



Anti-Corruption and Anti-Bribery Policy

1. Policy Statement

StashAway Malaysia Sdn. Bhd. (“StashAway”) has zero tolerance towards all forms of Bribery and Corruption. StashAway is committed to high standards of ethical behaviour in conducting its business with integrity, transparency, and compliance. The Anti-Corruption and Anti-Bribery Policy (“the Policy”) contains a strict prohibition against Corruption and Bribery i.e. the offer, acceptance, payment or authorisation of any bribe and any other form of Corruption which have been defined in the Policy, whether it was given in the private sector, or given to a local or foreign government official in the public sector, are not permitted for all staffs, the Directors and Associated Persons of StashAway. The policy is overseen by StashAway’s Board of Directors.

StashAway is committed to complying fully with the anti-corruption and anti-bribery laws and regulations to which it is subject to and putting in place the necessary governance framework to mitigate corruption and bribery risks. In cases where there is a conflict between mandatory laws and the principles contained in the Policy, the laws shall prevail.

StashAway also demands transparency in all its business dealings to avoid any improper advantage or the appearance of questionable conduct by its staffs, the Directors or the Associated Persons or in its dealings with third parties.

2. Objective and Scope

The Policy requires all staffs, the Directors and Associated Persons, to comply with the Policy and the principles stipulated below in the performance of their services for or on behalf of StashAway. The overarching key principles are as follows as outlined in the Guidelines on Adequate Procedures Pursuant to Subsection(5) of Section 17A under the Malaysian Anti-Corruption Commission Act 2009 issued by Prime Minister's Department:

- Top level commitment
- Risk assessment
- Undertake control measures
- Systematic review, monitoring and enforcement
- Training and Communication

The conduct of business by StashAway and its direct or indirect activities must be:

- Transparent, ethical, integrity and reasonable
- Authorised by the Senior Management at appropriate level
- Documented with appropriate business rationale
- In-line with standard and appropriate professional business dealing protocols
- Conducted without intention to corrupt or bribe

3. Definitions

- 3.1. **Corruption** refers to an unlawful seeking of benefits whether by means of offering, promising, soliciting, demanding, or giving or accepting bribes of any other properties or benefits, or an act of giving or receiving of any Gratification or reward in the form of cash or in-kind of high value or behaviour that implies corruption that is committed with government official or agency or any person or agent doing a business with StashAway, either directly or indirectly, in an attempt to illicitly influence the decisions or actions of that person who is in a position of trust or in order for that person or agent to perform or abstain from performing a duty to acquire or retain any other business or benefits in the conduct of business.
- 3.2. **Bribery** refers to the giving or offering of a bribe, which can take shape in the form of gifts in-kind, discount offers, votes, services (including sex), job position/placement, loan and many other forms of payment for payments and purchases.
- 3.3. **Associated Person** means in relation to a commercial organisation, its director, partner or employee or person who performs or has performed services for or on behalf of that commercial organisation.
- 3.4. **Facilitation fee(s)** are small bribes / payments made to induce officials to perform or speed up the performance of routine functions or services that they are otherwise obligated to perform under duty in their official capacity.
- 3.5. **Gratification** means:
 - (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; and
 - (g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).

4. Roles and Responsibility

- 4.1. The Policy and all associated procedures apply to all staffs, the Directors and the Associated Persons of StashAway. The Policy and procedures are to be reviewed at least annually - and updated to stay current with relevant laws and regulations.
- 4.2. The Board of Directors of StashAway is responsible for the establishment of the appropriate governance framework to ensure compliance with the Policy and all associated procedures.
- 4.3. All staffs, the Directors and Associated Persons of StashAway are required to carry out the following responsibilities and obligations relating to StashAway's Anti-Corruption and Anti-Bribery stance:
 - (a) be familiar with applicable requirements of the Policy;
 - (b) promptly record all transactions and payments accurately and with reasonable detail;
 - (c) ask the Compliance team if any question about the Policy arises or if there is a lack of clarity about the required action in a particular situation;
 - (d) always raise suspicious transactions and other indicators of Corruption and Bribery to the supervisor and/or Compliance team;
 - (e) promptly report violations or suspected violations in accordance with Item 5 of the Policy;
 - (f) not to misuse their position or StashAway's name for personal advantage.

5. Reporting on Violation

Any staff, Directors or Associated Person of StashAway who has knowledge of any activity that violates or that is likely to violate the Policy must promptly report the activity (even where the activity in question has stopped) to his/her supervisor and/or the Compliance team. If a report is made anonymously, sufficient information must be provided to support investigations into the matter. StashAway's Whistleblowing - Reporting & Investigations Procedure serves as a point of reference for the reporting and handling of such matters. All staffs, the Directors and the Associated Persons of StashAway may disclose the information confidentially via the email address at compliance-my@stashaway.com.

6. Facilitation fee(s) and bribe

- 6.1. StashAway will not pay any Facilitation fee(s).
- 6.2. If any of the staffs, the Directors or the Associated Persons receives a request to make a payment of Facilitation fee(s) on behalf of StashAway, he/she should be cautious and consider the purpose of such payment and whether the payment amount is reasonable for those goods or services. The said staff, Director or the Associated Person should also request a receipt that describes a purpose of payment. If having any enquiries, concerns or questions relating to such payment, he/she should report it to the supervisor and/or the Compliance team.

6.3. All staffs, the Directors or the Associated Persons shall avoid any activities that may lead to Bribery or convey that StashAway pays or accepts a Facilitation fee.

7. Political Contributions

7.1. StashAway recognises that staffs, the Directors or the Associated Persons may be active in the political process.

7.2. Any political contribution made by a given staff, the Director or the Associated Persons will solely be a representation of the staff's, the Director's or the Associated Person's personal political beliefs and should never be construed as contribution made on behalf of StashAway.

7.3. StashAway does not harbour any intention to contribute to political parties and their causes.

8. Charitable Contributions, Gifts and Hospitality

The gifting of charitable contributions, gifting/receipt of sponsorships or offering, giving, or receiving of gifts or hospitality must be transparent and lawful, and must be governed in accordance with the Policy. StashAway must ensure that the charitable contribution, sponsorship, gifts or hospitality:

- (a) are not used as a subterfuge for Bribery;
- (b) are limited, customary and lawful under the circumstances;
- (c) do not have or are perceived to have any effect on actions or decisions;
- (d) do not come with any expectation of any specific favour or improper advantages from the intended recipients;
- (e) do not affect the independent business judgement of the intended recipients;
- (f) are given or received in an open and transparent manner; and
- (g) do not constitute a conflict with the interests of or duties owed to StashAway's clients.

9. Conflict of Interests

Conflicts of interest arise where there is interest that can be considered to have potential interference with objectivity in performing duties or exercising judgement for or on behalf of StashAway.

10. Awareness and Training

All staffs, the Directors and the Associated Persons are required to undertake training at least annually to ensure awareness of and familiarity with the Policy.

11. Continuous Improvement

Regular audits and assessments of the Policy should be carried out to ensure its scope, policies and controls match the corruption and bribery related risks faced by StashAway.