

Code of Ethics and Conducts Policy Statement

MBSB Bank (“Bank”) pledges its full commitment to act professionally, fairly and with integrity in all its business dealings and expects its employees to observe the same.

Therefore, the Bank intends to explicitly declare the Bank’s commitment via this Code of Ethics and Conducts Policy Statement (“Policy Statement”) as to indicate MBSB Bank’s devotion to integrity, ethical and sustainable way of doing business. The Policy Statement is aligned with all relevant laws and regulations, including Code of Ethics for the Financial Services Industry (2016) and Malaysian Code on Corporate Governance (2021).

This Policy Statement is applicable to Malaysian Building Society Berhad (“MBSB”) and its bank and non-bank subsidiaries. The term used i.e. MBSB Bank or Bank, does include other entity under MBSB for ease of understanding.

1. **Integrity**

The Bank requires all Employees to be honest and open in all their dealings. These include behaving in an accountable and trustworthy manner, and avoiding any acts that might damage the reputation of, or bring discredit to the Bank at any time. As the Bank promotes a zero tolerance policy against all forms of bribery and corruption, Employees are required to avoid any activity that might lead to, or suggest, bribery and other forms of corruption. These include the giving or taking of bribes or making of facilitation payments, in whatever form including in kind, which is corrupt or potentially corrupt in nature. The prevention, detection and reporting of bribery and other forms of corruption is the responsibility of all Employees or those under the Bank’s control.

2. **Confidentiality**

The Bank requires all Employees to protect the confidentiality and sensitivity of information regarding the business or affairs of the Bank or of a customer of the Bank which were acquired in the performance of duties. The Bank stresses to use them for its intended purposes only and not divulging information to any unauthorised persons. This requirement applies even after the Employee’s employment with the Bank ceased.

3. **Competence**

The Bank committed to develop and maintain the relevant knowledge, skills and behaviour of the Employees to ensure that their activities are conducted professionally and proficiently to better serve the customers. These include obtaining and regularly updating the appropriate qualifications, training, expertise and practical experience.

4. **Conflict of Interest**

The Bank assures that the Employees will not place themselves in a situation where their personal interests in a transaction, or an obligation they owe to someone else, comes into conflict or appearance of conflict, with their obligation to the Bank, its customers, and any other relevant stakeholders. Employees are also emphasized to not use their positions to advance their own personal gains or advantages on the basis of information, assets and other resources gained during their employment. These shall include gains obtained for their family or persons connected to them and also any solicitation for corporate directorship or trusteeships. Employees shall ensure the influence of others will not override their business and professional judgment.

5. **Fairness**

The Bank required all Employees to act responsibly and embrace a culture of fairness and transparency in all types of interactions and dealings with stakeholders. Without jeopardizing the compliancy to applicable policies, procedures, laws and regulations, Employees should never take unfair advantage over stakeholders through manipulation, concealment, misrepresentation, and abuse of confidential information and material facts, or any other unfair dealing practices.

6. **Money Laundering Activities**

The Bank enforced to the Employees to not engage, directly or indirectly in any transactions that may involve proceeds from any unlawful activity. Employees or any stakeholder who engages in or attempts to engage in money-laundering commits an offence under Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001, and may be liable to a fine and/or to imprisonment. Any suspicious transactions or suspected incidents of money laundering must be reported. All Employees must also ensure that they do not allow their personal banking accounts to be used in facilitating similar money laundering activities.

7. **Insider Trading/Personal Investments**

The Bank stressed that dealing with any securities or other financial instruments while in possession of price sensitive non-public information about or affecting them or improperly disclosing such price sensitive non-public information directly or indirectly to others, including family members, is prohibited. This prohibition applies to personal transactions including those done by family members as well as transactions effected in the course of employment with the Bank. The Bank required to all Employees to comply with all applicable laws in relation to insider trading, apart from the Bank's policies and procedures. Employee who possesses such insider information is also prohibited from influencing any other person to deal in the securities concerned or communicating such information to any other person, including others who do not require such information in discharging their duty.