

# MALAYSIAN–FINNISH BUSINESS COUNCIL

## Compliance Charter

*Adopted by resolution of the Executive Committee on 27.4.2026 pursuant to Article 37(e)–(f) of the Articles of Association of the Malaysian–Finnish Business Council*

### 1. Purpose and Scope

The Malaysian–Finnish Business Council (“MFBC”) is a non-profit bilateral business council. Its purpose is to facilitate networking, policy dialogue, and trade promotion between Malaysia and Finland. The MFBC is not a trade association, industry coordination body, or commercial negotiation forum.

This Compliance Charter applies to all members, their representatives, and all activities conducted under the auspices of the MFBC. It is issued to satisfy the compliance requirements of member organisations subject to corporate anti-corruption, competition law, and related regulatory obligations.

### 2. Nature of the Council

The MFBC is strictly a facilitative and informational platform. It does not:

- negotiate or coordinate pricing, terms, or commercial conditions on behalf of members;
- allocate markets, customers, territories, or suppliers among members;
- consolidate or formalize common commercial positions among competing members;
- act as agent, representative, or negotiator for any member unless expressly mandated in writing for a specific administrative purpose; or
- collect, maintain, or distribute confidential commercial data relating to the private business operations of its members.

### 3. Independence of Members

All members of the MFBC remain fully independent economic operators. Participation in the MFBC does not create any partnership, joint venture, agency, or fiduciary relationship among members. Each member retains sole and exclusive responsibility for its own:

- commercial decisions and business strategy;
- pricing policies and sales terms;
- contractual arrangements and supplier relationships; and
- procurement and sourcing practices.

## **4. Prohibited Conduct**

The MFBC strictly prohibits the use of its platform, events, or communications for any unlawful, anti-competitive, or corrupt purpose. Members shall not, in connection with any MFBC activity, engage in, facilitate, or give rise to discussions or understandings relating to:

### **4.1 Competition Law Compliance**

- Pricing: discounts, margins, rebates, surcharges, or specific sales terms;
- Market or customer allocation: division of territories, customers, or distribution channels;
- Output restrictions: coordinated production levels, supply limitations, or capacity withholding;
- Bid rigging: coordination of tender responses or procurement strategies; or
- Sensitive commercial information: exchange of non-public data on costs, capacity, sales volumes, or business plans.

### **4.2 Anti-Bribery and Anti-Corruption**

- Offering, promising, giving, requesting, or accepting any bribe, kickback, or improper benefit — whether to a public official or private party;
- Making or authorising facilitation payments of any kind; or
- Using MFBC engagements with government authorities or policymakers as a vehicle for improper commercial influence.

## **5. Duty to Object and Withdraw**

Any member representative who becomes aware that a discussion, meeting, or communication has moved — or risks moving — into territory covered by Section 4 above must:

- immediately and clearly object;
- withdraw from the discussion or meeting if the matter is not promptly redirected; and
- report the matter to their organisation's legal or compliance function.

The MFBC Secretariat shall ensure that a standing compliance reminder is included in the agenda of all formal meetings.

## **6. Government and Policy Engagement**

The MFBC may facilitate collective dialogue between members and Malaysian or Finnish authorities on matters of general policy (such as immigration, skills, and workforce development). All such engagement shall be:

- conducted transparently, with the topic and scope of engagement communicated to participants in advance where practicable;

- collective and general in nature — not on behalf of any individual member's commercial interests; and
- free from any offer, inducement, or improper benefit to any public official or authority.

Advocacy and policy dialogue sessions are conducted on an informal, dialogic basis and formal minutes are not routinely prepared. Where practicable, a brief note of the date, attendees, and topics discussed will be recorded by a participating member; the absence of formal minutes does not reduce any member's compliance obligations under this Charter.

## 7. Enforcement and Disciplinary Action

Any member found to have used MFBC activities as a vehicle for conduct prohibited under this Charter shall be subject to disciplinary action by the MFBC Board, which may include:

- a formal written warning;
- suspension of participation rights; or
- termination of membership by Board resolution.

## 8. Binding Effect

This Compliance Charter was adopted by resolution of the Executive Committee on 27.4.2026 pursuant to Article 37(e)–(f) of the Articles of Association of the Malaysian–Finnish Business Council, and is recorded in the minutes of the meeting of the Executive Committee. In accordance with Article 37(b), this Charter is binding on all members until and unless countermanded by members at a general meeting. The Executive Committee intends to submit this Charter for ratification by the members at the next Annual General Meeting.

By maintaining membership in the MFBC, paying annual dues, or participating in Council activities, each member is deemed to have acknowledged and agreed to comply with this Charter. Each member company is responsible for ensuring that its representatives are made aware of and adhere to these standards in all MFBC interactions.

### Adopted on behalf of the Malaysian–Finnish Business Council

Signed:



Name:

Jari Silventoinen

Title:

Chairman

Date:

27.4.2026