




**OM-98/5
(PED, HRD)**

**GUIDELINE ON CODE OF
CONDUCT**

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1. ACRONYMS AND DEFINITIONS

AMLATFPUA	:	Anti-Money Laundering, Anti-Terrorism Financing & Proceeds of Unlawful Activities
Bank	:	Bank Pertanian Malaysia Berhad/Agrobank
BOD	:	Board of Directors
Branch	:	A main branch, branch/spoke, kiosk of Bank Pertanian Malaysia Berhad
Business Associates	:	An external party with whom the Bank has, or plans to establish, some form of business relationship. This primarily include counterparties, business partners, joint venture partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors
P/CEO	:	President/ Chief Executive Officer
PED	:	People Engagement Department
CHRO	:	Chief Human Resource Officer
Code	:	Code of Conduct
Confidential Information	:	The information that is not generally known to the public about the Bank, its customers, or other parties with whom the Bank has a relationship and that have an expectation on the confidentiality
Dealing	:	Buying or selling of relevant securities instruments
Entertainment	:	Includes all meals, drinks, hospitality, recreation (such as tickets or invitations to sporting or cultural events), travels, accommodation (such as hotel stays) and other forms of hospitality which are of value and for which the recipient does not pay the fair value

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- Family members/immediate relatives : The individuals defined as 'relative' under Section 3 of the Development and Financial Institution Act 2002 and described as 'close relative' in the BNM guideline and Financing Facilities with Connected Parties
- Gift : Includes all gift of products, services, cash or cash equivalents (such as cheques, travellers cheques, gift cards, gift certificates, vouchers, loans/financing and shares) and all business courtesies, gratuities, discounts, favors and other things of value for which the recipient does not pay the fair value
- HoD : Head of Department
- IAD : Internal Audit Department
- Immediate Superior/ Supervisor : An appointed person who is responsible in managing his/her subordinates
- Money Laundering : The act of a person as specified in Item 3, Section 2, MO-80
- Non-profit Public Service Corporation : A service rendered in the public interest, such as religious, educational, cultural, social, welfare, philanthropic or charitable institutions, subject to policy guideline in each institution, etc.
- Proprietary information : Proprietary information includes all non-public information that might be useful to competitors or that could be harmful to the Bank or its customers, if disclosed
- Staff : Any individual person who is employed by the Bank under a contract of service as a permanent, contract or temporary staff
- SPP : Standard People Practise
- Trust : An arrangement whereby a person or member of the board is placed in possession of or entrusted with property with the legal obligation of administering it for the benefit of

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those entitled to the beneficiary interest or for the purpose(s) specified in a "Trust Deed"

Vendor : A company which supplies goods/ services required by Agrobank

Will : A disposition or declaration by which an individual making it provides for the distribution or administration of property after his death

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1. PURPOSE OF CODE


- 1.1 This Code of Agrobank (herein referred to as the “Bank”) staff stipulates the sound principles that will guide all staff in discharging their duties. It sets out the standards of the good conduct in banking practice.
- 1.2 The purpose of the code is to:
 - 1.2.1 Uphold the good name of the Bank and maintain public confidence in the Bank.
 - 1.2.2 Maintain an impartial and unbiased relationship between the Bank and its customers.
 - 1.2.3 Uphold the high standards of personal integrity and professionalism of the Bank.

2. SCOPE

- 2.1 This Code applies to all staff of the Bank. Certain clauses will continue to apply to the staff even after they have ceased to be employed by the Bank.
- 2.2 Staff is bound to observe all legislations which may have a more comprehensive coverage of the subject matters contained in this Code.
- 2.3 The provision of this Code is deemed to be part of the Terms and Conditions of Service for all staff.

3. COMPLIANCE AND REPORTING

- 3.1 Any staff who becomes aware of any existing or potential violation of the Code, Bank’s policies, rules, regulations, guidelines and manuals should promptly notify the Chief Human Resource Officer (CHRO) or Internal Audit Department (IAD) or in accordance to the procedure as per MO118 – Whistleblower Protection Act.
- 3.2 The Bank strives for an environment where all concerns or complaints can be submitted by staff with the confidence that they will be handled professionally and with strict confidentiality.


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1. INTEGRITY OF THE BANKING SYSTEM

- 1.1. All Staff shall have the duty to protect the integrity of the banking system. They shall not land themselves to any scheme which could subvert the integrity of the banking system.
- 1.2. All Staff shall be vigilant against any attempt to use the Bank for any illegal purpose or activity, in particular relating to Anti-Money Laundering, Anti-Terrorism Financing & Proceeds of Unlawful Activities (AMLATFPUA).
- 1.3. All Staff shall follow strictly the Bank's procedures relevant to each particular transaction. These procedures include verification of customer's identities and assessing customers' honesty, integrity, commercial ability and creditworthiness. The extent of the verification shall be in accordance to the banking facilities sought by the customers and the duties prescribed for the Staff who attend the customers.
- 1.4. When an account has already been opened, all Staff shall inform his/her HOD immediately, who should seek to freeze the account as soon as possible as permitted by any contractual and statutory obligations to the customers as stated in the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Policy (AMLATFPUA) (MO-80).

2. INTEGRITY AND ACCURACY OF RECORDS AND TRANSACTIONS


- 2.1. All Staff shall ensure the accurate and complete information of the Bank's operations by:-
 - 2.1.1 Verify the accuracy of information received;
 - 2.1.2 Ensure the information/documents received are updated;
 - 2.1.3 Comply/process the data correction request by the customer or staff or agent or vendor within the period determined by the bank and regulatory or statutory provision.
- 2.2. All Staff shall ensure the accurate and complete records of the Bank's operations are kept and maintained in such a form and for such a period as determined by the Bank and regulatory provision. These records may be recorded in:-
 - 2.2.1 Hardcopy (books, slips, documents, statements, computer printout, etc).

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2.1.1 Electronic Record/softcopy (computer programs, magnetic stripes, Hard disk, CD, DVD, etc).


- 2.3. All Staff shall never make any entries or allow entries to be made for any account, record and documents of the Bank that are false or would obscure the true nature of the transactions as well as to mislead the true authorisation limit or approval by the relevant authority of such transactions.
- 2.4. All Staff shall ensure that any alteration or deletion to records are properly conducted and approved by the authorised personnel. Any removal of records must be properly documented and the staffs to adhere with the policy on destruction of data.
- 2.5. All Staff shall ensure that copy of the Bank's information and records are not made by any unauthorised person/persons including computer vendors.
- 2.6. All Staff shall report to their HOD immediately upon discovery of any unauthorised copying, entries, deletions or alterations in the Bank's records.
- 2.7. All records and computer files or programmes of the Bank, including personal files, financial statements and customer information, shall be accessed and used by the authorized personnel only and for the management-approved purposes for which they were originally intended.
- 2.8. All Staff shall note carefully on the provision of Section 108 of the Development and Financial Institutions Act (DFIA), 2002:-

“any person who is found guilty of making a false entry, omits to make, or causes to be omitted, any entry, or alters, abstracts, conceals or destroys, or causes to be altered, abstracted, concealed or destroyed, any entry, forges a document, or makes use of or hold in his/her possession a false document, purporting to be a valid document, alters any entry made in any document, or issues or uses a document which is false or incorrect, wholly or partially, or misleading shall be liable to imprisonment for a term not exceeding eight years or to a fine not exceeding twenty-five million ringgit or both.

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3. MISUSE OF POSITION

- 3.1. All Staff shall not abuse their position in the Bank to take advantage of any information obtained in the course of duty for personal benefit or of the benefit of other person.
- 3.2. All Staff shall not make use of their position in the Bank to solicit or receive favours from Bank's customers in exchange for:-
 - 3.2.1 Granting them banking facilities.
 - 3.2.2 Granting them favourable banking terms and conditions.
 - 3.2.3 Not properly pursuing delinquent accounts; or
 - 3.2.4 Granting them any tenders approved.
- 3.3. All Staff shall not bribe customers when soliciting business. Corporate gifts offered or presented to customers or marketing trips, and gifts offered for deposits are not considered examples of bribes.
- 3.4. All Staff shall not solicit the following from customers or other parties:-
 - 3.4.1 Favours.
 - 3.4.2 Preferential or concessionary offers; or
 - 3.4.3 Gift of any form, including cash, bonds/sukuk, negotiable securities, personal loan/financing, airline tickets, discounts or use of vacation or other entertainment facilities or property.
- 3.5. All Staff shall, whenever possible, avoid their customers and brokers from offering the staff with personal gifts, favours or service.
- 3.6. All Staff are prohibited from accepting any:-
 - 3.6.1 Gifts with commercial value or costly entertainment from customers.
 - 3.6.2 Any form or benefit under a Will or Trust (including insurance/takaful policies) made by the customers where the gifts or benefits result from a relationship arising in the ordinary course of duties in the Bank or as a result of services rendered by the staff as a representative of the Bank. All Staff shall declare to their HOD any gifts or favours received from customers or brokers; or

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3.6.3 Any gratifications from vendors and suppliers of goods and services to the Bank.

3.7. The Bank shall have the right to ask the Staff to surrender any gifts given to them by the customers. The Bank also has the discretion to decide on how to handle or dispose of the gifts.

3.8. All staff shall not make use of their position in the Bank to:-

3.8.1 Solicit corporate directorships from the Bank's customers, unless the member of staff is appointed to the Board to represent the Bank's interest; or

3.8.2 Borrow from or become indebted to these customers.


3.9. All Staff shall exercise their duty to ensure that no Staff misuses his/her position in the Bank. Any Staff who, in the course of their work notice any irregularities among other staff must report the said irregularities in confidence to the Bank.

3.10. All Staff shall not use the Bank's name or facilities for personal gain in political, investment or retail purchasing transaction, or in similar types of activities. All Staff and their family shall not use their connections with the Bank to borrow from or become indebted to customers or prospective customers. The use of position to obtain preferential treatment, such as in purchasing goods, shares and other securities, is prohibited.

3.11. All Staff shall not use the Bank's facilities and influence for speculating in commodities, gold, silver, foreign exchange or securities, whether acting personally or on behalf of friends or relatives. Such misuse of position may be used as one of the grounds for dismissal. All Staff shall not provide mutually beneficial transaction to Staff of other financial institutions in return for similar facilities, designed to circumvent the provisions contained in this Code.

4. MISUSE OF INFORMATION


4.1 All Staff shall not copy, remove or make use of any information obtained in the course of business for the direct or indirect benefit for them or of any other persons.

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- 4.2 Any Staff using the information of the Bank or customers to benefit themselves or confer an advantage on themselves or any other persons are regarded as a misuse of such information.
- 4.3 All Staff in possession of Confidential Information shall not use it in the following ways for the benefit of themselves or any other persons to:-
- 4.3.1 Influence any customer or any third party in dealing in any transaction; or
- 4.3.2 Communicate such information to any customer.
- 4.4 The above prohibitions relating to the misuse of information continue even after the staff cease to be employed by the Bank.
- 4.5 All Staff in one division, department or branch shall not retrieve or obtain information of the Bank or customer from other division, department or branch unless the information so received is necessary in their course of work. Any transmission or transfer of information among the divisions, departments or branches shall be properly authorized.

5. CONFIDENTIALITY AND PERSONAL DATA PROTECTION

- 5.1 The confidentiality of relations and dealings between the Bank and its customers is paramount in maintaining the Bank's reputation. All Staff is required to keep Confidential Information and personal data of the Bank's customer including information regarding their accounts and transactions.
- 5.2 All Staff are responsible for the safeguarding of Confidential Information and proprietary information, whether it is information disclosed to the Bank by customers, information regarding the Bank's business and activities or information about the Bank's personnel. All Staff shall maintain all confidential information in strict confidence, except when disclosure is authorized by the Bank or required by law.
- 5.3 All Staff responsibilities in these areas extend beyond merely not revealing confidential information including the Bank's material, but also include its proper handling, securing and disposal of confidential information and the safeguarding of the Confidential Information that the Bank receives from customers, shareholders and the public.
- 5.4 All records of customers shall be kept in the secured place at all times away from public view and unauthorized access.


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- 5.5 All Staff shall not remove or relocate documents or records of customers out of their divisions/departments/branches without the approval of their respective HOD.
- 5.6 All Staff shall have a duty to continue protecting the confidentiality of customer's information even after cessation of employment with the Bank and except with the Bank's consent, Staff shall not divulge or make use of any secret, copyright material or any correspondence, accounts or dealings of the Bank or its customers. No Staff shall in any way use information so obtained for financial gain.
- 5.7 All Staff shall return to the Bank, upon cessation of their employment with the Bank, without demand, all documents or records in their possession by reasons of their employment with the Bank and relating to the Bank's customer, which belong to the Bank or the Bank's customers.
- 5.8 All Staff shall not reveal to third parties any names or other information in connection with any dealings or transactions with any customer.
- 5.9 Confidential Information and personal data of the Bank's customer may be given or made available to thirds parties only with prior written consent of the customers where disclosure is authorized and permitted under the Development and Financial Institution Act 2002 (PN-23 & Act 618) and Personal Data Protection Act 2010 (Act 709).

6. PUBLICATION AND MAKING OF PUBLIC STATEMENTS

- 6.1. All Staff shall not, during or after termination of his/ her employment with the Bank to:
 - 6.1.1 Publish or cause to be published or circulate any articles, statements, books, photographs or letter in any form of media; or/and
 - 6.1.2 Conduct any interview or broadcast or deliver any lectures or speech;


on any matter which concerns his/her duties, or the policies, decision or the business of the Bank without obtaining prior written consent from the President Chief Executive Officer. In the absence of President Chief Executive Officer, prior written consent must be sought from whoever is appointed by the President Chief Executive Officer to act on his behalf.

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- 6.2. For making public statements, the following designated posts are exempted from seeking permission from the Bank is:
- 6.2.1 Chairman, Board of Director (BOD).
- 6.2.2 President Chief Executive Officer.
- 6.2.3 As per Guideline of Communication, MO-149/9
- 6.3 If permission is granted, all Staff shall be subjected to an implied condition that the:
- 6.3.1 Proposed publication shall not be published as may reasonably be implied that it had received official support or backing or sponsorship from the Bank; or
- 6.3.2 Proposed publication shall not bear the words “approved publication” or words to that effect.
- 6.4 Any Staff who wish to seek permission to publish or write a book or articles based on official information shall write to the CHRO.

7. USAGE OF SOCIAL MEDIA

- 7.1 While using social media such as, but not limited to, personal blogs and any social media platform including Facebook or Twitter or Instagram Staff are to be mindful that they do not disclose any Confidential Information about the Bank Business, its customers and all other matters related to the Bank. Staff are not authorized to make any commentaries on behalf of the Bank and especially those that would adversely affect the image and reputation of the Bank. Staffs are prohibited from using/editing the Bank Group’s Logos, pictorial images related to the Bank and Trademarks in their own personal social media accounts.


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1. SERVICE WITH CUSTOMERS

- 1.1. The Bank is committed in providing the best possible quality of service to its customers.
- 1.2. Serving the interest of the customers, it shall be the first and foremost responsibility of all staff. It is the responsibility of all staff to ensure that they are honest, trustworthy, responsive, credible and ethical in their conduct.

2. RELATIONSHIP WITH CUSTOMERS

- 2.1. All staff shall draw the customers' attention to the terms and conditions governing each banking service provided, including all applicable Bank charges.
- 2.2. All staff shall respond readily and promptly to customers' enquiries on the Bank's terms and conditions of banking services including Bank charges.
- 2.3. All staff, HOD, Branch Manager and owner to directly inform and report on any or potential non-compliance incidences, regulatory breaches, frauds, conduct related and etc. to the whistleblowing channels and/or to regulatory@agrobank.com.my and/or suspicious activity to aml@agrobank.com.my
- 2.4. The Branch Manager shall be responsible to take the following action on any claim of fraud by any customer on the branch:-
 - 2.4.1 Advising the customer to lodge an official report preferably substantiated by a police report and relevant documents.
 - 2.4.2 Inform/forward the report lodge directly to the Chief of IAD or Fraud Information Database Reporting Officer in IAD.
 - 2.4.3 Notify Person Responsible on any fraud incidences as per stated in MO-153 "Incident Management and Data Collection (IMDC Guidelines)".
- 2.5. Branch/Business Centre should report all customers' complaint promptly to the Client Relationship Management, Services Division, in accordance to the Bank's policies and guideline.

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3. FAIR AND EQUITABLE TREATMENT

- 3.1. All business dealings on behalf of the Bank with current and potential customers, with other members of the staff and with all those who may have reason to rely upon the Bank, shall be conducted fairly and equitably. All staff shall not be influenced fairly by friendship or association, either in meeting a customer's requirements or in recommending that they be met. Such decisions must be made on a strictly arms-length business basis. All preferential transactions with insiders or related interest should be avoided. If transacted, such dealing should be in full compliance with the law, judged on normal business criteria basis and fully documented and duly authorized by the BOD or an independent party.
- 3.2. No member of staff shall receive or offer any bribe or similar consideration to any person or company in order to obtain business for the Bank. Any commissions paid or other payment made, or favourable terms conceded, or other advantages given, by any staff member in the Bank's policies on such matters as notified from time to time and shall be promptly recorded in writing.

4. REQUIRED KNOWLEDGE, COMPETENCY AND COMPLIANCE

- 4.1. All staff particularly at the senior level should keep up-to-date and comply with applicable laws, rules and regulations in their respective area of operations.
- 4.2. All management staff is required to take reasonable steps to ensure that their subordinates are kept informed of and are familiar with all applicable laws and regulations relevant to their respective operations. They shall update their subordinates on any changes in such laws or regulations.
- 4.3. Any staff who is not familiar with the laws and regulations applicable in their area of operations should seek guidance from their immediate superior.
- 4.4. The staff shall develop and maintain the relevant knowledge, skills and behaviour to ensure that their activities are conducted professionally and proficiently. This includes acting with diligence, as well as obtaining, and regularly updating, the appropriate qualifications, training expertise and practical experiences.

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1. INTRODUCTION

- 1.1. All staff shall avoid any situations that can present potential conflict of interest, either real or perceived. It is the staff's responsibility to act at all times in the best interests of the Bank or its customers and/or shareholders in mind. In no way shall a staff personally gain from transaction based on the staff's relationship with the Bank.
- 1.2. All staff shall not have any financial or other business relationship with customers, vendors or competitors that might impair or even appear to impair the independence of any judgment they may need to make in the best interest of the Bank.
- 1.3. All staff shall disclose to their supervisors all potential conflicts of interest between them and the Bank.
- 1.4. All staff shall not engage directly or indirectly in any business activity that competes or conflicts with the Bank's interest. These activities include, but not limited to the following:-
 - 1.4.1 External Financial Interest.
 - 1.4.2 Other Business Interest.
 - 1.4.3 Other Employment.
 - 1.4.4 Entertainment and Gifts.
 - 1.4.5 Credit Facilities.
 - 1.4.6 Corporate Directorship.
 - 1.4.7 Trusteeship.

2. EXTERNAL FINANCIAL INTEREST

- 2.1. Where any staff has a financial interest in a customer, whether as a sole proprietor, partner, shareholder, creditor or debtor, such an interest must be disclosed immediately to the staff's immediate superior who in turn should report to their HOD. Thereafter, the staff shall not be directly involved in the Bank's dealing with the customer so long as the interest continues to exist.
- 2.2. Where staffs have holdings of publicly quoted securities, the above restriction does not apply in any cases unless the Bank considers the

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interest to be material, and the financial interest is considered likely to impair the objectivity of the staff concerned. In any case, holdings of five percent (5%) or more of the voting share of a public quoted company would be regarded as material. The staff shall inform the HOD on the situation.

- 2.3. When a conflict of interest arises between the Bank and the customer or between the staff and the customers and where such conflict is apparent, the customer shall be made aware of the consequences that may arise.
- 2.4. In assigning duties, supervisors shall not place their subordinates in situations where conflict of interest could arise.

3. OTHER BUSINESS INTEREST


- 3.1. It is considered conflict of interest if a staff conducts business other than Bank's business during working hours.
- 3.2. Where the acquisition of any business interest or participation in any business activity outside the Bank and working hours demands excessive time and attention from the staff, thereby depriving the Bank of the staff's best effort on the job, a conflict of interest is deemed to occur.

4. OTHER EMPLOYMENT

- 4.1. Before making any commitment, a written approval from CHRO or any other designated person shall be obtained before the staff embarks on any part-time employment or other business activities. Approval shall be granted only where the interest of Bank will not be jeopardized.
- 4.2. All staff shall devote his/her whole time and attention during working hours to his/her duties in the Bank.

5. ENTERTAINMENT AND GIFTS

- 5.1 Bank aspires to achieve the highest standards of integrity and honesty in the conduct of its business and operation.
 - 5.1.1 Staffs are required to act in the best interests of the Bank and to refrain from engaging in conduct which may affect the best interests of the Bank.

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5.1.2 Therefore, the staff shall NOT directly or indirectly:-

- Accept personal gift from customers or business associates.
- Give personal gift to customers or business associates.

5.1.3 This policy is meant to avoid conflicts of interest or the appearance of conflicts of interest in any on-going or potential business dealings with Bank.

5.1.4 The staff are required to familiarise themselves with the provisions of this code to ensure their conduct is in compliance with this code.

5.1.5 All staff shall observe and uphold its position on integrity and anti-bribery as set out in PL-142, Policy on Anti-Bribery & Anti-Corruption Policy.

5.2 Staff or their family members are not permitted to:-

5.2.1 Give or accept any gift of cash or cash equivalent to or from our customers or business associates. Cash equivalent could be in the form of vouchers, discount, coupons, shares, commissions, etc.

5.2.2 Accept any gifts or entertainment or cash or cash equivalent from parties engaged in a tender or competitive bidding exercise.

5.2.3 Accept any gift or entertainment or cash or cash equivalent that come with a direct/indirect suggestion, hint, understanding or implication that in return for the same, some expected or desirable outcome is required.

5.2.4 Accept any gift or entertainment or cash or cash equivalent that would be illegal or in breach of local or any applicable foreign bribery and corruption laws.

5.2.5 Accept any gift or entertainment activity that would be perceived as extravagant, lavish or excessive e.g. valued above the maximum threshold permitted by the Bank or may adversely affect the reputation of the Bank.

5.3 These prohibitions also applied when staffs are directly or indirectly involved in the organizing of annual dinners, sport events, family days and other events.

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- 5.4 The acceptance and provision of entertainment and gift(s) are permitted in certain exceptional circumstances as per the following:-
- 5.4.1 Reciprocal meal or entertainment exchanges that serve as legitimate business interests or are infrequent, normal and expected social courtesies;
- 5.4.2 Personal benefits arising from kinship/marriage;
- 5.4.3 Token gifts of nominal value normally bearing the Agribank or company logo (e.g. t-shirts, pens, diaries, calendar and other small promotional items) that are given out equally to members of the public and customers, attending events such as conferences, exhibitions, training, trade shows etc. and deemed as part of the Bank's brand building or promotional activities;
- 5.4.4 Gifts or financial support or contributions to charitable organisations or individuals on a charity basis under the Bank's corporate social responsibility framework/ policies/ guidelines; and
- 5.4.5 Gifts given and received during festivals not on a personal basis, must be shared and distributed to all staff.
- 5.5 Under the above exceptional circumstances, staff is expected to exercise proper judgment to ensure that any gift, entertainment or corporate hospitality is in compliance with Section 5.4.
- 5.6 Under no circumstances shall gifts in the form of cash, bond/ sukuk, negotiable securities, personal financing, guarantees and/ or other security in which some benefit is derived, airline ticket or use of vacation property be accepted by the staffs.
- 5.7 If the staff is offered a gift that breaches the Policy provided herein, then the gift should be immediately returned to the giver. However, for perishable items, e.g. flower and food item can be retained and redirected to another department/ section where possible. At all times, the giver should be informed of the Bank's Policy.
- 5.8 All staff or any other person being a person receiving any payment or remuneration in any capacity, professional or otherwise, directly or indirectly, ask for or receive, or consent or agree to receive, any gift, commission, emolument, gratuity, money, property, token or thing of value exceeding RM100.00 (Ringgit Malaysia: One Hundred) or any service, facility or other intangible benefit, whether for his/her own

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personal benefit or advantage or for the benefit or advantage of any other person is prohibited under Section 118 of the Development and Financial Institutions Act, 2002. The cumulative annual value of all entertainment and gift that staff may receive from the giver shall not exceed RM300.00 (Ringgit Malaysia: Three Hundred) in one calendar year.

5.9 In circumstances where it is impossible or impractical for staffs to decline the entertainment and gift, redirect or otherwise decline gift received:

5.9.1 Report to the Chief of Division or HOD or Regional Director by completing and submitting the relevant **Gift Reporting Form** (as Appendix A).

5.10 Entertainment/ gift under clause 5.9 above and any permissible entertainment/ gift with a value of more than RM300.00 in one calendar year must be reported by completing and submitting the Gift Reporting Form, where:-

5.10.1 The value of the permissible gift must be identified by the staffs prior to declaring the permissible gifts to the immediate supervisor for verification.

5.10.2 If the value of the permissible gift could not be identified, staffs must identify the value (which ever the highest) through the internet or online shopping channels i.e. Lazada, Zalora, 11 Street, Shopee, E-bay, Amazon and etc. The value must be deemed to be the full market value, not a value discounted for bulk purchases or special offers.

5.11 The Chief of Division or HOD or Regional Director in deciding the treatment of the entertainment/ gift and taking into account pertinent circumstances including type of the gift, the purpose, the position or seniority of the giver, the business context, reciprocity, applicable laws and cultural norms, may undertake to:

5.11.1 Donate the gift to charity as approved or designated by Agrobank; or

5.11.2 Hold it for departmental display or at a central location where all staff may enjoy the presence (e.g. office lobby); or

5.11.3 Share with other staffs in another division/ department; or

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5.11.4 Permit it to be retained by the staff. However, the staff required to pay the total amount of the gift's value and donate the amount to charity as approved or any fund designated by Agrobank.

5.12 All such transactions are to be recorded and maintained as part of the Gift Reporting Form under each Division, Department and/or Regional Office. The Division, Department and/or Regional Office must maintain the Gift Reporting Form. The Gift Reporting Form must be made available for inspection or audit as required.

5.13 If staffs in doubt, please refer Chief of Division, HOD and/ or Regional Director who could also seek guidance from CHRO.

6. CREDIT FACILITIES

6.1 All staff shall not approve credit facilities or any other transactions to:-

6.1.1 Themselves;

6.1.2 Any of their family members; or

6.1.3 Firm, companies or corporations in which they or their family have an interest.

6.2 All staff shall not derive any improper benefits either in kind or monetary at the expense of the Bank or its customers.

6.3 All staff also shall not obtain for themselves or any of their family members on any property or business advantage that belongs to the bank or its customers.

6.4 Staff shall comply with the requirements provided under Section 28 of Development Financial Institutions Act 2002 on prohibition of financing facilities.

7. CORPORATE DIRECTORSHIP

7.1 All staff shall not solicit corporate directorship. All staff shall not serve as a director of another corporation without the approval of the BOD. All staff who hold directorship without such approval shall seek approval from the BOD immediately, if they wish to remain as director of other corporations.

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7.2 All staff may act as director on Non-profit Public Service Corporations such as religious, educational, cultural, social, welfare, philanthropic or charitable institutions subject to being approved by the Bank.

8. TRUSTEESHIP

All staff shall not solicit appointment as executors, administrators or trustees of customers' estates. If such an appointment is made and the staff is a beneficiary of the estate, his/her signing authority for the estate's bank account(s) shall be approved by the BOD who will not unreasonably withhold approval.

9. EXTERNAL INFLUENCE

Staff is not allowed to use external influence or engage any political related person to gain their support in order to change or effect or influenced the management's decision such as, but not limited to: transfer or promotion of staff, appointment to any position, employment of any person. As such, staffs of the Bank are prohibited to seek or obtain letter of support from any third party such as but not limited to: Ministers, Deputy Ministers, Parliament or Political Secretaries and any person related to any political parties. The prohibition also inclusive of any dissemination or distribution of any Bank's internal information to any third parties for the above purposes.

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1. INTRODUCTION


The Bank's assets are to be used only for legitimate business purposes. The Bank has a well-earned reputation for generosity when it comes to staff benefits. However, the Bank's long term success will also depend on the staff's ability to be smart about conserving Bank's resources.

2. BANK EQUIPMENTS

All staff shall always take care to conserve the Bank's assets and equipment. All staff shall be provided with every possible tool needed to do their jobs effectively and comfortably, which makes it even more incumbent on all of them to avoid needless waste. The Bank's equipment and other assets shall not be requisitioned for purely personal use.

3. COMPUTER AND OTHER COMMUNICATION RESOURCES

- 3.1. The Bank's computers, telephones and other communication resources are a crucial aspect of Bank's properties, both physical and intellectual. All staff shall take all due care to maintain the security and privacy of these resources, and if there is a potential violation of network security, all staff are required to report to Head, Information Technology Department.
- 3.2. All staff shall observe good telephone etiquette when answering telephone calls as stated in "Manual Pengguna Standard People Practise (SPP) Perkhidmatan Pelanggan" (MP-23). The promptness and the manner in attending to telephone calls reflect the positive attitude and genuine caring for the Bank.

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1. PECUNIARY EMBARRASSMENT


- 1.1. All staff is expected to manage their financial matters well. The Bank shall take a very serious view of such “pecuniary embarrassment” i.e. the state of one’s indebtedness.
- 1.2. All staff shall deemed to be in a state of Pecuniary Embarrassment;
 - 1.2.1 Where he/she is judgment debtor, for as long as their judgment debt remain unsettled and a stay of execution has not been granted; or
 - 1.2.2 Where he/she is a bankrupt or an insolvent wage earner, for as long as he/she remains as an undischarged bankrupt or for as long as any judgment against him/her in favor of the official assignee remains unsatisfied and a stay of execution has not been granted.
- 1.3. Upon being adjudged a bankrupt, he/she shall cease to hold office and his/her service shall be terminated.

2. ANTI-MONEY LAUNDERING, ANTI-TERRORISM FINANCING & PROCEED OF UNLAWFUL ACTIVITIES (AMLATFPUA)

All staff shall be familiar and adhere with AMLATFPUA’s Requirements and Procedure. They must ensure compliance to the regulations and procedure contained their in. They shall also understand their obligations to be alert and report unusual or suspicious activity to the supervisor or the designated personnel.

3. OUR CODE

- 3.1. The above guidelines are meant to serve as a guide for the promotion of a proper standard of conduct and sound prudent practices in the business of banking.
- 3.2. All staff shall be expected to accept and be guided by both the letter and the spirit of this Code. It is impossible to spell out every possible scenario we might face, thus, we rely on one another’s discretion and judgment to uphold this policy.

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- 3.3. The matters covered in this Code are of the utmost importance to the Bank and its shareholders, and also the Bank's ability to conduct its business in accordance with its value system.
- 3.4. This Code of conduct shall not, however, restrict or replace the matured judgment of staff in conducting their day-to-day activities. It is also not to replace any existing rules and regulations of the Bank.
- 3.5. In the event of doubt over matters relating to the Code; all staff must seek guidance from their respective HOD, who may, if necessary seek guidance from the CHRO.
- 3.6. In the event of inconsistencies or discrepancies between the English version and the Bahasa Malaysia version of the Code, the English version shall prevail.

Gift Reporting Form

(This form is to be retained in the respective Division/ Department/ Region Office for inspections/ Audit purpose)

GIFT RECEIVER:			
Name of staff (receiver of gift)		ID No.	
Division/ Department/ Regional Office			
Details of Gift(s) Received			
Date of receipt			
Name of giver and position			
Name of company/ organisation			
Nature relationship with the giver/ company/ organisation			
Description of Gift			
Estimated value of Gift (RM)			
Signature		Date	

IMMEDIATE SUPERVISOR'S VERIFICATION:			
I,, ID No: would like to confirm that I have verified the gift declaration as stated above.			
Signature of immediate Supervisor		Date	

DECISION BY P/CEO/ CHIEF DIVISION/ HEAD OF DEPARTMENT/ REGIONAL DIRECTOR:			
Treatment of the gift (please tick):-			
• Gift is required to be returned by or before (please state date of return).....			<input type="checkbox"/>
• Donate the gift to charity as approved or designated by Agrobank.			<input type="checkbox"/>
• Hold it for departmental display or at a central location where all staff may enjoy the presence.			<input type="checkbox"/>
• Share with other staffs in another Division/ Department.			<input type="checkbox"/>
• Permit it to be retained by the staff. However, the staff required to pay the total amount of the gift's value and donate the amount to charity as approved or any fund designated by Agrobank. (to attach the receipt of payment)			<input type="checkbox"/>
• Other (please state):			
Name of P/CEO/ Chief Division/ Head of Department/ Regional Director			
Signature		Date	