



Global Compact
Network
Malaysia & Brunei



Anti-Corruption:

Implementing TRUST Principles
for Business Integrity Competence

Supporting Partner



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for Business Integrity Competence

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The case studies describe the successful implementation of adequate procedures as outlined by the Malaysian Anti-Corruption Commission (MACC) and the practical application of the TRUST principles. We would like to thank the participating companies for their valuable contribution.

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In a world where corruption remains a significant barrier to economic and social development, the imperative for businesses to advance integrity and transparency is more pressing than ever. Corruption not only hampers business growth but also escalates costs and poses serious legal and reputational risks. It raises transaction costs, undermines fair competition, and distorts development priorities, particularly affecting the most vulnerable communities.

At UNGCMYB, we believe in the transformative power of collective action. The Tenth Principle of the UN Global Compact unequivocally states that **“Businesses should work against corruption in all its forms, including extortion and bribery.”** This principle underscores our call to companies to develop robust policies and programs addressing all forms of corruption.

The case studies presented in this collection highlight the successful implementation of anti-corruption measures by corporates and SMEs in Malaysia. These companies exemplify the practical application of the TRUST principles, and that regardless of business size, they can showcase how robust anti-corruption practices can protect reputations and stakeholder interests while fostering sustainable business growth.

We commend these companies for their leadership and commitment to transparency. Their efforts not only enhance their performance but also contribute to a more transparent global economy.

It is our hope that these case studies will serve as valuable resources, inspiring other businesses to adopt best practices and join the collective fight against corruption.

Together, through collaboration and unwavering commitment, we can realise a world where business integrity prevails, fostering a sustainable and equitable future for all.



Faroze Nadar, Executive Director



Global Compact
Network
Malaysia & Brunei

EXECUTIVE SUMMARY

Anti-Corruption:
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CHALLENGES

Resistance to change from both within and outside the organisation.



LEADERSHIP COMMITMENT

Demonstrate ethical leadership values and lead by example.



Build a culture of honesty by providing avenues for information exchange and engagement.



Transformative initiatives to enhance supply chain integrity.



01

Comprehensive corruption risk management framework ISO 37001



02

Anti-corruption adequate procedures (TRUST) framework



03

Anti-Bribery Policy and Code of Conduct



04

Mandatory Anti-Bribery and Corruption Training



ENSURING EFFECTIVENESS

Collective action to scale positive impacts

05

Regular audits and transparent reporting

06

Monitoring and enforcing anti-corruption measures

07



BENEFITS

Ability to attract like-minded partners and secure long-term business.

Enhanced trust, confidence and respect among stakeholders.

Greater acceptance of anti-corruption practices among supply chain network.

Why Case Studies on Anti-Corruption?

Anti-Corruption:
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The Malaysian Anti-Corruption Commission (MACC) Act 2009 establishes the legal framework to combat corruption. This provision holds commercial organisations liable for corruption committed by their employees or associates, underscoring the need for robust anti-corruption measures within corporate structures.



If a commercial organisation is found guilty under Section 17A, the penalty is a fine of not less than 10 times the value of the bribe or RM 1 million, whichever is higher, or imprisonment for up to 20 years, or both. However, the commercial organisations can defend themselves if they can show that the organisation has implemented 'Adequate Procedures' in its operation. MACC provides guidelines on Adequate Procedures following the TRUST principles.

The case studies presented in this collection are therefore essential for several reasons:

- 01**

Practical Demonstration of Compliance	They illustrate how companies have effectively implemented adequate procedures to align with the corporate liability provision under Section 17A of the MACC Act 2009.
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- 02**

Guidance for Programs based on TRUST Principles	By providing detailed insights into the application of the TRUST principles - Top Level Commitment, Risk Assessment, Control Measures, Review, Monitoring, Enforcement, and Training & Communication - these studies serve as valuable resources for other organisations initiating their business integrity programs.
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- 03**

Promote Collective Action	To underline the role of collective action in combating corruption in the private sector, encouraging businesses to join forces with peers, suppliers, agents and other stakeholders.
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Anti-Corruption:

Implementing TRUST Principles
for Business Integrity Competence

The Case Studies

Partnering with Integrity: Duopharma Biotech Enables Business Associates Through Anti-Corruption Programs

Company Name:

Duopharma Biotech Berhad

Industry:

Healthcare

Company Description

Duopharma Biotech Berhad (Duopharma Biotech) is esteemed as one of Malaysia's leading pharmaceutical companies, renowned for its leadership and innovation in the industry. The company specialises in manufacturing, research and development, and commercialisation of over 300 generic drugs, including well-known brands like Omesec and Prelica, as well as consumer healthcare products such as CHAMPS®, FLAVETTES®, PROVITON®, and Uphamol. Duopharma Biotech has expanded its business into biosimilars through strategic collaborations with international partners. Headquartered in Kuala Lumpur, Duopharma Biotech operates three manufacturing plants in Klang, Bangi, and Glenmarie, Selangor. It has subsidiaries in the Philippines, Singapore and Indonesia. The company exports to numerous countries, including Ethiopia, Sudan, Papua New Guinea, Pakistan, Bangladesh, Sri Lanka, Republic of Yemen and Hong Kong. Duopharma Biotech is committed to providing equitable and accessible healthcare to all Malaysians, leveraging its professional knowledge to offer medicines, health supplements, and healthcare devices. The company prioritises innovation and quality, guided by the fundamental principles of passion, excellence, teamwork, integrity, responsible, and respect. This dedication has garnered Duopharma Biotech numerous national and international honours and recognition, demonstrating its effectiveness in providing high-quality, innovative healthcare solutions.



Key Takeaways

Duopharma Biotech realised that **supply chain integrity** was essential to running their business in a sustainable and ethical manner. Over a decade ago, they started with a supply chain risk assessment and identified several unethical issues within downstream activities. This prompted Duopharma Biotech to strengthen its governance to prevent unethical practices among its business associates. However, it was challenging to transform the **mindset** of these associates to adopt ethical standards and streamline previously ambiguous activities and processes that were once considered acceptable in the industry.

In response, Duopharma Biotech began to conduct briefings on Integrity and Anti-Corruption policy for all registered business associates and introduced the Integrity Pact in 2015, initially allowing voluntary participation by the associates. In August 2019, following the Board's approval of the updated Integrity Pact Policy, it became mandatory for all Duopharma Biotech key business associates including agents to sign the Integrity Pact. In 2021, the **Integrity Pact Policy and Agreement** were reviewed and enhanced to ensure the Agreement was truly bilateral, with both parties jointly defining the requirements, obligations, and sanctions for noncompliance.

In December 2022, an inaugural batch of 27 business agents participating in the Integrity & Anti-Corruption programme pledged their commitment to integrity, ethics, and anti-corruption by signing the **Ikrar Bebas Rasuah (IBR)**.

By 2023, Duopharma Biotech implemented the Integrity and Anti-Corruption Programme for all key business associates, including agents. In compliance with the MACC Act 2009, external business associates are required to complete the programme to ensure adherence to the integrity and anti-corruption standards. This has been a transformative approach that has uplifted the integrity standard in the pharmaceutical industry.

Duopharma Biotech encourages and adopts principles of ethical leadership, raising integrity and responsibility in the industry. The company's board of directors' **steadfast dedication and commitment** to integrity and anti-corruption principles underscores the pivotal role of leadership in embedding a culture of business integrity throughout the company and its entire ecosystem, laying the foundation for sustainable success. Embracing these anti-corruption principles and practices has fostered greater **trust and confidence** in the company's business processes and activities. Duopharma Biotech's initiatives align with global efforts to eradicate corruption, ensuring long-term business viability and significantly enhancing its corporate image. These activities contribute positively to the fulfilment of the **UNGC 10th Principle**.

“

Business Integrity drives our future. By championing an anti-corruption strategy, we build trust, fuel innovation, and secure sustainable success. Such practices pave our path to industry leadership and create lasting values for our stakeholders. ”

Mr. Leonard Ariff Bin Abdul Shatar
Group Managing Director, Executive Director

Framework Overview

Duopharma Biotech is dedicated to adhering to all relevant laws, regulations, and policies in its operating countries, ensuring honest and ethical business practices. This commitment includes compliance with the Malaysian Anti-Corruption Commission Act 2009 (Act 694) and MACC (Amendment) Act 2018, which took effect on 1st June 2020 and introduced the Corporate Liability concept. This Policy strives to guarantee that Duopharma Biotech complies with anti-corruption laws in Malaysia and other countries where it does business. This policy applies to all directors, officers, and employees of Duopharma Biotech, its subsidiaries, and related entities, regardless of where they work. This policy has broad principles and prohibitions across its supply chain system (i.e., suppliers, vendors, agents, distributors, consultants, and other third parties acting on Duopharma Biotech's behalf, regardless of citizenship or location).

Adequate Procedures Based on TRUST Principles

T

Top-Level Commitment



Duopharma Biotech's board commitment ensures compliance with Anti-Bribery Management System (ABMS) requirements and the company's corruption risk assessment framework. Duopharma Biotech's senior management demonstrates an **unwavering commitment** to anti-corruption measures through various strategic initiatives. By embodying the principles of **integrity, transparency, and accountability**, the senior management has instilled a culture of high ethical standards within the organisation.

The company adopts a **zero-tolerance stance towards bribery, corruption, and fraud**, expecting employees and business associates to uphold these rigorous ethical standards. This is evident from the achievement of ABMS ISO 37001 certification in 2020, assigning the Malaysian Anti-Corruption Commission's Corporate Integrity Pledge, and reaffirming commitment by signing the Ikrar Bebas Rasuah. Furthermore, the company places significant emphasis on whistleblower protection and response mechanisms. Established in 2018 and revised in 2022 to align with ISO37002:2021 - Whistleblowing Management Systems Guidelines, the whistleblowing policy safeguards against reprisals or victimisation for individuals reporting misconduct.

R

Risk Assessment



Based on the criteria outlined by the Malaysian Standard MS2764, Duopharma Biotech has implemented a strict **Corruption Risk Management (CRM) system**. The business identifies, assesses, and methodically resolves corruption risks following ABMS ISO 37001:2016 guidelines. The system is reviewed and upgraded every three years to address new hazards successfully. The company also does **desktop due diligence (“KYC”)** on new businesses before working with them to evaluate corruption risks and guarantee compliance. Furthermore, the organisation has instituted the Integrity and Anti-Corruption Programme for all key business associates, including agents.

In compliance with the MACC Act 2009, the identified external business associates are required to finish a 14-module course within a year to ensure adherence to integrity and anti-corruption standards. In addition, Duopharma Biotech implemented the **Corruption Risk Management (CRM) methodology**, which aids in uncovering structural flaws relating to fraud, bribery, and corruption issues. Approved by the Board, the CRM engages all key workers, and fosters shared responsibility for recognising and reducing corruption risks. This action embeds corruption prevention measures into the fabric of the company. Employees are regularly informed about anti-corruption policies by email, which is also available on the intranet and website in English and Bahasa Malaysia language for convenient reference. Additionally, briefing sessions and refreshers are conducted for employees at all sites, either in person or virtually. These policies are reinforced through reminder cards, bunting, posters, computer screensavers, and communication via Integrity Champions.

U

Undertake Control Measures



Duopharma Biotech upholds supply chain integrity through rigorous control measures outlined in its Anti-Bribery and Anti-Corruption Policy, which the Integrity Pact Agreement supplements. Annual briefings and integrity information are disseminated among vendors, reinforcing adherence to the company’s **Business Ethics Policy and ABMS Policy**, prominently displayed across all facilities. Duopharma Biotech conducts regular internal audits to verify that vendors adhere to rigorous standards of Good Manufacturing Practices (GMP) and Good Distribution Practices (GDP). Duopharma Biotech has been digitising work processes such as E-Bidding to enhance transparency in procurement practices. This **digital transformation** facilitates real-time monitoring, automated reporting, secure documentation, and robust audit trails. It also supports secure whistleblower systems and compliance training, ensuring accountability and adherence to standards.

Implementing the Integrity Pact in 2015 is pivotal to showcase the company’s commitment to fostering an ethical business environment. The Group implemented the Integrity Pact in 2015, initially allowing voluntary participation by suppliers. Following the Board’s approval of the updated Integrity Pact Policy in August 2019, it became mandatory for all Duopharma Biotech

(cont’d on next page)

Undertake Control Measures *(cont'd)*

suppliers to sign the Integrity Pact by this Policy. In 2021, the **Integrity Pact Policy and Agreement** were reviewed and enhanced to ensure that the Agreement is truly bilateral, with both parties jointly defining the requirements, obligations, and sanctions for noncompliance. Such proactive measures mitigate corruption risks and promote a culture of transparency and accountability throughout the supply chain.

Duopharma Biotech's comprehensive integrity and anti-bribery & anti-corruption policies also address conflicts of interest and promote ethical conduct within its workforce. These policies provide clear guidelines for managing conflicts of interest, ensuring decisions are made impartially and in the company's best interests. Rigorous desktop due diligence is conducted on all prospective business associates and employees, particularly those in managerial roles, to mitigate potential risks. Additionally, stringent control policies on gifts prohibit the offering or accepting cash or cash-equivalent gifts, safeguarding against any perception of impropriety and reinforcing the company's unwavering commitment to ethical business practices.

S

Systematic Review, Monitoring, and Enforcement (S)



Duopharma Biotech upholds rigorous standards in integrity and governance through its dedicated Integrity function, which conducts independent reviews and evaluates internal controls systematically. Supplier evaluations are conducted annually to assess corruption **risk exposure and adherence to TRUST principles**, further fortifying the company's commitment to ethical business practices. The integrity function is crucial to assuring the robustness and integrity of the internal control system, particularly in controlling the critical area of corruption risk within the Corruption Risk Management (CRM) framework. Any findings are communicated to senior management and the Board, ensuring transparency and accountability across all operations. In the event of potential corruption issues, the company maintains a proactive approach with thorough investigations and immediate referral to the Malaysian Anti-Corruption Commission (MACC).

The company maintains a **zero-tolerance policy** towards corruption, underscoring its unwavering dedication to upholding ethical standards and fostering a culture of compliance. Duopharma Biotech's steadfast commitment to combating corruption is highlighted by its notable achievements and accolades. The company's ABMS ISO 37001 certification without non-conformance reports and inclusion in the FTSE4Good Bursa Malaysia Index exemplify the effectiveness of its anti-corruption initiatives.

Recognition through awards such as the **Five Petals Gold Ethics Award** and the **Integrity, Governance and Anti Corruption Award (AIGA)** further validate its success in promoting integrity and governance within the industry. Integrating advanced technology also plays a pivotal role in Duopharma Biotech's anti-corruption strategy. Utilising online systems for due diligence, annual declarations, and ethics training modules facilitates continuous monitoring and ensures that employees remain well-informed about the company's robust anti-corruption measures. Internal yearly audits by the ABMS Steering Committee and external audits by SIRIM QAS International reinforce adherence to best practices and enhance overall organisational compliance.

T

Training and Communication



Duopharma Biotech employs comprehensive training and communication strategies to foster a **culture of integrity and compliance** throughout the company. The anti-bribery and anti-corruption policies are disseminated via various channels, including emails, intranet postings, physical and virtual briefings, and visual aids such as posters and screensavers. Integrity champions stationed across different sites are critical points of contact for addressing ethics-related concerns, ensuring swift and effective responses to potential issues.

Employee engagement is prioritised through regular training sessions, refresher briefings, and customised programs that cater to specific legal requirements. Comprehensive online modules on ethics and anti-corruption are mandatory for new hires, with tailored training modules adapted for employees working in international settings. These initiatives collectively aim to empower all staff members with the knowledge and awareness necessary to uphold ethical standards consistently. Stakeholder engagement remains integral to Duopharma Biotech's anti-corruption efforts, demonstrated through annual communications, updates via social media platforms, and dedicated Integrity Day events.

Feedback mechanisms, such as structured feedback forms, are utilised to evaluate the efficacy of training initiatives and refine future programs based on stakeholder input. Senior management also plays a pivotal role in advancing the company's anti-corruption agenda, participating actively in regular dialogues and quarterly town hall meetings dedicated to anti-corruption strategies and updates. These engagements underscore the company's commitment to **transparency and accountability** at all levels of the organisation. Initiatives like the Integrity & Anti-Corruption program tailored for business agents, who publicly pledge to uphold integrity by signing the Ikrar Bebas Rasuah, exemplify Duopharma Biotech's proactive efforts in promoting an anti-corruption ethos within its broader community and operations.

Perceived Benefits

Adopting robust anti-corruption practices has yielded multifaceted benefits for Duopharma Biotech in positioning the company as a beacon of **ethical governance and reliability** in the **pharmaceutical industry**. Foremost among these benefits is the enhancement of **corporate reputation and stakeholder trust**. Duopharma Biotech has cultivated strong relationships with shareholders, customers, agents, and regulatory authorities by adhering to strict ethical standards and maintaining transparency in operations. Operational benefits have also been realised through **improved risk management and compliance**.

Systematically identifying and mitigating corruption risks minimises potential disruptions and legal liabilities, safeguarding the company's financial health and sustainability. Enhanced supply chain transparency, facilitated by practices like E-Bidding and Integrity Pacts with suppliers, has further solidified **operational reliability and efficiency**. Moreover, the recognition garnered through certifications such as ISO 37001:2016 for Anti-Bribery Management Systems and prestigious awards like the Integrity, Governance and Anti Corruption Award (AIGA) underscore Duopharma Biotech's **commitment to excellence in ethical governance**. These accolades validate the company's efforts and attract new business opportunities and partnerships from entities seeking ethical collaborators.

Cultivating Integrity: Sarawak Energy's Efforts to Strengthen Integrity at Every Department and Management Level

Company Name:
Sarawak Energy Berhad

Industry:
Energy

Company Description

Sarawak Energy is an energy development company and a vertically integrated electricity utility with a vision to achieve sustainable growth and prosperity for Sarawak by meeting the region's need for reliable, renewable energy. As Malaysia's **largest renewable energy provider**, Sarawak Energy is dedicated to supplying reliable, affordable and predominantly renewable energy to Sarawak's 3 million people and beyond.

With a foundation of over 100 years in powering Sarawak, the Company's primary role is to deliver renewable and reliable power predominantly derived from Sarawak's abundant hydropower resources while prioritising sustainability in the long run. The Sarawak Government owned utility employs a multidisciplinary workforce of 6,000, mainly Sarawakians, to serve its 780,000 account holders, making Sarawak Energy the largest employer of local talent in Sarawak.

Aligning with Sarawak's vision of achieving developed status by 2030, the company embarked on a **digital transformation** in 2018 to enhance its operational efficiency, prioritise health, safety, security, and environment standards, streamline project delivery, and optimise talent management practices.

Its ongoing transformation is underpinned by its **core values of courage, unity, respect, integrity, and accountability** more commonly known by its acronym of CURIA to foster a performance-driven organisation that contributes substantially to Sarawak's sustainable growth. This report provides a more in-depth analysis and assessment of Sarawak Energy's **anti-corruption protocols**.



Key Takeaways

Sarawak Energy and its subsidiaries are fully committed to conducting business dealings with integrity and honesty, and to eliminating all forms of malpractice involving bribery, corruption, conflict of interest and unethical conduct.

Each employee must uphold the highest levels of personal and professional values in all decision-making processes when implementing or executing any decisions for Sarawak Energy and with any third party.

Sarawak Energy operates on a **Zero Tolerance to Fraud, Bribery, and Corruption principle** and expects all its business partners and third parties to have similar values and ethical practices. The challenge for Sarawak Energy lies in inculcating a culture of integrity, monitoring and enforcing anti-corruption measures due to their complexities. This requires unwavering vigilance and adaptability to effectively address emerging risks and regulatory changes.

As part of this ongoing campaign and its mandatory Code of Ethics that all employees are required to be guided by, Sarawak Energy actively implements the **'Living Integrity' programme** to further instil and for its people to internalise the values and culture of integrity in daily operations and business decision-making. Prioritising compliance with evolving laws and focusing on corporate responsibility demonstrates the organisation's commitment. The active involvement of senior leaders in integrity-centric initiatives underscores the significance of ethical behaviour across all stakeholders.

Guided by the Group CEO and senior leadership, Sarawak Energy is firmly committed to anti-corruption endeavours, exemplified by the Zero Tolerance to Fraud and Bribery policy.

Implementing precise policies and protocols ensures employees comprehend their duties and the consequences of unethical actions. Moreover, the introduction of a **whistleblowing channel** enhances transparency and accountability.

While Sarawak Energy underwent a corporate transformation to sustain its growth and culture, new challenges are present, including in fostering a culture of integrity among its expanding workforce.

Sarawak Energy has implemented several procedures and initiatives to ensure compliance with the MACC Act 2009 and ensure that all employees are aware and well-informed of their responsibilities. Since 2019, the annual Sarawak Energy **Corporate Integrity Pledge** has been signed by the Group Executive Committee (GEC) while all employees sign individual pledges to integrity as well. New recruits are required to sign the integrity pledge as part of the recruitment and onboarding process while mandatory online Anti-Bribery and Corruption and Code of Ethics Training, and Sarawak Energy Integrity Survey are conducted annually, with full participation from employees.

The active engagement of senior leaders in promoting integrity initiatives, programmes, projects and employee involvement in integrity-focused events emphasised the importance of ethical conduct among stakeholders. Through continuous interactions with employees across various platforms, they can better understand their roles and responsibilities while being aware of the implications of unethical behaviour and malpractices. The introduction of a whistleblowing channel has bolstered transparency and accountability, enabling the timely reporting and resolution of fraud and corruption cases.

“ Sarawak Energy's unwavering commitment to anti-corruption practices reflects upon our dedication to ethical leadership, accountability, and sustainable business practices, fostering a culture of integrity and trust for a resilient and ethical future. ”

Datu Haji Sharbini Suhaili, Group Chief Executive Officer



Framework Overview

Sarawak Energy and its subsidiaries have a shared commitment to the highest legal, ethical and moral standards and recognise the importance of protecting the Sarawak Energy Group, its operations, employees and assets against fraud, bribery and corruption risks as well as financial risk, operational breaches and illegal activities.

Sarawak Energy is strongly dedicated to conducting business dealings with integrity and honesty and eliminating all malpractices involving bribery, corruption, conflict of interest, and unethical conduct. The **Anti-Bribery and Corruption Policy (ABC)** reaffirms Sarawak Energy's Code of Ethics (COE) and core values of '**Courage, Unity, Respect, Integrity, and Accountability**'.

As employees, they must uphold the highest personal and professional values in decision-making processes and interactions with internal and external parties. The policy establishes boundaries on interactions with all parties and guides how to address potential malpractices such as bribery, corruption, conflict of interest, and unethical conduct. This policy sets out Sarawak Energy's commitment to zero tolerance for fraud, bribery, and corruption in all its forms. This ABC policy applies to all employees and third parties as defined in Sarawak Energy's COE, all its subsidiaries, and other associate companies.

As part of Sarawak Energy's strong commitment to anti-corruption, the Zero Tolerance to Fraud and Bribery policy was implemented. An integral part of this initiative is the establishment of 'The GEC', a dedicated platform for discussing and resolving specific issues. The primary objectives of this platform include enabling effective reporting, promoting information sharing, enhancing departmental collaboration, and achieving necessary resolutions.

Emphasising compliance with evolving legislation, specifically highlighting corporate accountability, further underscores Sarawak Energy's commitment. The proactive engagement of top executives in integrity-focused initiatives and activities underscores the significance of ethical behaviour across all associated parties.

Part of the Fraud Bribery and Corruption governance structure in Sarawak Energy encompasses the establishment of the **Integrity and Compliance Division**, and the Integrity Advisory Committee, with periodic reporting to the **Board Audit and Risk Committee (BARC)**.

BARC has an oversight function to ensure that all employees practise the highest level of integrity and ethics, comply with the applicable laws and regulatory requirements on anti-corruption and effectively manage the fraud bribery and corruption risks, inclusive of overseeing the activities of the internal audit function, ensure an objective and professional relationship is maintained with External Auditors and that conflicts of interest, if any, are avoided. This visible dedication nurtures a climate of honesty and reliance within the organisation, bolstering its credibility and laying the groundwork for enhanced partnerships with investors and clients (Anti-Bribery & Corruption Policy - Document No: 01). This document covers in detail the Anti-Bribery and Corruption policy of the company.

Adequate Procedures Based on TRUST Principles

T

Top-Level Commitment



Under the leadership of its Group CEO and senior management team, Sarawak Energy displays a strong commitment to anti-corruption efforts in the form of the ABC policy and the Zero Tolerance to Fraud Bribery and Corruption campaign. The Company's **Fraud Bribery and Corruption governance structure** are in place to set the clear roles and responsibilities of the Board, Board Audit and Risk Committee, Group Executive Committee to Line Management and employees.

Further top-level commitment is demonstrated through the annual integrity pledge by the GEC together with individual employee pledges. Internal communication within the company further inculcates the core values of integrity; compliance with regulations and internal PPGs; and zero tolerance for malpractice and unethical behaviour. **Proactive engagement** between senior management and employees of all levels, such as 'Turun Padang' sessions, Zero Tolerance to Fraud Bribery and Corruption briefings, and integrity-focused initiatives and activities are conducted frequently to ensure employee buy-ins for the company's values and practices.

The **3-line management model** is practised in Sarawak Energy, where the first, second and third lines execute distinct roles and responsibilities inclusive of collaborative assurance and periodic reporting to the relevant boards, board and management committees. The Integrity and Compliance Division provides quarterly Integrity and Fraud Control reports to the Board Audit and Risk Committee.

R

Risk Assessment



Demonstrating a proactive approach, the Company has taken significant strides in identifying and addressing fraud, bribery and corruption risks. Initially concentrating on managing fraud risks, Sarawak Energy has expanded its measures to include robust protocols for effectively mitigating corruption risks. This framework includes processes for recognising, evaluating, addressing, and overseeing significant risks and their trends, mainly through monitoring and reviewing procedures.

Through regular risk evaluations, timely updates, and education through fraud, bribery, and corruption risk clinics, Sarawak Energy can maintain a keen awareness of and adaptability to emerging challenges. This strategy ensures the company remains proactive in anticipating potential risks and safeguarding its activities and reputation. Furthermore, risk assessment methodologies are integrated with globally recognised standards for information security management systems such as **Enterprise Risk Management (ERM) and ISO 27001**. Sarawak Energy showcases its adherence to best risk management practices, solidifying its standing as a credible and reliable entity.

U

Undertake Control Measures



The robust implementation of strict control measures, exemplified by the Zero Tolerance to Fraud campaign, ABC policy and related suite of policies, procedures and guidelines on integrity and ethics, ensures employees are equipped with comprehensive knowledge regarding their responsibilities and the consequences of engaging in unethical behaviour.

These policies are made known to employees through awareness programmes on anti-bribery and corruption, conflict of interest, gifts, entertainment and hospitality, a code of ethics, consequence management, disciplinary procedures rules, and constant reinforcement of Sarawak Energy's core values.

Sarawak Energy Ethics Channel is a platform introduced to both employees and the public to whistleblow or voice any concerns. This channel is part of the ABC policy to further enhance **transparency and accountability**, allowing swift resolution of reported cases of fraud and corruption. Based on its whistleblowing policy, all reports must be made in good faith with relevant evidence provided, which shall be investigated on its merit and the confidentiality of whistleblowers is assured.

S

Systematic Review, Monitoring, and Enforcement (S)



Sarawak Energy continuously monitors and reviews its controls environment to ensure they are continuously updated and improved to fully meet the requirements of the law in relation to anti-bribery and corruption. Instances of reported fraud and corruption undergo comprehensive reviews by the Integrity and Compliance Division and are reported quarterly to the Board Audit and Risk Committee through the Integrity and Fraud Control Report – ensuring that requisite measures are promptly taken to rectify deficiencies or infringements.

Risk identification, assessment, evaluation, monitoring, reporting, and action planning for fraud bribery and corruption risk are also ongoing processes.

As part of the **integrity health check** initiatives put in place, Sarawak Energy's Annual Integrity Survey is conducted annually. The results are reported to the Group Executive Committee and the Board Audit and Risk Committee.

In addition to discharging its duties and responsibilities in maintaining a robust and sound internal control system, the Board has also formalised and implemented an ERM Framework for the Group to provide guidance relating to implementing enterprise risk oversight and management processes. This framework incorporates identification, assessment, mitigation and control, monitoring and reviewing processes, especially on significant risks and their trends. The ERM framework is aligned with the Fraud Bribery and Corruption Risk Management Framework. This continuous monitoring and enforcement deter potential offenders.

T

Training and Communication



Training and communication play a pivotal role in ingraining ethical principles and behaviours throughout the organisation. Under the umbrella of the **'Living Integrity' programme**, various initiatives are organised to promote integrity through employee testimonies, enterprise-wide messages published in Sarawak Energy's internal communication platforms, zero tolerance to fraud bribery and corruption awareness briefings for both employees and stakeholders, and its quarterly governance and compliance event – Integrity and Compliance Day.

New employees and directors are onboarded on integrity-related matters as well as bribery and corruption-related laws, while refresher training and education are continuously implemented for existing employees, focusing on Zero Tolerance to Fraud Bribery and Corruption. As part of inculcating integrity and compliance among employees, 52 Integrity Ambassadors were appointed in August 2024.

E-learning on Anti-Bribery Corruption is made mandatory for all employees and the training records are maintained for reference. Regular Zero Tolerance to Fraud Bribery and Corruption briefings are also conducted for third parties such as vendors and tenderers.

By fostering open dialogue and providing avenues for employees to voice their concerns, Sarawak Energy nurtures a culture of openness, courage and confidence to do the right thing. These endeavours empower employees to uphold ethical standards in everyday interactions and decision-making, making Sarawak Energy a great and ethical place to work.

Perceived Benefits

Anti-corruption practices have yielded numerous benefits for Sarawak Energy, extending beyond mere compliance with legal requirements. Among these benefits are enhancing integrity and trust among stakeholders, including employees, investors, customers, and partners. This contributes to a culture of answerability and honesty, through which the company fortifies its internal checks and balances and **safeguards its reputation** against external threats.

By fostering a culture of integrity, compliance and accountability, SEB has strengthened and positioned itself as a leader in ethical business practices. Moreover, **whistleblowers are accorded protection of confidentiality of identity**, protection against reprisals, adverse employment consequences, or retaliation. The perceived benefits of adopting anti-corruption practices extend beyond tangible outcomes; they underscore the company's commitment to ethical leadership and responsible business conduct in today's complex global marketplace.

In conclusion, Sarawak Energy's steadfast commitment to the TRUST principles and proactive approach to combating corruption reflect its unwavering **dedication to ethical leadership** and enduring business ethics. The company's reputation as a **trustworthy and ethical business partner** has been solidified through its emphasis on integrity at all levels of management, implementation of solid control measures, and fostering a culture of transparency and accountability. Despite encountering obstacles and setbacks along the journey, Sarawak Energy remains resolute in upholding ethical norms and cultivating a more resilient and sustainable future for all stakeholders.

Integrity from Within: Durianê's Commitment to Anti-Corruption and Ethical Business Practices

Company Name:
Durianê Professionals Sdn Bhd

Industry:
**Heavy and Civil Engineering
Construction Sector**

Company Description

Durianê Professionals Sdn Bhd (Durianê) is a Malaysia-based company established in January 2011 and incorporated on February 16, 2015. The company specialises in mechanical and electrical consulting engineering services, undertaking various projects, including conventional buildings, green and energy-efficient initiatives, renewable energy, and specialised industrial structures. With a portfolio exceeding 400 projects, their expertise spans Renewable Energy, Mixed Developments, Infrastructure, Energy Audits, Power System Studies, Industries, Data Centres, and Institutions. Durianê is dedicated to upholding the highest standards of ethical conduct, integrity, and accountability in all aspects of its business activities and operations.



Key Takeaways

The industry in which Duriane operates is often plagued by bribery and corruption practices. This might be ascribed to the numerous transactions required to carry out its business, such as getting government permits and clearances and dealing with various agents and suppliers. Determined to defy the norm, Duriane's leadership made a bold decision.

Initially, the task of combating corruption seemed daunting and almost impossible. Unlike larger, publicly listed companies that must adhere to stringent regulations, small and medium-sized enterprises (SMEs) like Duriane, face fewer external regulatory pressures. Thus, anti-corruption initiatives must be internally driven rather than externally enforced. As such, Duriane's management has taken it upon themselves to **drive change from within**, fostering a culture of integrity and transparency across all levels of the company.

Breaking the norm of accepting bribery in the industry is a challenging task. Among the obstacles are **the fear of losing potential clients** or not securing approval for completed projects. Despite these challenges, Duriane has received full commitment from all seven managing directors, who are dedicated to anti-bribery principles, paving the way for a more ethical standard way of doing business.

Duriane's journey towards business integrity began in July 2020 with implementing the **Anti-Bribery Management System (ABMS)**. Within two years, Duriane successfully achieved **ISO37001 certification**, a pathway for a systematic approach to enhancing effectiveness and maintaining integrity across all operations. This certification particularly strengthens the transparency and objectivity of Duriane's tender offering process.

As part of the ABMS system, Duriane has two main policies in place, namely the Anti-Bribery Policy and the Whistleblowing Policy. **The Anti-Bribery Policy**, established on February 20, 2023, outlines the company's and its supply chain network's responsibilities in observing and upholding anti-bribery principles. It aims to provide information and guidance to the employees and business associates on recognising and addressing

bribery issues. The **Whistleblowing Policy**, effective from July 1, 2021, encourages individuals within and outside the company to report suspected or actual bribery or unethical behaviour.

Despite limited resources and expertise in the workforce, which pose significant challenges in pursuing business integrity objectives, Duriane remains committed to fostering a culture of integrity among its stakeholders. Internally, the company implements various initiatives to raise awareness by ensuring all employees undergo anti-bribery training, adhere to anti-bribery policies, and include ABMS anti-bribery statements in **all tender documents**.

To ensure compliance with the anti-corruption standards, Duriane appoints an external party to **conduct audits** to oversee, assess and review its internal anti-bribery processes. As a responsible social actor in the market, Duriane contributes to a sustainable society by extending its business integrity initiatives to its supply chain network. This is achieved through strict compliance with ethical business practices outlined in Duriane's ABMS requirements.

In addition, in line with Malaysia's growing interest in anti-corruption and business integrity, Duriane has and will continue to actively provide training and webinars on anti-corruption issues to educate the public.

The top-down approach has proven effective both within and outside Duriane. Although the company initially lost some business deals during the early stages of implementation, this strategy has ultimately led to **increased trust** and acceptance from its supply chain.

By consistently demonstrating its commitment to integrity and ethical practices through adherence to non-bribery activities, Duriane has built a solid reputation, earning the confidence and respect of its stakeholders. This **long-term investment** in ethical business practices has strengthened relationships and established a foundation of trust and transparency across the company and its supply chain network.



“ Duriane will continue to drive business integrity excellence through an internally built anti-corruption culture, extending this commitment throughout our supply chain network. We aim to combat corruption and become a leader in championing anti-corruption initiatives among small and medium enterprises in Malaysia. ”

Ir. Yau Chau Fong, Managing Director

Framework Overview

The company's Anti-Bribery Policy underscores its dedication to high ethical standards and compliance with the Malaysia Anti-Corruption Commission (MACC) Act 2009. This policy requires all employees, from executives to entry-level staff, to follow strict anti-bribery principles. It applies to internal operations and involves dealings with suppliers, clients, and government officials. By aligning with Section 17A of the MACC Act, the company takes a proactive stance against corruption, focusing on preventing, detecting, and resolving bribery incidents, thereby promoting a culture of integrity and accountability.

Adequate Procedures Based on TRUST Principles

T

Top-Level Commitment



Top-level commitment is fundamental to the company's anti-corruption framework. The commitment from the seven Managing Directors who **strongly believe in ethical business conduct** drives anti-bribery and anti-corruption initiatives and the leadership team is dedicated to promoting a culture of transparency and ethical behaviour.

This commitment is evidenced by the clear anti-bribery policies and codes of conduct that are consistently communicated and reinforced throughout the company. Leaders are expected to model these behaviours and **lead by example** by adhering to the rules, such as declining tenders with bribery-related components, declaring gifts in the GHDS procedures, and setting a standard for others to follow.

This **top-down approach** ensures that anti-corruption measures are taken seriously and integrated into the company's strategic objectives. Regular meetings and reports on compliance issues further demonstrate leadership's dedication to maintaining high ethical standards and addressing any potential issues promptly and effectively.

R

Risk Assessment



Risk assessment involves adopting the **ISO 37001 ABMS**, which provides a **systematic approach** to risk assessment, continuous improvement and monitoring effectiveness. It also includes conducting sessions with its supply chain to ensure compliance across all business activities.

Risk assessment is a crucial component of the company's anti-corruption strategy. An independent, **externally appointed auditor** conducts thorough risk assessments to identify areas where bribery and corruption risks may be highest. This involves analysing various factors such as geographical locations, industry-specific risks, and the nature of interactions with third parties.

The company implemented targeted measures to mitigate these risks by identifying and understanding them. These assessments are conducted regularly to account for changing circumstances and emerging risks. The results of these assessments inform the development and refinement of policies and procedures, ensuring they remain effective and relevant.

U

Undertake Control Measures



The company has established a range of control measures to combat bribery and corruption. These include stringent gifts, hospitality, donations, and sponsorships (GHDS) procedures, requiring transparency and proper documentation using the **Gift and Hospitality Form**. The company ensures that GHDS are of reasonable value and do not influence business decisions or create conflicts of interest.

Any parties who encounter a potential risk scenario are required to report it to the manager or the Anti-Bribery Committee immediately. A strict no-tolerance policy for facilitation payments is enforced, and thorough **due diligence** is conducted on all third-party relationships. Control measures are rigorously enforced through transparent processes and thorough documentation, including **double authorisation**. For instance, the on-site reports are to be verified by a manager at the office.

The Anti-Bribery Policy provides clear guidelines for employees to avoid facilitation payments. Financial and non-financial controls, such as regular audits and internal checks, are in place to ensure compliance. These measures are supported by guidelines and training for employees to understand their roles in preventing corruption.

S

Systematic Review, Monitoring, and Enforcement (S)



Systematic review, monitoring, and enforcement are integral to the company's anti-corruption framework. The company has established mechanisms to continuously monitor and review its anti-corruption policies and procedures. This includes outsourced regular **audits** and **compliance checks** to ensure adherence to established standards both within the company and for external contractors.

The results of these independent audits are used to identify any weaknesses or areas for improvement, allowing the company to make necessary adjustments promptly. Enforcement of anti-corruption policies is also taken seriously, with clear **disciplinary actions** outlined for any breaches.

Any violations of the anti-bribery policy could lead to termination of employment or reports to the law enforcement authorities, deterring potential wrongdoing. This systematic approach ensures that the company's anti-corruption efforts are effective and sustainable over the long term. By maintaining a rigorous enforcement regime, the company reinforces its commitment to ethical practices and deters potential violations.

T

Training and Communication



Training and communication strategies are comprehensively implemented through the internal portal that serves as a central hub for updated information on anti-corruption issues, **quarterly mandatory training** for existing staff, and introductory training for new employees.

Employees receive thorough training on anti-bribery laws, company policies, and their responsibilities, with interactive sessions and real-world scenarios to enhance understanding. Key messages are reinforced via emails, newsletters, and internal portals.

Employees can access detailed guidelines on the Anti-Bribery Management System and seek clarifications from the compliance officer. A whistleblowing mechanism, including a **Whistleblower Report Form**, allows employees and the public to report suspected bribery anonymously without fear of retaliation. Whistleblowers are notified of investigation outcomes within five days, promoting transparency and encouraging proactive reporting of unethical behaviour.

Perceived Benefits

The benefits of adopting anti-corruption practices are manifold. Firstly, it enhances Duriane's reputation and builds stakeholders' trust and credibility. This trust is crucial for long-term business success and can increase customer loyalty and business opportunities. This is evident from the praise Duriane received from its supply chain network for its anti-bribery initiatives. Stakeholders find doing business with Duriane is more comfortable due to the **transparent processes** and absence of additional costs.

Secondly, the company ensures its sustainability and operational stability by mitigating the risk of legal and financial repercussions associated with corruption by abiding by the anti-bribery policy.

Thirdly, adopting these practices fosters a positive work environment where employees feel valued and respected for upholding ethical standards and practices. This, in turn, boosts staff morale and productivity.

Lastly, the ABMS aligns with international standards for combating corruption, adopting global best practices in business integrity. Duriane's efforts to combat corruption have **attracted like-minded partners**. While it will take time, these parties are committed to working together to elevate business integrity to the next level.



Pioneering Integrity: Thumbprints' Commitment to Anti-Corruption and Ethical Business Practices

Company Name:
Thumbprints Utd. Sdn Bhd

Industry:
Printing Solutions

Company Description

Thumbprints Utd. Sdn Bhd (Thumbprints) is a company based in Malaysia, with its head office in Rawang. It has established itself as a pioneer in the Malaysian printing industry. Since its inception, the company has consistently pushed the envelope, integrating advanced printing technologies and eco-friendly practices into its operations. Their comprehensive range of services includes commercial printing, packaging solutions, and publishing services, each tailored to meet the unique needs of their diverse clientele. With state-of-the-art facilities, Thumbprints ensures that every product, whether a marketing brochure, an intricate packaging design, or a published book, meets the highest standards of quality and environmental responsibility.

The company's modern machinery and energy-efficient processes underscore their dedication to reducing environmental impact, setting them apart as leaders in sustainable business practices. Thumbprints' forward-thinking approach is evident in its continuous investment in research and development, exploring new materials, techniques, and technologies to stay ahead in the competitive market. Moreover, Thumbprints' engagement with the community through various environmental and social initiatives reflects its broader mission of creating a positive societal impact. As they continue to evolve and expand their offerings, Thumbprints remains a beacon of innovation and sustainability, setting new benchmarks in the printing industry and demonstrating that business success and environmental stewardship can go hand in hand.



THUMBPRINTS®

Key Takeaways

The founders and CEO of Thumbprints understood the crucial role of integrity in maintaining ethical business practices. Over two decades ago, Thumbprints proactively identified and addressed various unethical issues. The company worked diligently to strengthen its governance and prevent unethical practices among its employees and business associates. Thumbprints sought guidance from Transparency International-Malaysia (TI-M) to kick-start its anti-corruption efforts. Today, Thumbprints is proud to have achieved anti-corruption compliance with **ISO 37001 standards**, drawing valuable insights from internal audits and external consultants.

The company faced significant challenges in its initial shift to transparent business practices, encountering numerous obstacles and rejections from its stakeholders. Despite losing clients in the initial stage, Thumbprints remained committed to its goal of fostering a strong culture of **honesty and integrity**. This dedication is strongly supported and upheld by top-level management, demonstrated through their active involvement in the **Zero Corruption Committee (ZCC)** and their unwavering support for Thumbprints' adherence to anti-corruption standards. This commitment underscores Thumbprints' dedication to maintaining a robust anti-corruption and strong business integrity culture.

Moreover, regular risk assessments are conducted to identify and mitigate potential corruption risks at Thumbprints. The company regularly evaluates its operations and interactions with external parties, such as suppliers and contractors, which help

pinpoint areas susceptible to corrupt practices. The risk assessment involves reviewing financial transactions, procurement procedures, and third-party engagements to ensure transparency and accountability. The ZCC conducts risk assessment reviews at least **twice annually** to ensure they remain current and relevant. Stringent enforcement measures have been implemented to address misconduct, which encompasses terminating employees who engage in such behaviour.

Furthermore, comprehensive **training programs** were implemented to educate employees, particularly the Heads of Departments, on adhering to the anti-corruption policies and procedures. Thumbprints diligently educated and communicated the importance of anti-corruption policies to their suppliers and business associates, urging them to sign the **integrity pledge**.

Thumbprints sets an example and promotes ethical leadership by establishing a high standard for business integrity and responsibility in the industry. The company has fostered increased trust and confidence in its business practices by adopting anti-corruption principles and practices, resulting in no new reported corruption cases. Furthermore, Thumbprints communicates with suppliers and agents regarding the company's strict stance on anti-bribery. Suppliers are encouraged to sign an integrity pledge. Additionally, **over 90% of suppliers** have signed the **integrity pledge**, and the company intends to maintain this rate in the near future.

“ We won't pay any bribe or facilitation payment in our business... this is not only the right thing to do as an individual, but also as an organisation; we must lead by example and protect our business. ”

Mr Lim Chee Yoong, Managing Director



Framework Overview

Honesty and Integrity have been Thumbprints' guiding principles since 1997. Over the years, Thumbprints has developed a robust and comprehensive anti-corruption framework to promote ethical business practices and ensure strict compliance with relevant laws. This framework is meticulously aligned with both local and international anti-corruption legislation, including the Malaysian Anti-Corruption Commission Act and principle-based approaches such as the United Nations Global Compact principles.

At the core of Thumbprints' framework is a firm commitment to the values of **honesty, integrity, and transparency** in all its operations. The company has instituted a **zero-tolerance policy** towards bribery and corruption, making it clear that any form of corrupt behaviour is unacceptable and will be dealt with decisively.

Adequate Procedures Based on TRUST Principles

T

Top-Level Commitment



Top Level Commitment is important in establishing a strong **anti-corruption culture** within the organisation. Thumbprints' Chairman takes personal responsibility for implementing anti-corruption policies. The Zero Corruption Committee (ZCC) is responsible for implementing an anti-bribery management system across all employees, including management and clients, suppliers, and business partners. Thumbprints demonstrate an unwavering **top-level commitment** to anti-corruption through the active involvement of senior management in the ZCC. The committee oversees the implementation of anti-corruption policies, ensuring that ethical standards are upheld across all levels of the organisation.

The management's dedication is evident in their ongoing efforts to educate employees about the importance of integrity and compliance. Thumbprints has set four anti-bribery targets, which top management is committed to achieving, include attaining **zero incidences of bribery and corruption**, achieving **zero incidences of fraud**, ensuring that 90% of suppliers, vendors, and contractors sign the **Supplier Corporate Integrity Commitment Form**, and achieving 80% **employee awareness** of the whistleblowing program.

R

Risk Assessment



Regular risk assessments are conducted to identify and mitigate potential corruption risks. Thumbprints evaluates its operations and interactions with external parties, such as suppliers and contractors, to pinpoint areas susceptible to corrupt practices. The risk assessment process involves reviewing financial transactions, procurement procedures, and third-party engagements to ensure transparency and accountability. The ZCC carries out the review twice annually to ensure that risk assessments system remains consistently up to date.

U

Undertake Control Measures



Thumbprints has long been a trailblazer in ethical business practices, particularly in the area of anti-corruption. In 2020, Thumbprints became the **first printer** in Malaysia to be **certified** by SIRIM Bhd for ISO 37001 Anti-Bribery Management Systems, underscoring their commitment to combating bribery and maintaining high standards of corporate governance. This prestigious certification reflects the robust anti-corruption measures and rigorous compliance frameworks that Thumbprints has implemented, setting a **benchmark** for the industry.

This includes political contributions and facilitation payments, which are prohibited entirely, while charitable donations and sponsorships must be approved by management. Gifts, entertainment, and hospitality are allowed in the context of promoting good business relations, and Thumbprints enforces a **'No Gift Policy'** where employees cannot accept gifts besides corporate gifts. The ZCC also details what payments fall into each category and when certain payments are permissible. For example, extortion payments are allowed if health and safety are at risk. This detailed procedure reduces possible confusion around whether an action is considered bribery.

In addition, Thumbprint **centralised** its connection with external parties for procurement, outsourcing, and contractual agreements instead of allowing various departments to deal with contractors or third parties. This allows better control over anti-corruption policies and procedures. This long-standing commitment to ethical conduct has fortified their corporate reputation and instilled a strong sense of trust among stakeholders, including customers, suppliers, and regulatory bodies, highlighting their leadership in promoting ethical business operations and setting higher standards within the industry.

S

Systematic Review, Monitoring, and Enforcement (S)



The ZCC **reviews the system twice a year** to ensure it is up to date and relevant. This allows for procedures to be continuously revised as needed. Quarterly meetings are also held, and the Board of Directors is made aware of the meeting reports. The ZCC ensures that the anti-bribery management system conforms to requirements and reports its performance to top management and relevant authorities. Their anti-corruption policy is enforced with internal investigations, where employees found guilty of misconduct are terminated. Thumbprints has established a mechanism by which individuals can report their corruption concerns.

Their **whistleblowing policy** allows employees to report wrongdoings in good faith without fear of reprisals. Reports can be made through letter, electronic mail, mobile phone, or directly to the Malaysia Anti-Corruption Commission or the Company Chairman, making this mechanism accessible. The policy also states that the whistleblower will be informed of the conclusion of the investigation, if possible, which encourages potential whistleblowers as they can feel assured their reports are being investigated.

In alignment with the core principles of **Honesty and Integrity**, Thumbprints have successfully achieved all four governance targets to cultivate a trust and reliability culture. In 2023, the company has met its objectives with **zero reported bribery**, corruption, and fraud cases, showcasing its steadfast commitment to ethical practices. This dedication to integrity enhances its corporate reputation and reinforces the trust of its stakeholders, including customers, suppliers, and regulatory bodies.

Furthermore, Thumbprints **surpassed** its goal of having 90% of suppliers, vendors, and contractors sign the **Supplier Corporate Integrity Commitment Form**, achieving a commendable 91% compliance rate. Additionally, Thumbprints exceeded their target of 80% employee awareness of the whistleblowing program, with 96% of Thumbprints employees being well-informed about this crucial initiative. These accomplishments reflect Thumbprints proactive approach to fostering a **transparent and accountable** organisational culture, ensuring long-term success and reliability.

T

Training and Communication



Thumbprints' ZCC regularly conducts anti-corruption training for staff to ensure they can act ethically. For example, in December 2023, they held an **Anti-Corruption Day** dedicated to informing employees about the company's policy towards gifts, entertainment, and hospitality. An anti-bribery and corruption document is available to employees, detailing Thumbprints' policies towards acting with good ethics in business dealings. This allows employees to understand better the proper course of action towards sponsorships, donations, and other such matters. Employees are also tested on their knowledge of the anti-corruption policies after briefings so that the company can assess how effective their training is.

Perceived Benefits

The adoption of anti-corruption practices has several benefits, including enhanced **corporate reputation**, reduced risk of legal penalties, and fostering a culture of integrity within the organisation. By adhering to stringent anti-corruption measures, the company can **build trust** with stakeholders, including customers, suppliers, and regulatory bodies, which is essential for long-term success. These practices demonstrate the company's commitment to ethical business conduct, making it a preferred partner and bolstering its **competitive advantage** in the market. Thumbprints' dedication to business integrity has not gone unnoticed; the company is regularly invited to speak at industry events and engagements, sharing its expertise and experiences in maintaining ethical standards and promoting transparency.

This recognition extends beyond just invitations to speak; Thumbprints is also acknowledged as a **leader** in corporate integrity initiatives. They hosted the second edition of **TI-M's Corporate Integrity System Best Practice** Session at their facilities, showcasing their role as a benchmark for best practices in the industry. Additionally, Thumbprints has been honoured with the **UNGCMYB Anti-Corruption Award**, further solidifying its status as a leading advocate for anti-corruption measures in the business community. This prestigious award highlights their unwavering commitment to upholding the highest standards of integrity and transparency. By facilitating such sessions and earning accolades, Thumbprints highlights its commitment to anti-corruption measures and actively contributes to the broader industry dialogue on the importance of maintaining high ethical standards. This proactive approach to promoting integrity and transparency further solidifies its standing as a trusted and responsible entity in the business community.



The Malaysian Anti-Corruption Commission Act 2009 provides a robust framework for combating fraud and corruption, setting the stage for organisations to operate ethically and legally. By embracing the TRUST principles and implementing comprehensive anti-bribery and anti-corruption programs, businesses protect themselves from legal repercussions and penalties, enhance their reputations, and foster a culture of integrity.

These proactive measures promote compliance and ethical business practices across the supply chain. As companies adopt these best practices and adequate procedures drawn from comprehensive case studies, they build resilient anti-corruption frameworks that effectively address challenges while promoting ethical behaviour. Key elements of such best practices include strong leadership commitment to ethical behaviour, implementing an Anti-Bribery Management System (ABMS) like ISO 37001, regular risk assessments, and stringent internal controls for gifts and hospitality. Regular independent audits, ongoing training, and robust whistleblowing mechanisms are essential to maintaining compliance. Ensuring the supply chain adheres to anti-bribery policies, leveraging digital tools for transparency, and continuously improving policies are critical.

Furthermore, the insights derived from the case studies would potentially enable industry practitioners, anti-corruption institutions, policymakers, and decision-makers to develop and refine anti-corruption strategies that are both effective and sustainable.

By mitigating corruption and unethical business practices, organisations can improve governance and accountability, which are key components of Sustainable Development Goal (SDG) 16: Peace, Justice, and Strong Institutions. This, in turn, supports the SDG 17: Partnerships for the Goals, by fostering a trustworthy environment for collaborations and partnerships.

Ultimately, this collective approach will contribute significantly to Malaysia's economic and social development, shaping a more transparent, accountable, and ethical business landscape.





Global Compact Network Malaysia & Brunei

United Nations Global Compact (UNGC) is a strategic policy initiative for businesses that are committed to take actions to advance broader societal goals. UN Global Compact Network Malaysia & Brunei (UNGCMYB) is the official country network of the UNGC. It is a movement, a collective awakening of businesses in Malaysia and Brunei uniting under the Ten Principles of the UN Global Compact. Our vision is clear: to lead the charge as the primary advocate for sustainable business actions, empowering both towering corporates and vibrant SMEs to not just chase but lead a collective, sustainable future.

Talk to us about joining us or visit our website at

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