



Chubb Insurance Malaysia Berhad (Company No:197001000564)

Policy & Procedures

Avoiding Bribery and Corruption policy (Version 2.0)

Policy Reference Matrix

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Related Internal Policy / Guidelines	1. Business Gifts and Entertainment Policy 2. Code of Conduct 3. Whistleblowing Policy 4. Conflict of Interest Policy 5. Incidents Handling Policy 6. Third Party Provider Policy 7. Outsourcing Risk Management Framework 8. Other applicable guidelines or procedures issued by Regional / Global Compliance from time to time.																			
Uploading to the Village and/or Website	<input type="checkbox"/> Confidential, not to be published on the Village and/or Website <input checked="" type="checkbox"/> Publish on the Village and/or Website																			
Where to seek help?	Please contact: <table border="1" data-bbox="448 1514 1417 1850"> <thead> <tr> <th>No</th><th>Name</th><th>Email</th></tr> </thead> <tbody> <tr> <td>1</td><td>Joy Tey</td><td>Joy.Tey@Chubb.com</td></tr> <tr> <td>2</td><td>Dhilip</td><td>SDhilipkumaran.Karruppiah@Chubb.com</td></tr> <tr> <td>3</td><td>Denise Teoh</td><td>Denise.Teoh@Chubb.com</td></tr> <tr> <td>4</td><td>Wei Han Yok</td><td>WeiHan.Yok@Chubb.Com</td></tr> </tbody> </table>					No	Name	Email	1	Joy Tey	Joy.Tey@Chubb.com	2	Dhilip	SDhilipkumaran.Karruppiah@Chubb.com	3	Denise Teoh	Denise.Teoh@Chubb.com	4	Wei Han Yok	WeiHan.Yok@Chubb.Com
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4	Wei Han Yok	WeiHan.Yok@Chubb.Com																		

Document Version Control

Version	Issuance Date	Document Updated By	Key Changes
1.0	1 June 2020	N/A	New issuance
2.0	1 December 2025	Joy Tey	<ul style="list-style-type: none"> Inserted Policy Reference Matrix to provide clarity in related regulatory and internal policies and guidelines, and the timeline for next review. A Document Version Control section has been added to provide clarity regarding the changes made. Added new definitions under Section 3. Added Adequate Procedures under Section 5 Added a new a designated email at SpeakUp.MY@chubb.com under the Compliance and Penalties, which replaces the ChubbCompliance.MY@Chubb.com email, under Section 8. Added Exemptions under Section 10. Reclassified the following items to Adequate Procedures under Section 5. <ul style="list-style-type: none"> - Training and Awareness - Monitoring and Review Moved the following sections to Attachment 1 <ul style="list-style-type: none"> - Examples of Activities that May Violate this Policy - Activities involving Officers of Public Body or Foreign Public Official - Third Parties - Due Diligence of Third Parties

Contents

1.	Purpose of Policy.....	5
2.	Applicability.....	5
3.	Definitions	5
4.	Introduction.....	6
5.	Adequate Procedures.....	7
6.	Complying with this Policy.....	11
7.	Provisions for Exceptions.....	11
8.	Compliance and Penalties.....	12
9.	Accurate Books and Records.....	13
10.	Exemptions.....	13
	Attachment 1.....	14
	Attachment 2.....	17

1.0 Purpose

- 1.1 The purpose of this Policy is to ensure compliance of Chubb Insurance Malaysia Berhad (“**Company**”) with all applicable anti-bribery legislation which includes but are not limited to the Malaysian Anti-Corruption Commission Act ,2009 , the U.S Foreign Corrupt Practices Act, and the UK Bribery Act. It is also to maintain accurate and transparent records of all transactions in the Company’s books.

2.0 Applicability

- 2.1 This policy applies to all employees, officers, directors, agents, third party service providers, business partners, or other persons acting on behalf of the Company.

3.0 Definitions

- 3.1 For purposes of this Policy, the following are the meaning of the terms used:

“**Gratification**” is defined in the Malaysian Anti-Corruption Commission Act ,2009 as:

- (a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
- (b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- (c) any payment, release, discharge, or liquidation of any loan, obligation or other liability, whether in whole or in part;
- (d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction, or percentage;
- (e) any forbearance to demand any money or money’s worth or valuable thing;
- (f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; or
- (g) any offer, undertaking, or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding item (a) to (f) above.

An “**officer of a public body**” is defined in the MACC Act as any person who is a member, an officer, an employee or a servant of a public body, and includes a member of the administration, a member of Parliament, a member of a State legislative Assembly, a judge of the High Court, Court

of Appeal or Federal Court, and any person receiving any remuneration from public funds, and, where the public body is corporation, includes the person who is incorporated as such.

A “**foreign public official**” is defined in the MACC Act as:

- Any person who holds a legislative, executive, administrative or judicial office of a foreign country whether appointed or elected;
- Any person who exercises a public function for a foreign country, including a person employed by a board, commission, corporation, or other body or authority that is established to perform a duty or function on behalf of the foreign country; and
- Any person who is authorized by a public international organization to act on behalf of that organization.

4.0 Introduction

4.1 The Company is dedicated to conducting business lawfully and with unwavering integrity. All individuals representing the Company – including employees, officers, directors, agents, third-party service providers, and business partners are expected to uphold ethical standards and comply with all applicable laws. The Company recognises the importance of anti-bribery regulations and is committed to preventing any actions that could be perceived as corrupt or improper.

4.2 The following are laws which prohibit the receiving of and making or promising or asking to make gifts or payments to others for a favour, financial reward, improper official action or other benefit:

(A) Malaysian Anti-Corruption Commission Act, 2009 (“**MACC Act**”)

There are various offences in relation to bribery and corruption under part IV of the MACC Act. These include:

- the offence of bribery of an officer of a public body
- the offence of bribery of foreign public officials; and
- the offence of accepting gratification.

Regarding the offence of giving or accepting gratification, it is an offence under Section 17 of the MACC Act for any person (including an organisation) – by himself or in conjunction with another – to corruptly solicit or receive or agree to receive for himself or another, or to corruptly give, promise or offer to any person for his or another’s benefit – any gratification as an inducement to, or a reward for, or otherwise on account of:

- any person doing or forbearing to do anything in respect of any matter or transaction, actual or proposed or likely to take place; or

- any offer of a public body doing or forbearing to do anything in respect of any matter or transaction, actual or proposed or likely to take place, in which the public body is concerned.

A commercial organisation such as the Company can be found liable for corrupt practices if its employees, officers, directors, agents, third party service providers, business partners or other persons acting on behalf of the Company (“**associated persons**”) commit corrupt practices when they obtain or retain business or an advantage for the Company.

Where a Section 17A offence is committed by a commercial organisation under the MACC Act, a person who is its director, controller, officer or partner, or who is concerned in the management of its affairs at the time of commission of the offence, is deemed to have committed that offence unless that person proves that the offence was committed without his consent or connivance and that he exercised due diligence to prevent the commission of the offence as he ought to have exercised. It is a defence for the commercial organisation to prove that it has in place adequate policies and procedures to prevent persons associated with the commercial organisation from taking such conduct.

(B) Foreign Corrupt Practices Act (“**FCPA**”)

The Foreign Corrupt Practices Act (“FCPA”) criminalizes payments to foreign officials anywhere in the world where the purpose is to influence an official decision to obtain a business benefit. All provisions of the FCPA apply to the directors, officers and employees of the Company because it is an affiliate of Chubb Limited and to all third parties who conduct business with the Company.

(C) UK Bribery Act

In the UK, the Bribery Act prohibits similar conduct which involves giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so. The Bribery Act applies to dealings with government officials as well as commercial organisations. It is also an offence under the Bribery Act to receive a bribe or not prevent bribery.

5.0 Adequate Procedures

- 5.1 The Company is committed to upholding the highest standards of integrity and compliance with anti-corruption laws, including those under MACC Act, FCPA, and the UK Bribery Act. To this end, adequate procedures are implemented to prevent the occurrence of any corrupt practices.

These measures include, but are not limited to, the following:

(i) Top Level Commitment

1. The management and the Board of Directors are committed to fostering a culture of integrity and transparency throughout the Company. The Company maintains a strict zero tolerance policy towards all forms of corruption.
2. As employees, officers, directors and associated persons of the Company, you are expected to:
 - (a) uphold the highest standards of honesty and ethical conduct in carrying out your job duties and responsibilities.
 - (b) comply fully with all applicable anti-bribery and anti-corruption laws, as well as the Company's internal policies.
 - (c) participate in and complete regular training on anti-corruption and ethical business practices.
 - (d) promptly report any encountered or suspected corrupt practices through the Company's secure and confidential channels, as outlined in The Company's Whistleblowing Policy; and
 - (e) provide feedback and cooperate fully with the Company in the ongoing review, audit, and strengthening of the Company's anti-corruption framework.
3. The Company is dedicated to continuously reviewing and enhancing its anti-corruption policies and procedures to ensure effectiveness and compliance with evolving legal and regulatory requirements. Non-compliance with this policy may result in disciplinary action, up to and including termination of employment or business relationship. All employees are encouraged to take an active role in maintaining an ethical and transparent workplace, and to seek guidance from management or the compliance team whenever in doubt.

(ii) Risk Assessment

1. The Company is committed to proactively identifying, assessing, and managing corruption risks across all areas of its business operations.
2. As employees, officers, directors, and associated persons of The Company, you are expected to:
 - (a) be aware of the potential corruption risks relevant to your role, department, and business activities.
 - (b) cooperate fully with the Company's risk assessment processes, including providing accurate information and participating in relevant reviews or audits.

- (c) promptly report any new or emerging risks, suspicious activities, or concerns to management or the compliance team.
 - (d) support the implementation of risk mitigation measures and internal controls designed to address identified corruption risks.
 - (e) participate in training and awareness programmes related to risk assessment and anti-corruption practices.
- 3. The Company regularly reviews and updates its risk assessment framework to ensure that all significant corruption risks are effectively managed and mitigated. Your active participation and vigilance are essential to maintaining a safe, ethical, and compliant workplace.

(iii) Undertake Control Measures

- 1. The Company is committed to implementing effective and appropriate controls and contingency measures to prevent, detect, and respond to corruption risks.
- 2. As employees, officers, directors, and associated persons of the Company, you are expected to:
 - (a) follow all established internal controls and procedures in your daily work, including seeking the necessary approval for payments, gifts, and entertainment as outlined in the Company's Business Gifts and Entertainment Policy.
 - (b) ensure that all business records, transactions, and expenses are accurate, complete, and transparent.
 - (c) conduct the necessary due diligence when engaging with third parties and promptly escalate any concerns or red flags to the compliance team, in accordance with the Company's Third-Party Provider Policy.
 - (d) safeguard all company information assets, including confidential and personal data, by ensuring they are properly handled, stored, and accessed only by authorized individuals; avoid any misuse of such information for personal benefit; and promptly report any actual or suspected breach of the Company's or customers' confidential or personal information in accordance with the Company's Incidents Handling Policy to the Data Protection Officer;
 - (e) remain vigilant for unusual or suspicious activities and report them immediately through the appropriate channels.
- 3. The Company has established an accessible and confidential whistleblowing channel, as detailed in the Whistleblowing Policy. This channel is available to all employees, officers, and directors, and may be used anonymously to raise concerns

about real or suspected corruption incidents. All reports are managed through secure channels and procedures to ensure the confidentiality of both the whistleblower's identity and the information provided.

4. You are encouraged to report, in good faith, any suspected, attempted, or actual corruption incidents. The Company strictly prohibits retaliation against anyone who makes a report in good faith. All concerns raised through the whistleblowing channel will be investigated promptly and thoroughly, in accordance with the procedures set out in the Whistleblowing Policy.

(iv) Systematic Review, Monitoring and Enforcement

1. The management and the Board of Directors are to actively oversee and ensure that regular reviews are conducted to assess the performance, efficiency, and effectiveness of the Company's anti-corruption programme, and to ensure the programme is properly enforced.
2. For this purpose, the Company has:
 - (a) planned, established, implemented, and maintained a monitoring programme that defines the scope, frequency, and methods for review.
 - (b) identified competent persons and established compliance, risk, and internal audit functions to carry out reviews of the Company's anti-corruption measures.
 - (c) engaged qualified and independent third parties to conduct periodic external audits to assess and ensure the Company's compliance with anti-corruption policies and procedures.
 - (d) ensured that all personnel receive appropriate training on anti-corruption policies and procedures and are regularly monitored to confirm their understanding and compliance in their respective roles and functions.
 - (e) ensured that, if necessary, disciplinary proceedings are conducted against personnel found to be non-compliant with the Company's anti-corruption programme.
3. All employees, officers, directors, and associated persons are required to actively participate in these review and monitoring processes, comply with established anti-corruption measures, and contribute to the ongoing effectiveness of the Company's anti-corruption programme.

(v) Training and Communication

1. The Company conducts regular and relevant training programmes for all employees, officers, directors, and associated persons to ensure a thorough understanding of anti-corruption laws, policies, and procedures. These programmes promote

awareness, support ethical decision-making, and equip personnel to identify and address corruption risks in their roles.

2. Additionally, updates and guidance on changes to anti-corruption requirements are communicated promptly through established channels to keep all personnel informed and compliant.
3. Employees, officers, directors, and associated persons are encouraged to engage in open dialogue, share best practices, and seek advice or clarification from management or the compliance team as needed.
4. All personnel are required to actively participate in training sessions and ongoing communication to uphold the Company's culture of integrity and compliance.

6.0 Complying with this Policy

6.1 To guard against even the appearance of committing an offence under the MACC Act, FCPA, and the UK Bribery Act therefore, whether you are a director, officer or employee of the company or any of its subsidiaries, or an associated person of the Company, you must not:

- a) make, provide, offer or authorise any payment, gift of any kind or anything of value to any person (including an officer of a public body or to an employee of another organisation) where the purpose of that payment is to obtain an improper advantage by inducing a person to perform a function or activity improperly or to reward them for doing so. Payments or the provision of gifts, made indirectly through a third party (such as agents, consultants, sales representatives, distributors or subcontractors) are also prohibited.
- b) make facilitation payments. These are typically small payments to secure the performance of routine services or action that the Company is otherwise entitled to receive, such as customs clearance, immigration and work permits.

7.0 Provisions for Exceptions

7.1 However, the Company's policy allows certain gifts or payments by the Company to officers of public body, foreign public official, and representatives of commercial organisations and vice versa:

- Gifts and entertainment given in good faith without expectation of reciprocity or advantage, and not as an inducement or reward for the recipient to do, or for having done or forborne to do, any act contemplated in Part IV of the MACC Act which relates to officers of a public body / foreign public officials / persons receiving gratification. Gifts or entertainment must also be in connection with the Company's legitimate marketing and sales activities and must

comply with the limitations set forth in the Company's Business Gifts and Entertainment Policy and the Chubb Group's Code of Conduct¹.

- Reasonable, bona fide travel and lodging expenditures directly related to the promotion, demonstration, or explanation of the Company's products or services, which are not inducements or rewards for the recipient to do or forbear to do, or for having done or forborne to do, any act contemplated in Part IV of the MACC Act which relates to officers of a public body / foreign public officials / persons receiving gratification.

[Note: This also applies to reasonable, bona fide travel and lodging expenditures incurred by the Company staff in connection with his/her job duties and which are accepted practice within the industry. For example, attending market meetings, seminars or third-party product and services briefings)].

8.0 Compliance and Penalties

- 8.1 We recognise the seriousness of not complying with applicable legislation such as the MACC Act, FCPA, and the UK Bribery Act, as the magnitude of civil and criminal penalties it imposes on individuals and the Company are severe. Violations of the various anti-bribery and anti-corruption laws can carry financial penalties not less than 10 times the value of the bribe or RM 1 million, and individuals may be imprisoned for up to 20 years.
- 8.2 Where an employee is found to be in breach of this Policy, an investigation will be conducted and appropriate action (including disciplinary measures) will be taken against the employee in accordance with the guidelines set out in the Company's Human Resources Policies & Procedures Manual.
- 8.3 The employees, officers, directors and associated persons of the Company should report violations or suspected violations of this Policy, or any bribery transactions which they become aware of to the management by sending an email to SpeakUp.MY@Chubb.com. Alternatively, they can speak to their manager or any senior leader or manager you feel comfortable with. The employee or officer of the Company can also contact Chubb's Ethics Hotline which is available 24 hours a day, 7 days a week. The link is available on the homepage of The Village.
- 8.4 Section 25 of the MACC Act imposes a legal duty on employees to promptly report any bribery transactions to a Commission officer or police officer. This includes situations where the employees are offered, promised, or receive any gratification in breach of the Act, even if the employee do not

¹ Entertainment involving officers of a public body/foreign public official must afford Chubb the opportunity to discuss business issues, and should not be lavish, nor too frequent.

accept it. Failure to comply with this reporting requirement can result in prosecution, leading to fines and/or imprisonment.

9.0 Accurate Books and Records

- 9.1 The Company must also meet relevant standards regarding our accounting practices, books and records and internal controls. All payments and other activities made pursuant to this Policy must be accurately recorded in the Company's corporate books, records and accounts according to the requirements and procedures set out in the Chubb Code of Conduct and in the Chubb Group Accounting Policies and Procedures Manual, which provide guidance on this issue.
- 9.2 False, misleading, incomplete, inaccurate or artificial entries in the books and records of the Company are strictly prohibited. Approval forms for the exceptions noted above must be retained by appropriate personnel in accordance with the Company's Record Retention Policy.

10.0 Exemptions

- 10.1 Exemptions from this Policy are not allowed. Where an employee of the Company breaches this Policy, the breach will be considered a breach of the Chubb Code of Conduct and will be dealt with accordingly.

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Attachment 1

Examples of Activities that May Violate this Policy

We must be alert to any activities that may violate laws against bribery and corruption. Among the circumstances that might give rise to a reasonable suspicion of a violation are:

- A transaction calling for a payment to be made to a party for services that the party appears to have no qualifications or capabilities to supply.
- An agent offering to help the Company obtain government approval of a particular investment or transaction for a fee that seems excessive for the services to be rendered.
- A party requesting that payment be made in cash, or to another party, or to a numbered account, or to a country other than the one in which the transaction will occur.
- A fellow employee or supervisor indicating that transaction should be characterized in corporate accounts or records in a manner that would conceal or distort the real terms of the transaction.
- An agent or representative having family ties to, financial relationships with, or potential allegiances to an officer of a public body, foreign public official or person with potential influence over a transaction in which the Company is engaged.
- A fellow employee or supervisor suggesting that a transaction need not be authorized in the manner ordinarily applicable to transactions of the same type and value.
- Making political contributions.
- Making donations that support the charitable activities of an officer of a public body or foreign public official or private sector person with whom the Company does not or seeks to do business.
- Extending offers of employment and internships to an officer of a public body, foreign public official, or private sector person(s) with whom the Company does or seeks to do business or to their family members and friends.

Because the application of this policy to particular circumstances depends on the specific facts, you should consult with the Company's Compliance Department with respect to any transaction in which there is any possibility that these anti-bribery provision may apply.

Activities involving Officers of Public Body or Foreign Public Official

All gifts, travel, entertainment and hospitality provided to officers of a public body or foreign public official must be pre-approved by Compliance by submitting the Anti-Bribery & Anti-Corruption Policy Pre-approval Form contained herein (**Attachment 2**).

As for all gifts, travel, entertainment and hospitality provided to the private sector, all requests are subject to the Company's Business Gifts and Entertainment Policy.

Third Parties

- This Policy prohibits payments to third parties, such as contractors, agents, consultants, lobbyists, distributors or sales representatives, who make a payment to officers of a public body, foreign public officials or third parties in violation of anti-bribery laws. This also includes parties with whom the Company has entered into a joint venture.
- We comply with this Policy by ensuring that all contracts with third parties contain a provision, where appropriate, stating that they are aware of the terms of this Policy, that they will comply with it and all applicable anti-bribery legislation, and that with respect to their obligations under the contract, they will not cause the Company to be in violation of this Policy or such laws.
- Example: “[Third Party] represents that it is familiar with the Company’s Avoiding Bribery & Corruption Policy and its purposes and will comply in all aspects with all laws, regulations and administrative requirements applicable to [third party’s] relationship with the Company, including but not limited to anti-bribery legislation. [Third party] further represents that it will not take any action that would cause the Company to violate any such laws, regulations and administrative requirements.”

Due Diligence of Third Parties

- Due Diligence of third parties is to be carried out by officers, employees and staff of the Company. It is the Company’s company policy, and a regulatory requirement that we “know” third parties with whom the Company does business, including our service providers who could be our associated persons for the purposes of this Policy.
- We will conduct due diligence to the extent possible to provide assurance that third parties with whom we do business and/or associated persons acting on our behalf are complying with legal requirements and the MACC Act. Generally, unless exceptions are provided for in writing in line with the Company policies, we will make reasonable inquiry and document answers to the following questions:
 - ❖ Who owns the third party? Who are its officers and employees?
 - ❖ Is the third party able to handle its obligations under the contract?
 - ❖ What is the reputation and expertise of the third party?
 - ❖ Does the third party employ any officers of a public body?
 - ❖ Is the third party related to or affiliated with officers of a public body?
 - ❖ Is the proposed compensation to be paid in exchange for the services rendered or products delivered reasonable?
 - ❖ Are the financial records provided by the third party audited and confirmed as true and fair by a certified auditor?
 - ❖ Does the proposed arrangement violate the law?
 - ❖ Does third party have reputable references?

- ❖ Has the third party been involved in any prior bankruptcies, criminal investigations, regulatory violations or civil litigation?
- The Company's Third-Party provider Policy and the Company's Outsourcing Risk Management Framework provide further guidance on this issue.

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Attachment 2

Anti-Bribery & Anti-Corruption Pre-Approval Form

All Chubb directors, officers and employees must receive approval from Chubb Compliance before giving any payment, gift, entertainment, travel, lodging, or anything of value to an officer of a public body or foreign public official as defined in the Avoiding Bribery and Corruption Policy. If you have any questions, send an email to Chubb Compliance.

Please enter all requested information below and provide clear explanations to avoid additional request for information.

Request Date

Please enter date in DD/MM/YYYY format.

Email Address of Requestor

Enter the email address of the person giving the gift/payment and etc.

Email Address of Submitter

Enter the email address of the person submitting the form if different from requestor.

Job Title

Enter the job title of the person giving the gift/payment.

Business Unit/Chubb Company and Country

Enter the business unit/Chubb Company and Country of the person giving the gift/payment.

Department

Enter the department of the person giving the gift/payment.

Type of Gift/Payment

Specify if this is a gift, entertainment, travel, or lodging and supply relevant details such as why you would like to give the gift or entertainment. Include class of travel, form of entertainment, charity sponsorship etc.

Name(s) of Recipient(s)

Indicate the recipient of the gift/payment.

--

Recipient(s) Company & Address

Indicate the recipient's company & address.

--

Purpose of Gift/Payment

--

Estimated Cost

Enter total cost or reasonable value estimate for the gift/payment. Please specify currency.

--

Other items given – last 12 months

Include all items given to the individual or entity in the past 12 months.

--

Additional Comments

--

Head of Department Name Stamp & Sign Off	Chief of Compliance's Sign Off	Country President Name Stamp & Sign Off