

Fit and Proper Policy for Directors and Chief Executive Officer



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1. PURPOSE

To serve as a guiding mechanism and framework for the NRC on the process for new appointments and re-appointments of Chairman, Directors and CEO, Board Committees' appointments, removal/ resignation of Director, removal of CEO, and the annual fit and proper ("**F&P**") assessment of Directors and CEO of the Bank.

2. SCOPE

This F&P Policy applies to the Bank's new appointments and re-appointments of Chairman, Directors and CEO, Board Committees' appointments, removal/resignation of Director, removal of CEO, and the annual F&P assessment of Directors and CEO.

3. POLICY STATEMENT

- (i) The Bank is required to ensure that the Chairman, Directors and CEO of the Bank have the integrity and competence required to perform their roles, and remain fit and proper to assume their responsibilities in accordance with the provisions of Sections 55(1) and 60 of the FSA 2013 and the requirements as contained in the BNM Guidelines.
- (ii) Pursuant to the BNM Guidelines, the NRC is responsible, inter alia:
 - (a) for new appointments of Chairman, Director and CEO assessing and, if deemed fit, recommending for Board approval the candidates for such positions ("Candidate(s)") ("New Appointments");
 - (b) for re-appointments of Chairman, Director and CEO assessing and, if deemed fit, recommending for Board approval the re-appointments for such positions ("Re-Appointments");
 - (c) for appointments to Board Committees assessing and, if deemed fit, recommending for Board approval the appointment of Directors to Board Committees ("Board Committees Appointments");
 - (d) for removal of Director assessing and, if deemed necessary, recommending for Board approval the removal of Director;
 - (e) for removal of CEO assessing and, if deemed necessary, recommending for Board approval the removal of CEO; and
 - (f) for annual F&P assessment of Chairman, Directors and CEO assessment per the Assessment Criteria and BNM Guidelines for such positions ("Annual F&P Assessment").
- (iii) This F&P Policy sets out the assessment criteria and guidelines for New Appointments, Reappointments, Board Committees' Appointments, removal/ resignation of Director, removal of CEO and the Annual F&P Assessment.

4. LEGAL AND REGULATORY PROVISIONS

This F&P Policy must be read in conjunction with other relevant HLIB's Policies and Standard Operating Procedures including the following, but not limited to:

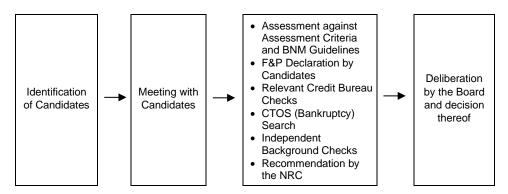
- (a) FSA 2013;
- (b) Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001;
- (c) Personal Data Protection Act 2010;
- (d) HLIB's Anti-Bribery and Corruption Policy;
- HLIB's Anti Money Laundering, Countering Financing of Terrorism, Countering Proliferation Financing & Targeted Financial Sanction Policy & Standard Operating Procedures;
- (f) CA 2016;
- (g) Any other policies and procedures issued by HLIB or Hong Leong Group (where relevant to HLIB) from time to time; and
- (h) Any other applicable laws, guidelines, policy documents, notifications and standards, circulars/directives or applicable regulations issued by the Securities Commission Malaysia, Bursa Malaysia Berhad, BNM or other regulatory authorities/associations, where applicable.

5. PRINCIPLES

5.1 Assessment Process

(A) New Appointments

(a) The nomination, assessment and approval process for New Appointments shall be as follows:



(b) Assessment Criteria and Guidelines

The Candidates will be assessed based on the following Assessment Criteria and BNM Guidelines:

 (i) how the Candidate will be a strategic and effective fit for the Board and contribute to the overall desired composition and required mix of expertise/experience to enhance the Board's overall effectiveness.

The NRC shall, inter alia, consider the attributes, qualifications, management, leadership and business experience, which ought to be at the most senior levels.

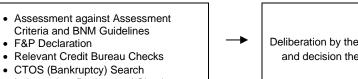


In respect of skills, expertise and background, the Candidate should ideally complement the mix of core competencies of the Board as a whole including but not limited to business, legal and financial expertise, professional knowledge, information technology and financial industry experience.

- (ii) in the case of CEO, the Candidate's knowledge and experience in the industry, market and segment and how this will bear on the performance of his/her duties;
- (iii) the Candidate shall complete the F&P Declaration as set out in Appendix 1 in respect of his/her probity, competence, personal integrity, reputation, qualifications, skills, experience and financial integrity in line with the standards required under the relevant BNM Guidelines. The Bank shall conduct independent background checks on the areas as set out in Appendix 2 ("Independent Background Checks"), to verify the information disclosed in the F&P Declaration;
- (iv) the Candidate is required to ensure that the financial obligation information reported in the BNM application form is accurate with cross reference made to his/her individual CCRIS report accordingly;
- (v) the Candidate will be briefed on expectations on his/her role including his/her time commitment, the F&P assessments to be conducted and general and specific contributions expected; and
- (vi) whether the Candidate is required to attend appropriate training to strengthen any specific area of market knowledge/experience so as to close the gaps identified to be lacking.

(B) Re-Appointments

(a) The assessment and approval process for Re-Appointments shall be as follows:



- Independent Background Checks
- Recommendation by the NRC

 Deliberation by the Board and decision thereof

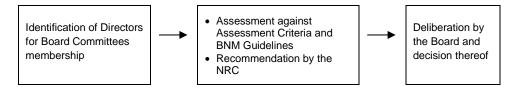
- (b) Assessment Criteria and Guidelines
 - (i) For Re-Appointments, the Chairman, Director and CEO will be evaluated on their performance in the discharge of duties and responsibilities effectively, including, inter alia, contribution to Board deliberations and commitment, and for independent directors, their independence.
 - (ii) In addition, the NRC shall, inter alia, consider the attributes, qualifications, management, leadership and business experience, which ought to be at the most senior level.
 - (iii) In respect of skills, expertise and background, he/she should ideally complement the mix of core competencies of the Board as a whole including but not limited to business, legal and financial expertise, professional knowledge, information technology and financial industry experience.



- (iv) The NRC shall also consider the Board Annual Assessment results of the Chairman and Director, the contribution during the term of office and the attendance at Board meetings, which pursuant to the BNM Guidelines, must be at least 75% of the Board meetings held in the financial year.
- (v) Chairman, Director and CEO shall complete the F&P Declaration in respect of their probity, competence, personal integrity, reputation, qualifications, skills, experience and financial integrity in line with the standards required under the relevant BNM Guidelines for submission to BNM for Re-Appointment. The Bank shall conduct Independent Background Checks to verify the information disclosed in the F&P Declaration.
- (vi) Chairman, Director and CEO are required to ensure the financial obligation information reported in the BNM application form is accurate with cross reference made to their individual CCRIS report accordingly.

(C) Board Committees Appointments

(a) The nomination, assessment and approval process for Board Committees Appointments shall be as follows:

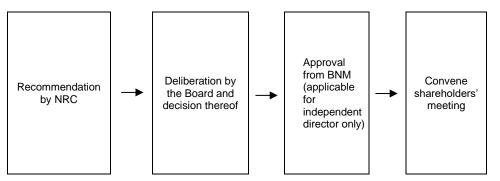


(b) Assessment Criteria and Guidelines

The assessment for Board Committees Appointments will be based on the Directors' potential contributions and value-add to the Board Committees with regard to Board Committees' roles and responsibilities.

(D) Removal/ resignation of Director/ Chairman

(a) The assessment and approval process for removal of Director shall be as follows:

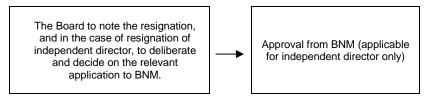


The written approval of BNM must be obtained before the Bank removes an independent director (this excludes termination in accordance with statutory requirements, including termination as outlined in paragraph (d)(i) below). The independent director concerned is required to take leave of absence until BNM's decision is received by the Bank.

Subject to the paragraph above, the Bank may by ordinary resolution at a shareholders' meeting remove the Director before the expiration of the Director's tenure of office.



(b) The assessment and approval process for resignation of Director shall be as follows:



The written approval of BNM must be obtained before an independent director resigns from his/her position.

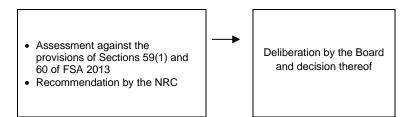
- (c) Where a Director/Chairman of the Bank:
 - (i) becomes disqualified under subsection 59(1) of FSA 2013; or
 - (ii) no longer complies with any of the F&P requirements as may be specified by BNM under Section 60 of FSA 2013,

he/she shall immediately cease to hold office and act in such capacity.

- (d) The Bank shall immediately:
 - (i) in the case of paragraph (c)(i), terminate the appointment of Director/Chairman; or
 - (ii) in the case of paragraph (c)(ii), remove the Director/Chairman from office.
- (e) The Bank shall notify BNM in writing of the fact that a person has ceased to be its Chairman/Director pursuant to FSA 2013 or under any other circumstances and of the reasons for the cessation within 7 days from the date of such cessation.

(E) Removal of CEO

(a) The assessment and approval process for removal of CEO shall be as follows:



- (b) Where a CEO of the Bank:
 - (i) becomes disqualified under subsection 59(1) of FSA 2013; or
 - (ii) no longer complies with any of the F&P requirements as may be specified by BNM under Section 60 of FSA 2013,

he/she shall immediately cease to hold office and act in such capacity.

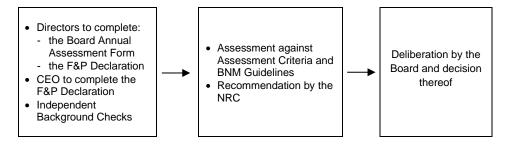
- (c) The Bank shall immediately:
 - (i) in the case of paragraph (b)(i), terminate the appointment of the CEO; or
 - (ii) in the case of paragraph (b)(ii), remove the CEO from office.



(d) The Bank shall notify BNM in writing of the fact that a person has ceased to be its CEO pursuant to FSA 2013 or under any other circumstances and of the reasons for the cessation within 7 days from the date of such cessation.

(F) Annual F&P Assessment

(a) The Annual F&P Assessment process shall be as follows:



The NRC will carry out the Annual F&P Assessment in conjunction with the Board Annual Assessment of the effectiveness of the Board as a whole, the contribution by each Director to the effectiveness of the Board, the contribution of the Board's various committees and the performance of the CEO ("**Board Annual Assessment**").

For newly appointed Chairman, Director and CEO, the Annual F&P Assessment and Board Annual Assessment will be conducted at the next annual assessment exercise following the completion of 1 year service.

Chairman, Director and CEO shall complete the F&P Declaration in respect of their probity, competence, personal integrity, reputation, qualifications, skills, experience and financial integrity in line with the standards required under the relevant BNM Guidelines annually. The Bank shall conduct Independent Background Checks to verify the information disclosed in the F&P Declaration.

(b) Assessment Criteria and Guidelines

Assessment Criteria and Guidelines will be as set out in the F&P Declaration and Board Annual Assessment Form.

5.2 BNM Submission

(1) Upon the approval of the Board, an application on the prescribed forms shall be submitted to BNM for approval in respect of the New Appointments or the Re-Appointments, as the case may be.

In addition, an application for appointment/re-appointment of Director must include an elaboration of the Board's assessment of the candidate, including -

- (a) A description of how the candidate is expected to address any gaps in the specific skills, knowledge or experience of the existing Board members, if any;
- (b) In the case of a candidate who lacks specific skills, knowledge or experience, a description of the gaps and steps that will be taken to support the candidate in addressing the gaps; and
- (c) In the case of re-appointment, objective assessments of the candidate's past performance on the Board.



An application for a CEO must include an elaboration of the Board's assessment of the candidate and the contribution expected from him/her having regard to the strategies, objectives and business plans of the Bank.

- (2) The Bank must submit an application to BNM at least 3 months before the individual is expected to assume the proposed responsibilities as Chairman, Director and/or CEO of the Bank. In the case of re-appointment, applications must be submitted 3 months prior to the expiry of the individual's existing term.
- (3) The Bank must not make an application to BNM to appoint or re-appoint a Director unless the Board is wholly satisfied that the candidate meets the criteria of Directors as set out in Section 5.4 of this F&P Policy, understands the expectations of the role and is able to meaningfully contribute to the Board.
- (4) The Bank must not make an application to BNM to appoint or re-appoint a CEO unless the Board is wholly satisfied that the candidate meets the criteria of CEO as set out in Section 5.8 of this F&P Policy.
- (5) Unless the written approval of BNM has been obtained
 - (a) The Bank must not publicly announce the proposed appointment of a Chairman, Director and/or CEO; and
 - (b) A Chairman, Director and/or CEO whose tenure has expired and is being proposed for re-appointment must immediately cease to hold office and act in such capacity, including by participating in Board meetings or holding himself/herself out as a Chairman, Director and/or CEO.

5.3 Statutory Requirements

In the assessment of New Appointments or Re-Appointments, as the case may be, the NRC shall inter alia be guided by the provisions of the FSA 2013, BNM CG Policy, BNM F&P Policy, the CA 2016 and the Capital Markets and Services Act 2007, where applicable, and any amendments made thereto from time to time as well as applicable new legislations and guidelines introduced from time to time (collectively referred to as the "**Statutory Requirements**").

5.4 Criteria of Directors

- (1) A person is disqualified from being appointed or elected, re-appointed or re-elected, accepting any appointment or election, or holding office, as a Chairman and Director of the Bank if—
 - (a) he/she is an undischarged bankrupt, has suspended payments or has compounded with his/her creditors whether in or outside Malaysia;
 - (b) a charge for a criminal offence relating to bribery, dishonesty or fraud under any written law or the law of any country, territory or place outside Malaysia, has been proven against him/her;
 - (c) he/she is prohibited from being a Director of a company or in any way, whether directly or indirectly, be concerned or take part in the management of a company in Malaysia pursuant to a Court order made under Section 199 of the CA 2016 and has not obtained any leave of the Court under the same section;
 - (d) he/she has been convicted of an offence relating to the promotion, formation or management of a company;



- (e) he/she has been convicted of an offence under Sections 213, 217, 218, 228 and 539 of CA 2016; or
- (f) under any law relating to prevention of crime, drug trafficking or immigration-
 - (i) an order of detention, supervision, or deportation has been made against that person; or
 - (ii) any form of restriction or supervision by bond or otherwise, has been imposed on him/her.
- (2) A Director of the Bank must not have competing time commitments that impair his/her ability to discharge his/her duties effectively.
- (3) A Director of the Bank must not be an active politician.
- (4) Where a firm has been appointed as the external auditor of the Bank, any of its officers directly involved in the engagement and any partner of the firm must not serve or be appointed as a Director of the Bank until at least 2 years after-
 - (a) he/she ceases to be an officer or partner of that firm; or
 - (b) the firm last served as an auditor of the Bank.
- (5) A Director must immediately disclose to the Board any circumstances that may affect his/her ability to meet the criteria of Directors as set out above. In such a case, the NRC and the Board shall review the status of the Director and to undertake the necessary actions specified in Section 5.1(D), if deemed appropriate.

5.5 Criteria of Independent Directors

- (1) BNM CG Policy states that the Board must determine whether an individual to be appointed as an independent director is independent in character and judgement, and free from associations or circumstances that may impair the exercise of his/her independent judgement. An individual must not be considered to be an independent director if he/she or any person linked to him/her:
 - (a) has been an executive in the last 2 years;
 - (b) is a substantial shareholder of the Bank or any of its affiliates; or
 - (c) has had a significant business or other contractual relationship with the Bank or any of its affiliates within the last 2 years.

"Significant business or other contractual relationship" refers to any transactions or contractual relationships with the Bank or any of its affiliates where the consideration in aggregate exceeds 5% of the gross revenue on a consolidated basis (where applicable) of the Entity or RM1 million, whichever is the higher. "Entity" refers to a firm or corporation where the said independent director is a partner, Director (except as an independent director) or major shareholder.

(2) An independent director must immediately disclose to the Board any change in his/her circumstances that may affect his/her status as an independent director. In such a case, the Board must review his/her designation as an independent director and notify BNM in writing of its decision to affirm or change his/her designation.



5.6 Criteria of the Chairman of the Board

- (1) The Chairman of the Board must not be an Executive Director, and must not have served as a CEO of the Bank in the past 5 years.
- (2) The Chairman of the Board must not be a Chairman of the Board Committees.

5.7 Tenure of Independent Directors

The tenure of an independent director shall not exceed a cumulative term of 9 years from the date of his/her first appointment in the Bank. Upon completion of the 9 years, an independent director shall retire on the expiry date of his/her term of office approved by BNM.

5.8 Criteria of CEO

- (1) FSA 2013 provides that a person is disqualified from being appointed or elected, re-appointed or re-elected, accepting any appointment or election, or holding office, as a CEO of the Bank if—
 - (a) he/she is an undischarged bankrupt, has suspended payments or has compounded with his/her creditors whether in or outside Malaysia;
 - (b) a charge for a criminal offence relating to dishonesty or fraud under any written law or the law of any country, territory or place outside Malaysia, has been proven against him/her;
 - (c) he/she is prohibited from being a Director of a company or in any way, whether directly or indirectly, be concerned or take part in the management of a company in Malaysia pursuant to a Court order made under Section 199 of the CA 2016 and has not obtained any leave of the Court under the same section; or
 - (d) under any law relating to prevention of crime, drug trafficking or immigration-
 - (i) an order of detention, supervision, or deportation has been made against that person; or
 - (ii) any form of restriction or supervision by bond or otherwise, has been imposed on him/her.
- (2) A substantial shareholder of the Bank must not hold a CEO or senior management position of the Bank.
- (3) A CEO must devote the whole of his/her professional time to the service of the Bank unless BNM approves otherwise in writing.
- (4) A CEO must immediately disclose to the Board any circumstances that may affect his/her ability to meet the criteria of CEO as set out above. In such a case, the NRC and the Board shall review the status of the CEO and to undertake the necessary actions specified in Section 5.1(E), if deemed appropriate.

6. PERSONAL DATA PROTECTION

The Bank will comply with the requirements in the Personal Data Protection Act 2010 ("**PDPA**") in carrying out the F&P assessment, including the requirement to obtain consent for the processing of personal data and provisions relating to data collection.



7. RECORDS MAINTENANCE

- (1) The Company Secretary of the Bank shall maintain a current list of Directors and CEO who are subject to this F&P Policy and the Annual F&P Assessment.
- (2) The Company Secretary of the Bank shall maintain comprehensive records of all documents and information relating to the F&P assessment of Chairman, Directors and CEO for a period of seven (7) years from the date of resignation or retirement of Chairman, Directors or CEO.
- (3) The documents and information recorded and maintained shall include correspondences (where applicable), report(s) on Independent Background Checks, information relating to and produced in the course of the F&P assessment.
- (4) All documents and information collected and maintained in relation to F&P assessment shall be kept strictly confidential and with its integrity safeguarded. The Company Secretary of the Bank shall securely maintain all such documents in a locked storage facility and ensure that access is restricted to authorised personnel within the Company Secretarial Department who are responsible for the secretarial functions of the Bank.

8. COMPLIANCE OF F&P POLICY

- (1) Compliance with this F&P Policy is the responsibility of each individual Director and CEO as well as the Board as a whole. Directors and CEO shall comprehend the F&P requirements in this F&P Policy and their obligation to continue meeting the F&P criteria set by BNM on an on-going basis.
- (2) The Company Secretary shall furnish this F&P Policy to:
 - (a) the current Chairman, Directors and CEO on an annual basis; and
 - (b) a person to be appointed as Chairman, Director or CEO prior to his/her appointment.

9. **DEFINITIONS**

"Bank" or "HLIB" refers to Hong Leong Investment Bank Berhad.

"BNM" refers to Bank Negara Malaysia.

"BNM CG Policy" refers to BNM policy document on Corporate Governance.

"BNM F&P Policy" refers to BNM policy document on Fit and Proper Criteria.

"BNM Guidelines" refers to the BNM F&P Policy and BNM CG Policy collectively.

"Board" refers to the Board of Directors of the Bank.

"CA 2016" refers to the Companies Act 2016.

"CEO" refers to the Group Managing Director/Chief Executive Officer.



"FSA 2013" refers to Financial Services Act 2013.

"F&P Policy" refers to Fit and Proper Policy for Directors and Chief Executive Officer.

"NRC" refers to the Nomination and Remuneration Committee of the Bank.



Appendix 1

HONG LEONG INVESTMENT BANK BERHAD

BANK NEGARA MALAYSIA POLICY DOCUMENT ON FIT AND PROPER CRITERIA ("BNM F&P CRITERIA")

This declaration shall be made by all Key Responsible Persons ("**KRP**") including Directors, Chief Executive Officers, Members of the Shariah Committees and Senior Officers pursuant to the BNM F&P Criteria

I hereby declare the following, to the best of my knowledge, and give consent to <u>Hong Leong Investment</u> <u>Bank Berhad ("**HLIB**") to conduct background check and investigation as and when the need arises.</u>

No.	1.0 Probity, Personal Integrity and Reputation	Yes	No
1.1	Are you or have you been the subject of any proceedings of a disciplinary or criminal nature, or have been notified of any impending proceedings or of any investigations, which might lead to such proceedings?		
	If yes, please provide details.		
1.2	Have you contravened any provision made by or under any written law designed to protect members of the public against financial loss due to dishonesty, incompetence or malpractice?		
	If yes, please provide details.		
1.3	Have you contravened any of the requirements and standards of a regulatory body, professional body, government or its agencies?		
	If yes, please provide details.		
1.4	Have you, or any business in which you have a controlling interest or exercise significant influence, been investigated, disciplined, suspended or reprimanded by a regulatory or professional body, a court or tribunal, whether publicly or privately?		
	If yes, please provide details.		
1.5	Have you engaged in any business practices which are deceitful, oppressive or otherwise improper (whether unlawful or not), or which otherwise reflect discredit on your professional conduct?		
	If yes, please provide details.		
1.6	Have you ever been dismissed, asked to resign or resigned from employment or from a position of trust, fiduciary appointment or position because of questions about your honesty and integrity?		
	If yes, please provide details.		



HONG LEONG INVESTMENT BANK BERHAD Fit and Proper Policy for Directors and Chief Executive Officer

No.	1.0 Probity, Personal Integrity and Reputation	Yes	No
1.7	Have you ever been associated, in ownership or management capacity, with any company, partnership or other business association that has been refused registration, authorization, membership or a license to conduct any trade, business or profession, or have had that registration, authorization, membership or license revoked, withdrawn or terminated?		
	If yes, please provide details.		
1.8	Have you held a position of responsibility in the management of a business that has gone into receivership, insolvency, or involuntary liquidation while you were connected with that business?		
	If yes, please provide details.		
1.9	Have you ever been a director of, or directly concerned in the management of, any corporation which is being or have been wound up by a court or other authority competent to do so within or outside Malaysia?		
	If yes, please provide details.		
1.10	Have you ever been a director of, or directly concerned in the management of any financial institution, the license of which has been revoked?		
	If yes, please provide details.		
1.11	In the past, have you acted unfairly or dishonestly in your dealings with your customers, employers, auditors and regulatory authorities?		
	If yes, please provide details.		
1.12	Have you at any time shown a strong objection or lack of willingness to cooperate with regulatory authorities resulting in a failure or potential failure to comply with legal, regulatory and professional requirements and standards, including compliance with tax requirements and obligations? If yes, please provide details.		
1.13	Have you at any time contributed significantly to the failure of an		
	organization or a business unit?		
	If yes, please provide details.		
1.14	Have you at any time shown strong objection or a lack of willingness to maintain effective internal control systems and risk management practices?		
	If yes, please provide details.		



HONG LEONG INVESTMENT BANK BERHAD Fit and Proper Policy for Directors and Chief Executive Officer

No.	1.0 Probity, Personal Integrity and Reputation	Yes	No
1.15	Do you have any business or other relationship which could materially pose a conflict of interest or interfere with the exercise of your judgment when acting in the capacity of a key responsible person which would be disadvantageous to the Financial Institution or the Financial Institution's interest?		
	If yes, please provide details.		
1.16	Has there been any penalty imposed and reprimand issued against you by a supervisory authority in or outside Malaysia?		
	If yes, please provide details.		
1.17	Have you ever been unsuccessful in any application with Bank Negara Malaysia for appointment or re-appointment as Director or Chief Executive Officer of a Financial Institution (Banking Institution, Insurance Company, Takaful Operator or Financial Holding Company)?		
	If yes, please provide details.		
1.18	Are you an active politician?		
	If yes, please provide details.		
	"active politician" refers to an individual who is a member of any national or state legislative body, or who is an office bearer of, or holds any similar office or position in a political party.		

No.	2.0 Competence and Capability	Yes	No
2.1	Do you have the appropriate qualification, training, skills, practical experience and commitment to effectively fulfill the role and responsibilities of the position and in the case of a director, having regard to your other commitments?		
2.2	For staff only: Do you have satisfactory past performance or expertise in the nature of the business being conducted?		



No.	3.0 Financial Integrity	Yes	No
3.1	Have you been, and would you be able to fulfill your financial obligations, whether in Malaysia or elsewhere, as and when they fall due? If no, please provide details.		
3.2	Have you been the subject of a judgment debt which is unsatisfied, either in whole or in part, whether in Malaysia or elsewhere? If yes, please provide details.		

Note:

1. You may use additional pages if necessary

I acknowledge and understand the fit and proper requirements outlined in the Fit and Proper Policy for Directors and Chief Executive Officer of HLIB, and my obligation to continue meeting those requirements on an ongoing basis. I undertake to immediately inform HLIB of the occurrence of any event that may materially compromise my fitness and propriety to act as a KRP of HLIB and thereby render my declaration above no longer applicable.

Signature of KRP	:	Designation/ Position	:
Full Name	:	Div / Dept	:
NRIC/Passport No.	:	Date	:



Appendix 2

Independent Background Checks

The independent background checks to be conducted by the Bank to verify the information disclosed in the F&P Declaration, shall cover, amongst others, the following areas:

- (i) Civil Litigation
 - Search includes all serious and minor litigation that is publicly available.
- (ii) Criminality/Local Integrity check
 - Search covers criminal records that are publicly available, offences from police open sourced databases, courts and enforcement agencies.
- (iii) Cyber Vetting/Adverse Media Search
 - Search includes all public media, online and publication search for adverse findings on the subject.
- (iv) Global Integrity Check
 - Search if the subject is linked to any International Sanctions, Anti Money Laundering, Counter Terrorist Financing, Interpol, Politically-Exposed Persons globally.
- (v) Malaysian Regulatory Searches
 - Search if the subject has been blacklisted as a cautioned individual by Malaysian Regulatory Bodies such as Bank Negara Malaysia, Securities Commission Malaysia and Malaysian Anti-Corruption Commission.