Anti-Bribery & Corruption Policy (“**Policy**”)

*This Policy shall be read in conjunction with the Malaysian Anti-Corruption Commission Act 2009 and its 2018 Amendment.*

Pertubuhan Penggerak Komuniti Impian (PPKI) adopts a zero-tolerance approach against all forms of bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships. PPKI or any third party acting on PPKI’s behalf must not provide, offer or accept bribes, kickbacks, corrupt payments, facilitation payments, or inappropriate gifts, to Government Officials or any commercial person or entity, regardless of local practices or customs.

# Scope

This Policy applies to all persons associated with PPKI, including employees/executive committee members at all levels whether permanent or temporary, members, volunteers, interns, agents, advisors, lawyers, company secretary, experts or contractors. This Policy forms part of any employee’s contract of employment and may be amended at any time. This policy applies to all processes and any dealings with any customers, clients, partners and suppliers.

# Procedures

1. **Bribes**

Bribery is the offering, promising, giving, accepting or soliciting of money, a gift, thing of value or other advantages as an inducement to do something that is illegal or a breach of trust in the course of carrying out a society’s activities.

It is illegal to give or receive a bribe, and a society is liable for bribes taken or given on its behalf where it does not have adequate procedures in place.

# Gifts and Hospitality

Gifts can be in the form of goods or services, including anything that can be of value to the person receiving it.

* 1. It is important to consider the intent of the gift, hospitality, or entertainment first; that the gift, has no improper motive to obtain or retain any business, or, to obtain some form of benefit or advantage;
  2. Whether it is for the society, or, the individual employee, anyone working for PPKI, is not allowed to give or accept any gift that may be deemed as a gratification, enticement or to gain an advantage;
  3. If unsure of the intent behind the gift, hospitality or entertainment offered, you must disclose the matter to Chairman/Society’s lawyer to obtain advice before proceeding;
  4. Any gift received, while representing PPKI, is given to the society and not you; and must be disclosed and declared in PPKI’s official communication platform;
  5. Any gift given, or, received, must always be of moderate and reasonable value and given in public and not in secret;
  6. Any gift given on behalf of PPKI, must follow the established control measures and policies (i.e. Purchasing, Signature Authority and Approval Policies)

If PPKI discovers a supplier or contractor has been used wholly or mainly because of the incentive of a gift and it was not disclosed; as such, the employee has not acted in the best interests of PPKI, this will also constitute a disciplinary offence and will lead to disciplinary action, which may include immediate dismissal.

# Political contributions

PPKI does not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

# Charitable contributions

Charitable support and donations are acceptable, and indeed are encouraged, whether of in-kind services, knowledge, time, or direct financial contributions. However, employees/executive committee members must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery.

# Facilitation payments

Facilitation payments are a form of bribery made to expedite or facilitate the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low-level officials to obtain a level of service, which one would normally be entitled to. It is a strict policy that facilitation payments must not be paid. It is recognised, however, that our employees/executive committee members may be faced with situations where there is a risk to the personal security of an employee or his/her family and where a facilitation payment is unavoidable, in which case the following steps must be taken:

* keep any amount to the minimum;
* create a record concerning the payment; and
* report it to your Chairman/Society’s lawyer.

# Record-Keeping

Employees/executive committee members must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted under our policy.

# Violation of the Policy

Any violation of the Policy by employees/executive committee members will attract serious repercussions and disciplinary action after due inquiry. Where there is strong evidence of bribery and corruption committed by any employee/executive committee members, can be summarily dismissed and will not be allowed to be employed/serve in PPKI.

Employees/executive committee members who are found to have assisted or facilitated the violation of the Policy, whether actively or by way of negligence or omission, will also be deemed to have violated the Policy and committed misconduct that is liable for dismissal from PPKI.

# Reporting for Violations of Policy and Whistleblower Rights

Any concerns, questions or reports should be addressed to firstly, to the Chairman, or where that is not possible, to the Society’s lawyer/Company Secretary.

Any reports made for violation of the Policy will be treated very seriously and accordingly, employees/executive committee members are responsible to ensure that they:

* 1. exercise sound judgment that it is a genuine threat and violation of the Policy;
  2. have evidence to support their allegations of any violations of the Policy;
  3. are available to provide evidence in any inquiry of such violations; and
  4. are not frivolous reports with the motive to scandalise.

Employees/executive committee members who refuse to accept or offer a bribe or those who raise concerns or report another’s wrongdoing are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy even if they turn out to be mistaken. Any genuine reports made will be kept strictly confidential and only informed to persons on a need-to-know basis to safeguard the interests of PPKI and also to ensure that any processes undertaken will not be compromised.

# Monitoring and Review

PPKI/executive committee members will be monitoring compliance with the Policy. There is no tolerance or excuse for non-compliance with the Policy.

Where there is any uncertainty for any practices which relate to the Policy, employees/executive committee members must always seek the advice of the Society’s lawyer/Company Secretary. Where there is still uncertainty, they should direct their concerns to People Operations.

The Policy will be reviewed from time-to-time, to ensure that it continues to remain relevant, appropriate, and effective in the enforcement of the principles herein and to ensure continued compliance with the prevailing law.

All employees/executive committee members of PPKI are responsible to keep themselves up to date with PPKI’s latest policies and processes, in particular, this Policy and ensure that the highest standards of compliance are followed.