

Maybank Securities Limited (“MSVN”) Anti-Bribery and Corruption Policy Statement

MSVN, a subsidiary of Maybank Investment Banking Group (“MIBG”) is committed to conduct its business dealings with integrity. To achieve this commitment, MSVN adopts a zero tolerance approach against all forms of bribery and corruption in carrying out its daily operations. MSVN complies with the Vietnamese Anti-Corruption Law 2018 as well as Malaysian Anti-Corruption Commission Act 2009.

MSVN has put in place an Anti-Bribery and Corruption (“AB&C”) framework which includes policies, procedures, pre-approval processes, risk assessments, due diligence on third parties and associated persons*, and employee training programme.

The MSVN Anti-Bribery & Corruption Policy (“AB&C Policy”) sets out the guiding principles for MSVN to address and manage bribery and corruption risks in all its dealings within and outside MSVN. Compliance to the AB&C Policy is mandatory and MSVN, its directors and employees are to strictly comply with the following principles:

- Giving or receiving bribes or participate in any form of bribery and corruption in its business dealings is strictly prohibited;
- The engagements of third parties and associated persons, and dealings with customers and third parties and associated persons must not be for the purpose of inducing or obtaining or retaining business, gaining an unfair advantage or influencing a government or regulatory decision for MSVN or for personal gain;
- The giving and receiving of gifts and entertainment, including donations and sponsorships, whether directly or indirectly with the intention to bribe, to retain or gain a business advantage, or for personal gain is strictly prohibited;
- Actual or potential conflict of interest which could result in actual or potential bribery and corruption risk to MSVN is prohibited; and
- Directors and employees are strictly prohibited from making facilitation payments.

Associated persons performing services for or on behalf of MSVN are also required to comply with the above principles where relevant.

**A person is associated with MSVN if the person is a partner or agent of MSVN or if the person performs services for or on behalf of MSVN.*