

AZIZ IBRAHIM CFP

SC License No: CMSL-I-A0001-2007
(Licensed by Securities Commission)

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

POLICY STATEMENT

Aziz Ibrahim Financial Consultant (AZIZCFP) is committed to conducting business ethically and honestly, and has no tolerance for bribery and corrupt activities. We are committed in all business dealings and relationships and will uphold all laws relating to anti bribery and anti corruption in Malaysia, in particular the Malaysian Anti Corruption Commission Act 2009.

SCOPE OF POLICY

This policy is applicable to anyone who is employed by or work at AZIZCFP and whether permanent, or temporary basis (personnel). It is also applicable to contractors, sub-contractors, consultants, agents, representatives and service providers of any kind performing work or services, for or on behalf of AZIZCFP (business partners).

ANTI-BRIBERY AND ANTI-CORRUPTION

The Malaysian Anti-Corruption Commission in its official portal (www.sprm.gov.my) describes "corruption" as an act of giving or receiving of any gratification or reward in the form of cash or in-kind of high value for performing a task in relation to his/her job function or activity. The example given is where a contractor rewards a gift in the form of an expensive watch to a government official for awarding a project to the company belonging to the contractor.

The MACC Act stipulates four (4) main offences, being:

- Soliciting / Receiving Gratification (Bribe) - Sections 16 & 17(a) MACC Act
- Offering / Giving Gratification (Bribe) - Section 17(b) MACC Act
- Intending to Deceive (False Claim) - Section 18 MACC Act
- Using Office or Position for Gratification (Bribe) (Abuse of Power / Position) - Section 23 MACC Act

The Malaysian Anti-Corruption Commission (Amendment) Act 2018, which will be in force on 1 June 2020 introduces two (2) more offences, being:

- Offering / Giving Gratification by commercial organisation (Corporate Liability) – Section 17A MACC Act
- Deemed Parallel Personal Liability for Senior Personnel (Personal Liability) – Section 17A(3) MACC Act

Corruption may include “bribery” which is any offering, promising, giving, requesting agreeing to receive, accepting a gratification, or other advantages with the intention of inducing or rewarding someone to perform their job function or activity improperly. Form of bribery includes kickbacks, inflated commissions, expensive gifts, and political donations, excessive or inappropriate entertainment.

In fighting the acts of bribery and corruption, this policy prohibits all personnel and business partners from committing any acts that can contribute to an offence described by the definition as stated above. Our personnel will not suffer any demotion, penalty or adverse consequences in retaliation for refusing to pay or receive bribes or participate in any illicit behaviour.

CONFLICTS OF INTEREST

Conflicts of interest arise where there is personal interest that can be considered to have potential interference with objectivity in performing duties or exercising judgement for or on behalf of AZIZCFP. Our Personnel must avoid situations in which their personal interest would conflict with their duties and responsibilities. Our Personnel must not use their position, official working hours, AZIZCFP’s resources and assets, or information available to them for personal gain or to AZIZCFPs disadvantage.

In situations where conflict of interest arises, our Personnel are required to immediately declare the matter to the CEO Mr Abd Aziz Bin Ibrahim.

GIFTS, ENTERTAINMENT, & HOSPITALITY

GIFTS

In matters related to providing gifts, corporate gifts, festive or ceremonial gifts may be given to other parties as long as it fulfils all the following conditions:

- It must be made for the right reason; as an act of appreciation or common courtesy with festive seasons or other ceremonial occasions.

- There must be no obligation for the receiver of the gifts as the gifts must not be used to cause others to perceive an improper influence.
- The gifting of the gifts must be made openly with a reasonable value. Its value must commensurate with the occasion and in accordance with general business practice and it must comply with applicable laws.

In related to accepting gifts, AZIZCFP recognises that exchange of gifts is a very delicate matter where, in certain situations, gift giving is customary. However, our Personnel are expected to decline (or avoid accepting gifts). In no circumstances may our Personnel (or anyone on their behalf) accept the gift in the form of cash or cash equivalent from any party having business dealings with AZIZCFP.

ENTERTAINMENT & HOSPITALITY

Our Personnel must not directly or indirectly provide or offer to provide entertainment / hospitality with a view to cause undue influence or in exchange for favours or advantages. Such acts are considered corruption.

Our Personnel or any of their family members must not accept entertainment / hospitality in exchange for an exercise or non-exercise of their job function or activity. This is to safeguard AZIZCFP's reputation and avoid allegations of impropriety or undue influence or worse, corruption.

DONATIONS AND SPONSORSHIPS

AZIZCFP does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office.

Our Personnel may participate in political activities in their individual capacity with their own money at their own time. Our Personnel must make it clear that their actions are personal and not reflective or representatives of AZIZCFP. No reimbursement will be made for any expenses in this matter.

Our Personnel must only make charitable or educational donations and public welfare sponsorships if they are ethical and legal under applicable laws. All of these expenses must be approved and documented in accordance with AZIZCFP's standard operating procedures. The use of donations or sponsorships to obtain any advantage of any kind is strictly prohibited under this policy.

FACILITATION PAYMENTS

Facilitation payments are form of payments made personally to an individual in control of a process or decision to secure or expedite the performance of a routine or administrative duty or function. In Malaysia, facilitation payment is illegal. It is seen as a form of corruption. Regardless of whether it is legal in any other country, facilitation payment is strictly prohibited under this Policy

Our Personnel and Business Partners must not directly or indirectly offer, promise or give any form of facilitation payment to any public officials for any purposes.

There may be occasion where you are forced to make facilitation payments in order to protect your life, limb or liberty. In such occasion, you must immediately report the incident to CEO Mr Abd Aziz Bin Ibrahim for the necessary action to be taken.

WHISTLEBLOWING CHANNEL

If you suspect, or reasonably believe that this Policy has been, or is being breached, you have an obligation to report your concerns to the CEO Mr Abd Aziz Bin Ibrahim using his personal contact no or personal email at azizcfp@yahoo.com

All concerns reported will be taken seriously, treated in confidential manner and investigated immediately. Your anonymity will be protected unless the disclosure is required by law pursuant to an investigation or legislation, but you may be required to provide a statement as supporting evidence to any investigation. Any retaliation directed against anyone making such report will not be tolerated.

All reports shall be made in good faith and the report must be legitimate. Anyone who makes any malicious, scandalous or vexatious report, and particularly if they persist with such untrue allegations, they will be subjected to AZIZCFP's disciplinary actions.

ANTI-BRIBERY AND ANTI-CORRUPTION COMPLIANCE FRAMEWORK

AZIZCFP has established and will continue to maintain an Integrity Standard Operating Procedures that is based on this Policy to be responsible for all anti-bribery and anti-corruption compliance matters.

The Integrity Standard Operating Procedures is being set up to ensure the compliance of this policy in these following manners:

- By providing advice and guidance on anti-corruption compliance and issues relating to bribery and corruption.

- Appropriate steps are taken to ensure that there is adequate monitoring, analysis and evaluation of the anti-corruption compliance.
- Report on the performance of the anti-corruption compliance programme to the management as the audit procedure.

REGULAR MONITORING & ENFORCEMENT FOR NON-COMPLIANCE

AZIZCFP is committed to making the gist of this policy as a continuous effort to maintain the reputation and standards of AZIZCFP. Regular audits shall be conducted to monitor, review, improve and assess the performance, and efficiency of ongoing anti-bribery and anti-corruption efforts by AZIZCFP. Such audits may be conducted internally by AZIZCFP or by an external party. The results produced by such audits shall be acted upon accordingly.

In the events of non-compliance of this policy, for our Personnel, it may lead to disciplinary action and termination of employment. For AZIZCFP Business Partners, it may lead to termination of contract and claim for damages.

TRAINING, COMMUNICATIONS, & CONFIRMATION BY OUR PERSONNEL

This policy is a public document which shall be communicated to all our Personnel and Business Partners. You must read and understand AZIZCFP's position on anti-bribery and anti-corruption. Any training on this Policy's approach shall be provided to our Personnel.

Effective from the date of this Policy, all our Personnel shall confirm that they have read, understood and will abide by this Policy. A copy of this confirmation shall be documented and retained by the management for the duration of employment.

This Policy will be updated, amended or reviewed from time to time to ensure its adequacy in implementation and enforcements.

Dated on 25th of March 2021