



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

INTRODUCTION

This ABAC Policy is to further enforce the Organisation's Code of Conduct and Business Ethics to ensure that all Associated Persons and Business Associates of the Organisation understand their responsibilities to comply with the ZERO tolerance for bribery and corruption within the Organisation.

SCOPE OF APPLICATION

This ABAC Policy is to provide information and guidance to all Associated Persons to comply with the Anti-Bribery Management System (ABMS) implemented by the Organisation to minimise the incidences of bribery and corruption that might occur in the daily operations of the Organisation.

Where relevant and applicable, Business Associates must comply with this Anti-Bribery and Anti-Corruption Policy and the Organisation reserves the right to impose or incorporate preventive provisions in the business contract with the Business Associate to prevent bribery by, on behalf of, or for the benefit of the Business Associates or another person with intent to -

- (i) obtain or retain business for the Organisation; or
- (ii) obtain or retain an advantage in the conduct of business for the Organisation.

By entering into any business contract with the Organisation, Business Associates are deemed to have read, understood and aware of the Organisation's ABAC Policy.



Rights to Report

Associated Persons and Business Associates who encounters attempted, suspected, or actual bribery, corruption, or violation of ABAC controls within the Organization are required to address their concerns the ABMS Compliance Function. All complaints shall be directed to abms@swmsb.com



Compliance with ABAC Law and Regulations

The Organisation requires all Associated Persons and Business Associates to be responsible to ensure that they comply with the relevant ABAC laws and regulations, in particular, to the Malaysian Anti-Corruption Commission Act 2009 and any amendments thereto. No exceptions will be acceptable for non-compliance of any domiciled ABAC laws and regulations where the Organisation conducts its businesses.



Business Dealings

This ABAC Policy applies equally to the Organisation's business dealings with the commercial ("private sector") and Government ("public sector") entities. Even the possible appearance of bribery and corruption is to be avoided.



Violation of the Organisation's ABAC Policy and ABMS

Non-compliance of the Organisation's ABAC Policy and ABMS by any Associated Persons and Business Associates will be deemed as an act of breach of contract.

Any clarification on this ABAC Policy can be directed to the Organisation's ABMS Compliance Function at abms@swmsb.com