Islam Group Integrity Kit

Prepared by:  
Integrity & Governance  
Department

**BANK ISLAM**

Assuring Trust. Delivering Value.

## The Bank Islam Group Integrity Kit: Principles, Policies & Expectations

Bank Islam Group's guiding principles for sustainable, transparent and corruption-free business conduct.



### Our Pledge

Bank Islam Malaysia Berhad Group (Bank Islam Group/the Group) has, since its inception, consistently upheld the principles of good corporate governance, operating with fairness and transparency. This reflects our shared value: **'Act with Integrity'**. As a signatory to the Corporate Integrity Pledge, the Group is committed to promoting integrity, good governance and transparency across all aspects of its operations.

### Our Integrity Policies

As part of its commitment to integrity and sustainable business practices, Bank Islam Group has developed a suite of integrity policies to support ethical and sustainable business practices. These policies apply to all stakeholders – including directors, employees, business associates and relevant members of the public – and are aligned with applicable laws and regulations, including the National Anti-Corruption Plan (NACP) and the Malaysian Anti-Corruption Commission Act 2009 (MACC Act), particularly Section 17A of the MACC (Amendment) Act 2018.

The policies include:

- Group Anti-Bribery and Corruption Policy (GABCP)
- Group Gift Policy (GGP)
- Group Whistleblowing Policy (GWBP)
- Group Business Associates Code of Ethics Guideline (GBACOC)

### Our Expectations

The Bank Islam Group Integrity Kit outlines key expectations for all business associates in their dealings with the Group. All associates are expected to read, understand and comply with the requirements set forth in this Kit.

### Our Commitment

Bank Islam Group adopts a zero-tolerance approach to bribery and corruption. Employees and business associates must not offer or accept anything of value – including gifts, hospitality or entertainment – for the purpose of gaining improper business or personal advantage, unless explicitly permitted under policy.

We pledge to act professionally, fairly and with integrity in all business dealings and expect the same from our stakeholders. If you have knowledge or reasonable belief of any attempted, suspected or actual misconduct, you are expected to report it in good faith via the whistleblower channels outlined in the Group Whistleblowing Policy.

As a leading Islamic financial institution, the Group also upholds strong Environmental, Social and Governance (ESG) commitments, guided by Value-Based Intermediation (VBI) and endorsed by Bank Negara Malaysia (BNM).



## Adherence to Section 17A MACC Act – Corporate Liability

**Section 17A of the Malaysian Anti-Corruption Commission Act 2009 (MACC Act) – Corporate Criminal Liability for Corruption Offences.**

Effective 1 June 2020, this provision holds both the organisation and its senior management accountable for corrupt acts unless they can prove adequate procedures were in place to prevent such misconduct.

### Key Provisions:

- **Section 17A(1):** A **commercial organisation** commits an offence if a **person associated** with it corruptly offers gratification to obtain or retain business or advantage.
- **Section 17A(3):** Upon conviction, directors, officers or partners are deemed guilty unless they can prove the offence occurred without their consent and that they exercised due diligence to prevent it.

### Definitions:

- **Commercial Organisation:** Includes companies and partnerships (including Limited Liability Partnerships), whether formed in Malaysia or abroad, provided they conduct business in Malaysia.
- **Person Associated:** Refers to a director, partner, employee or any individual performing services for or on behalf of the organisation.

### Key Offences Under MACC Act

Main bribery and corruption offences under MACC Act 2009 (Amendment 2018):

|    | MACC Act Provisions                                | Offenses                                             |
|----|----------------------------------------------------|------------------------------------------------------|
| 1. | Section 16 (Individuals) & Section 17 (a) (Agents) | Soliciting or receiving gratification                |
| 2. | Section 17(b)                                      | Offering or giving gratification                     |
| 3. | Section 18                                         | Submission of false claims                           |
| 4. | Section 23                                         | Abuse of position in public office for gratification |

### Penalties for Corporate Liability

Commercial organisations found to have committed such offences are liable to face significant legal and regulatory penalties:

- Fine of not less than 10 times the value of the gratification or RM1 million (whichever is higher), or
- Imprisonment of up to 20 years, or
- Both



# Group Anti-Bribery & Corruption Policy

Group Anti-Bribery and Corruption Policy (GABCP) outlines Bank Islam Group's zero-tolerance approach to all forms of bribery, corruption and other compliance-related risks.

## Purpose

This policy aims to:

- Proactively address risks related to bribery, conflicts of interest, malpractice and abuse of power
- Ensure full compliance with all applicable anti-corruption regulations in business conduct

## Applicability

The GABCP applies to all stakeholders of Bank Islam Group, including:

- Employees, directors and members of the public (where relevant)
- Business associates: customers, clients, vendors, contractors, consultants, agents, joint venture partners, outsourcing providers, solicitors, investors and valuers

## Policy Statement

All parties acting on behalf of Bank Islam Group must uphold our reputation by conducting business ethically, transparently and in accordance with our shared value, 'Act with Integrity'.

## Types of Bribery & Corruption

Bribery and corruption may take various forms, including but not limited to conflict of interest, political contributions, facilitation payments, money laundering and abuse of power.

Understanding the types of misconduct and the proactive steps we take to prevent them is essential to protecting our reputation and regulatory compliance.

| No. | Types of Bribery & Corruption                 | Control Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----|-----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.  | <b>Conflict of Interest</b>                   | <ul style="list-style-type: none"> <li>• Pre-employment screening</li> <li>• Self-declaration by employee, business associate and other stakeholders</li> <li>• Adherence to the Group's Code of Ethics and Code of Conduct</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                    |
| 2.  | <b>Gifts, Entertainment &amp; Hospitality</b> | <ul style="list-style-type: none"> <li>• Only permissible gifts from third parties are allowed and must be declared with prior approval from appropriate authorities</li> <li>• Must comply with value threshold (RM300), frequency and customary norms</li> <li>• Entertainment and hospitality must not create undue influence or expectation of future benefit</li> </ul>                                                                                                                                                                                                                                              |
| 3.  | <b>Sponsorships &amp; Donations</b>           | <ul style="list-style-type: none"> <li>• Must be in accordance to procedures as provided in relevant Bank Islam Group's policy</li> <li>• Offers from external parties (e.g. sponsoring staff events) must be declined professionally</li> <li>• Contributions must be genuine, transparent and not linked to business dealings</li> <li>• Political donations are prohibited</li> <li>• Donations to charities linked to public officials require careful scrutiny and documentation</li> </ul>                                                                                                                          |
| 4.  | <b>Facilitation Payments</b>                  | <ul style="list-style-type: none"> <li>• Assess the legitimacy and reasonableness of the payment</li> <li>• Always request a receipt detailing the purpose of the transaction</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 5.  | <b>Money Laundering</b>                       | <ul style="list-style-type: none"> <li>• Comply fully with the requirements outlined in the Anti-Money Laundering (AML), Countering Financing of Terrorism (CFT) and Countering Proliferation Financing (CPF) Procedure Guidelines, with particular attention to Red Flag transactions.</li> <li>• Conduct appropriate due diligence, including Know Your Customer (KYC), Customer Due Diligence (CRDD) and Enhanced Customer Due Diligence (ECDD).</li> <li>• Promptly report any suspicious transactions through the designated channels, in accordance with internal procedures and regulatory obligations.</li> </ul> |



## Dealings with Business Associates

Prior to engagement, all prospective Business Associates (BAs) will undergo a comprehensive Due Diligence (DD) assessment. This process evaluates their background, reputation and business capabilities – especially in cases where there is heightened exposure to bribery and corruption risks. The objective is to safeguard the interests of Bank Islam Group at all times.

Aligned with the Group's commitment to ESG principles, BAs may be required to submit ESG-related documentation during onboarding. This may include:

- Sustainability policies
- Mission statements
- Details of internal ESG initiatives

Preference will be given to BAs who demonstrate active integration of ESG values into their operations. All BAs are encouraged to support and align with these principles to foster responsible and ethical business practices.



# Group Gift Policy

A gift refers to the giving or receiving of items, services or gestures with the intent to influence the recipient's judgment or decision or with the expectation of a favour or benefit in return.

## General Rule for Giving and Receiving Gifts

Bank Islam Group's Gift Policy prohibits employees from giving or receiving gifts to or from third parties or stakeholders – except under specific permissible conditions. The policy outlines what may or may not be accepted as a present, award or token of appreciation. The general approval threshold is RM300. However, gifts from third parties are generally deemed inappropriate and fall under the non-permissible category.

### Permissible Gifts

- Exchange of gifts at company-to-company level as part of a company's official visits and courtesy calls (thereafter the gift is treated as the Group's property).
- Tokens of nominal value bearing the organisation's logo (e.g. pens, diaries, umbrellas) given out or received equally to or from members of the public, delegates, media, customers, partners and key stakeholders at official events (e.g. conferences, seminars, exhibitions, training, trade shows) for branding or promotional purposes.
- Flowers, fruits or food hampers (e.g., mandarin oranges, Raya cookies, chocolates) given during festive seasons to foster goodwill and strengthen professional relationships, provided they do not jeopardise the rapport between the employee and the stakeholder.
- Ceremonial gifts related to official events (e.g. IPO launches, corporate dinners).
- Lucky draw, mystery or contest prizes received at events (e.g. corporate dinners, golf tournaments, bowling competitions and other similar events but under certain conditions stipulated in this Policy).
- Reciprocal meals or iftar that serve legitimate business interests and are infrequent or customary.
- Gifts from Bank Islam Group to VVIPs, regulators, investors, external institutions or individuals during official functions (e.g. commemorative or door gifts received by all guests)
- Corporate gifts related to Corporate Social Responsibility (CSR) programmes or motivational, educational or religious events.
- Sample items from suppliers for procurement purposes (e.g. mugs, t-shirts, umbrellas).

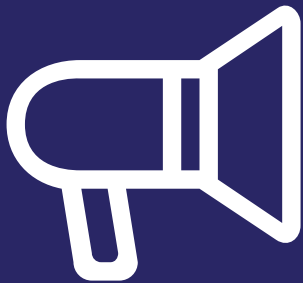




### Non-Permissible Gifts

- Cash or cash equivalents, including cheques, money orders, stocks, shares, savings bonds and cash vouchers.
- Financing, fees, rewards, securities or financial benefits, including the use of property (movable or immovable), vehicles or any other benefits of similar value.
- Payments, waivers or discharges of any financing, obligation or liability, whether in full or in part.
- Travel-related expenses or accommodation paid by customers or their agents in connection with business visits, meetings or events – unless justified as legitimate business travel and aligned with the Group's Human Resources Policy.
- Paid holidays, including transportation, accommodation or holiday packages.
- Individual apparel, such as jewellery, watches, bags, shoes, clothing, sunglasses, etc.
- Electronic items or IT gadgets, including laptops, computers, smartphones and similar devices.
- Paid club memberships, such as golf club memberships or equivalent.
- Complimentary tickets for hospitality outings involving Shariah non-compliant entertainment, including concert, musical or opera tickets, free casino slots, Formula 1 tickets or meals at non-halal establishments.
- Non-business-related gifts for personal occasions such as birthdays, weddings, retirements or farewells – particularly when funded by the Group.
- Entertainment unrelated to business, such as karaoke, spa treatments, golf, fishing and similar activities.
- Any offer, undertaking or promise – whether conditional or unconditional – of any form of gratification as described above, especially from the Group's business associates (e.g., IT and non-IT vendors, solicitors, valuers, agents), regardless of their panel status.





# Group Whistleblowing Policy

## Policy Statement

The Group Whistleblowing Policy (GWBP) encourages all employees to speak up against misconduct. Bank Islam Group is committed to upholding high ethical, moral, legal and business standards. The Group values transparency and accountability in all its operations, in alignment with Shariah principles.

## Policy Objective

The GWBP seeks to foster a culture of transparency, accountability and integrity. It provides a clear and structured process for employees and members of the public to report improper conduct, while ensuring protection for those who come forward in good faith.

## Policy Applicability

The policy applies to the Group which includes members of the Board of Directors, including all Board Committees in the respective entities, Shariah Supervisory Council members, Investment Committee members, employees, business associates, intermediaries and all parties involved directly or indirectly in the affairs of the Group where they are required to strictly adhere to this policy when carrying out and discharging their responsibilities. The policy also applies to members of the public, where relevant.

### **This policy applies to all entities within the Group, including:**

- Members of the Board of Directors and Board Committees
- Shariah Supervisory Council members
- Investment Committee members
- Employees, business associates and intermediaries
- Any party directly or indirectly involved in the Group's affairs

All parties are required to strictly adhere to this policy when carrying out their responsibilities. The policy also extends to members of the public, where applicable.

## Scope of Reporting

Disclosures may involve unethical conduct or malpractice that poses potential risk to the Bank. Examples include, but are not limited to:

- Bribery, kickbacks (received or given)
- Fraud or dishonesty
- Abuse of position
- Misuse of Group property or information
- Forgery or alteration of documents belonging to the Group, its customers, financial institutions or agents
- Embezzlement or theft
- Conflict of interest
- Poor or unethical sales practices, including mis-selling and insider trading
- Actual or suspected breaches of laws, regulations or internal policies
- Violations of the Group's Code of Ethics and Conduct and any other policies
- Breaches of regulatory requirements issued by BNM, Securities Commission Malaysia (SC) or Bursa Malaysia
- Abetment of any of the above misconducts
- Retaliation or detrimental action against whistleblowers or their associates
- Improper behaviour or actions that may harm the Group's reputation or financial standing

Members of the public are also encouraged to report such incidents, where relevant.

## Confidentiality and Whistleblower Protection

Whistleblowers are encouraged to identify themselves when submitting a disclosure. Anonymous reports may be investigated at the Group's discretion. All disclosures will be treated with strict confidentiality, and every effort will be made to protect the whistleblower's identity unless consent is given. Whistleblowers will be safeguarded from any form of retaliation or adverse action resulting from their disclosure.

## Conditions for Whistleblowing

To ensure the integrity of the process, the following conditions must be met:

- The report is made in good faith and in the best interest of the Group
- The whistleblower reasonably believes the information to be true at the time of reporting
- The whistleblower maintains confidentiality throughout the process



### Disclosure Channels

Reports of improper conduct should be directed to the relevant Designated Person, based on the designation of the individual being reported. Disclosures must be submitted via the official email channels listed in the table below.

#### 1. Bank Islam Group

| Level  | Person Being Reported                                                                                                                                                                                                          | Designated Reporting Authority                                                                                                                                                                                                                                   |
|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Tier 1 | <ol style="list-style-type: none"> <li>1. Member of the Board of Directors</li> <li>2. Member of the Shariah Supervisory Council</li> </ol>                                                                                    | Chairman (Bank Islam)<br><b>chairman@bankislam.com.my</b>                                                                                                                                                                                                        |
| Tier 2 | <ol style="list-style-type: none"> <li>1. Chairman</li> <li>2. Group Chief Executive Officer</li> <li>3. Group Chief Integrity &amp; Governance Officer</li> <li>4. Member of Integrity &amp; Governance Department</li> </ol> | Senior Independent<br>Non-Executive Director<br><b>SINED@bankislam.com.my</b>                                                                                                                                                                                    |
| Tier 3 | <ol style="list-style-type: none"> <li>1. Bank Islam Employees</li> </ol>                                                                                                                                                      | Senior Independent<br>Non-Executive Director<br><b>SINED@bankislam.com.my</b><br><br>Group Chief Integrity<br>& Governance Officer<br><b>whistle@bankislam.com.my</b><br>or submit report via Bank Islam<br>Group corporate website:<br><b>www.bankislam.com</b> |



## 2. BIMB Securities Sdn Bhd (BIMBSEC)

| Level  | Person Being Reported                                                                                                                                | Designated Reporting Authority                                                                                                                         |
|--------|------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| Tier 1 | <ol style="list-style-type: none"> <li>1. Member of the Board of Directors</li> <li>2. Member of the Shariah Advisory Committee</li> </ol>           | Chairman (BIMBSEC)<br><b>chairman.bimbsecurities@bankislam.com.my</b>                                                                                  |
| Tier 2 | <ol style="list-style-type: none"> <li>1. Chairman (BIMBSEC)</li> <li>2. Chief Executive Officer (BIMBSEC)</li> </ol>                                | Chairman of the Board Audit & Risk Committee (BIMBSEC)<br><b>barcchairman.bimbsecurities@bankislam.com.my</b>                                          |
| Tier 3 | <ol style="list-style-type: none"> <li>1. BIMBSEC Employees</li> <li>2. Registered Persons of BIMBSEC including Marketing Representatives</li> </ol> | Chairman of the Board Audit & Risk Committee (BIMBSEC)<br>Group Chief Integrity & Governance Officer<br><b>whistle.bimbsecurities@bankislam.com.my</b> |

### 3. BIMB Investment Management Berhad (BIMBINVEST)

| Level  | Person Being Reported                                                                          | Designated Reporting Authority                                                                                                                  |
|--------|------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|
| Tier 1 | 1. Member of Board of Directors (BIMBINVEST)<br>2. Member of Investment Committee (BIMBINVEST) | Chairman (BIMBINVEST)<br><b>chairman.bimbinvestment@bankislam.com.my</b>                                                                        |
| Tier 2 | 1. Chairman (BIMBINVEST)<br>2. Chief Executive Officer (BIMBINVEST)                            | Chairman Board Audit & Risk Committee (BIMBINVEST)<br><b>barc.chairman.bimbinvestment@bankislam.com.my</b>                                      |
| Tier 3 | 1. BIMBINVEST Employees                                                                        | Chairman Board Audit & Risk Committee (BIMBSEC)<br><br>Group Chief Integrity & Governance Officer<br><b>whistle.bimbinvest@bankislam.com.my</b> |

### 4. Bank Islam Trust Labuan Ltd/Bank Islam Labuan Offshore Branch (BTL/BILOB)

| Level  | Person Being Reported                                                                                             | Designated Reporting Authority                                                                                                 |
|--------|-------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|
| Tier 1 | 1. Chairman (BTL) / Member of the Board Oversight Committee<br>2. Member of BTL Board / Board Oversight Committee | Senior Independent Non-Executive Director<br><b>SINED@bankislam.com.my</b>                                                     |
| Tier 2 | 1. Chief Executive Officer (BTL and BILOB)<br>2. Senior Vice President (BILOB)<br>3. BTL and BILOB Employees      | Senior Independent Non-Executive Director<br><br>Group Chief Integrity & Governance Officer<br><b>whistle@bankislam.com.my</b> |



# Group Business Associates Code of Conduct (GBACOC) Guideline

All Bank Islam Group Business Associates (BAs) are expected to uphold the highest standards of ethical conduct, comply with applicable laws and regulations and support the Group's ESG commitments, as outlined below.

## Responsibilities of Business Associates

BAs are expected to conduct all dealings with integrity, professionalism and accountability. This includes, but is not limited to:

- 1. Accurate Recordkeeping:** Ensure all business information and communications are recorded and reported truthfully and completely.
- 2. Asset Stewardship:** Safeguard and responsibly manage any Group assets – physical or intellectual – entrusted to you.
- 3. Legal Disclosures:** Disclose information about the Group only when legally required, ensuring accuracy and timeliness.
- 4. Confidentiality:** Protect all confidential data shared by the Group in the course of business engagement.

## Regulatory Compliance

BAs must comply with all applicable laws, regulations and contractual obligations at all times. Key legal requirements include:

- All Malaysian regulations and laws including the Malaysian Anti-Corruption Act 2009
- Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001
- Personal Data Protection Act 2010
- Islamic Financial Services Act 2013 (Sections 145-146 on Banking Secrecy)
- Environmental laws and regulations governing hazardous materials, emissions and waste
- All terms and conditions outlined in the contractual agreement with the Group

## Commitment to Ethical Conduct

The Group enforces a strict zero-tolerance policy on bribery and corruption. BAs must not, directly or indirectly, offer, accept, solicit or promise any form of gratification – including cash, gifts or services – to influence decisions related to their engagement with the Group.

This aligns with Section 17A of the Malaysian Anti-Corruption Commission Act 2009 (Amendment 2018), which imposes corporate liability for corrupt acts committed by associated persons. Personal liability may also arise under other relevant provisions of the Act.

## Supporting ESG and Sustainability Commitments

As a leading Islamic financial institution, the Group is committed to ESG principles guided by VBI, in line with the Global Alliance for Banking on Values (GABV) and endorsed by BNM. BAs are encouraged to align with these commitments. During onboarding, BAs may be required to submit ESG-related documentation, such as sustainability policies, mission statements or internal initiatives. Preference will be given to BAs who actively integrate ESG values into their operations.

## Documentation Requirements

Prior to engagement, all BAs must complete and submit the following GBACOC documents:

### 1. Corruption Risk Due Diligence

Includes a questionnaire covering:

- Past or potential corruption violations
- Government affiliations
- Integrity-related compliance practices

### 2. Group Integrity Kit (GIK)

Acknowledgement of and commitment to comply with the Group's internal integrity standards and external anti-bribery regulations, as outlined in the GIK.

### 3. Business Associate Declaration of Interest

Disclosure of any professional or personal relationships with the Group's employees, shareholders or Board members to prevent conflicts of interest.

### 4. Business Associate Integrity Pledge

A formal declaration to reject and refrain from participating in any form of corrupt activity.





# Acknowledgement on Group Integrity Kit

I/We hereby acknowledge receipt and declare that I/we have read and hereby undertake to comply with the requirements set out in Bank Islam Group's Integrity Kit.

**Signed and confirmed  
by Authorised Signatory or Individual of the Company**

**Signature:**

**Name:**

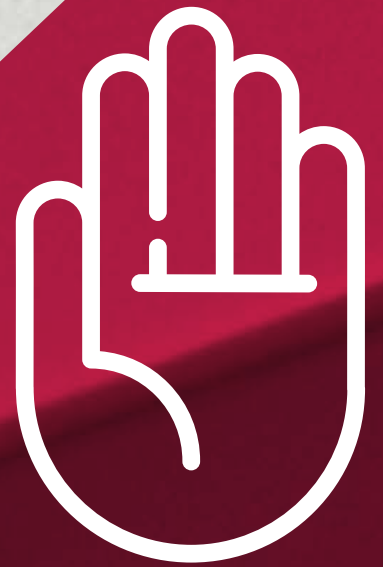
**Designation:**

**Date:**

**Company  
stamp:**

*(Not applicable  
for individuals)*

integrity



# Integrity

The quality of being honest and having strong moral principles.



Assuring Trust. Delivering Value.

Prepared by:  
Integrity & Governance  
Department



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