

ALLIANCE BANK MALAYSIA BERHAD (88103-W)

Code of Conduct

1. Introduction

Alliance Bank Malaysia Berhad and its subsidiaries ("the Group") is guided by its values of respect, integrity, teamwork and excellence to uphold the highest standard of professionalism and exemplary code of conduct. The Code of Conduct ('the Code') embodies the principle and standards of business and ethics conduct by the Group.

2. Objective

The Code describes the standards of conduct required of directors and employees of the Group. For all intents and purposes, all Directors and Employees shall always observe and ensure compliance with all applicable laws, rules and regulations to which they are bound to observe in the performance of their duties.

3. Applicability

The Code is applicable to all employees (including full time, probationary, contract /temporary staff and trainees) ("Employees") and Directors of the Group.

4. Review of the Code

The Board oversees compliance with the Code and reviews the Code regularly to ensure that it continues to remain relevant and appropriate.

5. Core Areas of Conduct

A. Compliance with Laws, Regulations, Internal Policies and Procedures

Breaches of laws or regulations can be damaging to our branding, business and reputation. A serious breach may lead to criminal prosecution and even revocation of our banking/business license. Employees are expected to know what the laws, regulations, internal policies and procedures which specifically apply to their respective area of operations.

B. Report Breaches

Breaches of laws/regulations and/or this Code, frauds or other criminal acts and similar serious incidents or any issue which it is believed to pose a reputational risk to the Group, must be reported to Group Compliance so that the matter can be looked into for appropriate actions.

C. Co-operate with our Regulators

We adopt the policy of transparency, accountability and corporate integrity as the key principles when dealing with our regulators.

D. Avoid Conflict of Interest

All employees and directors of the Group must not engage directly or indirectly in any business activity that competes or conflicts with the Group's interests with key emphasis on the following aspects:

a) Outside Financial or Other Interest

Employees and directors should not be directly involved in the Group's dealings with the customer or business partner/associate so long as such interest continues to exist.

b) Other Business Interest

It is considered a conflict of interest if an employee conducts business other than the Group's business during office hours.

c) Other Employment

Employees of the Group must not engage in any part-time employment and/or business activities outside its working hours unless prior written approval is obtained from Group Human Resource.

d) Entertainment and Gifts

Employees and directors of the Group must not accept costly entertainment from customers, potential customers or business partners in any circumstances. Employees and directors must not, directly or indirectly solicit, accept or receive any gift, payment or other advantage from any person as a reward or inducement for improper conduct.

E. Corporate Directorships/Partnerships

Employees of the Group must not engage in any of the following without the approval of the Board of Directors (or its respective delegated committee) as per BNM/GP 7 requirements:

- solicit corporate directorships/partnerships;
- serve as a director of another corporation;
- serve as a sole proprietor/partner (whether or not an employee is actively involved in the management of the business) of a business concern.

F. Misuse of Position

Employees and directors of the Group must not use the Group's name or facilities for personal advantage in political, investment or retail/purchasing transactions or other similar types of activities.

G. Misuse of Information and Insider Trading

No employees or directors shall deal or influence any other person to deal in the securities of any company listed or pending listing on a stock exchange at any time when he is in possession of information obtained as a result of his employment by, or his connection with the Group, which is not generally available to the public and which, if it were so available, would likely to have a material effect in the market price or market activity of the shares.

H. Reject Bribery and Corruption

Employees and directors must not:

- offer or provide any kind of payment or benefit to government officials and others with decision-making power over the Group's affairs;
- offer to pay an employee of a customer or potential customer for their business; or
- accept any kind of payment or benefit.

I. Integrity of Records and Transactions

Employees must not make entries/transactions or allow entries/transactions to be made for any account, record or document of the Group that are false or would obscure the true nature of the transaction as well as to mislead the true authorized limits or approval by the relevant authority of such transactions.

J. Respect Customer Confidentiality and Data Privacy

a) Customer Confidentiality

The confidentiality of relations and dealings between the Group and its customers is paramount in maintaining the Group's reputation. No employee or director shall during or after termination of his employment or directorship with the Group divulge the information provided by the customers to the Group to any third party, except in the proper course of his duties or with the Group's written consent or with customer's written consent.

b) Misuse of Confidential Information

As employees or directors of the Group, it is our responsibility to ensure that we exercise due care, diligence, fidelity and good faith in handling confidential information, be it confidential information owned by the Group, its customers or any other third party, including other financial institutions.

K. Data Privacy

We continually respect the rights of the individuals or companies in relation to their data by ensuring that:

- such data is accurate; and
- such data is only used and kept securely for the purposes and for as long as deemed necessary.

L. Fair and Equitable Treatment of our Customers

All business dealings on behalf of the Group with current or potential customers, in meeting the customer's requirements, shall be conducted openly, fairly and equitably or "above board" and must be made on a strictly arms-length basis.

M. Ensure that Products are Suitable for our Customers

Employees are expected to ensure that products that are sold to customers meet the customers' needs and that every effort is made to ensure that product benefits and risks are clearly explained to customers.

N. Advertise Products Fairly and Truthfully

We shall ensure that any advertisement for our products and services:

- is clear, concise, accurate and decent;
- complies with the relevant laws or regulations;
- does not make any unfair comparisons with other competitors' products;
- properly describes any significant risk involved; and
- respects cultural sensitivities and will not offend any particular individual, group or organization.

O. Resolve Complaints Promptly and Fairly

We operate a policy of dealing with complaints in a courteous, efficient and timely manner, and in accordance with internal and regulatory guidelines.

P. Competition

Collusion with any other institution in anti-competitive activities is strictly prohibited. These may include but are not limited to:

- exclusive dealing;
- price fixing;
- refusal to deal; and
- dividing territories.

Q. Stay Alert to Money Laundering, Terrorism and Fraud

a) Anti-Money Laundering and Counter Financing of Terrorism (AML/CFT) In our effort to combat money laundering and terrorism financing, we adhere to an AML/CFT policy framework which is established based on applicable regulatory requirements.

b) Fraud

Employees of the Group are expected to comply with established control procedures and stay alert to the risk of fraud.

R. Social Media Ethics

Employees shall apply our standards of social media ethics in ensuring that any posted content on branded social media should uphold good sense and responsible business practices.

S. Copyrighted Material

Employees should ensure that the requirements of the Copyright Act 1987 are adhered strictly.

T. Other Requirements for Directors of AFG and its Subsidiaries

In the performance of his duties, a director should also observe these additional codes such as:

- practicing good corporate governance;
- be conscious of the interest of shareholders, employees, creditors and customers of the Group; and
- upholding impeccable corporate and social responsibilities.