

## Anti-Bribery & Corruption Policy Statement

Zurich Malaysia is committed to fair and responsible business and prohibit all forms of bribery and corruption, as well as any business conduct that could create the appearance of improper influence. Our commitment to anti-bribery and anti-corruption is articulated in our Zurich Group's Code of Conduct.

The Anti-Bribery and Anti-Corruption (“ABC”) Local Policy with reference to the Malaysian Anti-Corruption Act 2009 (“MACC Act 2009”), sets out the minimum standards of conduct and guiding principles that applies to Zurich Malaysia and all its associated persons including but not limited to directors, employees, agents, representatives, service providers, etc. regardless of level, designation, scope of work and service provided.

Key standard and principles of Zurich Malaysia Anti-Bribery and Anti-Corruption Local Policy:

### 1. Gifts, Entertainment, and Other Advantages (GEOA)

GEOA given, offered or accepted in connection with business activities must be appropriate to the circumstances, moderate in terms of value, frequency, quantity and subject to relevant approvals. The followings are strictly prohibited under the GEOA standard:

- Gifts that are cash or cash equivalents;
- GEOA that constitutes, or creates the appearance of, obtaining or retaining business improperly or to personal benefit or for government action (whether due or not);
- GEOA that could create a conflict of interest for either party; and
- GEOA used for any illegal or improper purpose or that violates any applicable law or regulation.

### 2. Third party payments due diligence

Third party payment must be clearly linked to business volumes/activities and must be clear, transparent and properly documented with detailed business rationale and justification for the relationship, as well as proof of services rendered. Zurich Malaysia shall conduct due diligence on payments to third parties to confirm payment is not made as part of bribe or other inappropriate purpose.

### 3. Facilitation payments

Facilitation payments made to public officials<sup>1</sup> in their personal capacity to secure or expedite the performance of a routine necessary action are recognized as a form of corruption within Malaysia ABC legislation. Following the local legislation and Zurich Group policy, Zurich Malaysia prohibits any sort of facilitation payments, including funds from Zurich Malaysia employees or associated person personally.

### 4. Charitable Donations and Political Donations

Zurich Malaysia prohibits all kinds of political donations to political parties, political officials, or candidates for political office. Employees and associated person are prohibited from using Zurich Malaysia’s fund or resources

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<sup>1</sup> A Public Official, sometimes referred to as government official or government person, is an individual (whether elected, appointed, or career) who is employed by or performs duties for or on behalf of a government body at the national, regional, or local level. Such an individual can be a civil servant, state employee, or any other person otherwise serving as an officer, agent, regulator or representative of any government body at any level or exercising any public function. A Public Official includes employees, directors, or officers of State Owned or State-Controlled Entities or other public agencies and enterprises. A Public Official also includes any political party official, candidate for political office, and any official or agent of a public international organization.

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to make any direct or indirect political donation on behalf of Zurich Malaysia. Charitable donations are subject to prior consultation and approval.

### **5. Sponsorship and Zurich Malaysia Organized Events**

Sponsorship and Zurich Malaysia's social, cultural, sports and other events to which guests are invited is subject to prior approval.

Zurich Malaysia encourages its employees to speak up and report conduct, in good faith, they believe violates laws, regulations, internal policies or our Code of Conduct. Reports can be made on a disclosed basis or anonymously.

Click [HERE](#) to read the Zurich Malaysia's Speaking Up about Integrity Concerns Policy (previously known as Reporting of Improper Conduct and Concerns).