

Policy and Implementation

BCAS is committed to maintaining the trust of all stakeholders by avoiding any forms of corruption, collusion, and nepotism. In its operations, BCAS does not tolerate any acts of fraud, corruption, collusion, nepotism, or gratuities. This policy refers to the Anti-Gratuity implementation at BCA, the parent company of BCAS.

BCAS must take firm steps to neither give nor receive gratuities from customers, potential customers, or partners. To ensure its proper implementation, BCAS has established policies related to the control of gratuities, which include the following provisions:

1. All employees are strictly prohibited from soliciting or accepting, authorizing, or agreeing to receive any gifts or rewards from third parties seeking or attempting to secure facilities from BCAS, whether in the form of financing facilities or other facilities related to BCAS's operational activities. This prohibition also extends to third parties seeking or attempting to secure contracts or orders related to the procurement of goods and services from BCAS.
2. Should any party present a gift, and if accepting the gift is believed to have a negative impact and influence BCAS's decisions, and the value of the gift exceeds reasonable limits, the employee who receives the gift must immediately return it, accompanied by a courteous explanation that all employees are prohibited from accepting gifts;
3. In instances where returning the gift is impracticable for various reasons, the employee who receives the gift must promptly submit a written report to their supervisor for appropriate action in accordance with the prevailing regulations.

Joint Commitment

In line with BCAS's commitment to the implementation of Good Corporate Governance, the following obligations are mandated:

1. All BCAS personnel must be informed, understand, and diligently execute the Provisions regarding Conflicts of Interest with utmost responsibility and without exception.
2. To facilitate the enforcement of these provisions, members of the Board of Commissioners, Directors, and officers from Grade 5 to Grade 7 are required to submit an annual disclosure statement that outlines any conditions or situations that may give rise to a conflict of interest. This annual disclosure is self-assessed, thereby making each employee responsible for the accuracy of their declarations. Nevertheless, BCAS retains the right to verify the veracity of these statements.

Annual disclosures are prepared at the end of each year and submitted to the immediate supervisor. These disclosures are confidential, and the receiving officer must maintain their confidentiality. Any conflicts of interest or violations are evaluated by the immediate supervisor or escalated to a higher level if necessary and reported to the Legal and Human Resources Department. The unit leader is responsible for coordinating the preparation of annual disclosures and monitoring any violations or non-compliance with this policy.