

GROUP BUSINESS ASSOCIATES CODE OF CONDUCT (GBACOC) GUIDELINE

All Group Bank Islam Business Associates are expected to uphold ethical conduct, comply with regulations and support the Group's ESG commitments as detailed below.

Responsibilities of Business Associates (BAs)

All BAs are expected to conduct their dealings with integrity, professionalism and accountability. This includes:

- a. Recording and reporting all business information and communication accurately.
- b. Safeguarding and responsibly managing any Group assets – whether physical or intellectual – entrusted to you.
- c. Disclosing information about the Group when legally required, ensuring accuracy and timeliness.
- d. Protecting any confidential data shared by the Group in the course of work.

Regulatory Compliance

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

- a. All Malaysian regulations and laws including the Malaysian Anti-Corruption Act 2009.
- b. Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001.
- c. Personal Data Protection Act 2010.
- d. Islamic Financial Services Act 2013 (Sections 145-146 on Banking Secrecy).
- e. Relevant environmental laws and regulations regarding hazardous materials, emissions, and waste.
- f. Terms outlined in the contractual agreement with the Group.

Commitment to Ethical Conduct

The Group maintains a zero-tolerance policy toward bribery and corruption. BAs must not, directly or indirectly, offer, accept, solicit or promise any form of advantage – including monetary rewards, gifts or services – to influence decisions involving their engagement with the Group. This is aligned with Section 17A of the Malaysian Anti-Corruption Commission Act 2009 (Amendment 2018) (MACC Act), which introduces corporate liability for corruption committed for the benefit of a commercial organisation by associated persons. Personal liability may also arise under other relevant sections of the Act.

Supporting the Group's ESG & Sustainability Commitments

As a leading Islamic bank in Malaysia, the Group is committed to Environmental, Social and Governance (ESG) principles, guided by Value-Based Intermediation (VBI). These principles stem from the Global Alliance for Banking on Values (GABV) and are endorsed by Bank Negara Malaysia (BNM). BAs are encouraged to support and align themselves with these commitments. During onboarding, BAs may be asked to share ESG-related documentation – such as sustainability policies, mission statements or internal initiatives. Priority will be given to BAs who actively incorporate ESG values into their operations.

Documentation Requirements

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

- a. **Corruption Risk Due Diligence**
This includes questionnaire on:
 - Past or potential corruption violations
 - Government affiliations
 - Integrity-related compliance practices
- b. **Group Integrity Kit (GIK)**
BAs must acknowledge and undertake to comply with the Group's internal requirements as well as external anti-bribery regulations outlined in the GIK and ensure that they and their representatives are aware of these obligations.
- c. **Business Associate Declaration of Interest**
All BAs are to disclose any professional or personal connections with Group's employees, shareholders or Board of Directors to avoid potential conflicts of interest in any business dealings.
- d. **Business Associate Integrity Pledge**
A formal commitment to reject and avoid involvement in any form of corrupt activity.

