



ORGANISATIONAL ANTI-CORRUPTION PLAN (OACP) BANK ISLAM MALAYSIA BERHAD 2022 - 2025

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Dear Stakeholders,

It is an honour to introduce our first ever OACP for Bank Islam. We have developed the OACP to strengthen our governance, integrity and anti-corruption controls as proof of our commitments to the highest standards of honest and transparent business practices. This effort is in line with the Government's requirements as set out in the National Anti-Corruption Plan (NACP) and our plan reflects the highest standards of integrity in Bank Islam's governance model. It is incumbent upon Bank Islam to consistently display and adhere to a high standard of work excellence and professionalism, good behaviour and exemplary conduct, to instil, maintain and foster the confidence of financial industry stakeholders in the ability of Bank Islam to fulfil its duties and responsibilities. Integrity, honesty, accountability, and trustworthiness are the values we expect as an organisation and professionals.

I am confident the OACP will help us achieve our vision of being the preferred one-stop Bank for most sustainably and ethically possible financial solutions, staying anchored on the Shariah rules and principles.

Tan Sri Dr Ismail Haji Bakar Chairman





Dear Stakeholders,

At Bank Islam, we adopt a zero-tolerance approach against all forms of bribery and corruption. Our reputation is built on our core TAAT (Think Customer, Act with Integrity, Advance Beyond and Take Charge) values as a company and our collective commitment to act with integrity in all our business dealings and relationships. The Bank's OACP is a three-year strategy that aims to strengthen our governance, integrity and anti-corruption controls as part of our continuing efforts to consolidate further the Bank's efforts to maintain and enhance its high standards. The OACP serves as the primary guide for Bank Islam to ensure compliance with all applicable anti-corruption regulatory requirements when conducting business.

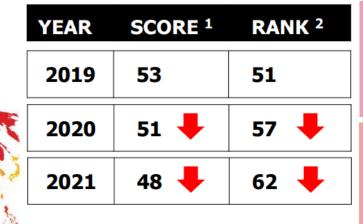
Bank Islam's track record is built upon a solid foundation of integrity and good governance. We must ensure our stakeholders are empowered to make ethical and informed decisions. I welcome the OACP to guide and empower us to prevent and control bribery and corruption.

Mohd Muazzam Mohamed Group Chief Executive Officer

Background of Bank Islam OACP



Our Commitment to Strengthen Governance and Fight Corruption



Notes:

- 1. 100 (very clean) to 0 (highly corrupt)
- 2. 180 countries ranked for all 3 years

According to a Transparency International report, a non-governmental organisation and global movement working in over 100 countries to end the injustice of corruption, for 2021, Malaysia ranks 62nd out of 180 countries in CPI with a score of 48/100.

The National Anti-Corruption Plan 2019-2023 ("NACP") was officially launched by the Prime Minister of Malaysia on 29 January 2019 to combat corruption and foster good governance. The NACP suggested OACP as an anti-corruption document to manage corruption issues at the organisational level.

Bank Islam OACP is developed to strengthen our governance, integrity and anti-corruption controls as proof of our commitments to the highest standards of honest and transparent business practices.



Corruption Perception Index (CPI) 2021 Map

STRATEGIC OBJECTIVE 6.2: Greater Corporate Entities Resilience against the Threat of Corruption

6.2.1 To oblige the Statutory Bodies, State-Owned Enterprises (SOEs), Company Limited By Guarantee (CLBG) and private sector regulated by regulatory bodies to develop Organisational Anti-Corruption Plan (OACP) with the assistance of three agencies namely the Malaysian Anti-Corruption Commission, National Centre for Governance, Integrity and Anti- Corruption and Malaysian Institute of

- Ministry of Economic Affairs (MEA)
 Prime Minister's Department (PMD)
- iii) Malaysian Anti-Corruption Commission (MACC)
- iv) Malaysian Institute of Integrity
- v) Statutory Bodies
- vi) State-Owned Enterprises (SOEs)
- vii) Company Limited by Guarantee (CLBG)
- viii) Private Sector regulated by regulatory bodies

Within 2 years (Jan 2019-Dec 2020)

Key Steps of Bank Islam OACP Development





Top Level Commitment

Establishment of Anti-Corruption Committee and formation of OACP Development Committee (ODC).



Data Analysis

Analyse data in the form of reports of the real state of governance, integrity and anti-corruption weaknesses:

- MACC/RMP records.
- Staff's disciplinary records; and
- Internal Audit/
 Compliance report.



Corruption Risk Management (CRM)

Process of identifying risk and weaknesses that lead to opportunities of corruption to occur.



Action Plan

- Prepare strategic objective & action plan to address issues of corruption, governance and integrity.
- Milestone as an indicator to measure achievement.
 Departments to be responsible and accountable for the initiatives assigned.

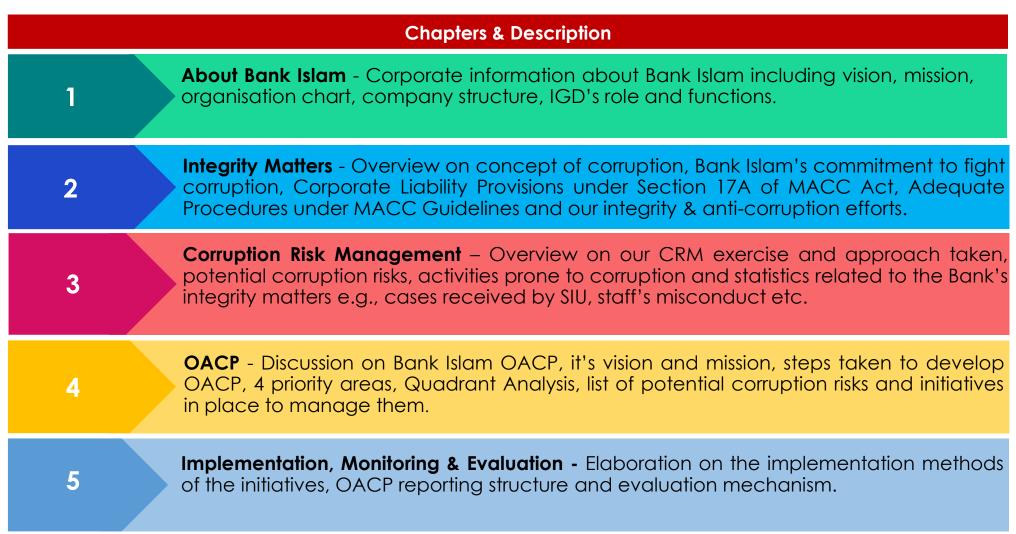


Monitoring & Evaluation

- Monitor, evaluate and report progress of the OACP.
- Monitor implementation of OACP action plan and ensure compliance to the plan.
- Coordinate and engage stakeholders.

OACP Chapters





Bank Islam OACP Overview



Covering all aspects

Chapters were developed in line with the Malaysian Anti-Corruption Academy (MACA) Certified Integrity Officer (CelO) modules and benchmarking exercise against other organisations.

Adopting National Anti-Corruption Plan (NACP) recommendations

Testament of commitment from Bank Islam to achieve our vision as the preferred Islamic financial institution with the highest standards of integrity, governance and accountability to all our stakeholders.

Collaborative efforts

Initiatives were developed through several workshops and discussions. Challenge session was also conducted to determine the viability of the initiatives proposed.



Tailored to Bank Islam's needs

Formulated through consultation with our experienced external consultant and various internal discussions.

Based on CRM Outcome

Based on our focused yet comprehensive CRM exercise which considers past data and future possibilities.

Bank Islam OACP Vision & Mission







Priority Areas, Strategies & Strategic Objectives



Priority Areas

Strategies

Priority Area 1: Business

Drive the asset growth in accordance with good governance practices

Priority Area 2: Branch Operations Strengthening and streamlining all branch operations activities

Priority Area 3: Administration & Support Strengthening the Bank's administration and support functions

Priority Area 4: Governance

Strengthening the efficacy of Bank's governance and internal control

Strategic Objectives

- Promotes integrity and reduce the corruption risk to increase business effectiveness and efficiency
- Maintaining transparency in all business transactions
- Enhance efficiency and maintaining Professionalism in branch operations
- Adherence to policies, procedures & guidelines
- Strengthening SOP towards good governance
- Reinforcing professionalism, accountability & integrity of bank staff
- Effectiveness of consequence management process to determisconduct by all staff
- Inculcate integrity, compliance culture and accountability in workplace
- Ensuring effectiveness of processes in preventing corruption
- Enhancing credibility of the Second and Third Lines of Defense
- Managing shareholder's interference and expectations

Significant Initiatives



STRENGTHEN CHECKER-MAKER PROCESSES

Strengthen checker – maker and layers of approval for processes and procedures and enhance cross checking method to mitigate corruption risks.

POLICY ENFORCEMENT

Impose appropriate actions for proven cases based on available policy.

POLICY ENHANCEMENT

Enhancement and review of SOP, manuals, guidelines and control in the Bank's processes and procedures.

TRAINING & AWARENESS

Continuous and ongoing awareness programme on integrity including Adherence to Section 17A Of The MACC Act 2009 (Amendment 2018), Group Anti-Bribery & Corruption Policy, Group Whistleblowing Policy, Group Gift Policy to stakeholders including staff, directors and business associates.



Implementation, Monitoring & Evaluation



Implementation Strategies

TOP MANAGEMENT COMMITMENT

ACC and top management to ensure all staff practice integrity and ethical values at the highest level

INITIATIVES IMPLEMENTATION

02 CRM

CRM shall be reviewed and approved on periodic basis or when there is a need for change Establishes initiatives together with a timeline to address corruption risk.

Monitoring & Evaluation

(i) Internal Reporting:

- Lead divisions of OACP initiatives shall report to IGD on the implementation of the initiatives contained in the OACP.
- IGD as the OACP Secretariat shall monitor the said initiative's implementation.
- IGD shall, in turn, present a report on the implementation of the OACP to MANCO & BAEC twice a year.
 Representatives from specific divisions may be required to present any issues or challenges to implementing the OACP initiatives.
- (ii) External Reporting: IGD shall report to the relevant regulators as and when required.

Periodic Review

A comprehensive review and evaluation of the OACP initiatives shall be conducted by IGD or an external consultant and reported to ACC and BAEC **once every 3 years.**



Integrity & Governance Department would like to express our heartiest appreciation to those who have contributed in the development of the Bank Islam OACP.

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