



Chartered Institute of Islamic Finance Professionals
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ANTI-BRIBERY & CORRUPTION POLICY & PROCEDURES

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1.0 ANTI-BRIBERY AND CORRUPTION COMMITMENT

1.1 Policy Statement

The CIIF is committed to applying the highest standards of integrity, ethical conduct, and accountability in all our business activities and operations, ensuring that there is cohesive alignment with our Mission and Vision. This Anti-Bribery and Corruption Policy aims to prevent the occurrence of bribery and corrupt practices in relation to the businesses of the CIIF. This policy statement applies to all CIIF Personnel (employees), members, affiliates, business associates, stakeholders, and partners of the CIIF. Third parties engaged to represent the CIIF's interests must comply with the principles set out in the policy.

The CIIF is committed to:

- Zero tolerance on bribery and corruption culture at all levels including third parties;
- Comply with the requirements of Anti-Bribery and Corruption Policy and Procedures;
- Comply with CIIF Employee Code of Conduct (ECoC); and
- Comply with the requirements of all applicable laws.

The Grand Councillors and Senior Management of the CIIF are committed to implementing and enforcing effective policies and procedures to detect, prevent, monitor, and eliminate any form of bribery and corruption, and to the continuous improvement of Anti-Bribery Management System (ABMS). Legal and Governance Unit is assigned with the responsibility and authority to oversee the implementation of the CIIF's Compliance and Integrity program and the ABMS, with direct access to the Grand Council and management for issues relating to bribery and corruption.

CIIF Personnel and others acting for and on behalf of the CIIF are strictly prohibited from directly and indirectly soliciting, accepting, or offering bribes in relation to the CIIF's business dealings and operations. Those who fail to comply with the ECoC and/or applicable laws will be subject to the appropriate consequence management process. Each personnel have a duty to read and understand the Policy. Non – compliance with and violation of the Policy by an employee may result in disciplinary action by the CIIF in accordance with its policies, procedures, directives, and guidelines and/or initiation of legal proceeding against those involved.

The CIIF provide channels and encourage reporting for all employees and members of the public to disclose any improper conduct within the CIIF, which is governed by the CIIF's Whistleblowing Policy.

This policy statement shall be reviewed and updated from time to time in compliance with the requirements of all applicable laws.

1.2 Corporate Integrity Pledge

Everyone subject to this policy and procedures shall take cognisance and abide for the CIIF Corporate Integrity Pledge included in **Appendix 2** of this policy and procedure. This policy and procedure is an extension of the CIIF Corporate Integrity Pledge.

2.0 OBJECTIVE

- 2.1 This Policy sets out the CIIF's overall position on bribery and corruption in all its forms. It also sets out the reasonable and proportionate measures to ensure the CIIF does not engage in corrupt practices for its own advantage or benefit.

3.0 SCOPE

- 3.1 This Anti-bribery and corruption policy applies to all CIIF Personnel, members, consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with the CIIF (including third parties), or any of the CIIF chapters or their employees, no matter where they are located (within or outside of Malaysia). The policy also applies to Officers, Grand Council, and/or Committee members at any level.
- 3.2 In the context of this policy, third party refers to any individual or organisation that the CIIF meets and works with. It refers to actual and potential members, customers, suppliers, affiliates, training providers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.
- 3.3 Any arrangements the CIIF makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.
- 3.4 This Policy shall be read in conjunction with the CIIF Employee Code of Conduct, the CIIF Whistleblowing Policy, the CIIF Third Party Code of Conduct, and the Malaysian Anti-Corruption Commission Act 2009 and its 2018 amendment ("MACCA").

4.0 ABBREVIATIONS AND DEFINITIONS

4.1 Abbreviations

Term	Definition
ABC	Anti-bribery and corruption
CIIF	Chartered Institute of Islamic Finance Professionals
CEO	Chief Executive Officer of the CIIF
COC	CIIF Code of Conduct Policy
GC	Grand Council constituted for the management of the affairs of the CIIF
GEH	Gifts, Entertainment and Hospitalities
IO	Integrity Officer role

Term	Definition
LGU	Legal and Governance Unit
WBP	CIIF Whistle Blowing Policy
MACCA	Malaysian Anti-Corruption Commission Act 2009, any amendments, supplements, regulations, Orders, prescriptions, and guidelines issued thereunder

4.2 Definitions

In this document, the following words shall have the meaning hereby assigned to them except where the context otherwise requires:

Term	Definition
ABC Policy & Procedures or policy & procedures	these policy and procedures
Bribery	<p>any act or omission considered as an offence of giving or receiving “gratification”. This may be in the form of offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person in a position of trust within an organisation.</p> <p>“Gratification” is as defined in the paragraph 3 of MACCA as follows:</p> <p><i>(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;</i></p> <p><i>(b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;</i></p> <p><i>(c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;</i></p> <p><i>(d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;</i></p> <p><i>(e) any forbearance to demand any money or money’s worth or valuable thing;</i></p> <p><i>(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</i></p> <p><i>(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).</i></p>

Term	Definition
	<p>Bribery may be “outbound”, ie someone who influences the actions of someone external, such as a Government official or important decision-maker in favour of the CIIF.</p> <p>It may also be “inbound”, where an external party is attempting to influence someone within the CIIF such as a decision-maker or someone with access to confidential information.</p>
Corruption	<p>bribery as defined above;</p> <p>abuse of entrusted power for personal gain as defined by Transparency International; or</p> <p>acts of extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.</p>
Business Associates (Third Party)	any party with which the organisation has, or plans to establish, some form of business relationship, including but not limited to members, clients, joint venture partners, consortium partners, contractors, consultants, sub-contractors, suppliers, service providers, vendors, advisors, agents, distributors, representatives, intermediaries, and any other persons or entities who provide work, goods or services or act for or on behalf of the CIIF ("Third Parties").
He/His	Denote both male and female
Gifts	Cash, cash equivalents, personalised gifts, bonds, commissions, negotiable securities, personal loans, travel package, airline tickets, usage of vacation property, vouchers, shares, or anything of pecuniary value
Entertainment	<p>(a) The provision of recreation; or</p> <p>(b) The provision of accommodation or travel in connection with or for the purpose of facilitating entertainment of the kind mentioned in item (a) above, with or without consideration paid whether in cash or in kind, in promoting or in connection with a trade or business activities and/or transactions</p>
Facilitation Payment	payment or other provision made (eg extravagant gifts, meals or favours of value) personally to an individual in the CIIF in control of a process or decision or given by an individual in the CIIF to other parties in control of a process or decision in order to secure or expedite a routine or administrative duty or function.
CIIF Personnel	A person employed by the CIIF, whether confirmed in a position or on probation, or any other person employed on contract, temporary basis or secondment or appointed by the CIIF (inclusive of interns and apprentices)

5.0 RESPONSIBILITY

- 5.1 All CIIF Personnel including the GC members are required to adhere to this policy at all times.
- 5.2 All the CIIF personnel including its directors, and directors and personnel of its controlled organisations are required to carry out those responsibilities and obligations relating to the CIIF's anti-bribery and corruption stance, alongside those already in existence, which includes the following:
 - 5.2.1 Be familiar with applicable requirements and directives of the policy and communicate them to subordinates;
 - 5.2.3 Promptly record all transactions and payments in the CIIF's books and records accurately and with reasonable detail;
 - 5.2.4 Ask the LGU if any questions about this policy arise or if there is a lack of clarity about the required action in a particular situation;
 - 5.2.5 Always raise suspicious transactions and other "red flags" (indicators of bribery or corruption) to immediate superiors for guidance on the next course of action;
 - 5.2.6 Be alert to indications or evidence of possible violations of this policy;
 - 5.2.7 Promptly report violations or suspected violations through appropriate channels;
 - 5.2.8 Attend and complete required anti-bribery and corruption training as required according to position; and
 - 5.2.9 Not misuse their position or the CIIF's name for personal advantage.
- 5.3 When dealing with business associates, all the CIIF personnel shall not:
 - 5.3.1 express unexplained or unjustifiable preference for certain parties;
 - 5.3.2 make any attempt at dishonestly influencing their decisions by offering, promising or conferring advantage;
 - 5.3.3 exert improper influence to obtain benefits from them;
 - 5.3.4 directly or indirectly offer or make promise or corrupt payments, in cash or in kind for a specific favour or improper advantage from them.
- 5.4 When dealing with external parties in a position to make a decision to the CIIF's benefit (such as a Government official or client), the CIIF personnel shall not:
 - 5.4.1 offer, promise or make any attempt at dishonestly influencing the person's decision by directly or indirectly offer or make promise of corrupt payments, in cash or in kind;
 - 5.4.2 be involved in any discussions regarding business or employment opportunities, for their own personal benefit or for the benefit of the external party;
 - 5.4.3 otherwise abuse the decision-making and other delegated powers given by the top management, in order to illicitly secure an outcome which would be to the commercial advantage to themselves and/or the CIIF; and
 - 5.4.4 exert improper influence to obtain personal benefits from them.

- 5.5 The CIIF's managers and senior management have a particular responsibility to ensure that the ABMS requirements are applied and complied with within their department or function and to monitor compliance with the policy. They also must ensure that subordinates in 'Exposed Positions' attend and complete relevant training.
- 5.6 Head of Legal and Governance Unit ("LGU") and the team are the owner of this policy and are responsible for the review and update of this policy, which is to be done at least once in two (2) years or as and when required by the Management to ensure it is in compliance with the latest requirements.

6.0 INTRODUCTION

- 6.1 The Anti-Bribery and Corruption Policy ("ABC Policy" and/or "the Policy") has been developed as part of the CIIF's Anti-Bribery Management System (ABMS) which has been designed to align with the requirements set out in the ISO 37001:2016. Having a clear and unambiguous policy statement on the Company's position regarding bribery and corruption forms the cornerstone of an effective integrity management system. The policy should thus be read in conjunction with the ISO as well as the Company's various policies & guidelines. If multiple documents speak on the same subject, then the more stringent provision always applies.
- 6.2 The nature of the CIIF's activity requires its personnel to engage in business with a wide range of parties, both internal as well as external. This Policy establishes the boundaries on interactions with all parties.
- 6.3 The CIIF's Anti-Bribery and Corruption Policy leverages the core principles set out in the Code of Conduct. The scenarios provided within this Policy do not limit the boundaries of the Policy which may be extended to cover all circumstances relating to bribery.
- 6.4 The CIIF Personnel shall uphold high levels of personal and professional values in all business interactions and decisions.

7.0 ANTI-BRIBERY AND CORRUPTION POLICY

- 7.1 Bribery and corruption in all its forms as it relates to the CIIF's activities is prohibited. Employees should be aware of the definitions as given in this Policy and the range of activities these could possibly cover.
- 7.2 Bribery and corruption may take the form of anything of value, such as money, goods, services, property, privilege, employment position or preferential treatment.
- 7.3 The CIIF personnel and its business associates shall not therefore, whether directly or indirectly, offer, give, receive or solicit any item of value, in the attempt to illicitly influence the decisions or actions of a person in a position of trust within an

organisation, either for the intended benefit of the CIIF or the persons involved in the transaction.

- 7.4 The anti-bribery and corruption statement apply equally to its business dealings with commercial ('private sector') and Government ('public sector') entities, and includes their directors, personnel, agents and other appointed representatives at all levels. Even the possible appearance of bribery or corruption is to be avoided, in particular when dealing with Government officials.
- 7.5 The anti-bribery and corruption statement apply to all countries worldwide, without exception and without regard to regional customs, local practices or competitive conditions.
- 7.6 No employee or external party will suffer demotion, penalty or other adverse consequences in retaliation for refusing to pay or receive bribes or participate in other illicit behaviour.
- 7.7 The CIIF is also committed to conducting due diligence checks on prospective personnel, particularly as it relates to appointments to positions where a more than minor bribery or corruption risk has been identified.

8.0 RECOGNITION OF LOCAL AND INTERNATIONAL LEGISLATION

- 8.1 The CIIF is committed to conducting its business ethically and in compliance with all applicable laws and regulations in the countries where it does business.
- 8.2 These laws include but are not limited to the Malaysian Penal Code (revised 1977) (and its amendments), the Malaysian Anti-Corruption Commission Act 2009 (MACCA) and its amendments, the Companies Act 2016, the US Foreign Corrupt Practices Act 1977 (amended 1998), Anti-Money Laundering and Anti-Terrorism Financing Act 2001 (AMLATFA), and the UK Bribery Act 2010. These laws prohibit bribery and acts of corruption, and mandate that companies establish and maintain accurate books and records and sufficient internal controls.
- 8.3 In cases where there is a conflict between mandatory laws and the principles contained in this and other policies, the law shall prevail.

9.0 GIFTS, ENTERTAINMENT, AND HOSPITALITIES

- 9.1 An occasional gift or offer of entertainment is often viewed as a normal part of doing business. But sometimes even a well-intentioned gift or offer can cross the line. Any gift that creates a sense of obligation or compromises the CIIF Personnel professional judgment should be avoided.

- 9.2 The CIIF Personnel must ensure they follow the rules and be aware of any special restrictions. For example, giving anything of value to a government official may be prohibited.
- 9.3 All parties should always use good judgment and turn down any offer if it is being given to influence a decision or if it would give the appearance of something improper, even if it is within the value limits that may be acceptable to the CIIF. This situation should be reported to the Legal and Governance Unit.
- 9.4 All parties must never (directly or indirectly) ask for, accept or receive (whether for his/her own benefits or otherwise) any gratification (tangible or intangible gifts, services, gratuities, monies, properties, free passages, travel facilities, entertainment, corporate hospitalities of the likes), which are in any way related to the performance of his/her official duties from any party, as part of a reward or consideration for the work done.
- 9.5 Where there is the slightest doubt in the genuineness and purpose in situations warranting the giving/receiving of gifts, entertainment, and hospitalities reference should be made to CEO of the CIIF, for eventual escalation to the GC.
- 9.6 The CIIF has a policy against making or receiving hospitality or contributions of any kind to or from political parties, political committees, candidates or political causes using Institute's resources (including monetary and in-kind services), even where permitted by law.
- 9.7 However, **tokens of appreciations, gifts and souvenirs which are normally considered as corporate gifts** of insignificant value and are provided or given to all participants in the same capacity are not considered as GEH. Examples include complimentary flight and accommodation that are provided to all speakers at events, fees and complimentary food and beverages provided to all speakers or participants.
- 9.8 The only form of gift-giving allowed to external parties is a corporate gift. Any gift-giving or event of hospitality is subject to approval according to the Limits of Authority and must fulfil the following conditions:
- 9.8.1 They are limited, customary and lawful under the circumstances;
 - 9.8.2 They do not have or are perceived to have (by either the giver or the receiver), any effect on actions or decisions;
 - 9.8.3 There must be no expectation of any specific favour or improper advantages from the intended recipients;
 - 9.8.4 The independent business judgment of the intended recipients must not be affected;
 - 9.8.5 There must not be any corrupt/criminal intent involved. The giving out of the gift and hospitality must be done in an open and transparent manner;
 - 9.8.6 The giving out of the gift and hospitality must be done in an open and transparent manner.

- 9.9 It is the CIIF's policy that no Employee or his relative shall accept any form of gifts (except for Corporate Gifts) or favours from Business Associates (third parties) having business dealing with the CIIF, if it could be perceived as intended to, or likely to, influence him in the fair, impartial and efficient discharge of their duties.
- 9.10 Gifts should only be offered to and received in connection with a customary business or cultural occasion (cash, loans, kickbacks or the equivalent advantages are absolutely prohibited). For avoidance of doubt, **Gifts must not exceed RM500.00** and in any event, must not occur more than **3 times a year** with the same person or organisation.
- 9.11 CIIF Personnel shall not accept any gratuitous entertainment from any of the third parties. When dealing with third parties, set clear expectations and actively monitor the work of third parties doing business on the CIIF's behalf. Do not pay any kind of "facilitating or grease payment" (to obtain routine services from third parties) and speak up if a bribe is suspected.
- 9.12 Third parties dealing with the CIIF should refer to the CIIF's Third Party Code of Conduct available on CIIF's website.
- 9.13 **Procedure**
- 9.13.1 CIIF Personnel shall report/declare all gifts received from Business Associates to their immediate superior by filling up a Gift Declaration Form (**Appendix 3**) and in case of doubt, shall consult the respective Heads of Departments and/or LGU in respect of the purpose or nature of the gift, entertainment or hospitality given to them. The Head of Units/Departments and/or LGU, if decided such gift is not appropriate and against the CIIF's policy, shall instruct the CIIF Personnel to return the Gifts to the giver or provide any other instructions that he thinks fit.
- 9.13.2 The completed Gift Declaration Form must be submitted to LGU for record purposes.

10.0 FACILITATIONS PAYMENT

- 10.1 The CIIF adopts a strict policy of prohibiting the use of facilitation payments in its business. Facilitation payment is a payment or other provision made personally to an individual in control of a process or decision. It is given to secure or expedite the performance of a routine or administrative duty or function.
- 10.2 The CIIF prohibits accepting or obtaining, either directly or indirectly, facilitation payments from any person for the benefit of himself or for any other person. The CIIF views facilitation payments as seriously as bribery and corruption.
- 10.3 Personnel shall decline to make the payment and report to LGU immediately when they encounter any requests for a facilitation payment. In addition, if a payment has

been made and personnel are unsure of the nature, the LGU must be notified immediately, and the payment recorded accordingly.

- 10.4 Any individual with any suspicious, concerns or queries regarding a payment made on behalf of the CIIF or improper business practices, he should raise these by reporting to the CIIF Management via the channel as outlined in the CIIF WBP.
- 10.5 **Specific Procedures relating to facilitation payments involving extortion or other criminal “pressure”:**
 - 10.5.1 The CIIF recognises that, despite strict policy on facilitation payments, the CIIF may face a situation where avoiding a facilitation payment may put the individual or his family’s personal security at risk. Under these circumstances, the following steps must be taken:
 - a. Keep a record of the details of the incident and reason for the payment
 - b. Surrender such payments to Head of Finance of CIIF;
 - c. Immediately report this incident to head of unit; and
 - d. If appropriate, or if required by law, reporting the payment to the relevant authorities.
- 10.6 Any CIIF Personnel having any suspicions, concerns or queries regarding a payment made on the CIIF’s behalf, or on any perceived improper business practices, he should raise these by reporting to the CIIF Management via the channel as outlined in the CIIF’s WBP.

11.0 LETTER OF SUPPORT AND RECOMMENDATION

- 11.1 **Receiving support letters**
 - 11.1.1 The CIIF may from time to time receive support letters from suppliers, vendors or business associates. As a rule, the CIIF awards contracts and employee positions purely on a merit basis. Therefore, support letters in all forms shall not be recognised as part of the CIIF’s business decision-making process.
 - 11.1.2 The CIIF does not entertain support letters and requests for special privileges. The CIIF shall prevent external parties from using their position to influence the CIIF’s decision-making for personal gain including for their family and friends.
 - 11.1.3 If one receives support letters, one should then immediately lodge a report to the LGU for their further action, with the immediate supervisor copied in the report.
- 11.2 **Issuing support letters**
 - 11.2.1 The letters of support or recommendation may be issued for the following purposes:
 - a. Status of Employment/ Employment confirmation
 - b. Reference Letter – eg: testimonial of performance/work attitude

- c. Confirmation of Membership status (for verification)
 - d. Letter of Support for members (eg: members contribution and support throughout their membership with the CIIF)
- 11.2.2 Letters of support or recommendation may not be issued for any reasons outside of the above.
- 11.2.3 In the case where a CIIF Personnel has issued a letter of support to the requestor, one should also report the matter directly to LGU or alternatively, through the whistleblowing channels.

12.0 RECRUITMENT, PROMOTION AND SUPPORT OF PERSONNEL

- 12.1 The CIIF recognises the value of integrity in its personnel and business associates. The CIIF's recruitment, training, performance evaluation, remuneration, recognition and promotion for all the CIIF personnel, including management, shall be designed and regularly updated to recognise integrity.
- 12.2 The recruitment of Personnel should be based on approved selection criteria to ensure that only the most qualified and suitable individuals are employed. This is crucial to ensure that no element of corruption is involved in the hiring of employee.
- 12.3 In addition to this, proper background checks (eg: via e- Sistem Tapisan Keutuhan (eSTK)/MACC portal) should be conducted in order to ensure that the potential Personnel has not been convicted in any bribery or corruption cases. More detailed background checks should be taken when hiring Personnel and this includes promoted and transferred Personnel that would be responsible in management positions, as they would be tasked with decision making obligations.
- 12.4 The CIIF does not offer employment to prospective personnel in return for their having improperly favoured the CIIF in a previous role.
- 12.5 Any potential conflict of interest during the recruitment process should be declared accordingly to CIIF Human Resource. Proper approval process should be adhered to, aligned with the internal recruitment procedures.
- 12.6 In relation to of its personnel, the CIIF shall implement procedures such that:
- 12.6.1 conditions of employment require the CIIF personnel to comply with the ABC Policy and ABMS, and give the organisation the right to discipline personnel in the event of non-compliance;
 - 12.6.2 within a reasonable period of their employment commencing, the CIIF personnel receive a copy of, or are provided access to, the ABC Policy and training in relation to the policy;
 - 12.6.3 the CIIF has Handling Disciplinary Problems Policy and Procedures which enable it to take appropriate disciplinary action against the personnel who violate the ABC Policy and ABMS;

- 12.6.4 the personnel will not suffer retaliation, discrimination or disciplinary action (Eg: by threats, isolation, demotion, preventing advancement, transfer, dismissal, bullying, victimisation, or other forms of harassment) for:
- a. refusing to participate in, or turning down, any activity in respect of which they have been reasonably judged there to be a more than a low risk of bribery that has not been mitigated by the CIIF; or
 - b. concerns raised or reports made in good faith, or on the basis of a reasonable belief, of attempted, actual or suspected bribery or violation of the ABC Policy or the ABMS (except where the individual participated in the violation).

13.0 BUSINESS ASSOCIATES (THIRD PARTIES)

- 13.1 All business associates (any party with which the organisation has, or plans to establish, some form of business relationship, including but not limited to members, clients, joint venture partners, consortium partners, contractors, consultants, sub-contractors, suppliers, service providers, vendors, advisors, agents, distributors, representatives, intermediaries, and any other persons or entities who provide work, goods or services or act for or on behalf of the CIIF ("Third Parties")), including but not limited to their employees, affiliates or any other third parties or sub-contractors who have been engaged by the Third Parties to perform services for, or provide products to, or act for or on behalf of the CIIF (collectively, "Personnel"), are required to comply with this Policy, the CIIF's Third Party COC and all other policies as it relates to them.
- 13.2 In circumstances where the CIIF retains controlling interest, such as in certain joint venture agreements, business associates, partners or affiliates are required to adhere to the CIIF ABC Policy and Procedures and the CIIF Third Party CoC. Where the CIIF does not have controlling interest, associates are encouraged to comply the same.
- 13.3 Due diligence should also be carried out with regards to any business associates, partners or affiliates intending to act on the CIIF's behalf as an agent or in other representative roles, to ensure that the entity is not likely to commit an act of bribery or corruption in the course of its work with the CIIF.
- 13.4 Due diligence may include a search through relevant databases, checking for relationships with public officials, self-declaration, and documenting the reasons for choosing one particular Business associate over another. The results of the due diligence process must be documented, retained for at least seven years and produced on request by the custodian of the process.
- 13.5 The CIIF shall include standard clauses in all contracts with business associates, partners or affiliates that enable the CIIF to terminate the contract in the event that bribery or an act of corruption has been proved to occur. Additional clauses may also be included for business associates, partners or affiliates acting on the CIIF's behalf where a more than minor bribery risk has been identified.

- 13.6 Further guidelines and procedures on the third parties can be referred to the CIIF Third Party Code of Conduct.

14.0 ROLES AND RESPONSIBILITIES

- 14.1 **CIIF Grand Council & Committee Members and CIIF Personnel** must be aware of the intent and requirements of this policy & procedures and must ensure that they read, understand, and fully comply with the information contained within this policy and procedures, and with any training or other anti-bribery and corruption information that are given.
- 14.2 **CIIF Grand Council shall:**
- 14.2.1 Sets commitment towards prohibition of bribery and corruption in the business conduct within the CIIF;
 - 14.2.2 Approves the ABC Policy & Procedures;
 - 14.2.3 Ensure the alignment of ABC Policy & Procedures to the strategy of the CIIF;
 - 14.2.4 Maintains oversight on ABC governance, ensuring that the best practices of ABC management system is established, implemented, maintained and reviewed to adequately address the CIIF's bribery and corruption risks, including the Policy & Procedures; and
 - 14.2.5 Promotes appropriate ABC culture within the CIIF.
- 14.3 **CIIF Sub-Committee** shall: The CIIF Grand Council also may delegate the responsibilities to the sub-committee appointed by them that shall, in detail:
- 14.3.1 monitor and ensure that the internal controls are in place to safeguard the CIIF and those involved in its management and direction against corruption risks. This includes monitoring to ensure that the CIIF implements the Board's direction on anti-bribery and corruption compliance;
 - 14.3.2 ensure that the CIIF conducts regular reviews to assess the performance, efficiency and effectiveness of the anti-bribery and corruption programme, and ensure the programme is enforced. The reviews may take the form of an internal audit, or an audit carried out by an external party;
 - 14.3.3 determine the scope, frequency, and methods for review; ensure that an external audit (for example MS ISO 37001 auditors) by a qualified and independent third party is conducted at least once every three years to obtain assurance that the CIIF is operating in compliance with its policies and procedures in relation to corruption, which first external audit shall be conducted in 2021;
 - 14.3.4 monitor the performance of the IO and those whose positions or functions have been identified as having high corruption risk to ensure:
 - a. sufficiency of resources in relation to any anti-bribery and corruption policies and procedures; and
 - b. sufficiency of understanding and compliance with the CIIF's stance in their respective roles and functions.

14.4 Senior Management

- 14.4.1 provides overall direction on the establishment, implementation and periodic review of ABC Policy & Procedures;
- 14.4.2 ensures the integration of ABC Policy & Procedures requirements into key organisation functions such as human resource management, procurement and finance, and enhance the underlying controls on these key functions so as to support ABC Policy & Procedures requirements;
- 14.4.3 supports the resource allocation and investment in a robust and effective ABC Policy & Procedures;
- 14.4.4 supports adequate training and awareness programmes for the employees of the CIIF;
- 14.4.5 communicates on the ABC Policy & Procedures, both internally and externally;
- 14.4.6 promotes appropriate ABC culture within the CIIF; and
- 14.4.7 support other relevant management personnel in preventing and detecting bribery and corruption.

14.5 Integrity Officer (IO): The CIIF shall appoint an appropriate person as the IO of CIIF charged with the following responsibilities –

- 14.5.1 monitor due compliance with this policy & procedures;
- 14.5.2 to provide advice and guidance on aspects of compliance;
- 14.5.3 to institute and monitor the Anti-bribery and corruption compliance programme of the CIIF is in place and duly observed by all those concerned;
- 14.5.4 to keep full and complete records of matters requiring approval under this policy & procedures; and
- 14.5.5 to report to the CIIF Sub-Committee (appointed by GC) and Grand Council regularly (at least every calendar quarter) on the state of the CIIF compliance with its Anti-bribery and corruption compliance programme.
- 14.5.6 attends to inquiries about ABC Policy & Procedures and its practices within the CIIF.

14.6 CIIF Personnel, as an employee of the CIIF must:

- 14.6.1 read, understand, and fully comply with this policy & procedures at all times;
- 14.6.2 attend and complete regular Anti-bribery and corruption and bribery training;
- 14.6.3 abide by other anti-bribery and corruption information they are given;
- 14.6.4 be vigilant and are responsible in preventing, detecting, and reporting of bribery and corruption; and
- 14.6.5 avoid activities that could lead to or imply that he/she is engaged in any forms of bribery/corruption;
- 14.6.6 refuse to pay or receive bribes or participate in acts of corruption even if such refusal/non-participation may result in the CIIF losing its business or not meeting the targets.

14.7 Finance Unit will keep complete and accurate records of the amount and reason for payments accepted and made by the CIIF as well as ensure that the requirements of this policy and procedures are met prior to accepting or making the payments. This

includes ensuring that the relevant escalation and approval process are strictly adhered to.

15.0 CONFLICTS OF INTEREST (COI)

- 15.1 All parties must avoid conflicts of interest. A conflict of interest exists when a personal interest or activity interferes or appears to interfere with the duties that he performs at the CIIF or interfere with the best interests of the CIIF. A conflict of interest may unconsciously influence even the most ethical person and the mere appearance of a conflict may cause one's acts or integrity to be questioned.
- 15.2 All parties are expected to use their judgment to act, at all times and in all ways, in the best interests of the CIIF while performing their duties or during engagements with the CIIF. As such, all parties should attempt to avoid actual or apparent conflicts of interest.
- 15.3 When making decisions related to the CIIF, all parties have a duty to act in the CIIF's best interests and avoid even the appearance of a conflict. For example, a conflict of interest may occur when a person or a family member receives a personal benefit as a result of his position with the CIIF or he takes a business opportunity that is meant for the CIIF. Similarly, the person may not use his position at CIIF to request personal benefits for himself or his family members.
- 15.4 The CIIF Personnel is not allowed to be actively involved in the management or administration of any institutions, companies, firms, cooperatives, or political parties without prior approval of the GC.
- 15.5 If the CIIF Personnel discover that a personal activity or association could compromise or appear to compromise their objectivity or ability to make impartial business decisions, they should disclose it immediately to their supervisor.
- 15.6 A conflict of interest may also arise from the person's personal relationship with a customer, supplier, vendor, competitor, business partner, or other CIIF Personnel, if that relationship impairs or may be perceived to impair his objective business judgment.
- 15.7 CIIF Personnel shall be alert to potential and perceived conflict of interest situations and shall diligently assess and avoid such activity or situation. Such situations could arise:
 - 15.7.1 when he/she exercises or can be seen as exercising preference for his/her own interests or the interests of his family/household members, associates or friends at the expense of the interest of the CIIF;
 - 15.7.2 when he/she influences or can be seen as influencing the CIIF's decisions on dealings in favour of a business, enterprise or entity owned or partially owned

- by him/her, his/her close family / household members, associates or friends;
and
- 15.7.3 when he/she or any business, enterprise or entity owned or partially owned by him/her, his/her close family / household members, associates or friends competes or is seen as competing with or against the CIIF or any qualifications, courses or other offering.
- 15.8 The best rule for any situation that appears to present a conflict of interest is to “abstain and disclose”. If it is not possible to avoid participating in the event or activity creating the conflict:
- 15.8.1 promptly disclose the potential conflict to your supervisor and submit a request to the GC, and
- 15.8.2 avoid participating in decisions that might raise the appearance of a conflict until you receive appropriate guidance from the GC who shall consider the facts and circumstances of the situation to decide whether corrective or mitigating action is appropriate.
- 15.9 Some specific potential conflicts of interest to be mindful of are as follows:
- 15.9.1 **Outside Business and Consulting Engagements**
- a. The CIIF Personnel must obtain approval from the GC prior to:
- i. beginning any employment, business, or consulting relationship with another company that is a current or potential competitor of the CIIF or that otherwise has a business relationship with the CIIF, or
 - ii. accepting any teaching engagements with an educational institution, establishment, or other organization.
- b. In addition, the CIIF Personnel should avoid conducting the CIIF business with members of his family or others with whom he has a significant personal or financial relationship without the prior approval of the GC.
- 15.9.2 **Serving on Boards and Investing in Other Companies**
- a. The CIIF Personnel is allowed to be active in industry and civic associations. However, the CIIF Personnel are required to obtain approval from the GC.
- 15.9.3 **Other Business Interests**
- a. It is considered a conflict of interest if an employee conducts business other than the CIIF’s business during working hours.
- 15.10 Declaration of Conflicts of Interests
- 15.10.1 **Employees**
- a. Employees are required to make declaration of any conflicts on interests by completing the Integrity and Background Declaration Form, attached as **Appendix 4**, or any other form as provided by the CIIF to document declaration of conflicts of interests.
 - b. Employees are required to make declaration of any conflicts of interests as and when they are taking up a new position in the CIIF as well as on an ‘ad hoc’ basis if they become aware of a conflict, regardless of whether such conflict is an actual, potential or perceived conflict of interest.

- c. All declaration of conflicts of interests shall be made to the Head of Human Resource. If the Head of Human Resource is unsure whether the situation of conflict is acceptable or manageable, he/she should consult the Integrity Officer.

15.10.2 Grand Councillors (GC)

- a. GC are required to make declaration of any conflicts of interests by completing the integrity and Background Declaration Form for Grand Councillors, attached as **Appendix 5**, or any other form as provided by the CIIF to document declaration of conflicts of interests.
- b. GC are also required to make declaration of any conflicts of interests on an 'ad hoc' basis if they become aware of a conflict, regardless of whether such conflict is an actual, potential or perceived conflict of interest.
- c. All declaration of conflicts of interests shall be made to the Head of Human Resource. If the Head of Human Resource is unsure whether the situation of conflict is acceptable or manageable, he/she should consult the Integrity Officer.

15.10.3 Business Associates (Third Parties)

- a. Business Associates are required to declare prior to onboarding by completing the Integrity and Background Declaration Form for Business Associates, attached as **Appendix 6**, or as and when there is a change in circumstances by notifying the representative from the CIIF of which the Business Associates are engaged with. Existing Business Associates must declare any conflict of interest in the same way upon this Policy being disseminated to them.
- b. If Business Associates are unsure whether he/she have either an actual, potential or perceived conflict of interest, he/she is advised to make a declaration to the representative from the CIIF of which the Business Associates are engaged with.
- c. Any Employee who has received any notification or declaration of conflicts of interest from Business Associates shall refer such notification or declaration to his/her Head of Department. If the Head of Department is unsure whether the situation of conflict is acceptable or manageable, he/she should consult the Integrity Officer.

- 15.11 The CIIF reserves the right to review and revisit any prior approvals in order to avoid an actual or apparent conflict of interest. The CIIF may periodically conduct an inquiry of the CIIF Personnel in order to determine the status and circumstances of the abovementioned potential conflict and the CIIF Personnel are responsible for continually monitoring and reporting any change in circumstances that might give rise to an actual or apparent conflict of interest.

16.0 STAFF DECLARATIONS (ANNUAL)

- 16.1 All new recruits shall complete trainings on the ABC Policy, and at the end of such trainings attest that this Policy shall be complied with.

- 16.2 All the CIIF personnel shall certify in writing that they have read, understood and will abide by this policy. A copy of this declaration shall be documented and retained by the Human Resources Department for the duration of the personnel's employment. The declaration form can be found in the Appendix 1 of this Policy.
- 16.3 The LGU reserves the right to request information regarding an employee's assets in the event that the person is implicated in any bribery and corruption-related accusation or incident.
- 16.4 All GC, CIIF personnel and business associates will provide **annual declaration** of compliance with this Policy in the form available on the CIIF's website.
- 16.5 The LGU will be responsible for ensuring that all annual declarations are obtained on or before the end of the first quarter of each financial year and provide written confirmation to the GC that such declarations have been obtained and summarising the results thereof.

17.0 ANTI-BRIBERY AND CORRUPTION COMPLIANCE FUNCTION

- 17.1 The CIIF shall establish and maintain an anti-bribery and corruption compliance function within the LGU to oversee the design, implementation and management of the ABMS.
- 17.2 The LGU shall perform functions below within the CIIF structure, equipped to act effectively against bribery and corruption:
 - 17.2.1 overseeing the design and implementation by the organization of the anti-bribery management system;
 - 17.2.2 providing advice and guidance to personnel on the ABMS and issues relating to bribery and corruption;
 - 17.2.3 ensuring that the anti-bribery management system conforms to the requirements of this document;
 - 17.2.4 reporting on the performance of the anti-bribery management system to the GC and senior management and other compliance functions, as appropriate;
 - 17.2.5 adequate to manage effectively the bribery risks faced by the organisation;
 - 17.2.6 escalate to HRD to conduct disciplinary proceedings against personnel found to be non-compliant with the provisions of the ABC Policy; and
 - 17.2.7 recommend to such senior management to conduct an audit to obtain assurance that the CIIF is operating in compliance with the ABMS, at least once every three years.
- 17.3 Appropriate resources shall be provided for effective operation of the ABMS and that the LGU is staffed with persons who have the appropriate competence, status, authority and independence.

- 17.4 The CIIF shall conduct regular risk assessments to identify the bribery and corruption risks affecting the business, set anti-bribery and corruption objectives, and assess the effectiveness of the controls in achieving those objectives.

18.0 COMMUNICATION AND TRAINING

- 18.1 The CIIF shall ensure a copy of this Policy be provided to the GC, all the CIIF personnel and business associates. They will be advised that the policy is also available on the CIIF's website for their review. The GC, all CIIF personnel and the CIIF's business associates will be informed whenever significant changes are made.
- 18.2 The CIIF shall conduct an awareness programme for all its personnel on the Company's position regarding anti-bribery and corruption, integrity and ethics.
- 18.3 Training shall be provided on a regular basis, in accordance with the level of bribery and corruption risk related to the position. Training should be provided to personnel who are:
- 18.3.1 new to the Company;
 - 18.3.2 appointed to or currently holding an exposed position.
- 18.4 Human Resource Department shall maintain records to identify which the CIIF personnel have received training, and produce, communicate and update the training schedule in conjunction with LGU.
- 18.5 Business associates, partners and affiliates acting on behalf of the CIIF shall also be made aware of the CIIF's position regarding anti-bribery and corruption, integrity and ethics by going through the CIIF's Third Party Code of Conduct and acknowledge their understanding of the requirements.
- 18.6 The CIIF's ABC Policy Statement zero-tolerance approach to bribery and corruption must be communicated to all business associates at the outset of our business relationship with them and as appropriate thereafter.

19.0 REPORTING OF POLICY VIOLATIONS

- 19.1 Suitable reporting channels shall be established and maintained for receiving information regarding violations of this policy, and other matters of integrity provided in good faith by the CIIF personnel and/or external parties.
- 19.2 Personnel who, in the course of their activities relating to their employment at the CIIF, encounter actual or suspected violations of this policy are required to report their concerns using the reporting channels stated in Whistle Blowing Policy.
- 19.3 Reports made in good faith, either anonymously or otherwise, shall be addressed in a timely manner and without incurring fear of reprisal regardless of the outcome of any investigation.

- 19.4 Retaliation in any form against the CIIF personnel where the person has, in good faith, reported a violation or possible violation of this policy is strictly prohibited. Any CIIF personnel found to have deliberately acted against the interests of a person who has in good faith reported a violation or possible violation of this policy shall be subjected to disciplinary proceedings including demotion, suspension, dismissal or other actions (including legal action) which the CIIF may pursue.
- 19.5 All reported violation of this policy will be investigated by IO or any other person within LGU or other investigating team appointed by the IO.

20.0 SANCTIONS FOR NON-COMPLIANCE

- 20.1 Non-compliance as identified by the audit and any risk areas identified through this and other means should be reported to the senior management and the GC in a timely manner in accordance with the level of risk identified.
- 20.2 The CIIF regards bribery and acts of corruption as serious matters and will apply penalties in the event of non-compliance to this policy. If any CIIF Personnel breaches this policy & procedures, they will face stern disciplinary action and if found accountable, could face summary dismissal for gross misconduct without compensation for termination of employment.
- 20.3 For external parties, non-compliance may lead to penalties including termination of contract. Further legal action may also be taken in the event that the CIIF's interests have been harmed by the results on non-compliance by individuals and organisations.
- 20.4 The CIIF shall notify the relevant regulatory authority if any identified bribery or corruption incidents have been proven beyond reasonable doubt as per the CIIF Referral Policy.
- 20.5 Where notification to the relevant regulatory authority has been made, the CIIF shall provide full co-operation to the said regulatory authorities.

21.0 SUSPICIONS OR CONCERNS OF BRIBERY/CORRUPTION

- 21.1 If anyone has reason to believe or suspect that an instance of bribery or corruption has occurred or will occur, he/she should immediately escalate in writing providing sufficient details of the date, time, and description of the incident citing those whom he/she believes are involved in the matter and submit via the CIIF Whistleblowing channel. Please refer to CIIF Whistleblowing Policy and Procedures for the detailed guidelines and information.

22.0 RECORD KEEPING

- 22.1 The CIIF will keep detailed and accurate financial records and shall have appropriate internal controls in place to act as evidence for all payments made.

- 22.2 The complete records of any and all matters for which approval is sought under this policy & procedures as well as all reviews, assessments and audit conducted will be kept by the LGU. Please refer to the CIIF Employee Code of Conduct for more detailed guidelines and information.

23.0 CONTINUOUS IMPROVEMENT (MONITORING AND REVIEW)

- 23.1 In maintaining the ABMS, the CIIF is committed to satisfying the requirements set out in ISO 37001. Any need for improvements will be applied as soon as possible. The CIIF Personnel are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Any concerns to improve the ABMS can be channelled to LGU.
- 23.2 The CIIF shall monitor the legal and regulatory regimes where it operates and any changes to the CIIF's business environment and risks and identify opportunities for ABMS improvement. A report should be submitted to the top management and GC on a regular basis for the appropriate action to be taken.
- 23.3 Regular assessments of the ABMS should be carried out to ensure its scope, policies, procedures and controls match the bribery and corruption related risks faced by the CIIF. The IO is responsible for monitoring the effectiveness of this policy and will review its implementation on a regular basis. They will assess its suitability, adequacy, and effectiveness.
- 23.4 The CIIF endeavours to make a good impact on the business environment where it operates. This includes extending its integrity programme to non-controlled business associates such as suppliers and contractors, seeking to work with companies who have a similar commitment and supporting initiatives in the private and public sectors which are likely to improve the integrity of its operating environment.
- 23.5 Any need for improvements will be applied as soon as possible. The CIIF Personnel are encouraged to offer their feedback on this policy & procedures if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the IO.
- 23.6 This policy & procedures is part of an employee's contract of employment and may be amended at any time to improve its effectiveness at upholding the CIIF's zero-tolerance position against all forms of bribery and corruption.

-END OF POLICY-

APPENDIX 1: EMPLOYEE DECLARATION ON CIIF ANTI-BRIBERY AND CORRUPTION POLICY AND PROCEDURES



EMPLOYEE DECLARATION ON CIIF ANTI-BRIBERY AND CORRUPTION POLICY & PROCEDURES

I, _____, hereby declare that I have read and understood CIIF's Anti-Bribery and Corruption Policy & Procedures (version 2.0 dated XXXXX). I understand that, if I violate the policy & procedures, I may be subject to disciplinary action, including termination of my employment without compensation. I further understand that I will contact my supervisor if I have any questions about any aspect of the policy & procedures.

EMPLOYEE

Signature

Name:

Title:

Dated: _____

APPENDIX 2: CORPORATE INTEGRITY PLEDGE

IKRAR INTEGRITI KORPORAT



Ikrar Integriti Korporat

CHARTERED INSTITUTE OF ISLAMIC FINANCE PROFESSIONALS

5 PRINSIP ANTIRASUAH BAGI SYARIKAT-SYARIKAT DI MALAYSIA

- Prinsip 1: Komitmen untuk menggalakkan nilai integriti, ketelusan dan tadbir urus yang baik
- Prinsip 2: Pengukuhan sistem kawalan dalaman yang menyokong pencegahan rasuah
- Prinsip 3: Pematuhan undang-undang, polisi dan prosedur yang berkaitan dengan usaha memerangi rasuah
- Prinsip 4: Pembanterasannya segala bentuk gejala rasuah
- Prinsip 5: Menyokong inisiatif pencegahan rasuah oleh kerajaan dan SPRM

Mengiktiraf bahawa:

- Prinsip Antirasuah Bagi Syarikat-Syarikat Di Malaysia, sebagaimana ianya boleh dipinda atau disemak dari semasa ke semasa, adalah merupakan prinsip di mana organisasi/syarikat di Malaysia perlu memberikan komitmen untuk mempromosikan integriti, ketelusan dan tadbir urus terbaik dalam semua aspek operasinya;
- Untuk menjalankan perniagaan yang bebas daripada rasuah, sejajar dengan Prinsip Antirasuah Bagi Syarikat-Syarikat Di Malaysia bagi menjaga kepentingan organisasi/ syarikat dan pemegang sahamnya, di mana rasuah boleh memusnahkan nilai pegangan saham, menjejaskan keyakinan para pelabur dan menghalang perkembangan mampan organisasi/syarikat.

Bahawasanya kami, seluruh warga kerja Chartered Institute of Islamic Finance Professionals berikrar:-

- tidak akan sama ada secara sendiri atau wakil atau melalui mana-mana ejen melakukan apa-apa kesalahan rasuah atau sebarang bentuk penyelewengan di bawah mana-mana peruntukan undang-undang, termasuk tetapi tidak terhad kepada Akta Suruhanjaya Pencegahan Rasuah Malaysia 2009 atau Kanun Keseksaan;
 - tidak akan menjalankan apa-apa amalan perniagaan atau aktiviti-aktiviti yang memerlukan atau menggalakkan mana-mana pekerja, wakil atau ejen untuk melakukan sebarang bentuk kesalahan rasuah;
 - akan bersama-sama dengan pelanggan, rakan kongsi perniagaan, agensi kawal selia dan agensi penguatkuasaan undang-undang bagi mewujudkan persekitaran perniagaan yang bebas daripada rasuah;
-
- akan mendukung Prinsip Antirasuah Bagi Syarikat-Syarikat Di Malaysia dalam menjalankan perniagaan dan interaksi dengan pelanggan, rakan kongsi perniagaan, dan agensi Kerajaan; dan
 - akan bertindak tegas terhadap mana-mana pihak yang melakukan perbuatan yang boleh menggugat integriti serta menjatuhkan imej organisasi/ syarikat.

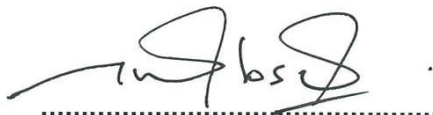
Ditandatangani Bagi Pihak Chartered Institute of Islamic Finance Professionals



Dato' Badlisyah Abdul Ghani,
President



Haji Abdul Rahman Mohd Yusoff
Deputy President



Dr. Syed Adam Alhabshi,
Honorary Secretary



Masumi Hamahira
Honorary Treasurer

Tarikh :

APPENDIX 3: GIFT DECLARATION FORM

GIFT DECLARATION FORM

Receiving any gifts in return for providing services (even if these services are part of a usual role) can be perceived as an inducement to show favour to a person or organisation in his official capacity. Employees are advised to decline such offers, but it is acknowledged that there may be occasions when this is not feasible. All Employees should conduct themselves with integrity, impartiality and honesty at all times and should maintain high standards of propriety and professionalism.

Please complete the form once you received any gift and return to HR & Admin Department

Details of employee receiving gift :

Recipient Name	
Position	
Department	
Date of Declaration	

Description of gift:

Description of gift	
Value / estimated value of gift (RM)	
Purpose of the offer	
Person / organisation provide the gift	
Relationship to the person / organisation offered the gift	
Acceptance of gift	Yes / No

Approved by:

Signature	
Date	
Name	
Position	

LGU Acknowledge:

Name & Signature	
Date	

APPENDIX 4:

INTEGRITY AND BACKGROUND DECLARATION FORM FOR EMPLOYEES



INTEGRITY AND BACKGROUND DECLARATION FORM FOR EMPLOYEES ("DECLARATION FORM")

1. I agree to comply with all laws and regulations in the conduct of business or service in relation to the businesses and operations of the CIIF.
2. I agree to abide by the terms and conditions governing my appointment or employment relationship with the CIIF, with reference to:
 - (i) any official contracts, employment letter, letter of offer, letter of appointment, engagement letter, or any form of document of the similar nature;
 - (ii) the terms and conditions of employment;
 - (iii) the CIIF Code of Conduct; and
 - (iv) the CIIF Anti-Bribery & Anti-Corruption Policy and Procedure.
3. I agree to act in an ethical manner and shall not undertake any bribery and corrupt conduct in contravention of the Malaysian Anti-Corruption Commission Act 2009 in carrying out my duties and responsibilities for the CIIF.
4. I understand if I fail to comply with clauses 1 to 3 of this Declaration Form, the CIIF reserves the right to undertake a review of my appointment or employment with the CIIF, which may lead to disciplinary actions, dismissal and even reporting any instances of bribery and corruption to the relevant authorities.
5. I declare, in the best of my knowledge and belief, that:
 - ☐ I am not aware of any actual, potential, or perceived conflict of interest situations with the CIIF or other stakeholders of the CIIF.
 - ☐ apart from the actual, potential, or perceived conflict of interest situations declared in Appendix A of this Declaration Form or save as disclosed to the CIIF (not specifically disclosed in Appendix A of this Declaration Form), I am not aware of any other actual, potential, or perceived conflict of interest situations with the CIIF or other stakeholders of the CIIF.

(tick whichever is applicable)

I agree to notify the CIIF, as soon as practicable, on any new actual, potential, or perceived conflict of interest.

6. I further declare that:

☐ I have never been convicted of crime or offences, other than traffic offences (if any).

☐ I have been convicted of the following crime or offences.

(tick whichever is applicable)

Type here

To provide a brief description of financial or commercial crime convicted, if any:

I declare that all information provided in this Declaration Form is to the best of my knowledge and belief and are true, complete, and accurate. I understand that if any information provided in this Declaration Form is untrue, incomplete or inaccurate, the CIIF reserves the right to undertake a review of my appointment or employment with the CIIF, which may lead to disciplinary actions, dismissal and even reporting any instances of bribery and corruption to the relevant authorities.

Signature :

Name :

Position :

Department :

Date :

Appendix A – Declaration of Conflicts of Interest Situations

Name:	
Position:	

You are required to disclose, to the best of your knowledge and belief, any conflicts of interest situations with Chartered Institute of Islamic Finance Professionals (“CIIF”), which may include, but not limited to, the following:

- (i) a Grand Council or an Employee of the CIIF having Close Relationship with an external stakeholder with whom the CIIF has business relations with, e.g. counterparty of a material contract, governmental body issuing material licences and/or permits;
- (ii) a Grand Council or an Employee of the CIIF having Close Relationship with another Grand Council or Employee of the CIIF;
- (iii) a Grand Council or an Employee of the CIIF having Close Relationship with a recipient of donation or sponsorship made by the CIIF; and
- (iv) a Grand Council or an Employee of the CIIF having Close Relationship with a competitor of the CIIF or with a party which may have a direct interest or a directly conflicting interest with the CIIF.

Note:

- (a) *“Close Relationship” refers to any of the following situations:*
 - (i) *being a family member of the other person, where “family” shall have the definition provided in Bursa Malaysia Securities Berhad’s Main Market Listing Requirements, i.e.*
 - 1) *spouse;*
 - 2) *parent;*
 - 3) *child including an adopted child and step-child;*
 - 4) *brother or sister; and*
 - 5) *spouse of the person referred to in 3) and 4) above.*
 - (ii) *being a director, major shareholder, partner, or a person with executive power of an entity or organisation;*
 - (iii) *being a family member of the person referred in (ii) above; and*
 - (iv) *being a person who is accustomed or under an obligation, whether formal or informal, to act in accordance with the directions, instructions, or wishes of the other person.*

No.	Name of conflicted party (actual, potential, and perceived)	Relationship with conflicted party	Nature of Conflicts of Interest Situation with the CIIF and Detailed Description (e.g. shareholdings, directorships, and close family member relationship)
(i)			
(ii)			
(iii)			
(iv)			
(v)			
(vi)			

APPENDIX 5:

INTEGRITY AND BACKGROUND DECLARATION FORM FOR GRAND COUNCILLORS



INTEGRITY AND BACKGROUND DECLARATION FORM FOR GRAND COUNCILLORS **("DECLARATION FORM")**

1. I agree to comply with all laws and regulations in the conduct of business or service in relation to the businesses and operations of the CIIF,
2. I agree to abide by the terms and conditions governing my relationship with the CIIF, with reference to:
 - (i) any official contracts, letter of offer, letter of appointment, engagement letter, or any form of document of the similar nature; and
 - (ii) the CIIF Anti-Bribery & Corruption Policy and Procedures.
3. I agree to act in an ethical manner and shall not undertake any bribery and corrupt conduct in contravention of the Malaysian Anti-Corruption Commission Act 2009 in carrying out my duties and responsibilities for the CIIF.
4. I understand if I fail to comply with clauses 1 to 3 of this Declaration Form, the Grand Council reserves the right to undertake a review of my appointment with the CIIF, which may lead to termination and even reporting any instances of bribery and corruption to the relevant authorities.
5. I declare, in the best of my knowledge and belief, that:
 - ☐ I am not aware of any actual, potential, or perceived conflict of interest situations with the CIIF or other stakeholders of the CIIF.
 - ☐ apart from the actual, potential, or perceived conflict of interest situations declared in Appendix A of this Declaration Form or save as disclosed to the CIIF (not specifically disclosed in Appendix A of this Declaration Form), I am not aware of any other actual, potential, or perceived conflict of interest situations with the CIIF or other stakeholders of the CIIF.

(tick whichever is applicable)

I agree to notify the CIIF, as soon as practicable, on any new actual, potential, or perceived conflict of interest.

6. I further declare that:

☐ I have never been convicted of any financial, crime or offences, other than traffic offences (if any).

☐ I have been convicted of the following financial, crime or offences.

(tick whichever is applicable)

To provide a brief description of financial or commercial crime convicted, if any:

Type here

I declare that all information provided in this Declaration Form is to the best of my knowledge and belief and are true, complete, and accurate. I understand that if any information provided in this Declaration Form is untrue, incomplete or inaccurate, the CIIF reserves the right to undertake a review of my appointment with the CIIF, which may lead termination and even reporting any instances of bribery and corruption to the relevant authorities.

Name :

Identification Number :

Signature :

Date :

Appendix A – Declaration of Conflicts of Interest Situations

Name:	
Position:	

You are required to disclose, to the best of your knowledge and belief, any conflicts of interest situations with the Chartered Institute of Islamic Finance Professionals (CIIF), which may include, but not limited to, the following:

- (i) a Grand Council of the CIIF having Close Relationship with an external stakeholder with whom the CIIF has business relations with, e.g. counterparty of a material contract, governmental body issuing material licences and/or permits;
- (ii) a Grand Council of the CIIF having Close Relationship with another Grand Council or Employee of the CIIF;
- (iii) a Grand Council of the CIIF having Close Relationship with a recipient of donation or sponsorship made by the CIIF; and
- (iv) a Grand Council of the CIIF having Close Relationship with a competitor of the CIIF or with a party which may have a direct interest or a directly conflicting interest with the CIIF.

Note:

(b) *“Close Relationship” refers to any of the following situations:*

- (i) *being a family member of the other person, where “family” shall have the definition provided in Bursa Malaysia Securities Berhad’s Main Market Listing Requirements, i.e.*
 - 1) *spouse;*
 - 2) *parent;*
 - 3) *child including an adopted child and step-child;*
 - 4) *brother or sister; and*
 - 5) *spouse of the person referred to in 3) and 4) above.*
- (ii) *being a director, major shareholder, partner, or a person with executive power of an entity or organisation;*
- (iii) *being a family member of the person referred in (ii) above; and*
- (iv) *being a person who is accustomed or under an obligation, whether formal or informal, to act in accordance with the directions, instructions, or wishes of the other person.*

No.	Name of conflicted party (actual, potential, and perceived)	Relationship with conflicted party	Nature of Conflicts of Interest Situation with the CIIF and Detailed Description (e.g. shareholdings, directorships, and close family member relationship)
(i)			
(ii)			
(iii)			
(iv)			
(v)			
(vi)			

APPENDIX 6:

INTEGRITY AND BACKGROUND DECLARATION FORM FOR BUSINESS ASSOCIATE (THIRD PARTY)



INTEGRITY AND BACKGROUND DECLARATION FORM FOR BUSINESS ASSOCIATES ("DECLARATION FORM")

1. The Entity agrees to comply with all laws and regulations applicable to its business.
2. The Entity agrees to adhere to the terms and conditions governing the business relationship with the Chartered Institute of Islamic Finance Professionals ("CIIF"), with reference to:
 - (i) any official contracts, letter of offer, letter of appointment, engagement letter, or any form of document of the similar nature; and
 - (ii) the CIIF Anti-Bribery & Corruption Policy and Procedures.
3. The Entity agrees to conduct its business in an ethical manner and with integrity and the Entity shall not undertake any bribery and corrupt conduct in contravention of the Malaysian Anti-Corruption Commission Act 2009 (including offering or accepting bribes), especially in relation to the provision of goods and/or services to the CIIF.
4. The Entity understands that failure to comply with clauses 1 to 3 of this Declaration Form, the CIIF reserves the right to suspend (pending results of investigation) any service or business arrangements (established through official contracts, letter of offer, letter of appointment, engagement letter or any form of document of the similar nature) or terminate such service or business arrangements, initiate legal action and/or reporting any instances of bribery and corruption to the relevant authorities.
5. The Entity further declares, in the best of its knowledge and belief, that:
 - ☐ The Entity is not aware of any actual, potential, or perceived conflict of interest situations with the CIIF or other stakeholders of the CIIF.
 - ☐ apart from the actual, potential, or perceived conflict of interest situations declared in Appendix A of this Declaration Form, the Entity is not aware of any other actual, potential, or perceived conflict of interest situations with the CIIF or other stakeholders of the CIIF.

(tick whichever is applicable)

The Entity agrees to further notify the CIIF, as soon as practicable, on any new actual, potential, or perceived conflict of interest.

6. The Entity declares that:

- ☐ the Entity has never been convicted of any financial or commercial crime.
- ☐ the Entity has been convicted of the following financial or commercial crime.

(tick whichever is applicable)

To provide a brief description of financial or commercial crime convicted, if any:

Type here

On behalf of the Entity, I declare that all information provided in this Declaration Form is to the best of the knowledge and belief of the Entity and myself and are true, complete, and accurate. The Entity understands that if any information provided in this Declaration Form is untrue, incomplete or inaccurate, the CIIF reserves the right to suspend (pending results of investigation) any service or business arrangements (established through official contracts, letter of offer, letter of appointment, engagement letter or any form of document of the similar nature) or terminate such service or business arrangements , initiate legal action and/or reporting any instances of bribery and corruption to the relevant authorities.

Name of organisation ("Entity") :

Nature of business relationship :

Name of Authorised Signatory :

Signature :

Designation :

Company Stamp :

Date :

Appendix A – Declaration of Conflicts of Interest Situations

Name of Organisation (“Entity”) :	
Nature of business relationship with the CIIF:	

You are required to disclose, to the best of your knowledge and belief, any conflicts of interest situations with Chartered of Islamic Finance Professionals (“CIIF”), which may include, but not limited to, the following:

- (i) as Business Associates of the CIIF, you have a Close Relationship with a Grand Council or an Employee of the CIIF;
- (ii) as Business Associates of the CIIF, you have a Close Relationship with an external stakeholder with whom the CIIF has business relations with, e.g. counterparty of a material contract, governmental body issuing material licences and/or permits; and
- (iii) as Business Associates of the CIIF, you have a Close Relationship with a recipient of donation or sponsorship made by the CIIF.

Note:

- (a) *“Business Associates” includes associated and affiliated companies of the CIIF, including but not limited to members, customers, joint venture partners, consortium partners, contractors, consultants, sub-contractors, suppliers, vendors, advisors, agents, distributors, representatives and intermediaries*
- (b) *“Close Relationship” refers to any of the following situations:*
 - (i) *being a family member of the other person, where “family” shall have the definition provided in Bursa Malaysia Securities Berhad’s Main Market Listing Requirements, i.e.*
 - 1) *spouse;*
 - 2) *parent;*
 - 3) *child including an adopted child and step-child;*
 - 4) *brother or sister; and*
 - 5) *spouse of the person referred to in 3) and 4) above.*
 - (ii) *being a director, major shareholder, partner, or a person with executive power of an entity or organisation;*
 - (iii) *being a family member of the person referred in (ii) above; and*
 - (iv) *being a person who is accustomed or under an obligation, whether formal or informal, to act in accordance with the directions, instructions, or wishes of the other person.*

No.	Name of conflicted party (actual, potential, and perceived)	Relationship with conflicted party	Nature of Conflict of Interest Situation with the CIIF and Detailed Description (e.g. shareholdings, directorships, and close family member relationship)
(i)			
(ii)			
(iii)			
(iv)			
(v)			
(vi)			