

Anti-Bribery & Anti-Corruption (ABAC) Policy

Effective Date: 1 August 2025

1. Policy Statement

Easi Wealth Management Sdn Bhd ("Easi") conducts all business **honestly, ethically, and free from bribery and corruption**. We adopt a **zero-tolerance stance** against any form of bribery, corruption, facilitation payments, or kickbacks in all jurisdictions where we operate.

We comply with:

- **Malaysian Anti-Corruption Commission Act 2009 (MACCA)**
- **Bank Negara Malaysia's AML/CFT/CPF Guidelines**
- **All applicable laws**

2. Scope & Applicability

This policy applies to:

- ✓ **All Directors, Employees** (permanent, contract, temporary)
- ✓ **Third Parties** (agents, consultants, introducers, business partners)

Note: Easi does **not** hold a CMSL license and reports solely to **Bank Negara Malaysia (BNM)** on AML/CFT matters.

3. Definitions

Term	Definition
Bribery	Offering, promising, giving, or receiving any undue advantage to influence decisions.
Corruption	Abuse of entrusted power for private gain (cash, gifts, favors, etc.).
Facilitation Payments	Unofficial payments to expedite routine services (prohibited).
Gifts & Hospitality	Must be reasonable, transparent, and pre-approved if exceeding RM300 .

4. Legal Compliance

- All employees must comply with **MACCA** and **BNM's AML/CFT/CPF** requirements.
- **No conflict** between this policy and Bank Negara's guidelines—**BNM rules prevail** if stricter.

5. Responsibilities

Role	Responsibilities
Board of Directors	Ultimate oversight of anti-bribery measures.
Compliance Officer	Day-to-day implementation, monitoring, and reporting to BNM if required.
All Employees	Report suspicions via whistleblowing channels.

6. Gifts, Hospitality & Donations

✔ Permitted only if:

- Transparent & recorded in the **Gift Register** within **5 working days**.
- Value ≤ **RM300** (unless approved by **Compliance Officer**).
- Not given to government officials without **Board approval**.
- No cash or cash equivalents (e.g., vouchers).

7. Facilitation Payments & Kickbacks


✗ Strictly prohibited—no exceptions.

8. Due Diligence on Third Parties

Before engaging **agents, partners, or introducers**, we:

- Conduct **background checks** (criminal, financial, reputational).
- Ensure **contracts include anti-bribery clauses**.

9. Whistleblowing & Reporting

- **Confidential reports** via:
 snlim@easiwealth.com.my
- **No retaliation** against whistleblowers.
- **Investigations** led by **Compliance Officer**, escalated to **BNM** if required.

10. Record-Keeping & Monitoring

- Maintain **accurate records** of all transactions, gifts, and third-party engagements.
- **Internal audits** conducted **annually** to ensure compliance.

11. Training & Awareness

- **Mandatory training** on anti-bribery & **BNM AML/CFT rules** for all staff.
- **Annual declarations** confirming understanding of this policy.

12. Enforcement & Penalties

- **Breach of policy** → **Disciplinary action** (up to **termination**) and **BNM reporting**.
- **Third-party breaches** → **Contract termination** and **legal action**.

13. Policy Review

- **Reviewed every 3 years** or as required by **BNM**.

14. Contact

For queries, contact:  snlim@easiwealth.com.my



Board of Directors

Date: 24 JULY 2025