



## **AXA AFFIN Life Insurance Berhad Anti-Bribery and Corruption Policy Statement**

AXA AFFIN Life Insurance Berhad is committed to conduct business with highest integrity and ethical standards aligned with our company core values. In view that bribery and corruption are unethical, our company prohibits all forms of bribery and corruption in its daily business activities. In this regard, our company adopts a zero tolerance towards bribery and corruption and takes a strong stance against such acts.

It is our company policy to comply with all applicable laws and regulation for our operations and this include the laws and guidelines prescribed by Malaysian Anti-Corruption Commission against bribery and corruption. In regard to this, our company has put in place an internal framework to prevent bribery and corruption practices (i.e. pre-approval procedures; due diligence process; training awareness programs and etc.).

Our company has also developed a document which sets out our company's anti-bribery and corruption principles (Anti-Bribery and Corruption Code of Conduct) which will be used as a guiding principles by our staff members in all its business dealings within and outside of the organisation. In this regard, our staff members and business associates are required to adhere to these principles.

### **Staff Members**

It is our company policy whereby staff members are required to conduct business with the highest integrity and ethical standards; comply with the applicable internal policies, procedures, laws and regulations; and uphold the company's principle on zero tolerance towards bribery and corruption practices. In this regard, staff members are:

- (a) strictly prohibited from participating in any acts or behaviours which likely to characterise the acts of bribery and corruption in all its business dealings and relationships;
- (b) ensure that the third parties are not engaged for the purpose of inducing or obtaining or retaining business, gaining an unfair advantage or influencing business decision;
- (c) discouraged from involving in actual or potential conflict of interest which could result in actual or potential bribery and corruption risk to the company; and
- (d) strictly prohibited from offering facilitation payments which perceived as a form of bribery and corruption especially if it involves public offices and politically exposed person.

Note:

“staff members” referred to our directors (both executive and non-executive), officers and employees (including permanent employee, part-time employee and contract employee with fixed terms).

### **Business Associates**

In the commitment on combating bribery and corruption, our company expects all third parties that have been engaged to refrain themselves from all forms of corrupt conduct and strict adherence to bribery and corruption laws and regulations in its commercial activities.

Note:

“business associates” referred to third parties (person or entity) who performs services for or on behalf of our company (i.e. agents, distributors, service providers and etc.)