BPMB
Malaysia Development Bank

ORGANISATIONAL ANTI-CORRUPTION PLAN (OACP) 2022 – 2026

THOUGHTS FROM THE LEADERSHIP

From the Chairman's Desk

Echoing Bank Pembangunan Malaysia Berhad ("BPMB") Group's commitment to combat corrupt practices and uphold the highest level of integrity as one of Malaysia's leading Development Financial Institutions ("DFI"), I am pleased that BPMB Group has successfully developed and launched its Organisational Anti-Corruption Plan ("OACP") for the period of 2022 – 2026.

The BPMB Group's OACP 2022 – 2026 is an integrated, comprehensive and holistic integrity strengthening plan for BPMB Group to promote awareness, commitment and cooperation of its stakeholders in practicing the values of ethical work and integrity whilst combating corrupt practices within the organisation.

With the roll-out and Group-wide implementation of this plan, I am confident that it can serve as a term of reference and guide for all of us in the organisation – addressing issues related to integrity, governance, and most importantly corruption within the organisation.

As the Interim Chairman, I certainly take this matter seriously as trust and transparency is key in effective governance. Hopefully, we all can be guided by this plan to reinforce our commitment to combat corruption across all aspects of the organisation, and ultimately preserve and protect BPMB Group's reputation.

Together, let us work hand-in-hand to extend our full commitment in the implementation of all initiatives under the OACP plans for 2022 – 2026. With strong integrity principles and good governance practice, we move forward, stronger and better.

Thank you.

YBhg. Datin Rashidah Mohd Sies
Interim Chairman,
BPMB Group

GCEO's Statement

On behalf of BPMB Group's management team, I am pleased to share with you the BPMB Group's OACP for the period of 2022 – 2026.

The OACP is a key strategic guide that has been developed to underscore BPMB Group's commitment to anti-corruption compliance with zero tolerance for non-compliance. It steers the organisation and our people towards upholding integrity while eliminating corrupt practices, ensuring that our business is conducted ethically and lawfully.

With an unwavering commitment to the OACP alongside our Code of Conduct, I am confident that we will continue to be an ethical corporate citizen that supports the nation's aspirations to combat corruption in order to achieve a developed nation status.

Thank you.

Roni L. Abdulwahab
Group Chief Executive Officer (GCEO),
BPMB Group

BPMB Group's Statement of Commitment

The BPMB Group's OACP for the period of 2022 – 2026 is an anti-corruption policy that reflects BPMB Group's commitment to combat corruption and power abuse through transparency, accountability, whilst promoting a culture of integrity within the Group.

In line with the 6th Strategy embedded under the National Anti-Corruption Plan ("NACP") (2019 – 2023) – to inculcate good governance in corporate entities, BPMB Group remains committed towards championing this agenda. As a Development Financial Institution ("DFI") in support of providing a path to Malaysia's infrastructure solutions, BPMB Group's commitment in developing this plan is testament to BPMB Group's preparedness to realise the vision of developing a transparent and corruption free environment.

In order to ensure the successful implementation of this plan, its stakeholders will together participate to realise the planned initiatives. By collaborating to counter the debacle of corruption, BPMB Group is confident of creating a new era of a fair and just system based on a culture of transparency, accountability and integrity within the Group.

Jason Goay Ngee Chiew
Chief Risk & Compliance Officer

Rohayati Talaha@Talha
Head of Compliance

Ali Ab Hamid
Chief Integrity & Governance Officer
Head of Financial Intelligence & Integrity

Executive Summary

“The NACP 2019 – 2023 was launched by the 7th Prime Minister of Malaysia, YAB Tun Dr. Mahathir Mohamad on 29 January 2019. The requirements of the NACP under Initiative No. 6.2.1 outlines the requirement of the development of OACP in Statutory Bodies, Government Owned Companies, Limited Liability Companies and the private sector regulated by regulatory bodies.

Thus, BPMB Group has developed its OACP for 2022 – 2026 by outlining comprehensive and integrated plans in combating corruption, integrity and governance within the organisation as the main plan and guide to BPMB Group."

As Malaysia's pioneer and key Development Financial Institution ("DFI"), our vision for OACP is towards an organisation with high core value of Integrity and Good Governance in a zero corruption environment. Meanwhile, our mission is to strengthen BPMB Group's Governance, Integrity and Anti-Corruption through compliance with the laws, policies and regulations in force.

It is hoped that this plan will reduce any misconduct involving integrity and corruption among BPMB Group staff and subsequently progress towards a clean and zero corruption environment within the Group.

GLOSSARY OF ABBREVIATIONS & ACRONYMS

ABMS	Anti-Bribery Management System
AML/CFT	Anti-Money Laundering/ Counter Financing of Terrorism
BOD	Board of Director
BPMB	Bank Pembangunan Malaysia Berhad
BRMC	Board Risk Management Committee
CA	Credit Administration
CCOM	Corporate Communications
CM	Client Management
COG	Credit Operation Guideline
CRA	Corruption Risk Assessment
DCO	Designated Compliance Officer
e-STK	Integrity Vetting System
FA	Facility Agreement
FII	Financial Intelligence and Integrity
FIN	Finance
GCB	Group Corporate Banking
GCEO	Group Chief Executive Officer
GCS	Group Corporate Secretarial
GC	Group Compliance
GHR	Group Human Resources
GL	Group Legal
GIA	Group Internal Audit
GRM	Group Risk Management
GRC	Group Risk and Compliance
GSM	Group Shariah Management
GSC	Group Strategy and Communications
HOF	Heads of Function
IIM	Institut Integriti Malaysia
IT	Information Technology
LO	Letter of Offer
MACC	Malaysian Anti-Corruption Commission
MOF	Ministry of Finance
MRC	Management Risk Committee
MS ISO	Malaysian Standard International Organisation for Standardisation
NACP	National Anti-Corruption Plan
NKRA	National Key Result Area
OACP	Organisational Anti-Corruption Plan
PIN	Pelan Integriti Negara
PLC	Pembangunan Leasing Corporation
PMS	Property Management & Services
PROCU	Procurement
PROD	Products
RECO	Recovery
SDG	Sustainable Development Goals
SM	Sales and Marketing
SOP	Standard Operating Procedure
TREA	Treasury

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INTRODUCTION

Group at a Glance

Incorporated in 1973, Bank Pembangunan Malaysia Berhad (BPMB) is one of Malaysia's first DFIs and is wholly owned by the Malaysian Government through the Minister of Finance Inc.

Since inception, BPMB has been providing a path to Malaysia's infrastructural solutions and was mandated to provide medium to long-term financing to the nation's nascent infrastructure, maritime, oil and gas and technology sectors. With a focus on these four main sectors, BPMB has played a key role in Malaysia's development for nearly five decades.

Evolving in tandem with the nation's progress, BPMB has evolved beyond serving the early developmental needs, shifting gears from being a provider of development finance to a catalyst for a new economy. Being sector agnostic, BPMB has expanded its focus from the four sectors mandated during inception, now aligning its strategies with the Government's initiatives on Sustainability, Digitalisation and Technology. In addition to financial viability, BPMB is setting its sights firmly on impactful projects, pursuing the shift towards impact assessment, regardless of sector.

BPMB has been accorded the highest rating of 'AAA' by both RAM Rating Services Berhad ("RAM") and Malaysian Rating Corporation Berhad ("MARC"). It is regulated and supervised by Bank Negara Malaysia under the Development Financial Institution Act 2002.

"As Malaysia's pioneer and key Development Financial Institution ("DFI"), our vision for OACP is towards an organisation with high core value of Integrity and Good Governance in a zero corruption environment."

Our Vision, Mission and Purpose

Bank Pembangunan Malaysia Berhad (BPMB) is one of Malaysia's pioneers and key DFIs. We keenly pursue development projects closely aligned with the national growth agenda, to finance projects that generate sustainable outcomes and positively impact the community and the environment.

Purpose

Developing a sustainable and inclusive Malaysia.

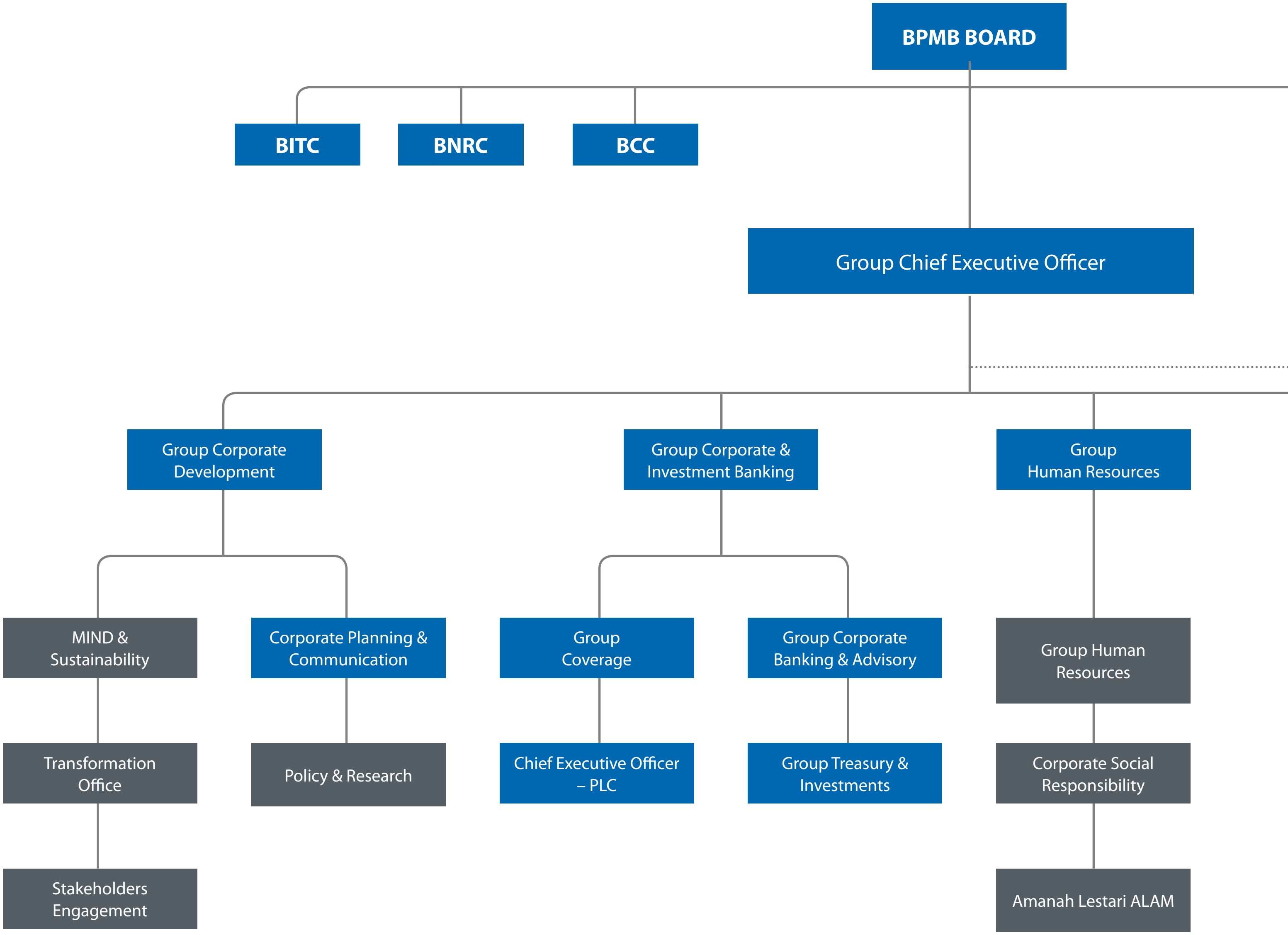
Vision

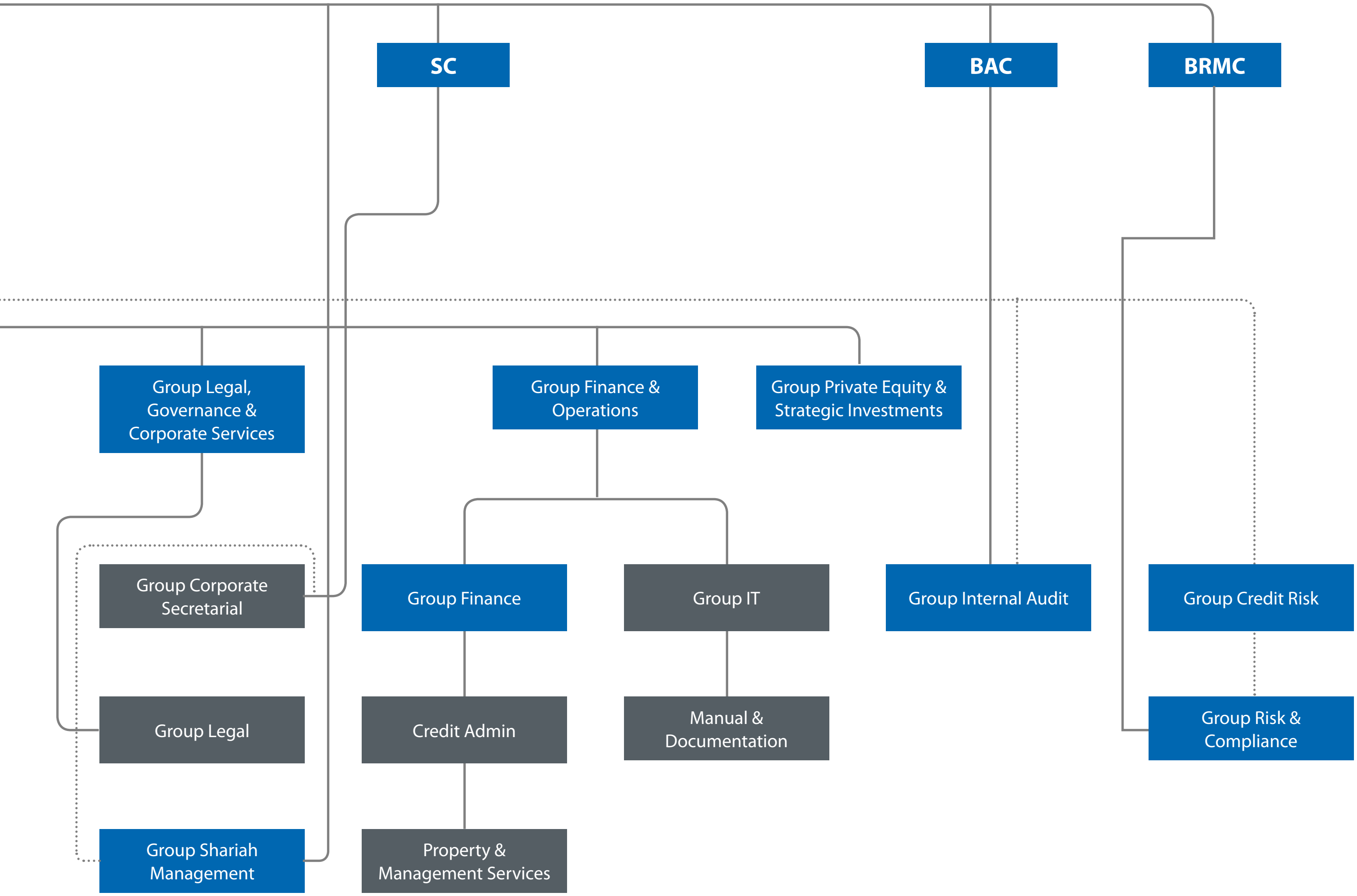
Malaysia's leading developmental partner.

Mission

Impactful delivery with strategic outcomes.

Organisational Structure




SC
BAC
BRMC
Group Legal, Governance & Corporate Services
Group Finance & Operations
Group Private Equity & Strategic Investments
Group Corporate Secretarial
Group Finance
Group IT
Group Internal Audit
Group Credit Risk
Group Legal
Credit Admin
Manual & Documentation
Group Risk & Compliance
Group Shariah Management
Property & Management Services

Chapter 1

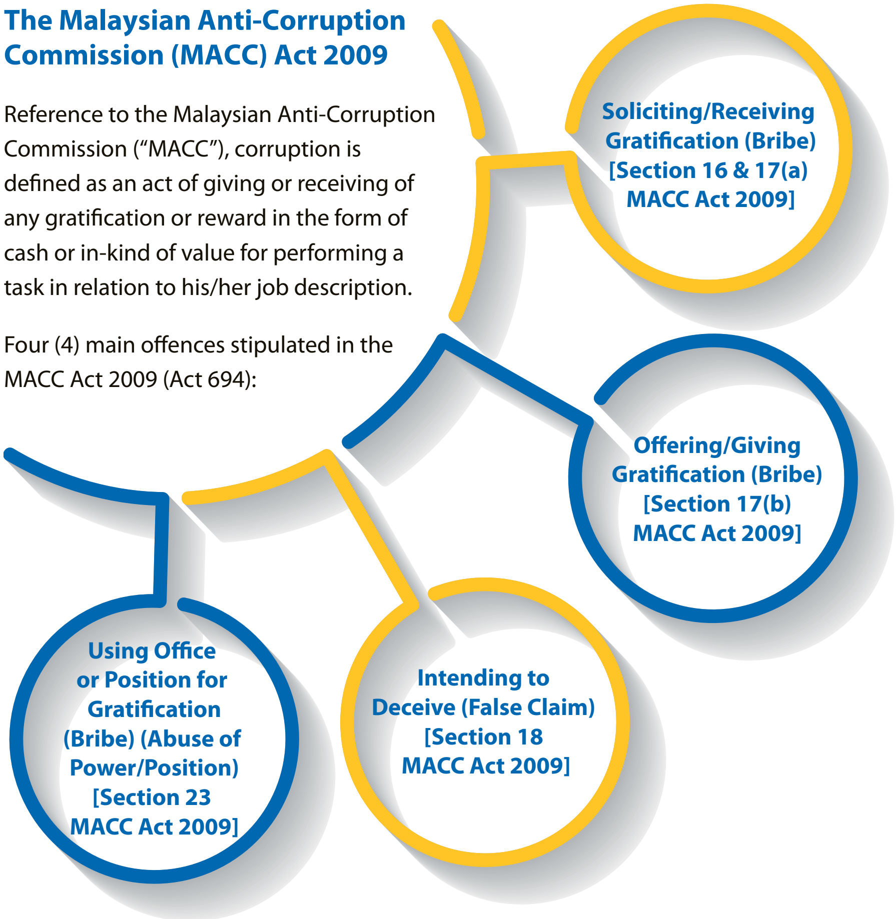
Our Integrity Journey

Our Integrity Journey

The Malaysian Anti-Corruption Commission (MACC) Act 2009

Reference to the Malaysian Anti-Corruption Commission ("MACC"), corruption is defined as an act of giving or receiving of any gratification or reward in the form of cash or in-kind of value for performing a task in relation to his/her job description.

Four (4) main offences stipulated in the MACC Act 2009 (Act 694):



The Section 17A of the Malaysian Anti-Corruption Commission (Amendment) Act 2018 had been amended, among others, to introduce "Corporate Liability Provision" for bribery and corruption effective from 1st June 2020.

Section 17A was enacted to enable organisations involved in corruption activities to be subjected to legal action and persons associated with the organisations will be deemed to commit the corresponding offence unless it can be proven that adequate measures have been put in place.

Section 17A (1) provides that a commercial organisation commits an offence if an associated person promises gratification to any person with an intent "to obtain or retain business" or "an advantage in the conduct of business for the commercial organisation".

National Anti-Corruption Plan ("NACP")

The establishment of NACP is to address corruption issues in the country and become the Government's key document that outlines integrated course of actions in the fight against corruption.

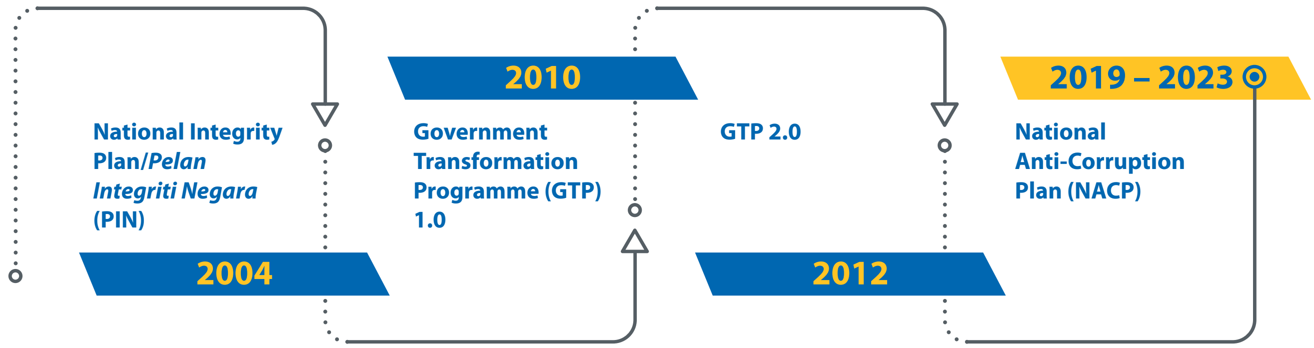
The NACP's vision is to create a corrupt-free nation through three (3) strategic goals particularly as per below:

1. **Accountability and Credibility of Judiciary, Prosecution and Law Enforcement Agencies;**
2. **Efficiency and Responsiveness in Public Service Delivery; and**
3. **Integrity in Business.**

Through cooperation with various parties in combating corruption, the government is determined to create a new scenario in the country based on the principles of transparency, accountability and integrity values.

Our Integrity Journey

Corruption Prevention Agenda in Malaysia



In efforts to move towards a developed nation status and high-income country, the anti-corruption agenda has become a national priority. Several key initiatives at the national level have been developed starting with the National Integrity Plan/Pelan Integriti Negara ("PIN") launched on 23rd April 2004 which features a detailed plan in line Vision 2020 to create a high moral and ethical society.

The Government Transformation Programme ("GTP") continues the basic principles of PIN through the National Key Result Areas ("NKRA") on Combating Corruption. As outlined in the GTP, corruption must be completely eliminated to reduce the cost of performing business as well as eradicate inefficiencies within the Government system. The GTP 1.0 initiative aims to address the issue in relation towards corruption through various anti-corruption initiatives from top to bottom. The Anti-Corruption NKRA introduces programmes that not only focuses on the issues of corruption towards enforcement agencies, but it also strengthens the Government's procurement system to minimise opportunities for corrupt practices.

It is a known fact that fighting against corruption is a long-term effort thus GTP 2.0 acts as an improvement mechanism through more effective monitoring of several initiatives introduced under GTP 1.0.

Nevertheless, international studies such as the Global Corruption Barometer and the Corruption Perceptions Index still shows that a large number of public respondents do not believe that the problem of corruption has improved in the country. The results of the survey indicate that the transformation process requires enhancement and more need to be done to raise public awareness of this issue at all levels.

In this regard, the Government has decided to combine all efforts on governance, integrity and anti-corruption under a single integrated plan. Subsequently, the Cabinet Special Committee on Anti-Corruption ("JKKMAR") chaired by the 7th Prime Minister of Malaysia, on 8th June 2018 decided that an integrated anti-corruption plan should be immediately drafted to address corruption issues in the country.

Development of BPMB Group's OACP 2022 – 2026

OACP is a fundamental anti-corruption document at the organisational level to curb weaknesses and issues regarding governance, integrity and anti-corruption.

The OACP is aimed at assisting and helping the organisation to develop its own corporate anti-corruption strategy plan. It outlines the problem statement, approaches and programmes relevant to all aspects in improving the plan such as task implementation and service delivery by specifying reasonable timeframe towards the achievements of strategic objectives.

The development of BPMB Group's OACP 2022 – 2026 involved several key processes. It entails a series of workshops, brainstorming sessions, challenge sessions, refining sessions with the Designated Compliance officers ("DCO") and consultant from Institut Integriti Malaysia ("IIM") as well as presentation to Senior Management and the Board of Directors ("BOD"). The involvements of BOD and Senior Management are key to demonstrate the commitment and determination to inculcate the culture of integrity, good governance as well as combating corruption activities at BPMB Group.

For the purpose of developing the OACP, we commenced with the establishment of the Task Force team comprised of DCO from every Function. The Task Force played a very crucial role in ensuring the successful development of BPMB Group's OACP. Besides the DCOs, all Heads of Function (HOF) also significantly contributed to the formulation of the five (5) years' strategic plans for BPMB Group in combating corruption activities as well as to inculcate integrity culture and good governance.

Implementation of Integrity and Good Governance Policy in BPMB Group

BPMB Group heeds the Government's mandate to instil a culture of integrity where the Board of Directors, Senior Management and all employees are committed to adhere to relevant laws, rules, regulations and regulatory guidelines. This is BPMB Group's effort to become and organisation free from misconduct, abuse of power and corruption that is clearly demonstrated through the establishment of strong compliance.

Policies, Guidelines, and Integrity-related initiatives will ensure that risks associated with corruption, good governance, and integrity are successfully controlled.

Our Integrity Journey

Among the initiatives, policies and guidelines established are as follows:

Anti-Bribery & Corruption Policy	Corruption-Free Pledge (IBR)	Corruption Risk Management	ISO 37001:2016 ABMS Certification
Anti-Bribery & Corruption Policy Statement	Fit and Proper For Board of Directors, Shariah Committee and Group Chief Executive Officer	Employee Disciplinary Handbook	Consequence Management Framework
Whistleblowing Policy & Procedure	Corporate Integrity Pledge	Inclusion of Integrity & No Gift Policy in All Official Documents	ABMS Manual for BPMB Group
BPMB Employee Code of Ethics and Business Conduct	Code of Ethics and Business Conduct for Board of Directors and Shariah Commitee	Due Diligence (e-STK,AML/CFT)	Authority Matrix

Chapter 2

Our OACP Framework

Our OACP Framework

The Need for OACP Framework

"BPMB Group has set clear objectives to achieve the OACP vision and mission towards building an organisation with integrity, good governance and corruption-free environment. BPMB Group will in the next five (5) years continuously implement and formalise sustainable anti-corruption efforts.

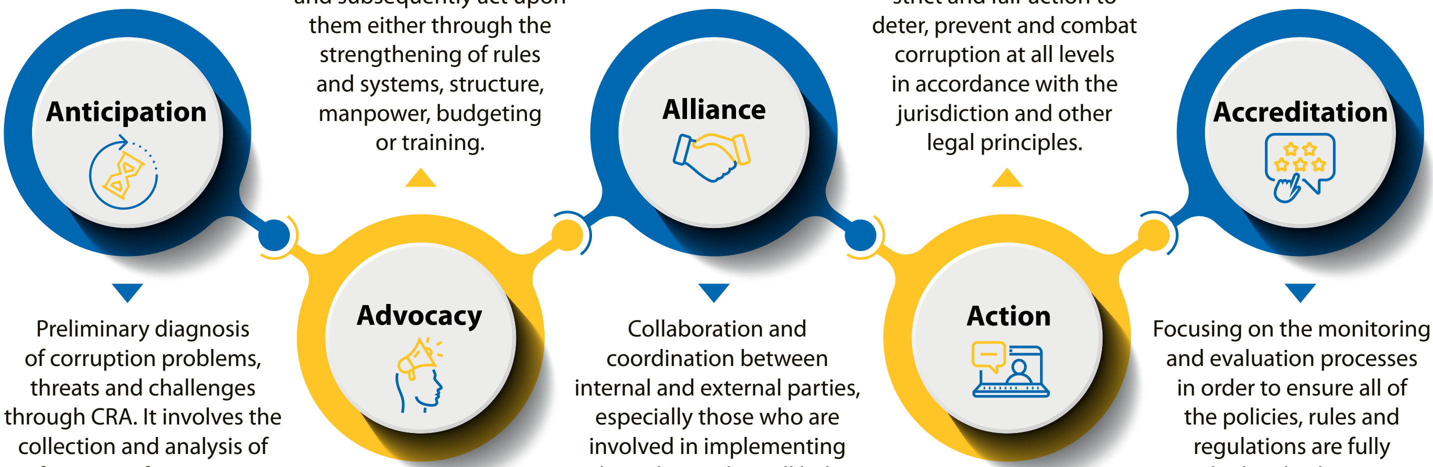
The plan is geared towards improving transparency and embedding integrity and accountability in all related systems, process and procedures within BPMB Group. The plan also aims at eliminating abuse of power, putting a stop to political interference, no cronyism and nepotism as well as embezzlement and mismanagement.

All these will be achieved through the formulation of strategies based on the parameters of integrity and governance. Consequently, as the level of transparency and integrity of the organisation improves, the perception towards BPMB Group will simultaneously steer towards positivity."

The Guiding Principles

5As

In order to ensure smooth and effective implementation of the strategic plan, a comprehensive 5As approach comprising Anticipation, Advocacy, Alliance, Action and Accreditation was applied as the guiding principles for BPMB Group's OACP Framework.



Preliminary diagnosis of corruption problems, threats and challenges through CRA. It involves the collection and analysis of information from various data sources. This step is important in helping BPMB Group identify the precise corrective measures that minimise or eradicate corruption risks within BPMB Group.

Recommendation of policies to overcome corruption risks within BPMB Group. Decision-makers must take ownership of the proposals, and subsequently act upon them either through the strengthening of rules and systems, structure, manpower, budgeting or training.

Collaboration and coordination between internal and external parties, especially those who are involved in implementing the policies. This will help BPMB Group to maximise the usage of resources through resource sharing in the form of manpower, budget and logistics.

Enforcement of laws through punitive, preventive and educative approaches. BPMB Group shall take strict and fair action to deter, prevent and combat corruption at all levels in accordance with the jurisdiction and other legal principles.

Focusing on the monitoring and evaluation processes in order to ensure all of the policies, rules and regulations are fully complied with. The purpose of the accreditation is not to give rewards, but to encourage compliance with policies.

Our OACP Framework

Highlights of BPMB Group's OACP Framework

The framework is built within three (3) priority areas with key strategies defined for each area. The three (3) priority areas identified are:

1. **Human Resources Development**
2. **Governance and Compliance**
3. **BPMB Group's Activities**

This is supported by six (6) objective strategies to elevate the integrity and governance standards from the year 2022 – 2026.

Based on holistic assessments conducted with 22 Functions and subsidiaries, 131 initiatives were outlined under three (3) priority areas, three (3) strategies and then lead to six (6) objective strategies to address potential corruption, integrity and governance issues in BPMB Group.

Priority Areas	Strategies	Objectives
Human Resources Development	To strengthen Staff Integrity, Accountability and Competency.	1. To inculcate Integrity and Accountability among the staff of BPMB Group through awareness. 2. To enhance staff competency through training.
Governance & Compliance	To inculcate Good Governance in BPMB Group.	3. To review and enhance BPMB Group's policies and procedures. 4. To enforce consequence management for non-compliance activities.
BPMB Group's Activities	To enhance the efficiency and transparency in BPMB Group's activities.	5. To enhance the efficiency and transparency in BPMB Group's business activities through enhancement of main processes. 6. To strengthen the strategic alliance with internal and external parties in combating bribery and corruption through frequent communication.

VISION

- Towards a Corrupt-Free BPMB Group.

MISSION

- To uphold the Rule of Law.
- To improve organisation Efficiency, Transparency and Accountability based on Good Governance.
- To create a clean business environment.

About The Framework

The main objectives of the BPMB Group's OACP Framework are to set out the vital actions that will assist BPMB Group to combat corruption within the organisation. In order to achieve the vision and mission as stated in the OACP, BPMB Group has established the strategic objectives from the identified priority areas.

STRATEGIES

- To strengthen staff Integrity, Accountability and Competency.
- To Inculcate Good Governance in BPMB Group.
- To enhance the efficiency and transparency in BPMB Group's activities.

OBJECTIVE

- Promote the highest standard of ethics, integrity, accountability and legal conduct to all employees of BPMB Group.
- Uphold Malaysia's Anti-Corruption Principles in promoting integrity, transparency and good governance in all aspects of its operation.
- Uphold a zero-tolerance approach to all forms of bribery and corruption.
- Increase confidence of stakeholders towards BPMB Group.
- Sustain a good reputation for BPMB Group.

Our OACP Framework

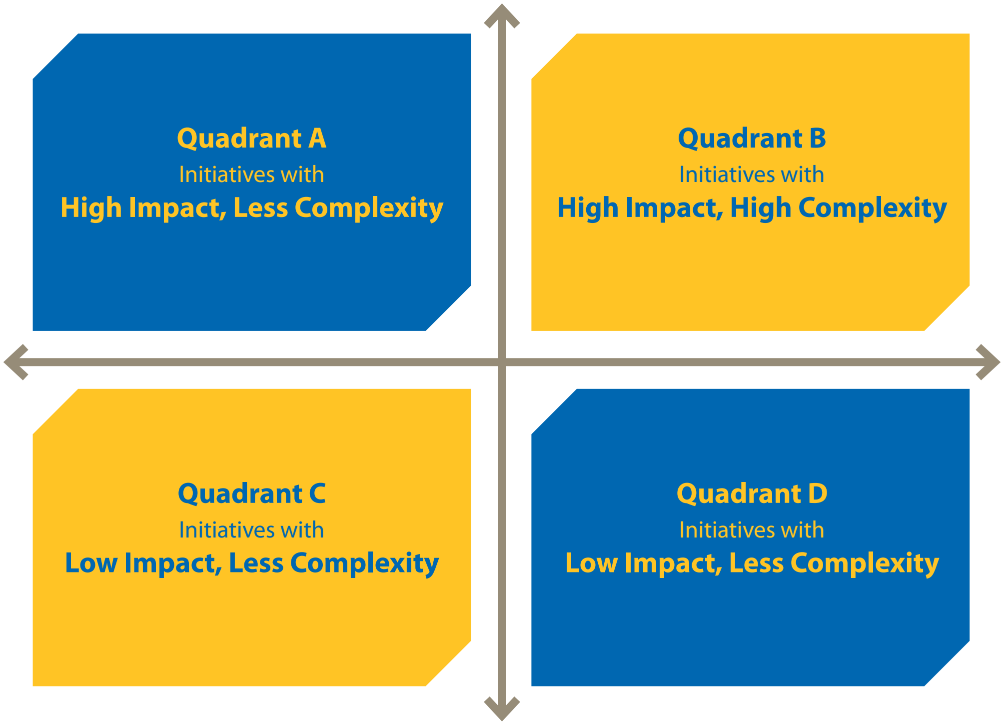
Quadrant Analysis

A Quadrant Analysis is a tool used for decision making, to measure the impact and complexity of the initiatives and it is technically divided into four (4) quadrants.

The measure/data is designed and analysed for the initiatives on the basis of the expected IMPACT with the level of COMPLEXITY during the implementation of each initiative.

BPMB Group shall focus on executing the initiatives that are categorised under Quadrant A i.e. high impact and less complexity – which requires less effort to implement and will provide the quickest results in the transformation towards better governance of the organisation. The 131 initiatives are deliberated in the implementation action plan at the subsequent pages.

"The timeframe for BPMB Group to complete all the initiatives may vary based on complexity. However, it is a prerequisite for completion within the BPMB Group's OACP five-year plan (2022 – 2026)."



Note:
Complexity: The difficulty and complicatedness in implementing the initiatives
Impact: Marked effects or influence that bears positive changes

Five (5) Years Plan

IMPLEMENTATION OF 131 INITIATIVES OF BPMB GROUP'S OACP 2022 – 2026

PRIORITY AREA 1: HUMAN RESOURCES DEVELOPMENT

Strategy 1 –To Strengthen Staff Integrity, Accountability and Competency

Strategic Objective 1.1: To Inculcate Integrity and Accountability Among The Staff of BPMB Group Through Awareness

No.	Initiative	Implementor	Milestone Within	Strategy	Quadrant
1.1.1.	To conduct continuous awareness on the existing and potential risks on corruption, integrity and governance related to the procurement process.	PROCU	5 years (2022 – 2026)	Strategy 1	C
1.1.2.	To conduct Procurement's Roadshows to all Functions especially on critical/regular user: i. PMS; ii. IT; iii. GHR; and iv. Other Functions.	PROCU	5 years (2022 – 2026)	Strategy 1	A
1.1.3.	To ensure compliance and conduct continuous awareness on the existing policy and SOPs.	PROCU	5 years (2022 – 2026)	Strategy 1	C
1.1.4.	To conduct awareness on consequences of insufficient documentation.	GCB	5 years (2022 – 2026)	Strategy 1	C
1.1.5.	To conduct awareness on consequences of wrong advice/wrong/insufficient disclosure during the marketing activities.	GCB	5 years (2022 – 2026)	Strategy 1	C
1.1.6.	To conduct awareness on the consequences in accepting fraudulent applications or insufficient compliance/fraudulent compliance documents.	GCB	5 years (2022 – 2026)	Strategy 1	C

Our OACP Framework

PRIORITY AREA 1: HUMAN RESOURCES DEVELOPMENT

Strategy 1 –To Strengthen Staff Integrity, Accountability and Competency

Strategic Objective 1.1: To Inculcate Integrity and Accountability Among The Staff of BPMB Group Through Awareness

No.	Initiative	Implementor	Milestone Within	Strategy	Quadrant
1.1.7.	To conduct awareness to supervisors/heads of units/ department on monitoring of Credit Evaluation and consequences of Substandard Credit Evaluation.	GCR	5 years (2022 – 2026)	Strategy 1	C
1.1.8.	To conduct continuous awareness on the existence of Finance's procedures.	FIN	5 years (2022 – 2026)	Strategy 1	C
1.1.9	To conduct awareness on the offence of disclosing information to external parties and its consequences.	GHR	5 years (2022 – 2026)	Strategy 1	C
1.1.10.	To conduct continuous awareness on Code of Ethics and Conduct to all staff.	GHR	5 years (2022 – 2026)	Strategy 1	C
1.1.11.	To conduct awareness program on the Code of Conduct for Wholesale Financial Market (2020).	TREA	5 years (2022 – 2026)	Strategy 1	C
1.1.12.	To conduct periodic awareness as a reminder to all staff in handling sensitive and confidential data.	GHR	5 years (2022 – 2026)	Strategy 1	C
1.1.13.	To develop, implement and obtain certification of MS ISO 37001:2016 Anti-Bribery Management System (ABMS) to curb corruption for subsidiary i.e. Pembangunan Leasing Corporation Sdn. Bhd (PLC).	PLC & GC	5 years (2022 – 2026)	Strategy 1	B
1.1.14.	To conduct Corruption Risk Assessment for subsidiary i.e. Pembangunan Leasing Corporation Sdn. Bhd (PLC).	GC & PLC	5 years (2022 – 2026)	Strategy 1	B
1.1.15.	To develop and implement the OACP for BPMB Group.	GC	5 years (2022 – 2026)	Strategy 1	B

PRIORITY AREA 1: HUMAN RESOURCES DEVELOPMENT

Strategy 1 –To Strengthen Staff Integrity, Accountability and Competency

Strategic Objective 1.1: To Inculcate Integrity and Accountability Among The Staff of BPMB Group Through Awareness

No.	Initiative	Implementor	Milestone Within	Strategy	Quadrant
1.1.16.	To conduct continuous awareness to enhance staff "confidence" on Whistleblowing Channel.	GC	5 years (2022 – 2026)	Strategy 1	C
1.1.17.	To conduct continuous awareness on integrity, governance and MACC offences to all staff: i. Study Tour Program at MACC, PDRM, Prison Department or other Law Enforcement Agencies (LEA); ii. Coffee Talk with Business Associates (BA); iii. Awareness Training from External Speaker; and iv. Integrity awareness during Compliance Day.	GC	5 years (2022 – 2026)	Strategy 1	A
1.1.18.	To attend specific awareness training conducted by an external trainer (subject matter expert) on Anti-Money Laundering and Counter Financing Terrorism (AMLCFT).	GC	5 years (2022 – 2026)	Strategy 1	A
1.1.19.	To require auditors to declare COI so that other auditors can perform the checking/review for the respective functions.	GIA	5 years (2022 – 2026)	Strategy 1	A
1.1.20.	To conduct an awareness program on IT Security Policy.	IT	5 years (2022 – 2026)	Strategy 1	C
1.1.21.	To conduct awareness among GSM staff on the necessity to obey the internal manual and the consequences/ effects of breaching the internal manual.	GSM	5 years (2022 – 2026)	Strategy 1	C
1.1.22.	To conduct a continuous learning program on series of shariah risk awareness modules for all staff.	GRM	5 years (2022 – 2026)	Strategy 1	A

Our OACP Framework

PRIORITY AREA 1: HUMAN RESOURCES DEVELOPMENT

Strategy 1 –To Strengthen Staff Integrity, Accountability and Competency

Strategic Objective 1.1: To Inculcate Integrity and Accountability Among The Staff of BPMB Group Through Awareness

No.	Initiative	Implementor	Milestone Within	Strategy	Quadrant
1.1.23.	To ensure compliance and conduct continuous awareness on the existing of Group Risk policy and procedures within GRM staff.	GRM	5 years (2022 – 2026)	Strategy 1	A
1.1.24.	To ensure compliance and conduct continuous awareness on the existing of SOPs in administration & monitoring collection/payment.	RECO	5 years (2022 – 2026)	Strategy 1	A
1.1.25.	To ensure compliance and conduct continuous awareness with the existing SOPs concerning: i. Recovery's proposal process; and ii. Recovery's process in Appointment/Termination of Solicitors, Receivers & Managers and Consultants.	RECO	5 years (2022 – 2026)	Strategy 1	A
1.1.26.	To conduct continuous awareness on the existence of GCOM SOPs.	GCOM	5 years (2022 – 2026)	Strategy 1	C
1.1.27.	To conduct continuous awareness on the existence of SOPs on disbursement process and validation of disbursement.	CA	5 years (2022 – 2026)	Strategy 1	C
1.1.28.	To conduct awareness among CA staff on the necessity to follow the procedures/policies and the consequences/effects of breaching the procedures/policies.	CA	5 years (2022 – 2026)	Strategy 1	C
1.1.29.	To conduct refresher course for all auditors on the data protection/security policy by GIT.	GIA	5 years (2022 – 2026)	Strategy 1	C
1.1.30.	To conduct awareness training on IT asset management to all staff.	IT	5 years (2022 – 2026)	Strategy 1	C

PRIORITY AREA: GOVERNANCE AND COMPLIANCE

Strategy 1.2 –To Inculcate Good Governance in BPMB Group

Strategic Objective 1.2: To Enhance the Staff's Competency Through Training

No.	Initiative	Implementor	Milestone Within	Strategy	Quadrant
1.2.1.	To provide competency training for applicant/ requesting Function related to procurement matters.	PROCU	5 years (2022 – 2026)	Strategy 1	A
1.2.2.	To conduct training on understanding of Payment procedure (Group) to related staff.	FIN	5 years (2022 – 2026)	Strategy 1	A
1.2.3.	To conduct compliance training on "Personal Data Protection Policy" and Management of Customer Information and Permitted Disclosure Policy" to all staff.	GC	5 years (2022 – 2026)	Strategy 1	A
1.2.4.	To enhance the competency in conducting Customer Due Diligence (CDD) and Enhanced Due Diligence (EDD) to all Business Banking staff.	GC	5 years (2022 – 2026)	Strategy 1	A
1.2.5.	To enrol FII staff for AML certification.	GC	5 years (2022 – 2026)	Strategy 1	A
1.2.6.	To enhance competency related with credit review to client management staff.	CM	5 years (2022 – 2026)	Strategy 1	A
1.2.7.	To enhance competency training on credit evaluation to credit officers.	CA	5 years (2022 – 2026)	Strategy 1	A
1.2.8.	To provide product development training to Group Business Product staff.	PROD	5 years (2022 – 2026)	Strategy 1	A
1.2.9.	To conduct competency training related to technical criteria on vendor selection for PMS staff.	PMS	5 years (2022 – 2026)	Strategy 1	A
1.2.10.	To enrol any course related with Contract Management.	PMS	5 years (2022 – 2026)	Strategy 1	A

Our OACP Framework

PRIORITY AREA: GOVERNANCE AND COMPLIANCE

Strategy 1.2 –To Inculcate Good Governance in BPMB Group

Strategic Objective 1.2: To Enhance the Staff's Competency Through Training

No.	Initiative	Implementor	Milestone Within	Strategy	Quadrant
1.2.11.	To conduct competency training for PMS staff in conducting an assessment of Bidders.	PMS	5 years (2022 – 2026)	Strategy 1	A
1.2.12.	To conduct competency training on technical information of building facility maintenance for PMS staff.	PMS	5 years (2022 – 2026)	Strategy 1	A
1.2.13.	To enrol for certification on credit to client management staff.	CM	5 years (2022 – 2026)	Strategy 1	A
1.2.14.	To promote and support auditors to enrol the relevant professional certification e.g. CBA and CIA programs.	GIA	5 years (2022 – 2026)	Strategy 1	A
1.2.15.	To implement on-the-job coaching by respective Credit Risk team heads.	GCR	3 years (2022 – 2024)	Strategy 1	A
1.2.16.	To enhance competency training in performing credit risk assessment.	GCR	3 years (2022 – 2024)	Strategy 1	A
1.2.17.	To conduct competency training on project management for GSC staff.	GSC	5 years (2022 – 2026)	Strategy 1	A
1.2.18.	To conduct training to GSC by Subject Matter Experts (external speaker).	GSC	5 years (2022 – 2026)	Strategy 1	A
1.2.19.	To conduct sharing session with GSM staff as and when the new Shariah Advisory Council (SAC) resolutions of the Bank Negara Malaysia (BNM)/Securities Commission (SC) are announced.	GSM	5 years (2022 – 2026)	Strategy 1	A

Five (5) Years Plan

IMPLEMENTATION OF 131 INITIATIVES OF BPMB GROUP'S OACP 2022 – 2026

PRIORITY AREA: GOVERNANCE AND COMPLIANCE

Strategy 2 –To Inculcate Good Governance in BPMB Group

Strategic Objective 2.1: To Review and Enhance BPMB Group's Policies and Procedures

No.	Initiative	Implementor	Milestone Within	Strategy	Quadrant
2.1.1.	To incorporate and strengthen on the consequences/ effects of breaching the Policy and Procedure in procurement manual.	PROCU	5 years (2022 – 2026)	Strategy 2	A
2.1.2.	To enhance the existing procurement's manual by strengthening the good governance practise and enforce the core values in procurement process.	PROCU	5 years (2022 – 2026)	Strategy 2	A
2.1.3.	To review and enhance procurement manual in establishing guidance or checklist before releasing any payment.	PROCU	5 years (2022 – 2026)	Strategy 2	A
2.1.4.	To ensure compliance and conduct continuous awareness of the procurement's policy and SOPs.	PROCU	5 years (2022 – 2026)	Strategy 2	A
2.1.5.	To enhance the verification process by enhancing the requirement on justification provided by Applicant/ Requesting Function i.e. to mention specifically in the procurement guideline.	PROCU	5 years (2022 – 2026)	Strategy 2	A
2.1.6.	To strengthen the enforcement of multi-level review of documentation/applications by Supervisors.	GCB	2 years (2022 – 2023)	Strategy 2	A
2.1.7.	To enhance all BBD documents between customer and Bank including LO, FA, and on boarding documents to include Anti-bribery/No gift/Whistleblowing clauses.	GCB	5 years (2022 – 2026)	Strategy 2	A

Our OACP Framework

PRIORITY AREA: GOVERNANCE AND COMPLIANCE

Strategy 2 –To Inculcate Good Governance in BPMB Group

Strategic Objective 2.1: To Review and Enhance BPMB Group's Policies and Procedures

No.	Initiative	Implementor	Milestone Within	Strategy	Quadrant
2.1.8.	To review and enhance out-dated procedures (Business Products Manual).	PROD	3 years (2022 – 2024)	Strategy 2	A
2.1.9.	To review and enhance the existing AA in ensuring controls and governance structure are in place.	GRC	3 years (2022 – 2024)	Strategy 2	A
2.1.10.	To ensure compliance and conduct continuous awareness on policy and procedures within GRC staff.	GRC	5 years (2022 – 2026)	Strategy 2	A
2.1.11.	To strengthen the effective communication on new issued procedures to GRC staff.	GRC	5 years (2022 – 2026)	Strategy 2	A
2.1.12.	To strengthen the enforcement of checker-maker arrangement (2 layers of review) for optimum supervision in updating policy and procedure.	CA	5 years (2022 – 2026)	Strategy 2	A
2.1.13.	To establish a database for benchmarking according to the standard of practice.	MIND & Sustainability	5 years (2022 – 2026)	Strategy 2	B
2.1.14.	To ensure compliance and conduct continuous awareness on SOPs in administration & monitoring collection/payment.	RECO	5 years (2022 – 2026)	Strategy 2	A
2.1.15.	To ensure compliance with the existing SOPs concerning: i. Recovery's proposal process; and ii. Recovery's process in Appointment/Termination of Solicitors, Receivers & Managers and Consultants.	RECO	5 years (2022 – 2026)	Strategy 2	A
2.1.16.	To ensure compliance on Confidentiality by Whistleblowing Committee.	GC	1 year (2022)	Strategy 2	A

PRIORITY AREA: GOVERNANCE AND COMPLIANCE

Strategy 2 –To Inculcate Good Governance in BPMB Group

Strategic Objective 2.1: To Review and Enhance BPMB Group's Policies and Procedures

No.	Initiative	Implementor	Milestone Within	Strategy	Quadrant
2.1.17.	To strengthen the enforcement of the checker-maker process invalidating the Self-Testing Matrix (STM).	GC	2 years (2022 – 2023)	Strategy 2	A
2.1.18.	To establish specific policy on staff pinching.	GHR	3 years (2022 – 2024)	Strategy 2	A
2.1.19.	To revisit GHR SOPs on working hours to minimize/ strictly prohibit the attendance of staff at the office during the weekend.	GHR	5 years (2022 – 2026)	Strategy 2	A
2.1.20.	To exercise annual update (mandatory) of the following declarations for BPMB Group staff: i. Politically Exposed Person (PEP); ii. Financial interest with Connected Parties; and iii. Interest/ownership in business, assets.	GHR	3 years (2022 – 2024)	Strategy 2	A
2.1.21.	To impose the SOPs of GS&C that has been approved to ensure all team members being communicated in all projects.	GSC	3 years (2022 – 2024)	Strategy 2	A
2.1.22.	To review and enhance on the following: i. Policy on Corporate Strategic Plan; i. Procedure on Monitoring of Corporate Strategic Plan; and iii. Procedure on Review of Corporate Strategic Plan.	GSC	3 years (2022 – 2024)	Strategy 2	A
2.1.23.	To strengthen solicitor declaration by incorporating the element of the connected party(ies) with BPMB Group.	GL	2 years (2022 – 2023)	Strategy 2	A

Our OACP Framework

PRIORITY AREA: GOVERNANCE AND COMPLIANCE

Strategy 2 –To Inculcate Good Governance in BPMB Group

Strategic Objective 2.1: To Review and Enhance BPMB Group's Policies and Procedures

No.	Initiative	Implementor	Milestone Within	Strategy	Quadrant
2.1.24.	To implement declaration of interest in writing by minutes' writer.	GCS	1 year (2022)	Strategy 2	A
2.1.25.	To strengthen and incorporate the consequences/effects on breaching the SOP in Corporate Secretarial guideline.	GCS	3 years (2022 – 2024)	Strategy 2	A
2.1.26.	To incorporate new or existing directive in manual document which may require revalidation from MOF or BNM.	GCS	5 years (2022 – 2026)	Strategy 2	A
2.1.27.	To incorporate new or existing directive in manual document which may require revalidation from MOF or BNM.	PROCU	5 years (2022 – 2026)	Strategy 2	B
2.1. 28.	To enhance/revise the existing internal manuals to include the need to seek consent from the SC for the use of SC's e-signature.	GSM	2 years (2022 – 2023)	Strategy 2	B
2.1.29.	To strengthen the effective communication on new issued procedures to GSM staff.	GSM	2 years (2022 – 2023)	Strategy 2	A
2.1.30.	To strengthen the enforcement of checker-maker arrangement (2 layers of review) for optimum supervision.	GSM	5 years (2022 – 2026)	Strategy 2	A
2.1.31.	To incorporate new process flow in the existing internal manuals on the applicability of BNM/SC/SAC resolutions which may require revalidation of the issued rulings by BPMB Group Shariah Committee.	GSM	5 years (2022 – 2026)	Strategy 2	A
2.1.32.	To enhance/conduct revision on the existing internal manuals.	GSM	5 years (2022 – 2026)	Strategy 2	A

PRIORITY AREA: GOVERNANCE AND COMPLIANCE

Strategy 2 –To Inculcate Good Governance in BPMB Group

Strategic Objective 2.1: To Review and Enhance BPMB Group's Policies and Procedures

No.	Initiative	Implementor	Milestone Within	Strategy	Quadrant
2.1.33.	To incorporate GSM's Manual on the requirement to disclose conflict of interest or connected parties to HOF.	GSM	5 years (2022 – 2026)	Strategy 2	A
2.1.34.	To review and enhance Procedure on Corporate Website.	CCOM	1 year (2022)	Strategy 2	A
2.1.35.	To review and enhance CCOM SOPs on Media & Relations.	CCOM	3 years (2022 – 2024)	Strategy 2	A
2.1.36.	To ensure compliance with CCOM SOPs on due diligence process.	CCOM	5 years (2022 – 2026)	Strategy 2	A
2.1.37.	To establish periodic reminder in reviewing the SOP for each Function.	M&D	5 years (2022 – 2026)	Strategy 2	A
2.1.38.	To review the existing processes and procedures periodically i.e. every two (2) years.	M&D	5 years (2022 – 2026)	Strategy 2	B
2.1.39.	To enhance Sales & Marketing documents between customer and PLC, including LO, FA, and on boarding documents i.e. required Anti-bribery/No gift/Whistle blowing clauses.	PLC – SM	1 year (2022)	Strategy 2	A
2.1.40.	To enhance the Credit Operation Guideline (COG).	PLC	2 years (2022 – 2023)	Strategy 2	A
2.1.41.	To enhance the Procedure of Disbursement.	PLC – CA	5 years (2022 – 2026)	Strategy 2	A
2.1.42.	To enhance PLC's Authority Matrix, i.e., ACAM.	PLC	1 year (2022)	Strategy 2	A

Our OACP Framework

PRIORITY AREA: GOVERNANCE AND COMPLIANCE

Strategy 2 –To Inculcate Good Governance in BPMB Group

Strategic Objective 2.2: To Enforce Consequence Management For Non-Compliance Activities

No.	Initiative	Implementor	Milestone Within	Strategy	Quadrant
2.2.1.	To impose action on responsible officers and supervisors in accordance to consequence management framework.	GHR	5 years (2022 – 2026)	Strategy 2	B

PRIORITY AREA 3: BPMB GROUP'S ACTIVITIES

Strategy 3 – To Enhance the Efficiency and Transparency in BPMB Group's Activities

Strategic Objective 3.1: To Enhance the Efficiency and Transparency in BPMB Group's Business Activities Through Enhancement of Main Processes

No.	Initiative	Implementor	Milestone Within	Strategy	Quadrant
3.1.1.	To incorporate new or existing directive in Letter of Award (LOA) which may require revalidation from the regulator i.e. BNM.	PROCU	2 years (2022 – 2023)	Strategy 3	A
3.1.2.	To strengthen the enforcement and standardisation of memorandum format in payment process.	PROCU	2 years (2022 – 2023)	Strategy 3	A
3.1.3.	To strengthen the enforcement of checker-maker arrangement i.e. 3 layers of checking process in finalising tender document.	PROCU	3 years (2022 – 2024)	Strategy 3	A
3.1.4.	To ensure compliance on Procurement policy and procedures specifically on tender process when engaging with parties to appoint/select consultant.	PROCU	5 years (2022 – 2026)	Strategy 3	A
3.1.5.	To implement portfolio rotation in monitoring tender activities to procurement staff.	PROCU	5 years (2022 – 2026)	Strategy 3	A
3.1.6.	To ensure compliance in handling data confidentiality and sensitivity during procurement process with vendor.	PROCU	5 years (2022 – 2026)	Strategy 3	A
3.1.7.	To establish an initiative to speed up the execution process i.e. formalize the follow-up with acknowledgement by HOF.	PROCU	5 years (2022 – 2026)	Strategy 3	A
3.1.8.	Marketing activities attended together with team leaders and tracked through Call Memo.	GCB	5 years (2022 – 2026)	Strategy 3	A

Our OACP Framework

PRIORITY AREA 3: BPMB GROUP'S ACTIVITIES

Strategy 3 – To Enhance the Efficiency and Transparency in BPMB Group's Activities

Strategic Objective 3.1: To Enhance the Efficiency and Transparency in BPMB Group's Business Activities Through Enhancement of Main Processes

No.	Initiative	Implementor	Milestone Within	Strategy	Quadrant
3.1.9.	To impose multi-level review on documentation/ applications/Supervision/reviewed by Supervisors.	GCB	5 years (2022 – 2026)	Strategy 3	A
3.1.10.	To strengthen the enforcement of IT security access control (through authorize ID) on the project document.	IT	2 years (2022 – 2023)	Strategy 3	A
3.1.11.	To closely monitor the progress on the identification of GSM Key Personnel.	GSM	2 years (2022 – 2023)	Strategy 3	B
3.1.12.	To enhance security at room Bank's strategy Products.	GSC	3 years (2022 – 2024)	Strategy 3	B
3.1.13.	To implement portfolio rotation within client management staff.	CM	5 years (2022 – 2026)	Strategy 3	B
3.1.14.	To incorporate in Zakat relevant document such as SOP on the need to have backup arrangement for the performance of due diligence in view of concentration risk and transfer of knowledge to other staff within GSM.	GSM	1 year (2022)	Strategy 3	B
3.1.15.	To develop proper policy and procedure on Zakat distribution management.	GSM (Zakat Management)	1 year (2022)	Strategy 3	B
3.1.16.	To establish/introduce a template for the purpose of recording and justifying the approval/clearance provided by Shariah Committee.	GSM	2 years (2022 – 2023)	Strategy 3	A

PRIORITY AREA 3: BPMB GROUP'S ACTIVITIES

Strategy 3 – To Enhance the Efficiency and Transparency in BPMB Group's Activities

Strategic Objective 3.1: To Enhance the Efficiency and Transparency in BPMB Group's Business Activities Through Enhancement of Main Processes

No.	Initiative	Implementor	Milestone Within	Strategy	Quadrant
3.1.17.	To strengthen the supervision of staff in conducting due diligence process of zakat applicants.	GSM (Zakat Management)	5 years (2022 – 2026)	Strategy 3	A
3.1.18.	To conduct Annual Assessment of Shariah Committee.	GSM	5 years (2022 – 2026)	Strategy 3	A
3.1.19.	To conduct annual ABMS internal audit.	GC	5 years (2022 – 2026)	Strategy 3	A
3.1.20.	To facilitate renewal of ABMS ISO 37001:2016 certification.	GC	5 years (2022 – 2026)	Strategy 3	A
3.1.21.	To monitor the implementation of the OACP for BPMB Group.	GC	5 years (2022 – 2026)	Strategy 3	A
3.1.22.	To ensure minutes are circulated as per the agreed Turn-Around-Time (TAT).	GCS	1 year (2022)	Strategy 3	A
3.1.23.	To implement job rotation – same auditor cannot perform the audit for 2 consecutive years.	GIA	5 years (2022 – 2026)	Strategy 3	A
3.1.24.	Stricter control to ensure maker checker by respective Function to be stated in the SOP.	GIA	5 years (2022 – 2026)	Strategy 3	A
3.1.25.	Daily monitoring of Treasury trade position.	TREA	5 years (2022 – 2026)	Strategy 3	B
3.1.26.	Daily monitoring of Money Market interbank rates.	TREA	5 years (2022 – 2026)	Strategy 3	B

Our OACP Framework

PRIORITY AREA 3: BPMB GROUP'S ACTIVITIES

Strategy 3 – To Enhance the Efficiency and Transparency in BPMB Group's Activities

Strategic Objective 3.1: To Enhance the Efficiency and Transparency in BPMB Group's Business Activities Through Enhancement of Main Processes

No.	Initiative	Implementor	Milestone Within	Strategy	Quadrant
3.1.27.	To ensure the FX transaction rates must be within daily reported ranges (MYR).	TREA	5 years (2022 – 2026)	Strategy 3	B
3.1.28.	To impose declaration on Spouse/Relative working in the Financial Market (On boarding/Annual).	TREA	5 years (2022 – 2026)	Strategy 3	B
3.1.29	Full disclosure of bids and pricing of market participants by Lead Manager(s) on regular basis throughout bidding exercise.	TREA	5 years (2022 – 2026)	Strategy 3	B
3.1.30.	Counterchecking of Treasury critical reports and ratios.	TREA	5 years (2022 – 2026)	Strategy 3	B
3.1.31.	Monthly reconciliation of key performance figures and ratios reports to ALCO.	TREA	5 years (2022 – 2026)	Strategy 3	B
3.1.32.	Treasury Management System (TMS) Enhancement.	TREA	5 years (2022 – 2026)	Strategy 3	B
3.1.33.	To improve the asset store security system by adding CCTV at the store door.	IT	3 years (2022 – 2024)	Strategy 3	A
3.1.34.	To implement portfolio rotation within IT Function.	IT	5 years (2022 – 2026)	Strategy 3	B
3.1.35.	To develop IT Asset Inventory System for tracking.	IT	5 years (2022 – 2026)	Strategy 3	B

PRIORITY AREA 3: BPMB Group's Activities

Strategy 3 – To Enhance the Efficiency and Transparency in BPMB Group's Activities

Strategic Objective 3.2: To Strengthen the Strategic Alliance with Internal and External Parties in Combating Bribery and Corruption Through Frequent Communication

No.	Initiative	Implementor	Milestone Within	Strategy	Quadrant
3.2.1.	To increase the frequency of engagement sessions between the Business Product Team and Business Banking or external parties in designing/developing new Products.	PROD	5 years (2022 – 2026)	Strategy 3	B
3.2.2.	To increase the frequency of engagement sessions between the Business Product Team and Business Banking.	PROD	5 years (2022 – 2026)	Strategy 3	B
3.2.3.	Discussion session to be held between Business Product Team and Authorities (on case-to-case basis).	PROD	5 years (2022 – 2026)	Strategy 3	A
3.2.4.	To increase the frequency of engagement sessions between regulators and MOF to understand their concerns/expectations.	GSC	5 years (2022 – 2026)	Strategy 3	B

Chapter 3

Empowering Anti-Corruption Efforts

Empowering Anti-Corruption Efforts

BPMB Group's Approach on Implementation, Monitoring & Evaluation Mechanisms

"The BPMB Group's OACP is a living document that has been developed for the purpose of ensuring its effectiveness on the implementation of the initiatives by all relevant Functions and subsidiaries. It aims to contribute and reform the anti-corruption strategies in BPMB Group."

Empowering Anti-Corruption Efforts

Implementation Mechanism

Execution Tier

Owners of the respective initiatives will collaborate with DCO to carry out the OACP's initiatives and provide updates on their progress to FII to ensure the Plan's success.

The implementation mechanism focuses on the following tasks:

- Assessing corruption risks;
- Endorsement of Policies and Procedures;
- Execution of programmes and activities;
- Monitoring and evaluation of performances.

Supervision Tier

FII to monitor all initiatives are executed adequately and in accordance to the timeline stated in the OACP.

Coordination and Monitoring Mechanism

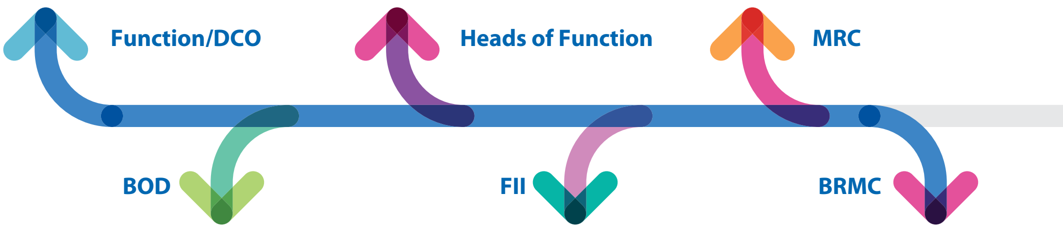
The initiatives implementation progress is continuously tracked and assessed to determine successful implementation via an annual progress report.

On an annual basis, FII will evaluate the completed initiatives to gauge their effectiveness and update the OACP document should there is necessary changes to the initiatives' activities with a view to ensure all identified risks are appropriately managed.

Evaluation Mechanism

Evaluation process is required to ensure that each initiative and activity carried out successfully addresses the potential risks and meets the objectives of the BPMB Group's OACP.

BPMB Group leverages on the existing monitoring system and platform with a clear demarcation of roles and reporting line in implementing the OACP based on a mechanism as shown in the accompanying chart.



Governance Structure on The BPMB Group's OACP 2022 – 2026

BOD

- To be notified on the outcome of the initiatives and plans for BPMB Group's report by BRMC.
- Provide any suggestion or input on the outcome of initiatives and implementation plans.

BRMC

BRMC is the committee responsible to oversee the framework through notification of the report tabled at MRC.

- Status on the performance and implementation of the initiatives made on the action plan;
- Information on the implementation of the action plans; and
- Suggest or acknowledge the best effort to any solution of the initiatives.

MRC

MRC is the committee responsible to oversee the whole progress of the framework including its initiatives:

- Approval of the proposal paper on the BPMB Group's OACP as presented by FII;
- Evaluate on the quantitative and qualitative on all the action plans;
- Monitor the performance of the initiatives based on the timeline;
- Scrutinize the goals of the OACP for BPMB Group by assessing strategies and initiative; and
- Reporting the progress on yearly basis.

FII

- Qualitative and quantitative measures of all initiatives.
- Acts as a secretariat to monitor and track the implementation of the action plans; and
- Prepare the progress report to MRC, BRMC & BOD on yearly basis.

DCO

- Periodic updates on the action plan to the OACP Secretariat; and
- Qualitative and quantitative measures of all initiatives.

Chapter 4

Conclusion

Conclusion

"Financial Intelligence and Integrity, Group Risk and Compliance would like to express our heartiest appreciation and special thanks to those who have contributed in the development of the BPMB Group's OACP for year 2022 – 2026."

The success of the BPMB Group's OACP 2022 – 2026 in the next five (5) years can strengthen the direction of the organisation in improving governance, integrity and anti-corruption controls within the BPMB Group.

A total of 131 plans and initiatives were outlined to be implemented in ensuring that issues of governance, integrity, and anti-corruption are adequately managed over the next five (5) years.

Through the approach of three (3) strategies formulated, the action plan will act as an instrument in ensuring that all measures and efforts to eradicate the crime of corruption can be materialised. The plan will also be constantly reviewed and revised to reflect current changes.

Finally, the BPMB Group's OACP 2022 – 2026 will serve as a guide and reference for all BPMB Group's staff in an endeavor to promote and strengthen governance, integrity, and anti-corruption in daily business operations.

Our Appreciation

Special thank you to the relevant Functions/Agency for providing invaluable information, analysis and strong support:

1. Interim Chairman of BPMB Group, YBhg. Datin Rashidah Mohd Sies
2. Board of Directors
3. Group Chief Executive Office Roni L. Abdulwahab
4. Senior Leadership Team of BPMB Group
5. Heads of Function
6. BPMB Group Subsidiary(ies)
7. Task force Members and Designated Compliance Officers (DCOs)
8. Financial Intelligence and Integrity, Group Risk and Compliance
9. Malaysian Institute of Integrity

Secretariat of BPMB Group's OACP

1. Jason Goay Ngee Chiew
2. Rohayati Talaha@Talha
3. Ali Ab Hamid
4. Ismail Abdul Karim
5. Nur'Ain Zainal
6. Jeffri Ashari
7. Shahrizad Sulaiman
8. Juliana Md Isa

Conclusion

Taskforce Members and Designated Compliance Officers (DCOs)

No.	Taskforce Members	Function/Subsidiary
1.	Ahmad Reza Bin Kamaruddin	Group Human Resources
2.	Mohd Salehuddin Mohd Bhokhari	Corporate Secretarial
3.	Zalmanizam Mahadi	Group Legal
4.	Raja Nur Izzati Raja Azhar	Group Risk and Compliance
5.	Rashid Hassan Graham Brown Mohd Asri Sanmehad	Group Corporate Banking
6.	Ng Thong Yoong	Group CEO's Office
7.	Nurul Wahidah Rosli	Group Shariah Management
8.	Sarifah Ahmad Nuri	Group Internal Audit
9.	Nor Ariza Abd Rahim	Corporate Planning
10.	Nor Sham Bin Soyod	Corporate Communication
11.	Soleha Mohd Isa	Products Development
12.	Mohd Rizal Rozhan	MIND and Sustainability
13.	Iam Nazir Ibrahim	Group Treasury & Investments
14.	Shariffah Noraziah Al-Idid Binti Syed Sidi Idid	Finance
15.	Nurul Adani Yasid	Procurement
16.	Amreen Bin Mohamed	Recovery
17.	Muhammad Amir Sahri	Group Information Technology
18.	Fairul Ihzan Binti Khalil	Credit Administration
19.	Navathilagan Subramaniam	Property Management and Services
20.	Shahruddin Masman	Manual and Documentations
21.	Soo Wai Ming	Group Credit Risk
22.	Muhammad Danish Hafiz Ibrahim	
23.	Wan Nordalia Wan Mohamad Nasir	Group Coverage
24.	Harman Saringat	Pembangunan Leasing Corporation
25.	Norimi Musa	
26.	Nurul Hana Mohamad Zin	
27.	Mohamad Nizam Ishak	
28	Mohd Kamal Redzuan Musa	

Gallery

ABMS Awareness Training Program

ABMS Internal Audit Workshop

OACP Workshop

Development of Organisational Anti-Corruption Plan for BPMB Group 2022 – 2026 was conducted by Mr. Umar Chong, Consultant from Institute Integrity Malaysia (IIM) and attended by Designated Compliance Officer (DCOs).

Gallery

Ikrar Bebas Rasuah (IBR)

Anti-Bribery Management System's Kick Off Meeting

A kick off meeting on Anti-Bribery Management System (ABMS) Project for BPMB Group was delivered by Institute Integrity Malaysia and attended by BPMB Board of Directors.

Compliance Awareness Week: Towards A Sustainable Compliance Culture

The ceremony of "Ikrar Bebas Rasuah" (IBR) signed by the Former of President/ Group Chief Executive Officer, BPMB Group, En. Arshad Mohamed Ismail and witnessed by Mr. Razali Bin Khamis, Auxilliary Police MACC.

Integrity Awareness by the Former Magistrate, Mr. Mohd Firdaus Ramlan to BPMB Group staff

Coffee Talk Session with Business Associates

Study Visit to MACC

Corruption Risk Assessment Workshop

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Launching of BPMB Group Towards Certification on MS ISO 37001: 2016 ABMS

Surveillance Audit by SIRIM

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