

The logo for EXIM BANK MALAYSIA, featuring the word "EXIM" in white serif font on a red rectangular background, and the word "BANK" in white serif font on a blue rectangular background below it.

EXIM
BANK

MALAYSIA

A photograph of the EXIM BANK MALAYSIA building, a modern skyscraper with a glass facade, viewed from a low angle. The building is partially obscured by large, overlapping geometric shapes in red and blue. The sky is a mix of purple and orange, suggesting a sunset or sunrise.

ORGANISATIONAL
ANTI-CORRUPTION PLAN
(OACP)
2023 - 2028

LEADERSHIP MANDATE

Dear Stakeholders,

EXIM Bank's Organisational Anti-Corruption Plan (OACP) is a comprehensive and inclusive plan that was developed in line with the National Anti-Corruption Plan (NACP) 2019 – 2023. This requires Statutory Bodies, State-Owned Enterprises, Companies Limited by Guarantee and private sector entities regulated by the regulatory bodies, including EXIM Bank, to develop their own OACP by 2023.

The EXIM Bank OACP is an integrated anti-corruption plan, to be implemented by the internal stakeholders of EXIM Bank. This is a cornerstone of EXIM Bank's Anti-Bribery Management System (ABMS) to improve governance, which includes periodic assessment of potential risk areas in our business that may be exposed to corrupt practices.

I am sure the OACP will help us realise our goals. In this regard, I would like to express my appreciation and gratitude to all parties and individuals involved in developing this plan.

Thank you.

Dato' Charon Wardini Mokhzani
Chairman
EXIM Bank Berhad



STATEMENT OF COMMITMENT

Dear Stakeholders,

In EXIM, we are committed to upholding our Core Values, namely, Accountability, Efficiency, Integrity, Openness, and Teamwork in our daily work. When it comes to integrity, we must endeavor to uphold high standards at all times.

The Bank's OACP is a five-year strategy that aims to strengthen integrity, governance, and anti-corruption - a key element of the framework to cultivate a culture of integrity. A total of 9 identified strategic objectives and 30 initiatives are to be implemented by all relevant stakeholders.

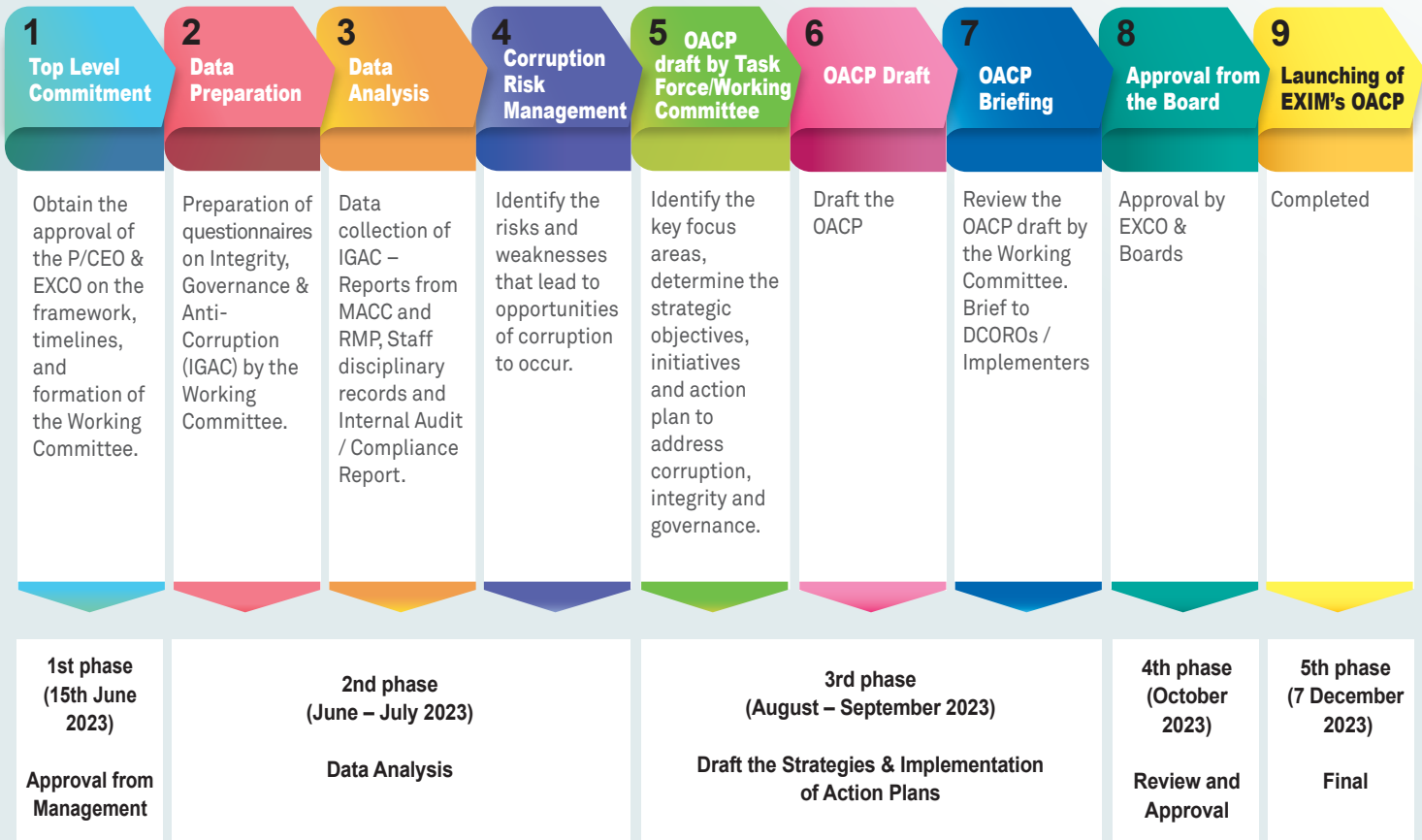
I implore everyone in EXIM Bank to fully commit to understanding, complying and effectively implementing every initiative outlined in this OACP by prioritising integrity in all our dealings.

Thank you.

Arshad Ismail
President / Chief Executive Officer
EXIM Bank Berhad



EXIM'S OACP JOURNEY



The OACP Chapters

01

Chapter One

Introduction of EXIM Bank OACP

- Overview of EXIM Bank
- EXIM Core Values
- Aspiration of National Anti-Corruption Plan (2019 – 2023)
- EXIM OACP Journey

Chapter Two

Analysis of Data

- Data Sources
- Analysis from Internal Data
- Analysis from External Data

02

03

Chapter Three

Strengthening EXIM Bank's Integrity Efforts

Chapter Four

OACP's Strategic Action Plans & Initiatives

- Implementation of OACP's Framework
- Priority 1 – Integrity & Ethics
- Priority 2 – Governance
- Priority 3 – Bribery & Corruption

04

05

Chapter Five

Monitoring, Evaluation & Coordination

- Internal Reporting
- External Reporting

SUMMARY OF EXIM OACP



EXIM's OACP Vision and Mission

The Bank's Anti-Corruption efforts are developed in line with the Guidelines on Adequate Procedures issued by the Prime Minister's Department, pursuant to subsection (5) of Section 17A, under the Malaysian Anti-Corruption Act 2009.

The illustration below depicts our OACP's vision and mission:



Framework to achieve OACP's vision & mission.

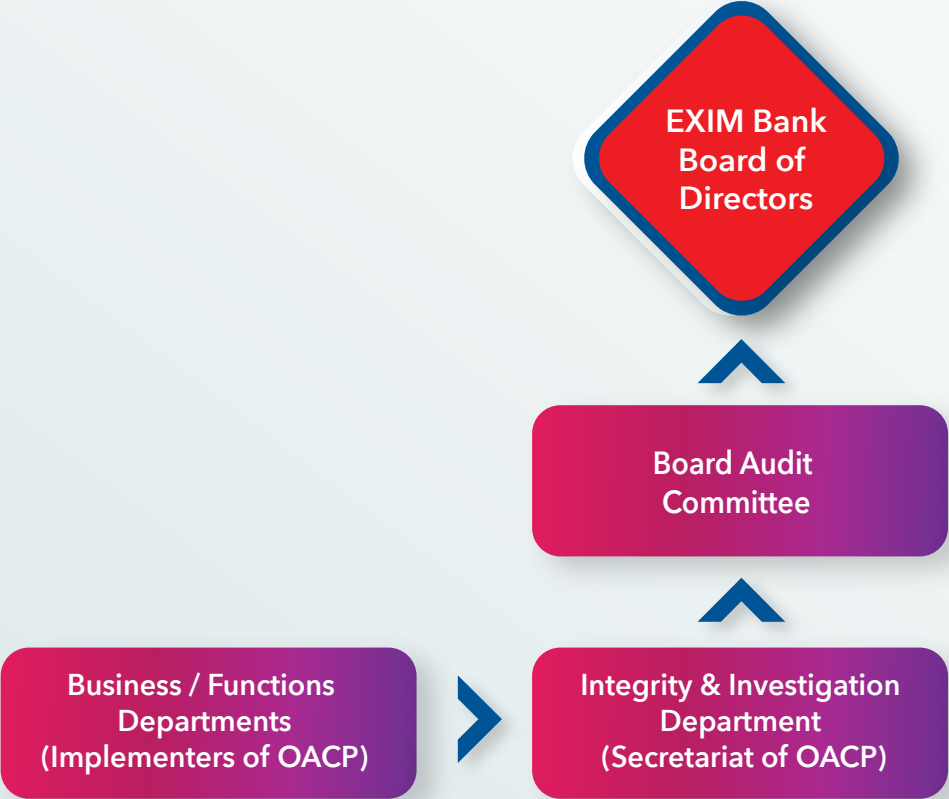
Priority Areas	Strategies	Strategies Objectives
Priority Area 1: Integrity and Ethics	Strategy 1: Foster a culture of integrity and ethics	<ol style="list-style-type: none">1. Raise communication and awareness among all stakeholders.2. Boost the trustworthiness of all staff.3. Uphold the accountability principle.
Priority Area 2: Governance	Strategy 2: Build trust in governance	<ol style="list-style-type: none">1. Improve good governance through top-down commitment.2. Reinforce internal controls, business processes, and compliance through emphasis on procurement activities.3. Enhance Third Parties involvement to strengthen ethics in business.
Priority Area 3: Bribery and Corruption	Strategy 3: Strengthen the efficacy of anti-corruption measures	<ol style="list-style-type: none">1. Empower anti- corruption prevention initiatives.2. Encourage whistleblowing as a preventive measure.3. Monitor and evaluate anti-corruption efforts.

Monitoring, Coordination & Evaluation

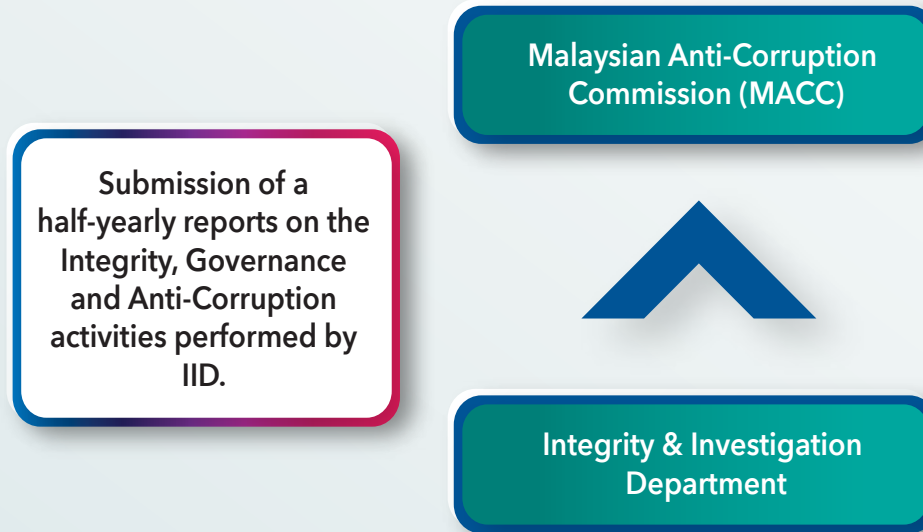
In ensuring the OACP initiatives are implemented effectively and within the stipulated time frame, the implementation of the monitoring process is utmost required. The following outline the essential responsibilities in the successful implementation of the OACP over a five-year period.

No.	Monitoring & Evaluation Mechanism	Descriptions
1.	Commitment from Top Management	<ul style="list-style-type: none"> The Board will set the tone from the top, with the support of Senior Management, to ensure all initiatives under OACP is implemented successfully and all employees practice the highest standard of integrity. The Board also has the support from the Integrity and Investigation Department (IID) that will spearhead the OACP implementation plan by engaging all departments and updating the progress to Board Audit Committee (BAC) and the Board of Directors.
2.	Corruption Risk Management (CRM)	<ul style="list-style-type: none"> The Bank has in place a CRM process that is conducted on an annual basis to monitor and assess the myriad of risks the Bank is exposed to. IID and Risk Management Division will review the outcome from this exercise to monitor the effectiveness of the existing controls in managing its corruption risks.
3.	Coordination, Monitoring & Evaluations of Initiatives	<ul style="list-style-type: none"> IID is responsible for coordinating and monitoring the progress of the activities. All implementers must report to IID on the progress of their respective department's initiatives. The Board, with the support from BAC and IID (being a secretariat of OACP to oversee the execution of all OACP initiatives and to provide semi-annually reports/updates to BAC), is to ensure that all initiatives are completed within the respective time period by the implementers and to assess the efficacy of the Bank's OACP .

Internal governance reporting on monitoring of the action plan.



External governance reporting on the monitoring of action plan.



ABBREVIATIONS AND DEFINITIONS

No.	ABBREVIATIONS	DEFINITIONS
1.	ABC	Anti-Bribery & Corruption
2.	BAC	Board Audit Committee
3.	Bank / EXIM Bank	Export-Import Bank of Malaysia Berhad
4.	BOD	Board of Directors
5.	DCORO	Designated Compliance and Operational Risk Officer
6.	IID	Integrity & Investigation Department
7.	IIM	Institut Integriti Malaysia
8.	MACC	Malaysian Anti-Corruption Commission
9.	NACP	National Anti-Corruption Plan
10.	PCEO	President/Chief Executive Officer
11.	OACP	Organisational Anti-Corruption Plan
12.	RMP	Royal Malaysia Police

Appreciation of OACP

Our sincere appreciation to each contributor for their dedication, invaluable insights, and unwavering support, which have enriched EXIM's OACP.

Thank you for your outstanding efforts and collaborative spirit.

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