



Anti-Corruption, Gifts and Entertainment Guidelines

Commitment

The Alliance for Financial Inclusion (AFI) is committed to conduct its business with utmost integrity and to zero-tolerance to corruption.

In line with the Anti-Corruption Policy, AFI has developed the Anti-Corruption, Gifts and Entertainment Guidelines (“Guidelines”) to provide guidance to the Board of Directors, employees, consultants and stakeholders on its relationship with service providers and members. Similarly, service providers must comply with the terms spelt out in this document in their relationship with AFI.

Guidelines

1. AFI condemns any form of bribery or corruption. Directors and staff shall not accept bribes and shall take all measures to prevent corrupt practices in all AFI’s dealings with stakeholders.
2. In addition, customers and suppliers shall not:
 - (a) offer or provide, directly or through any intermediaries, any bribe, gift, reward, consideration, favor or any other advantage, whether material or immaterial (“Advantages”) to any representative of AFI for the purpose of:
 - (i) influencing them to act contrary to AFI’s interest; or
 - (ii) obtaining or rewarding favorable treatment by AFI with respect to the terms, conditions, price or performance of a contract or AFI Service offering;
 - (b) offer or provide Advantages which might be considered a bribe under international legislation, to a government official, either in Malaysia or any other country.
3. AFI members and suppliers will ensure that all their employees, sub-contractors or agents are aware of and comply with the provisions in this document.
4. Members and suppliers shall ensure that they adhere to the following:
 - **Gifts**

Any gift must be unsolicited and must not affect or be perceived to affect, business judgement. Gifts of modest value can only be offered to and received in connection with a customary conventional hospitality such as at ceremonies or cultural occasion. Such gifts may not exceed the equivalent of USD50 per gift item. Cash or kickbacks are strictly prohibited.



- **Hospitality (meals and entertainment)**
Similarly, hospitality must be unsolicited and not affect, or be perceived as affecting, business judgment. Meals and entertainment should only be offered to and received from the specific AFI staff dealing with the service provider in respect to their role in AFI and may only be offered in conjunction with legitimate business meetings, conferences or events hosted, supported or sponsored by AFI. They may never be provided on a stand-alone basis. Hospitality must be of modest value and may not exceed the equivalent of USD100 per occasion.

- **Prohibition against Electioneering**
Please note that AFI or its staff may not contribute to any political activities or take part in any political activities in any country of its members.

Obligation to Report Corrupt Practices

AFI staff are obliged to report in writing any case of attempted corruption or breach of these regulations to the Executive Director as soon as practicable but in any case, within 48 hours of occurrence.

In the case of the Executive Director, he/she shall report such case or breach to the Chair of the Board of Directors or the Vice-Chair in the absence of the Chair.

In the case of a member of the Board of Directors, he/she shall report such case or breach to the Chair of the Board and in the case of the Chair of the Board, he/she shall report such case of breach to the Vice-Chair of the Board.

Policy

These Guidelines shall be read and applied together with the AFI Anti-Corruption Policy.

Approved by the Board of Directors on 19 April 2018.