

PNB

Organisational Anti-Corruption Plan of the PNB Group 2025 - 2028



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Leadership Mandate

PNB was incorporated on 17 March 1978 to promote Bumiputera share ownership and develop employment opportunities for Bumiputera professionals in the corporate sector. From the first unit trust fund launched for Bumiputeras in 1981 and the first one open to all Malaysians, ASM 2 Wawasan in 1996, PNB has to date steadily expanded its portfolio to 18 unit trust funds. At present PNB manages investments from more than 16 million account holders who entrusted their hard-earned savings to PNB, to invest on their behalf.

PNB upholds this trust above all and continues carrying the legacy of PNB's founding leaders widely known for their high level of integrity. Members of the Board of Directors of PNB together with all staff members of PNB are fully committed to strive and achieve the mission of PNB in enhancing the economic wealth of the Bumiputera community and all Malaysians, for the prosperity of the nation.

This second installation of Organisational Anti-Corruption Plan of the PNB Group 2025 – 2028 (OACP) is part of our continuous efforts to reinforce the sustained trust of Malaysians and our on-going commitment in supporting the Government's call for integrity to be a key component to drive the 12th Malaysia Plan (2021–2025) and 13th Malaysia Plan (2026 – 2030).

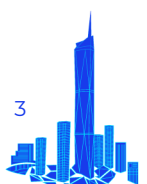
The OACP is an integrated anti-corruption plan, to be adopted and implemented by the internal stakeholders of PNB Group. It outlines potential risks related to governance, integrity and corruption within the Group and shall be the main reference and guide on issues relating to the prevention of corruption. The focus areas are based on the five T.R.U.S.T principles of adequate procedures, as stipulated in the Guidelines on Adequate Procedures Pursuant to Subsection (5) of Section 17A Under the Malaysian Anti-Corruption Commission Act 2009 released by the Prime Minister's Department. A total of 19 identified strategic objectives and 27 initiatives are contained therein.

Being an institution that is internationally certified under ISO 37001:2016 Anti-Bribery Management Systems (ABMS), commitment and support are crucial in ensuring the successful implementation of this OACP. Integrity has been ingrained in the DNA of PNB all these years and this new OACP serves to reinforce and strengthen our existing systems.

This OACP has been formulated specifically for PNB Group and derived from Adequate Procedures Best Practice Handbook, with the support of internal stakeholders throughout the organisation. Additionally, this OACP was also benchmarked against other companies' anti-corruption plans to ensure relevant industry best practices are met.

The strategies and initiatives outlined in this OACP are the results and outcomes of various discussions, consultations and engagements with the internal stakeholders on identifying the appropriate action plans.

Let us all #teamPNB pledge to ensuring that all the 19 identified strategic objectives and 27 initiatives in this OACP are successfully implemented and operationalised within the stipulated timeframe. The onus is on us to inculcate the best practices in delivering our services to our stakeholders, through compliance with the applicable rules, regulations and policies via transparency, integrity and sound business practises.



Abbreviations and Definitions

Abbreviations	Definitions
ABC	Anti-Bribery and Anti-Corruption
ABMS	Anti-Bribery Management Systems
ASNB	Amanah Saham Nasional Berhad (Company No. 197901003200 (47457-V))
BCC	Compliance Committee of PNB Group of the Board of Directors of PNB
BOD	Board of Directors of PNB
BU	Business Unit
CIgO	Chief Integrity Officer
CRM	Corruption Risk Management
MACC	Malaysian Anti-Corruption Commission
MCC	Management Compliance Committee
OACP	Organisational Anti-Corruption Plan of the PNB Group
PGCE	President & Group Chief Executive
PNB	Permodalan Nasional Berhad (Company No. 197801001190 (38218-X))
PNB Group	PNB and/or the following entities: (a) ASNB; (b) Pelaburan Hartanah Nasional Berhad (Company No. 198801008611 (175967-W)); (c) PNB Merdeka Ventures Sdn Bhd. (Company No. 200001015384 (517991-A)); (d) PNB Research Institute Sdn. Bhd. (Company No. 198501007000 (139442-U)); and (e) Any other company and/or entity sanctioned by the BOD.
SC	Securities Commission Malaysia

Chapter 1: Introduction

1.1 Background

PNB was established on 17 March 1978, as one of the instruments of the government's New Economic Policy (NEP). PNB has a legacy deeply rooted in our nation's history. Over the past 45 years, PNB has grown to become one of the largest fund management companies in Malaysia, dedicated to enriching the lives of the Bumiputera community and all Malaysians, in the pursuit of the nation's prosperity.

The purpose of PNB Group is to uplift the financial lives of Malaysians across generations with the mandate to enhance the economic wealth of the Bumiputera community and all Malaysian for the prosperity of the nation.

This can be achieved by maintaining high levels of professionalism, discipline and prudence in formulating investment strategies with full support from the internal and external stakeholders to ensure consistency in performing investment and fund management functions.

In upholding good corporate governance, various efforts and initiatives have been established by PNB which among others include the establishment of Sustainability Framework in response to the change in global investment landscape. Its aspirations are underpinned by three ESG pillars i.e. Environment, Social and Governance. Additionally, PNB has established Stewardship Framework which also promotes good governance and outlines the following four key areas:

- Best-practice Board governance
- Sustainable returns through organisational health
- Value-adding partner to investee companies and co-investors
- Disciplined capital deployment with high performance expectations

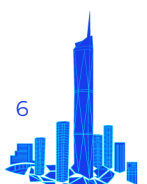
PNB reached a momentous milestone on 6 April 2021 when it was certified for its achievement in ISO37001:2016 ABMS certification. This was soon followed by ASNB with its own certification for ISO37001:2016 ABMS on 13 December 2021.

As per the requirements stated in the ISO37001:2016 ABMS and in addition to assist PNB Group in achieving its vision and embrace its anti-bribery and anti-corruption principle of **"A Corruption-Free Business Environment"**, this OACP is established with the following objectives:

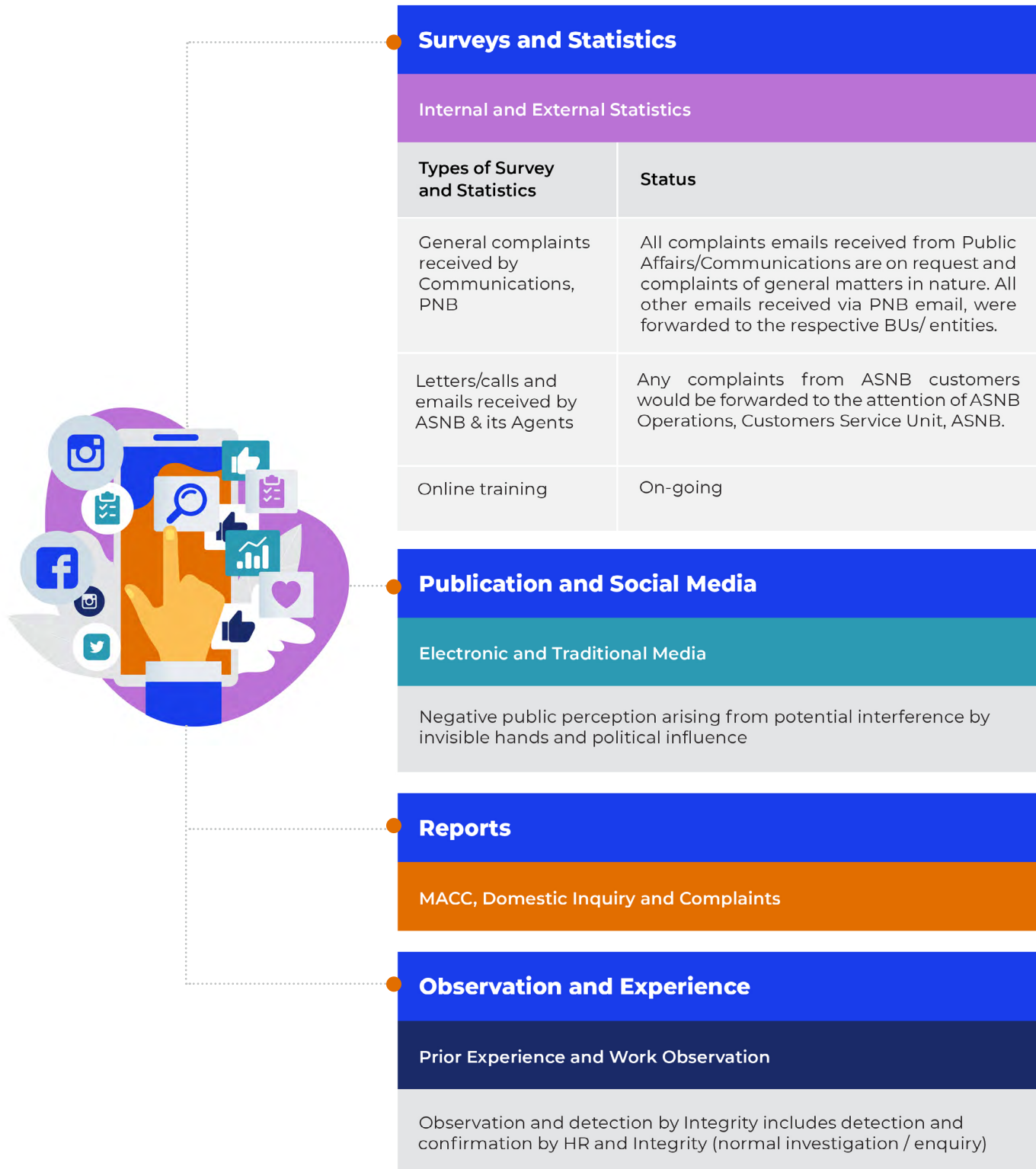
- To identify weaknesses within the existing controls that may present opportunities for corrupt practices to occur.
- To establish a method that best suits to manage, handle, enforce, evaluate as well as to improve anti-corruption measures effectively.
- To help PNB Group implement reasonable and proportionate measures designed to prevent, detect, and respond to bribery and comply with anti-bribery laws, and voluntary commitments applicable to its activities.
- To assist in mitigating the corruption risks faced by PNB Group.
- To demonstrate to the stakeholders that PNB Group has adequate anti-corruption measures and initiatives in place.
- To ensure the performance of business activities in PNB Group is in line with the OACP strategy and goal towards a Corruption-Free Business Environment.
- To promote better corporate governance and legal compliance.

1.2 Potential Issues and Challenges

Among the potential issues and challenges that may be encountered by PNB Group in fighting against corruption are depicted in the following diagram:



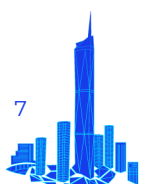
1.3 Data Analysis



General Findings

Most of the reports published on PNB on the social media was mainly relating to its investment matters.

Internal Audit findings were mainly on requirements to have the governance reform i.e. to ensure good policies and practices in promoting transparency and accountability.



1.3.1 Internal Data

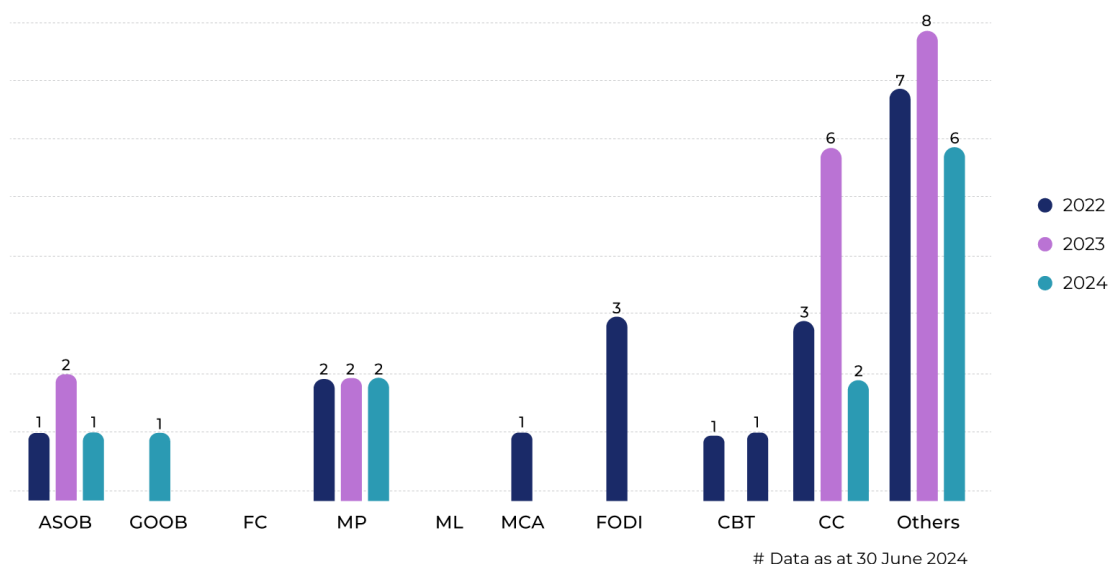
i. Breakdown of Complaints in PNB Group by Category for the Year 2022 - 2024

Type of Cases	2022	2023	2024#
Accepting & Soliciting of Bribes (ASOB)	1	2	1
Giving & Offering of Bribes (GOOB)	0	1	0
False Claims (FC)	0	0	0
Misuse of Positions (MP)	2	2	2
Money Laundering (ML)	0	0	0
Misuse of Company Assets (MCA)	1	0	0
Falsifying Organisational Data or Information (FODI)	3	0	0
Criminal Breach of Trust (CBT)	1	0	1
Administration - Code of Conduct (CC)	3	6	2
Administration - Others	7	8	6
Total	18	19	12

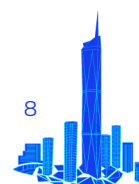
Source: Integrity Complaint Management Register

Data as at 30 June 2024

Breakdown of Complaints by Category 2022 - 2024



The chart above shows the breakdown of complaints in PNB Group by category for the three-year period in 2022 - 2024 which showed that in 2023, there were a slight increase in complaints compared to 2022; in particular, relating to complaints on breaches of the Code of Conduct of Employee Handbook. Other categories, such as "Accepting & Soliciting Bribes," "False Claims," and "Money Laundering," have remained relatively stable with minimal fluctuations.

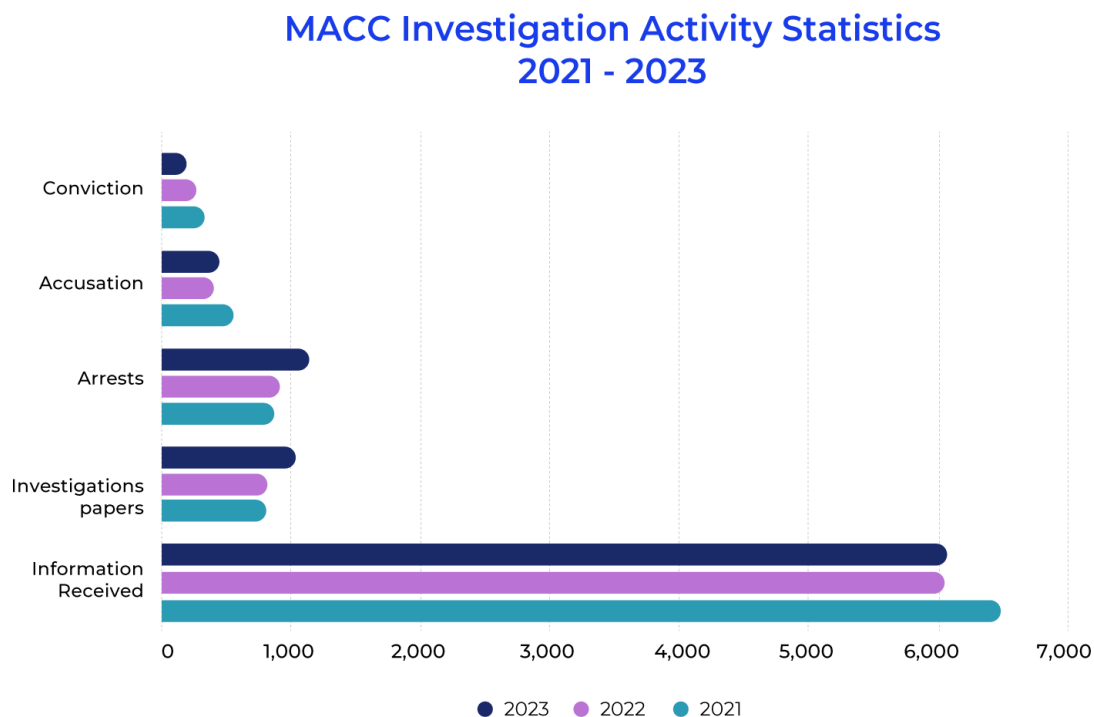


1.3.2 External Data

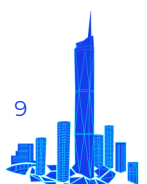
i. MACC Investigation Activity Statistics for the Year 2021 - 2023

Category	2021	2022	2023
Information Received	6463	6028	6040
Investigation Papers	828	820	1026
Arrests	851	909	1137
Accusation	525	390	446
Conviction	300	255	185
Total	8,967	8,402	8,834

Source: MACC Official Instagram Page



The chart above illustrates MACC's investigation activities from various perspectives between 2021 and 2023. Overall, the following activities, i.e. investigation papers and arrests showed an upward trend during this period, reflecting a heightened commitment to combating corruption in Malaysia by MACC.

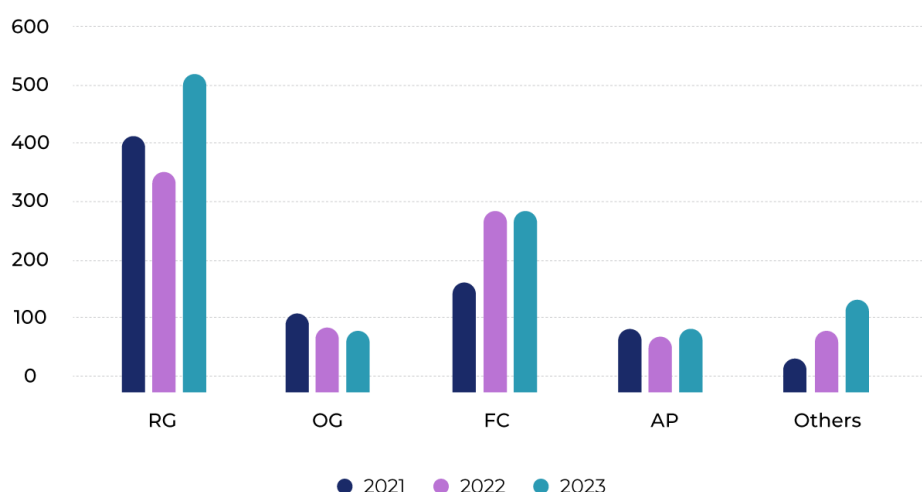


ii. Arrests Based on Type of Offences for Year 2021 - 2023

Category	2021	2022	2023
Receiving Gratification (RG)	419	354	527
Offering Gratification (OG)	115	92	86
False claims (FC)	175	292	293
Abuse of power/position (AP)	89	79	90
Other offences	52	92	141
Total	850	909	1137

Source: MACC

Arrests Based on Type of Offences 2021 - 2023



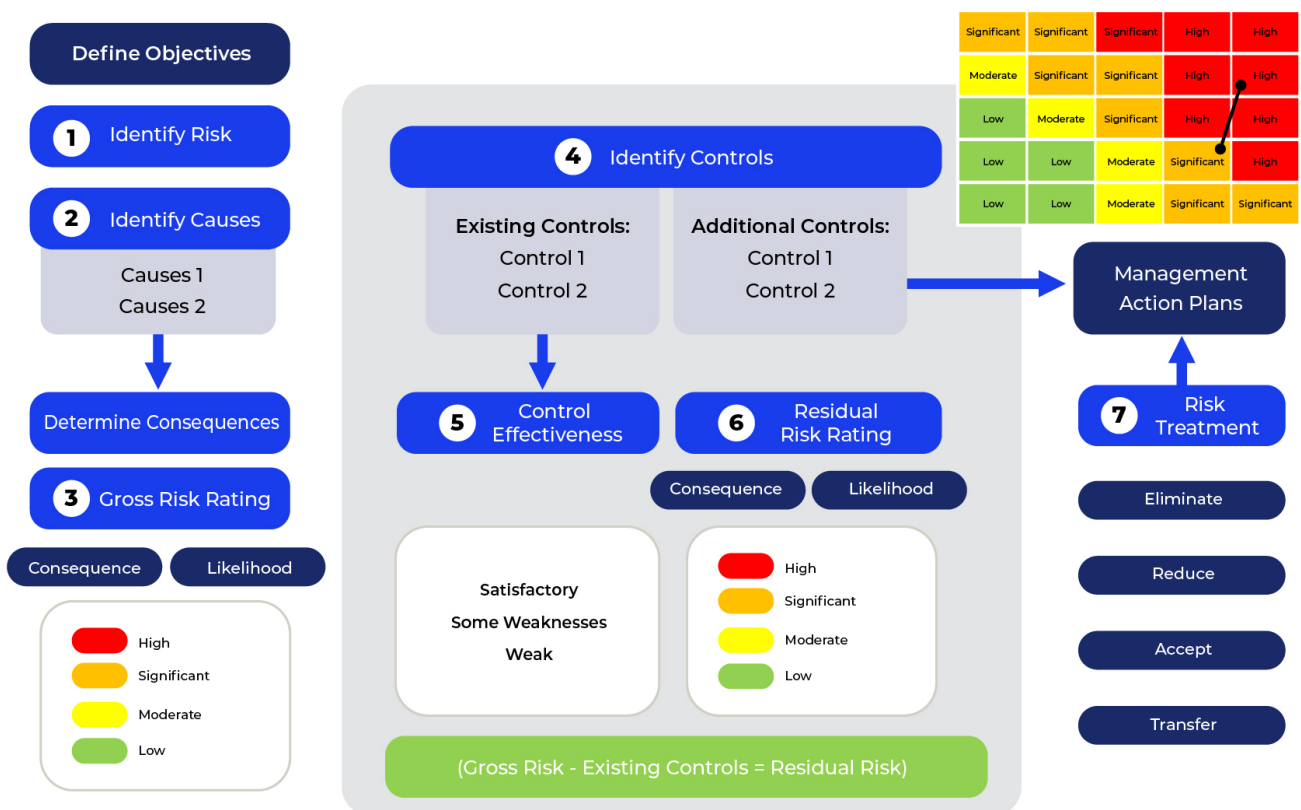
The chart above provides a breakdown of arrests made by the MACC from 2021 to 2023, categorised by the types of offences involved. The data reveals that the most common offence leading to arrests was “Receiving Gratification” (RG), accounting for approximately 45% of all arrests during this period. False claims (FC) and Offering Gratification (OG) were the next most frequent offences, with percentages of 26% and 10% respectively.

1.4 Corruption Risk Management

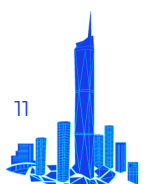
PNB Group has implemented CRM as one of the efforts in mitigating the corruption risk within the organisation by identifying weaknesses that may expose opportunities and chances for corruption to happen. Corruption risk has been identified by BUs using the prescribed corruption risk register form which is aligned with the enterprise risk register.

Consequently, each of the corruption risk was addressed with inclusion of several identified initiatives which include strengthening the existing controls, enhancement in monitoring the operationalisation of policies and procedures, establishment of new controls and introducing new methods to detect corruption or misconduct that may cause a particular risk. These identified initiatives have been compiled and adopted as part of the anti-corruption efforts outlined in this OACP.

Below is the illustration of the CRM process which provides a framework for BUs in PNB Group in identifying risk factors and treatments, and embedding prevention as part of the efforts to fight corruption:



Note: The CRM processes have been adapted and modified to be in line with the Enterprise Risk Management of PNB Group.



1.5 Priority Areas

- 1.5.1 The following priority areas which are adopted by PNB Group in formulating the OACP Framework are based on the five principles of Adequate Procedures:



Top Level Commitment

Top level management is responsible for ensuring PNB Group practices the highest levels of integrity and ethics, complies with laws and regulatory requirements related to the prevention of corruption, and effectively manages the key corruption risks.



Risk Assessment

To conduct corruption risk assessment periodically and when there is a change in laws or circumstances of the business to identify, analyse, assess, and prioritise the internal and external corruption risks.



Undertake Control Measures

To ensure appropriate controls and contingency measures are in place, to address any corruption risk arising from weaknesses in the governance framework, processes and procedures.



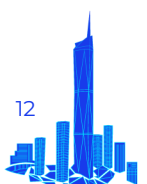
Systematic Review, Monitoring and Enforcement

To ensure regular reviews are conducted to assess the performance, efficiency and effectiveness of the anti-corruption programme, and ensure the programme is enforced.



Training and Communication

To develop and disseminate internal and external trainings, and communications relevant to its anti-corruption management system, in proportion to its operation, which cover the policy, training, reporting channel and consequences of non-compliance.



Chapter 2: Scenario Planning

2.1 Future Anti-Corruption Scenario

Scenario planning is the strategic planning method used to make flexible long-term plans. The method assumes what the future is going to be and how the business environment will change over time. It identifies a specific set of uncertainties of what might happen in the future of the business.

Below are some of the anti-corruption scenarios that are seen to have a major impact on the strengthening of governance and organisational efforts to fight corruption.



Source: National Anti-Corruption Plan (NACP) 2019 - 2023

Chapter 3: OACP Framework

3.1 The Need for a Framework

PNB Group has set a clear goal to achieve its vision to support the direction towards Corruption-Free Business Environment with establishment and implementation of sustainable anti-corruption efforts. Therefore, this OACP which has been developed will be able to drive towards transparency by applying the principles of integrity and accountability in all systems and procedures at the PNB Group.

The implementation and enforcement of this initiative will be able to increase the level of transparency and integrity of the PNB Group, as well as the positive perception of our stakeholders. Hence, this OACP has outlined a comprehensive framework in the fight against corruption.

3.2 Purpose, Mandate and Shared Values

3.2.1 Purpose & Mandate

Purpose	To uplift the financial lives of Malaysians across generation.
Mandate	To enhance the economic wealth of the Bumiputera community and all Malaysians for the nation's prosperity.

3.2.2 Shared Values

We are

B.R.A.V.E



Bold

We strive to push the boundaries of what is possible.



Responsible

We take ownership and we do what we say we are going to do.



Agile

In a fast-changing world, we never stop moving.



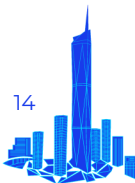
Visionary

Our foresight and expertise inspire a better future.



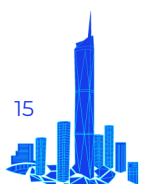
Empowering

We work together, supporting each other to deliver on our shared goals.

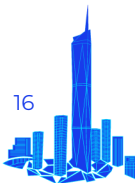
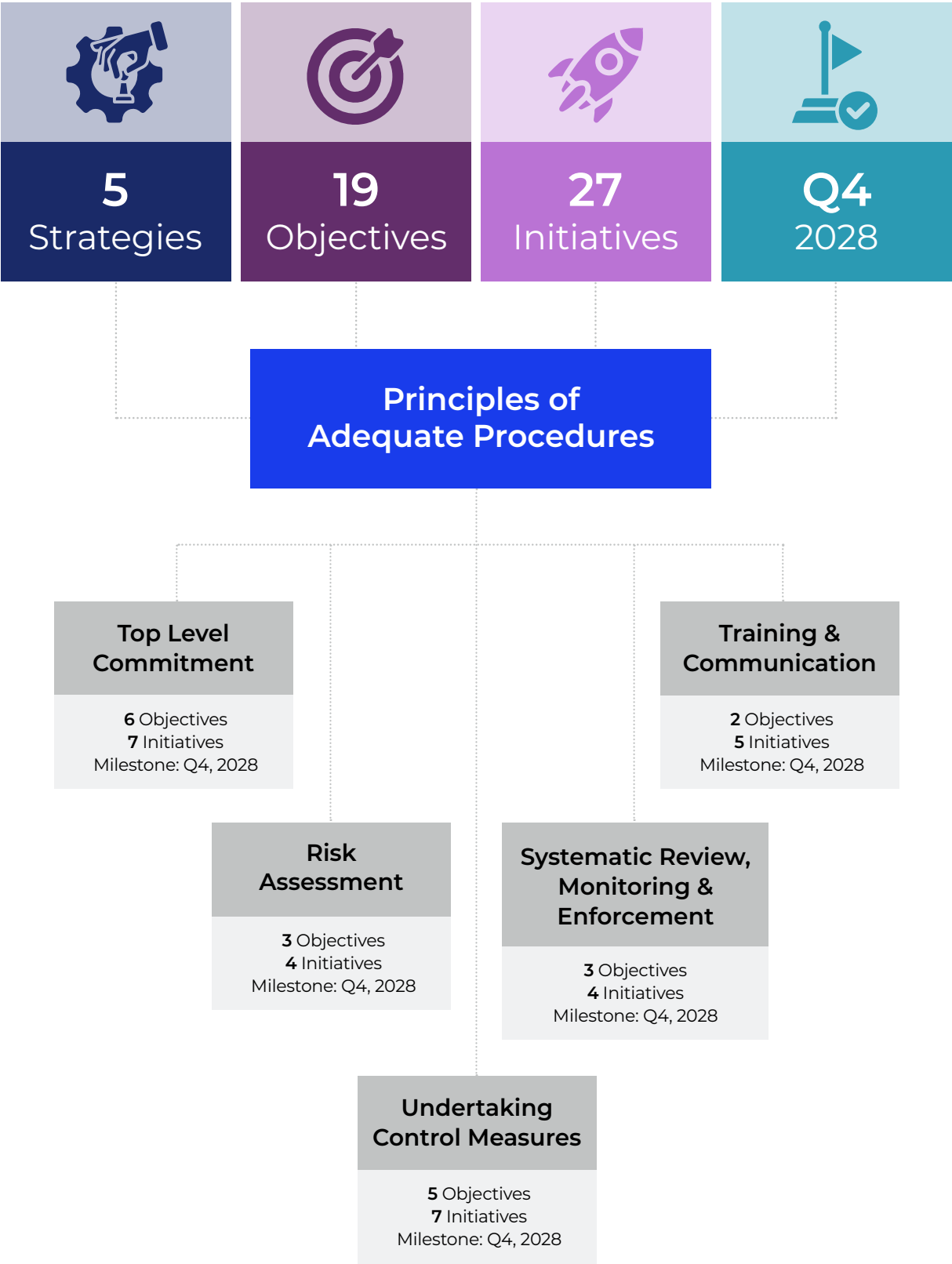


3.3 Strategic Plan

Refine LEAP-6 is PNB's comprehensive strategic plan for 2025-2027, designed to guide the organisation toward sustainable growth and excellence. The plan is built upon six foundational pillars, each contributing to PNB's overall success.



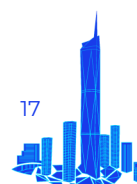
3.4 Strategies & Initiatives



Priority Area 1: Top Level Commitment

Strategy 1: Provide assurance to the internal and external stakeholders that the organisation is operating in compliance with applicable regulatory requirements, internal policies and procedures.

Objective			Initiatives / Action Plans	Responsibility	Milestone
1.1	Compliance to the Guidelines on Corporate Governance for Capital Market Intermediaries and the Guidelines on Conduct for Capital Market Intermediaries of SC.	1.1.1	To maintain, and periodically review the level of compliance with Guidelines on Corporate Governance for Capital Market Intermediaries and the Guidelines on Conduct for Capital Market Intermediaries of SC and/or other guidelines, guides, circulars issued by SC or any regulatory bodies or governance body.	<ul style="list-style-type: none"> • BOD • PGCE • Head of BUs 	Continuous Initiative
1.2	Continuous effort and initiative to comply with PNB Stewardship & Sustainability Framework.	1.2.1	To maintain and periodically review the PNB Stewardship and Sustainability Framework and Voting Guidelines and enhance the policy where applicable.	<ul style="list-style-type: none"> • BOD • PGCE • Head of BUs 	Continuous Initiative
1.3	Review of Integrity Charter and Framework of the PNB Group.	1.3.1	To review the Integrity Charter and Framework of the PNB Group as part of continuous efforts in ensuring full compliance with the provisions under applicable rules and regulations and its associated guidelines and procedures.	<ul style="list-style-type: none"> • BOD • PGCE • Integrity / CIGO 	Q2, 2025
1.4	Review of ABC Policies of the PNB Group.	1.4.1	To maintain and periodically review the ABC Policies of the PNB Group including but not limited to the following: <ul style="list-style-type: none"> i. ABC Policy Statement; ii. Code of Business Ethics; iii. Whistleblowing Policy; and iv. Procurement Integrity Pact. 	<ul style="list-style-type: none"> • BOD • PGCE • Integrity / CIGO 	Continuous Initiative
1.5	Annual audit of ISO 37001:2016 ABMS for PNB and ASNB.	1.5.1	To implement adequate procedures, ABMS programme and effective systems for managing and monitoring risks relating to corruption as per the standards of ISO37001:2016 ABMS.	<ul style="list-style-type: none"> • BOD • PGCE • Head of BUs • Integrity / CIGO 	Continuous Initiative
1.6	Promoting and strengthening integrity culture among stakeholders of the PNB Group.	1.6.1	To ensure there are Integrity Representatives in every BUs, with stipulated functions in the job description of the relevant employees.	<ul style="list-style-type: none"> • Integrity / CIGO • Head of BUs 	Continuous Initiative
		1.6.2	To hold a regular and structured training and awareness programmes, to raise awareness on integrity and anti-corruption including but not limited to Integrity, Risk, Audit and Compliance (IRAC) Week, PNB Integrity Solidarity Group and GLIC Integrity Event.	<ul style="list-style-type: none"> • BOD • PGCE • Integrity / CIGO 	Continuous Initiative



Priority Area 2: Risk Assessment

Strategy 2: Conduct corruption risk assessment periodically, and identify, analyse, assess and prioritise the internal and external corruption risks of the organisation.

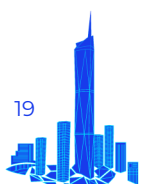
Objective			Initiatives / Action Plans	Responsibility	Milestone
2.1	Continuous Annual Review of CRM.	2.1.1	To conduct annual review of Corruption Risk Assessment of each BUs via Enterprise Risk Management System.	· Integrity / ClgO · Head of BUs	Continuous Initiative
		2.1.2	To establish a system procedure (SOP) on the walk-through briefing on the annual assessment of CRM for all BUs.	· Integrity / ClgO	Q2, 2025
2.2	Minimising the risk of corruption in the new business.	2.2.1	To execute necessary evaluation process on relevant business proposals, in line with the related policies and procedures including due diligence process to determine the risk rating of the third parties.	· Procurement · Head of BUs · Compliance · Integrity	Continuous Initiative
2.3	Reporting to BCC on the results of the CRM.	2.3.1	To report the results of CRM to BCC with action plans included.	· BOD · Integrity / ClgO	Continuous Initiative



Priority Area 3: Undertake Control Measures

Strategy 3: Establish the appropriate controls and contingency measures which are reasonable and proportionate to the nature and size of the organisation.

Objective			Initiatives / Action Plans	Responsibility	Milestone
3.1	Due diligence considerations and criteria.	3.1.1	To conduct due diligence using the established prescribed format on any relevant parties or personnel including as BOD, new hire, agents, vendors, contractors, suppliers, and consultants, prior before entering into any formalised relationships.	<ul style="list-style-type: none"> • Procurement • Head of BUs • Compliance • Integrity 	Continuous Initiative
3.2	Whistleblowing channels reporting.	3.2.1	To maintain, monitor and take appropriate actions on complaints submitted by internal / external parties be it concerns about real or suspected corruption incidents.	• ClgO	Continuous Initiative
		3.2.2	To continuously review the Whistleblowing Policy of the PNB Group to ensure relevance and appropriateness.	• Integrity / ClgO	Continuous Initiative
3.3	Maintaining high standards in PNB's corporate governance.	3.3.1	To execute the various integrity declarations for the execution of respective stakeholders within PNB Group.	<ul style="list-style-type: none"> • Head of BUs • Integrity / ClgO 	Continuous Initiative
3.4	Training and awareness programme for staff members relating to integrity matters.	3.4.1	To monitor and review where applicable the Employee Handbook of PNB particularly the Code of Conduct chapter.	• Human Capital	Continuous Initiative
		3.4.2	To monitor and review the training needs and awareness programme for staff members to ensure topics relating to integrity, ethics and corruption prevention are provided and covered.	<ul style="list-style-type: none"> • Human Capital • Integrity 	Continuous Initiative
3.5	Strengthening the operations of ASNB Agents in accordance with the established benchmarks.	3.5.1	To conduct regular monitoring and review on the performance of ASNB agents via the established scorecard to ensure their compliance with the relevant policies and procedures.	• Sales, ASNB	Continuous Initiative

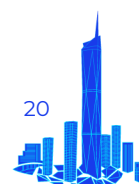




Priority Area 4: Systematic Review, Monitoring and Enforcement

Strategy 4: Conduct regular reviews to assess the performance, efficiency and effectiveness of the anti-corruption programme, and its enforcement.

Objective			Initiatives / Action Plans	Responsibility	Milestone
4.1	Annual Review Plan for the Anti-Corruption Programme.	4.1.1	To ensure review of anti-corruption programme are conducted regularly in ensuring conformance to the requirements of relevant international standards, internal policies and procedures, as well as regulators.	· Integrity / ClgO · Internal Audit	Continuous Initiative
		4.1.2	To ensure review of the anti-corruption programme by a qualified and independent party, i.e. external auditor are conducted regularly in order to be aligned with best practices and international standards.	· Integrity / ClgO · Internal Audit	Continuous Initiative
4.2	Monitoring of anti-corruption programme.	4.2.1	To monitor all BUs on the adoption of necessary initiatives, including continuous education and training relating to integrity, ethical and corruption prevention matters.	· Integrity / ClgO · Head of BUs	Continuous Initiative
4.3	Enforcement of Consequence Management Framework.	4.3.1	To execute consequence management framework on staff members who are found to be non-compliant to the programme.	· Human Capital · Compliance	Continuous Initiative

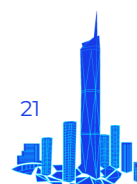




Priority Area 5: Training and Communication

Strategy 5: Develop and disseminate internal and external training and communications relevant to its anti-corruption management system.

Objective			Initiatives / Action Plans	Responsibility	Milestone
5.1	Providing adequate training in strengthening and enhancing integrity and transparency culture within the PNB Group.	5.1.1	To conduct integrity awareness programme for the BOD, employees and business associates, on the ABC Policies of the PNB Group via: i. K-Hub; ii. Survey & quizzes; iii. Corporate training programme, seminar and in-house courses; iv. Induction Day (new hire); and v. iRAC.	· Integrity	Continuous Initiative
		5.1.2	To execute Integrity Training Module for all employees of the PNB Group.	· Integrity	Continuous Initiative
		5.1.3	To collaborate with other organisations within PNB investee companies dedicated to increasing awareness about anti-corruption initiatives and advocating for ethical practices.	· Integrity	Continuous Initiative
5.2	Communication of ABC Policies.	5.2.1	To send consistent and frequent reminders of the ABC Policies of the PNB Group to all employees via email blasts.	· Integrity	Continuous Initiative
		5.2.2	To communicate the ABC Policies of the PNB Group to business associates with a strong emphasis of the organisation's stand on cultivating a culture of integrity.	· Integrity	Continuous Initiative



Chapter 4: Implementation, Monitoring and Evaluation

4.1 Implementation Framework

- PNB has implemented three lines of defence model for the management of all risk classes, including integrity-related and corruption risk.
- This model is essential for the effective operation and implementation of the Integrity Charter and Framework.



The model distinguishes among the following functions:

- Functions that own and manages corruption risk (**First Line of defence**)
- Functions that oversee corruption risks and controls (**Second Line of defence**)
- Functions that provide independent assurance to Senior Management and the BOD (**Third Line of defence**)





4.2 Monitoring and Evaluation

In monitoring and evaluating the OACP, the following modes are adopted:



1

Present progress report on the OACP to the MCC, BCC and BOD every quarter.



2

Review and reassess the OACP implementation towards its effectiveness every year.



3

Issuance and Renewal of New OACP at the end of the tenure and new issuance in the subsequent year.



Chapter 5: Conclusion

The achievement of the various initiatives in this OACP will highly depend on the commitment of PNB's leadership, support and participation from members at all levels in PNB Group. Other crucial factors that contribute to this success are strong policies and procedures, effective communication, strong compliance and integrity culture, and capable and adequate resources.

All leaders at every level shall demonstrate "tone from the top" i.e. PNB's stance against the use of corrupt practices in relation to the business activities and spearhead the efforts to improve upon the effectiveness of the corruption risk management framework, internal control system, review and monitoring, and training and communication. They shall be able to mobilise and inspire their subordinates towards realising the objectives of the OACP.

Effective communication is one of the effective strategies for building integrity culture in all activities undertaken by an organisation. Hence, all initiatives described in this OACP are expected to assist PNB Group in mitigating the potential risk of corruption that may arise and it will be reviewed and enhanced, if required, depending on its relevancy and outcome of the implementation plans.

