

## **ANTI-CORRUPTION AND BRIBERY POLICY STATEMENT**

Sumitomo Mitsui Banking Corporation, Labuan Branch (Licensed Labuan Bank: 930016-C) (“SMBCLBN”) recognises that integrity and trust are of utmost importance in sustaining SMBCLBN’s business. SMBCLBN has a zero tolerance policy with respect to giving or receiving gratification including but not limited to bribes and favours.

In compliance with the Malaysian Anti-Corruption Commission Act 2009 (“the Act”), SMBCLBN is committed to preventing bribery and corruption by adopting the principles of **T.R.U.S.T** as prescribed in “Guidelines on Adequate Procedures” issued by the Prime Minister’s Department pursuant to the Act.

### **Top level commitment**

Top level management practices highest level of integrity and ethics and is responsible for ensuring full compliance and effective implementation of the anti-corruption and bribery programmes in managing key corruption risks.

### **Risk assessment**

Corruption risk assessment is conducted periodically to identify, analyse, assess and prioritise internal and external corruption risks.

### **Undertake control measures**

Appropriate controls and contingency measures are put in SMBCLBN’s governance framework, processes and practices to address corruption risks that may arise.

### **Systematic review, monitoring and enforcement**

Regular reviews are conducted to assess the effectiveness of SMBCLBN’s anti-corruption programmes to ensure that it is operating as intended.

### **Training and communication**

All officers, employees and business associates of SMBCLBN are provided with appropriate training regarding anti-bribery and corruption compliance.

SMBCLBN expects all SMBCLBN’s directors, officers, employees and business associates (including but not limited to agents, representatives, suppliers, vendors and service providers) to comply with all the above principles in the performance of their services for and on behalf of SMBCLBN.

Date: 1 June 2020