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Anti Bribery and Corruption Policy

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Chairman and Group Chief Executive Officer's Integrity Statement

The SCH Group Bhd. (SGB) is committed to applying the topmost standards of ethical conduct and integrity in its business activities. Every individual acting on SGB's behalf is responsible for maintaining our reputation by conducting company business honestly and professionally. Integrity is an integral part of our values.

We reaffirm a zero-tolerance to bribery and corruption and are committed to acting professionally, impartial and with integrity in all our business dealings and relationships wherever we operate.

*Integrity is not something you show to others.
It's choosing courage over comfort;
choosing what is right over what is convenient;
choosing action based on value rather than personal gain.*

We will behave with unquestioned integrity and in accordance with Section 17A of the Malaysian Anti-Corruption Commission Act 2009 and SGB's Anti Bribery and Corruption policy ("Policy"). The Policy designed to provide guidance as to what practices are appropriate for the employees. It delineates how we will treat each other with dignity and respect, and it charges each one of us with the responsibility to be a steward of our company culture and values.

Thank you for upholding SGB's reputation for ethical business practices and in our interactions with our customers, suppliers, shareholders and all stakeholders.

**Independent Non-Executive
Chairman**
Dato' Chan Choun Sien

**Executive Director &
Group Chief Executive Officer**
De Souza Michael Lawrence



DEFINITION, INTERPRETATION & CONSTRUCTION

<p>“Bribery & Corruption”</p>	<p>means any action which would be considered as an offence of giving or receiving ‘Gratification’ under the Malaysian Anti-Corruption Commission Act (MACCA) 2009. In practice, this means offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person who is in a position of trust within an organisation. Bribery may be outbound, where someone acting on behalf of SCH Group attempts to influence the actions of external party, or vice-versa.</p>
<p>“Gratification”</p>	<p>defined in the MACCA to mean the following:</p> <ul style="list-style-type: none"> (a) money, donation & sponsorship, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage; (b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity; (c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part; (d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage; (e) any forbearance to demand any money or money’s worth or valuable thing; (f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and (g) any offer, undertaking or promise, whether conditional or unconditional, of any Gratification within the meaning of any of the preceding paragraphs (a) to (f).
<p>“Business Associate”</p>	<p>means an external party including but not limited to its clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors.</p>
<p>“Conflict of Interest”</p>	<p>means when a person’s own interests either influence, have the potential to influence, or are perceived to influence their decision making at SCH Group.</p>
<p>“Controlled Organisation”</p>	<p>means an entity where SCH Group has the decision-making power over the entity such that it has the right to appoint and remove the management. This would normally be where SCH Group has the controlling stake but it could be where there is an agreement in place that SCH Group has the right to appoint the management.</p>
<p>“Corporate Gift”</p>	<p>means the goods given by an individual or organisation to another. Corporate Gifts may also be promotional items given out equally to the general public at events, functions, trade shows and exhibitions as a part of building the company’s brand and include gifts from the company to its personnel in relation to an internally or externally recognised company’s events, functions or celebrations. The gifts are given transparently and openly, with the implicit or explicit approval of all parties involved. Corporate Gifts normally bear the company’s name and logo. Examples of Corporate Gifts include items such as diaries, table calendars, pens, notepads and plaques.</p>
<p>“Donation & Sponsorship”</p>	<p>means charitable contributions and sponsorship payments made to support the community. Examples include sponsorship of educational events, supporting NGOs, and other social causes;</p>



“Exposed Position”	means a staff position identified as vulnerable to bribery through a risk assessment. Such positions may include any role involving: procurement or contract management; financial approvals; human resource; relations with government officials or government departments; sales; positions where negotiation with an external party is required; or other positions which SCH Group has identified as vulnerable to bribery;
Hospitality”	means the considerate care of guests, which may include refreshments, accommodation and entertainment at a restaurant, hotel, club, resort, convention, concert, sporting event or other venue such as SCH Group’s offices, with or without the personal presence of the host. Provision of travel may also be included, as may other services such as provision of guides, attendants and escorts; use of facilities such as a spa, golf course or ski resort with equipment included;
“Management”	means Group Chief Executive Officer, Managing Director, Executive Director or Financial Controller.
“Personnel”	means directors and all individuals directly contracted to SCH Group on an employment basis, including permanent and temporary employees, including their family members and/or agents and/or appointed representatives



1. Objective

Anti-Bribery and Corruption Policy (“Policy”) sets out SCH Group and its subsidiaries’ (“SCH Group” or “the Group”) principles in dealing with improper solicitation, bribery and other corrupt activities and related issues that may arise in the course of business.

This Policy sets out SCH Group overall position on bribery and corruption in all its forms. The Policy is not intended to be exhaustive as there may be additional obligations that the Personnel is expected to adhere to or comply when performing their duties. For all intents and purposes, the Personnel shall always observe and ensure compliance with this Policy and all applicable laws, rules and regulations in the performance of their duties.

SCH Group is committed to conducting its business ethically and in compliance with all applicable laws and regulations in the countries where it does business. These laws include but are not limited to the Malaysian Penal Code (revised 1977) (and its amendments), the Malaysian Anti-Corruption Commission Act 2009 and its amendments, the Companies Act 2016, the US Foreign Corrupt Practices Act 1977 (amended 1998), and the UK Bribery Act 2010. These laws prohibit bribery and acts of corruption, and mandate that companies establish and maintain accurate books and records and sufficient internal controls.

This Policy is not intended to provide definitive answers to all issues related to bribery and corruption. If multiple documents speak on the same subject, then the more stringent provision shall apply at all times. If a law conflicts with a policy as set out in this policy, should comply with the law. If you perceive that a provision in this policy conflicts with the law in your jurisdiction, should consult with your Head of Department/Division, Human Resource Department or Top Management, rather than disregard the policy without consultation.

This Policy should be read in conjunction with SCH Group’s various policies & guidelines.

2. Scope

This Policy is applicable to SCH Group, its Controlled Organisation, Business Associates acting on behalf of the Group, the Board of Directors and all SCH Group’s Personnel and shall be amended from time to time in line with laws and regulatory requirements. All reviews and changes therein must be approved by the Board of Directors before coming into effect.

Joint-venture companies in which SCH Group is non-controlling or co-venture and associated companies are encouraged to adopt these or similar principles and standards. External Providers are also expected to comply with this Policy in relation to all work conducted with SCH Group, or on behalf of the Group

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3. The Law and Compliance Risk

The Malaysian Anti-Corruption Commission Act 2009 (MACC Act) has been amended, among others, to introduce corporate liability provision for bribery and corruption under Section 17A, which will come into effect on 1st June 2020.

Section 17A applies to all “commercial organisation”, i.e. companies and partnerships, incorporated in Malaysia which conduct their respective businesses in Malaysia – s17A(8). The Section has a broad application as it covers “a company wherever incorporated”, hence applying also to foreign companies which operate their businesses in Malaysia. The offence also holds a commercial organization liable for the offence committed outside of Malaysia.

Essential Features of Section 17A of the MACC Act criminalizes an organisation for corruption-related actions by associated persons done for the benefit of the organisation. Section 17A (1) states that a commercial organisation commits an offence if a person associated with it corruptly gives, offers or promises any gratification to any person with an intent to obtain or retain business or a business advantage for the said commercial organisation.

Section 17A(3) of the MACC Act *deems* the Management (e.g. director, controller, officer, partner or a person concerned in the management of the affairs) of a convicted commercial organisation to have committed the same offence, and be held personally liable for the offence. One can be absolved of such personal liability only if the person (in Senior Management) can prove that the offence was committed “without his consent or connivance and he exercised due diligence to prevent the commission of the offence as she ought to have exercised, having regard to the nature of his function in that capacity and to the circumstances” – S.17A(3) MACC 2009.

The officer must also prove on the balance of probabilities that he/she had exercised due diligence to prevent the commission of the offence as he/she ought to have exercised having regard to the nature of his/her function in that capacity and to the circumstance. Penalty for Offence Under Section 17A.

Section 17A (2) states that the penalty for the offence shall be a fine of not less than 10 times the value of the gratification in question or RM1 million, whichever is higher or imprisonment for not more than 20 years, or both.

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4. Principle and Commitment

SCH Group is committed to conduct business with integrity, honesty and respect. This means avoiding practices of bribery and corruption of all forms in daily operations.

- 4.1 We have adopted a zero-tolerance approach against all forms of bribery and corruption. Employees who refuse to pay bribes or participate in acts of corruption will not be penalised even if such refusal may result in losing business.
- 4.2 We will uphold all laws relevant to countering bribery and corruption. We remain bound by the laws of the Malaysia, including The Malaysian Anti-Corruption Commission Act 2009 (MACC Act) has been amended, in respect of our conduct both at home and abroad.
- 4.3 We committed to acting professionally, fairly and with integrity in all our relationships and business dealings wherever we operate and to implementing and enforcing effective system to counter bribery and the corruption risk of the organisation.
- 4.4 We will ensure that the results of any audit, reviews of risk assessment, control measures & performance are reported to all top-level Management including the full Board of Directors and acted upon.

SCH Group expects that contractors, sub-contractors, consultants, agents, representatives and others performing work or services for or on behalf of the Group will comply with this Policy in relevant part when performing such work or services.

5. Risk Assessment

SCH Group will undertake Corruption Risk Assessment, incorporated into general risk register, periodically and when there is a change in law or circumstance of the business to identify, analyse, assess and prioritise the internal and external corruption risks of the organisation. This risk assessment should be used to establish appropriate processes, systems and controls approved by the top-level Management to mitigate the specific corruption risks the business is exposed to.

The risk assessment to cover external & internal risks, which may include:

- chances for corruption & fraud activities due to weaknesses in the organisation's governance framework & internal systems/etc;
- financial transactions that may disguise corrupt payments;
- business activities in countries/sectors that pose a higher corruption risk
- non-compliance of external parties acting on behalf of the organisation regarding legal & regulatory requirements related to anti-corruption.
- relationships with third parties in its supply chain (e.g. agents, vendors, contractors & suppliers)



6. Undertake Control Measures

The Management will put in place the appropriate controls and contingency measures which are reasonable and proportionate to the nature and size of the organisation, in order to address any corruption risks arising from weaknesses in the organisation's governance framework, processes and procedures.

Establish key considerations or criteria for conducting due diligence on any relevant parties or personnel (such as Board members, employees, agents, vendors, contractors, suppliers, consultants and senior public officials) prior to entering into any formalised relationships. Methods may include background checks on the person or entity, a document verification process, or conducting interviews with the person to be appointed to a key role where corruption risk has been identified.

Group CEO shall establish and maintain an anti-bribery and corruption compliance function within the to oversee the design, implementation and management of this Policy.

Group CEO shall perform functions below within SCH Group's structure, equipped to act effectively against Bribery and Corruption:

- a) provide advice and guidance to Personnel on this Policy and issues relating to Bribery and Corruption;
- b) take appropriate steps to ensure that adequate monitoring, measurement, analysis and evaluation of this Policy is performed;
- c) report on the performance of this Policy to the top management and Audit Committee regularly.

Appropriate resources shall be provided for effective operation of this Policy and that the Group CEO is staffed with persons who have the appropriate competence, status, authority and independence.

7. Systematic Review, Monitoring and Enforcement

SCH Group shall monitor the legal and regulatory regimes where it operates and any changes to SCH Group's business environment and risks and identify opportunities for this Policy's improvement. A report should be submitted to the top management and Audit and Risk Committee on a regular basis for the appropriate action to be taken.

Regular assessments of this Policy should be carried out to ensure its scope, policies, procedures and controls match the Bribery and Corruption related risks faced by SCH Group.

SCH Group endeavors to impact the business environment where it operates. This includes extending its integrity programme to non-controlled Business Associates such as suppliers and contractors, seeking to work with companies who have a similar commitment and supporting initiatives in the private and public sectors which are likely to improve the integrity of its operating environment.

Regular audits shall be conducted to ensure compliance with this Policy. Such audits may be conducted internally by SCH Group or by an external party. Audit documentation should include performance improvement action plans. Non-compliance as identified by the audit and any risk areas identified through this and other means should be reported to the top management and Audit Committee in a timely manner in accordance with the level of risk identified.



8. Training

SCH Group shall organize an awareness programme for all its Personnel on the understanding of the SCH Group's position regarding this Anti-bribery and Corruption Policy, Integrity of Engagement and Ethics in Workplace from time to time which shall be announce by the Human Resource Department prior to commencement of the awareness programme.

Training shall be provided on a systematic basis, in accordance with the level of Bribery and Corruption risk related to the position. Training should be provided to all individuals who are:

- conducting their internship programme in SCH Group;
- recently employed by SCH Group;
- all existing Personnel of SCH Group;
- All appointed to or currently holding an Exposed Position deem by the Board of Director
- All Business Associates acting on behalf of SCH Group.

Human Resources Department shall maintain and organize the records of the awareness programme to identify and recognize which SCH Group Personnel have received the training, and produce, communicate and update the training schedule in conjunction with MD/CEO.

9. Communication

The Human Resource Department should take into account what key points should be communicated, to whom they should be communicated, how they will be communicated, and the timeframe for conducting the communication plan. The Management should also consider what languages the materials will be communicated in.

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10. Gifts, Donations and Sponsorships

SCH Group's Personnel shall not directly, or indirectly, receive or ask for (solicit) gifts, which includes cash or cash equivalent in any intangible form which includes but not limited to gift certificates, loans, commissions, coupons, discounts or any other related forms. It is the responsibility of the Personnel to inform and communicate to external parties involved in any business dealings with the Group's practices of "No-Gift" policy and to request the external party's understanding and awareness of adhering to the said policy.

Although the general principle is to immediately refuse and return the gifts offered by the external party, accepting or receiving a gift on behalf of SCH Group may be allowed but subject to the Group CEO approval and under these limited circumstances as follow:

- Corporate Gift not exceeding RM500 in a single receipt;
- Customary and lawful under the circumstances;
- Do not have or are perceived to have (by either the giver or the receiver), any effect or impact on the decision making of the SCH Personnel.
- No expectation of any specific favour or improper advantages from the intended recipients;
- Independent business judgment of the intended recipients not influence;
- No corrupt / criminal intent involved or pre-meditated; and
- Gift, Donations and Sponsorship to be done in a clear and transparent manner.

If a gift, donation and sponsorship is intended for public officials, Personnel must ensure that the gift, donation and sponsorship is not excessive and lavish, and must commensurate with the official designation of the public official and not his personal capacity, subject to the limit above.

If a Business Partners and Associate offer a Personnel a gift which falls outside of the above circumstances, the Personnel shall politely decline and explain the Anti-Bribery and Corruption Policy in force by SCH Group. The Personnel may accept the gift on SCH Group behalf and hand over the gift to the Management who may decide that the gift may be given to charity, which includes in a festival event within the departments or share with other employees in the department.

11. Facilitation Payments

SCH Group adopts a stringent policy of disallowing the use of facilitation payments in its business. Facilitation payment is an unofficial and unethical payment or other provision made directly or personally to an individual in control of a process or decision. It is given to secure, facilitate or expedite the performance of a routine or administrative duty or function.

Personnel shall decline to make the payment and communicate to the Group CEO or Higher Management immediately when they encounter or experience any requests for a facilitation payment. In addition, if a payment has been made and Personnel are unsure or unaware of the nature, the MD/CEO must be notified promptly, and the payment shall be detailed accordingly. Personnel must not undertake to offer, or agree to give or offer, facilitation payments to any other party.



12. Recruitment, Promotion and Support of Personnel

SCH Group recognises and promotes the value of integrity in its Personnel and Business Associates. SCH Group's recruitment, training, performance evaluation, remuneration, recognition and promotion for all SCH Group's Personnel, including management, shall be designed and regularly updated to acknowledge integrity.

The recruitment of Personnel should be based on approved selection criteria or assessment evaluation to ensure that only the most qualified and suitable individuals are employed. This is essential to ensure that no element of bribery or corruption is involved in the hiring of the Personnel.

In line with this, proper background and assessment checks should be conducted occasionally upon notification by the Human Resource Department in order to ensure that the potential Personnel have not been convicted in any bribery or corruption cases nationally or internationally. More detailed background checks should be performed when hiring Personnel that would be responsible in management positions, as they would be tasked with decision making obligations.

13. Business Associates

All Business Associates which includes but not limited to external providers such as consultants, advisors, vendors and agents, and all related parties to SCH Group acting on behalf of SCH Group are required to comply with this Policy and all other related statutory acts and regulation pertaining to the Anti-Bribery and Corruption.

In circumstances where SCH Group retains controlling interest, such as in certain joint venture agreements, partnership agreement and all other agreements which expressly and impliedly show a Business Associates relationship between SCH Group, then all the Business Associates and their employees which includes all third party representative acting on behalf of the Business Associate shall be required to adhere and comply to this Policy. Where SCH Group does not have controlling interest, Business Associates are encouraged to observe and adopt the policy.

Due diligence shall also be carried out with regards to any Business Associates intending to act on SCH Group's behalf as an agent or in other representative roles, to ensure that the entity is not likely to commit an act of bribery or corruption in the course of its work with SCH Group.

The extent of the due diligence should be based on a Bribery and Corruption risk assessment. Due diligence may include a search through relevant databases, checking for relationships with public officials, self-declaration, and documenting the reasons for selecting one particular Business Associate over another. The results of the due diligence process must be recorded and documented manually and digitally which shall be retained for not more than five years and be produced on the request by the custodian of the process.

Business Associates covenant and agree that the standard clause in all contracts with SCH Group may include a valid termination clause in the event that bribery or an act of corruption has been proven to occur by the Business Associates or their representatives. Additional clauses may also be included for Business Associates acting on behalf of the Group where bribery risk has been identified.



14. Responsibilities of Personnel

In conjunction with Section 4 of this Policy, all SCH Group's Personnel are required to carry out those responsibilities and obligations relating to SCH Group's anti-bribery and corruption stance, alongside those already in existence, which includes the following:

- Be familiar and aware with applicable requirements and directives of the policy and communicate them to subordinates;
- Promptly record all transactions and payments in SCH Group's books and records accurately and with reasonable detail;
- Ask the Management/Human Resource, if any questions arise in the event if there is an ambiguity in the Policy or if there is a lack of clarity about the required action in a particular situation;
- Always raise suspicious transactions and other "red flags" (indicators of bribery or corruption) to immediate superiors for guidance on the next course of action;
- Be alert to indications or evidence of possible violations of this Policy;
- Promptly report violations or suspected violations through appropriate channels;
- Attend required anti-bribery and corruption training as required according to position; and
- Not to misuse their position or SCH Group's name for personal advantage.

When dealing with Business Associates, all SCH Group's Personnel shall not:

- express unexplained or unjustifiable preference for certain parties;
- make any attempt at dishonestly influencing their decisions by offering, promising or conferring advantage;
- exert improper influence to obtain benefits from them;
- directly or indirectly offer or make promise or corrupt payments, in cash or in kind for a specific favour or improper advantage from them.

During an active or anticipated procurement or tender exercise, Personnel participating in the exercise in any way whatsoever, shall not:

- receive gifts, donation or sponsorship of any kind from any external party participating, planning to participate, or expected to participate, in the procurement or tender exercise;
- provide anything other than a Corporate Gift to any external/third party related to the exercise;
- be involved in any discussions regarding business or employment opportunities, for personal benefit or for the benefit of a Business Associate;



- abuse or disrupt the decision-making and other delegated powers given by the top management; and
- Circumvent normal procurement or tender process and procedure.

When dealing with external parties in a position to make a decision to SCH Group's benefit (such as a Government official or client), SCH Group's Personnel shall not:

- offer, promise or make any attempt at dishonestly or recklessly influencing the person's decision by directly or indirectly offer or make promise of corrupt payments, in cash or in kind;
- be involved in any discussions regarding business or employment opportunities, for their own personal benefit or for the benefit of the external party;
- otherwise abuse the decision-making and other delegated powers given by the top management, in order to illicit and safeguard an outcome which would be to the commercial advantage for themselves and/or SCH Group; and
- exert improper influence to obtain personal benefits from them.

SCH Group's managers have a particular responsibility to ensure that this Policy is applied and complied within their department or function and to monitor compliance of the same.

15. Conflict of Interest

A Conflict of Interest may arise in circumstances where an individual is in a position to take advantage of his/her role in SCH Group for his/ her personal benefit, including the benefit of his/her family and/or friends and/or company. This would limit the duties of good faith, fidelity, diligence and integrity as expected by SCH Group from its Personnel in the performance of the Personnel's duties and obligations.

All Personnel should refrain from situations in which personal interest could conflict with their professional obligations or duties. Personnel must not abuse their position, official working hours, company's resources and assets, or information available to them for personal gain or to the company's disadvantage.

In situations where a conflict does occur, Personnel are required to declare the matter as per the Employees to the Management.



16. Report of Policy Violation

Suitable reporting channels shall be established and maintained to receive information regarding violations of this policy, and other issues of integrity provided in good faith by SCH Group Personnel and/or external parties.

Personnel who, in the course of their activities relating to their employment at SCH Group, encounter actual or suspected violations of this Policy are required to report their concerns using the reporting channels as stated in the Whistleblowing Policy.

Reports made in good faith, either anonymously or otherwise, shall be addressed in a timely manner and without incurring fear of reprisal regardless of the outcome of any investigation.

Retaliation in any form against SCH Group Personnel where the person has, in good faith, reported a violation or possible violation of this Policy is strictly prohibited. Any SCH Group Personnel found to have deliberately acted against the interests of a person who has in good faith reported a violation or possible violation of this Policy shall be subjected to disciplinary proceedings including demotion, suspension, dismissal or other actions (including legal action) which SCH Group may pursue.

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APPENDIX

Staff Declaration Form

I, _____, hereby declare that I have read and understood SCH Group’s Anti-Bribery and Corruption Policy & Procedures (“Policy”) and the responsibilities required of me in relation to the said Policy.

I will abide by the requirements and provisions set out in the Policy which shall be read together and forms part of my employment contract with SCH Group.

I hereby confirm that I will: -

- a) complied with all applicable laws, regulations, and sanctions relating to anti-bribery and anti-corruption including but not limited to the Malaysian Anti-Corruption Commission Act 2009 (“Act”) or any equivalent laws which I am/ it is subject to;
- b) not engaged in any activity, practice, or conduct which would constitute an offence under the Act or equivalent laws;
- c) taken a zero-tolerance approach to bribery and corruption and observed the highest ethical standards in my activities/ its own business activities and agree that neither I/ it nor any associated person have/ has offered, promised or accepted any payment or gift to or from any person (directly or indirectly) for the purpose of influencing a decision; and
- d) maintained and complied with relevant policies and procedures designed to promote and achieve compliance with applicable anti-corruption laws.

I understand that if I am party to any breach of the Policy during the term of my employment, then it could be regarded as major misconduct which may result in disciplinary action, up to and including dismissal against me.

.....

Name :
NRIC :
Designation :