



ASRAMA RAYA SDN BHD

STANDARD OPERATING PROCEDURE

ANTI-BRIBERY AND

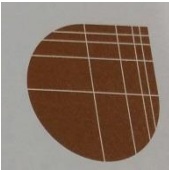
ANTI-CORRUPTION

AR/SOP 3/Anti-Bribery and Anti-corruption/V4

Edited by  Name: Pong Kuan Kin Position: Assistant Forest Manager Date: 03-01-2024	Approved by  Name: Chan Kim Men Position: Forest Manager Date: 04-01-2024
Version No.	4
Relevant FSC Indicator	1.4.1
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CONFIRMED

04 JAN 2024

	ASRAMA RAYA SDN BHD		Ref.	AR/ SOP 3/Anti-Bribery and Anti-Corruption/V4
	Policy/Procedure/ Title	Standard Operating Procedure Anti-Bribery and Anti-Corruption		
	Relevant Indicator	1.4.1		
	Prepared by	Asst. Forest Manager	Approved by	Forest Manager
	Version No.	4	Approval Date	04-01-2024

1. PURPOSE

- To ensure bribery, coercion and other acts of corruption do not occur.
- To ensure corrective measures are implemented if corruption does occur.
- To provide an effective mechanism (internal investigations and disciplinary actions) to eliminate bribery and corruption in workplace.
- To educate all employees to recognise and avoid bribery and corruption in workplace.

2. SCOPE

This standard of procedure (SOP) is applied to all employees under Asrama Raya Sdn Bhd - Forest Management Unit and its contractors (Jalur Bangsa Sdn Bhd) at all locations. All of the forest management workers and forest harvesting workers are required to follow and obey all of the SOP.

3. ANTI-BRIBERY AND CORRUPTION COMMITMENT

Asrama Raya Sdn Bhd (ARSB) and its contractor Jalur Bangsa Sdn Bhd (JBSB) are committed to conducting business dealings with integrity. This means avoiding practices of bribery and corruption of all forms in the company's daily operations.

ARSB has adopted a zero-tolerance approach against all forms of bribery and corruption. ARSB is committed not to offer or receive bribes in money or any other form of corruption and comply with anti-corruption legislation where this exists.

4. ANTI-BRIBERY AND CORRUPTION POLICY

Under Forest Management Unit:

- ARSB and its contractor JBSB – *Forest Management Unit* are committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented.
- ARSB and JBSB have zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.

- ARSB and JBSB will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the Malaysia, including the **Malaysian Anti-Corruption Act 2009 (MACC Act 2009) (Act 694)** :
 - i. Soliciting/Receiving Gratification (Bribe) [section 16 & 17(a) MACC Act 2009]
 - ii. Offering/Giving Gratification (Bribe) [section 17(b) MACC Act 2009]
 - iii. Intending to Deceive (False Claim) [Section 18 MACC Act 2009]
 - iv. Using Office or Position for Gratification (Bribe) (Abuse of Power/Position) [Section 23 MACC Act 2009]

, in regards to our conduct both at home and abroad.

- ARSB and JBSB recognises that bribery and corruption are punishable under **Malaysian Anti-Corruption Act 2009 (MACC Act 2009) (Act 694)**. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.

5. RESPONSIBILITIES OF ARSB PERSONNEL

- 5.1 All of the ARSB employer and employees (including Director, Manager and its contractor JBSB) are responsible for understanding and complying with this SOP. The role of all employees includes the following:
- a) Be familiar with applicable requirements and directives of the policy and communicate them to subordinates.
 - b) Transaction integrity is practiced by ARSB and JBSB. All of the financial transactions and payments of ARSB and JBSB are transparent and must be recorded correctly.
 - c) All transactions and payments made by ARSB and JBSB cannot be disclosed, no transaction or payments are hidden.
 - d) Accounting personnel must record the actual values of each transaction with proper description and classification in accounting ledger and software.
 - e) Accounting personnel also must store all of company's finances data securely and readily retrievable for inquiry or reporting.
 - f) Communicate with Head of Integrity & Internal Audit Department for any enquiry about this SOP or if there is a lack of clarity about the required action in a particular situation.
 - g) Raise suspicious transactions and other "red flags" (indicators of bribery or corruption) to Director for guidance on the next course of action.
 - h) Be alert to indications or evidence of possible violations of this SOP.

- i) Promptly report violations or suspected violations to Director.
 - j) Attend appropriate anti-bribery and corruption training.
 - k) Not misuse their position or ARSB's company name for personal advantage.
- 5.2 When dealing with business associates, all ARSB and JBSB employer and employee shall NOT:
- a) express unexplained or unjustifiable preference for certain parties.
 - b) make any attempt at dishonestly influencing their decisions by offering, promising or conferring advantage.
 - c) exert improper influence to obtain benefits from them.
 - d) directly or indirectly offer or make promise or corrupt payments, in cash or in kind for a specific favour or improper advantage from them.
- 5.3 During an active or anticipated procurement or tender exercise, personnel participating in the exercise in any way whatsoever, shall not:
- a) receive gifts or hospitality or any kind from any external party participating, planning to participate, or expected to participate, in the procurement or tender exercise.
 - b) provide anything other than a corporate gift and token hospitality to any external/third party related to the exercise.
 - c) be involved in any discussions regarding business or employment opportunities, for personal benefit or for the benefit of a business associate.
 - d) abuse the decision-making and other delegated powers given by the top management.
 - e) bypass normal procurement or tender process and procedure.
- 5.4 When dealing with external parties in a position to make a decision to ARSB's benefit (such as a Government official or client), ARSB personnel shall not:
- a) offer, promise or make any attempt at dishonestly influencing the person's decision by directly or indirectly offer or make promise of corrupt payments, in cash or in kind.
 - b) be involved in any discussions regarding business or employment opportunities, for their own personal benefit or for the benefit of the external party.
 - c) otherwise abuse the decision-making and other delegated powers given by the top management, in order to illicitly secure an outcome which would be to the commercial advantage to themselves and/or the company.

- d) exert improper influence to obtain personal benefits from them.

6. PROCEDURES UPON DETECTION OF CORRUPTION PRACTICES

6.1 Internal Investigations

- i. Official complaint or report regarding bribery and corruption case is received from the employee / complainant.
- ii. An internal investigation must be carried by the Integrity & Internal Audit Department. Where the matter is potentially serious it will be promptly reported to the Director of ARSB.
- iii. The report must be correctly recorded and an investigative file must be established. In the case of an oral report, Integrity & Internal Audit Department who received the report must prepare a written report for record.
- iv. The Head of Integrity & Internal Audit Department must promptly conduct the investigation. The investigation will check on all relevant details which include times, date and the persons involved in the case. The identity of a person filing a report will be treated as confidential to the extent possible, and only revealed on a need-to-know basis or as required by law or court order.
- v. The Head of Integrity & Internal Audit Department must submit the investigation report to Director. Director must evaluate the case based on the investigation report and all the details given by Head of Integrity & Internal Audit Department.
- vi. The case is categorized as merit and non-merit.
- vii. For merit case, it must be reported to Malaysian Anti-Corruption Commission (MACC). The case will be investigated and handled by MACC.
- viii. For non-merit case, the investigation report must be submitted to Human Resource Department.
- ix. Show cause letter must be issued out by Director. Deliberation must be carried out by ARSB's Disciplinary Committee/ Human Resource Department.

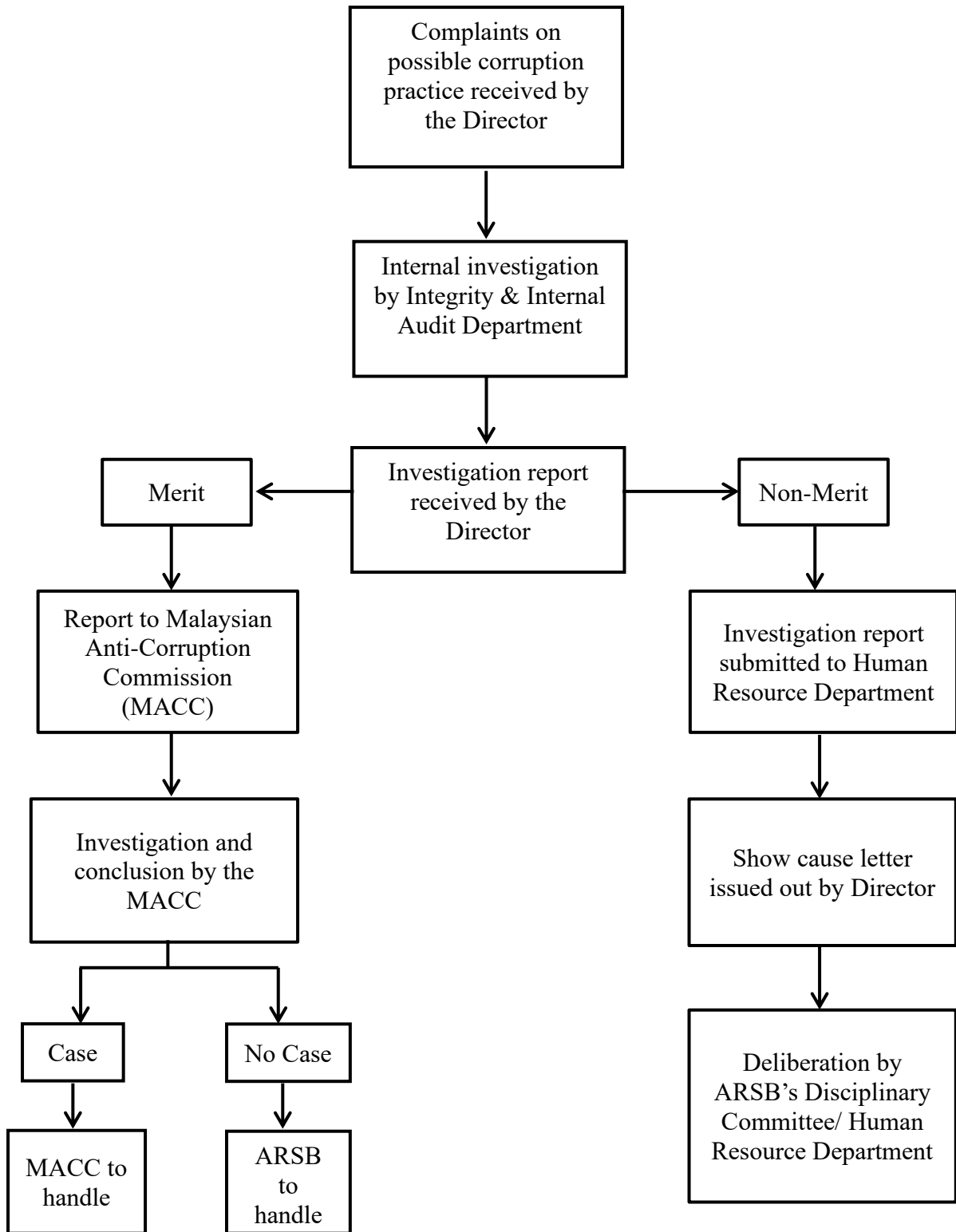


Figure 1. ARSB flow chart of internal investigation

6.2 Disciplinary Action

- i. After Head of Integrity & Internal Audit Department completed the full investigation, a show cause letter must be issued to offender.
- ii. A disciplinary committee meeting must be carried out to discuss on the disciplinary actions to be taken on the offender.
- iii. After consults with the Head of Integrity & Internal Audit and Head of Human Resources Department again, the final legal and disciplinary actions must be carried out by Director.
- iv. For merit case, Director recommends to MACC for further actions. If the case is identified as serious corruption or bribery, penalty must be imposed by MACC.
- v. Any employees of ARSB and its contractor (JBSB) of a criminal act and/or serious misconduct will be considered to have committed a serious disciplinary offence and can be dismissed or removed from his or her position on grounds of gross misconduct.
- vi. Where supervisory negligence is found to be a contributory factor, disciplinary action must also be initiated against those managers or supervisors responsible.
- vii. For non-merit cases, a warning letter must be given to the employee or transferring the employee to other section.

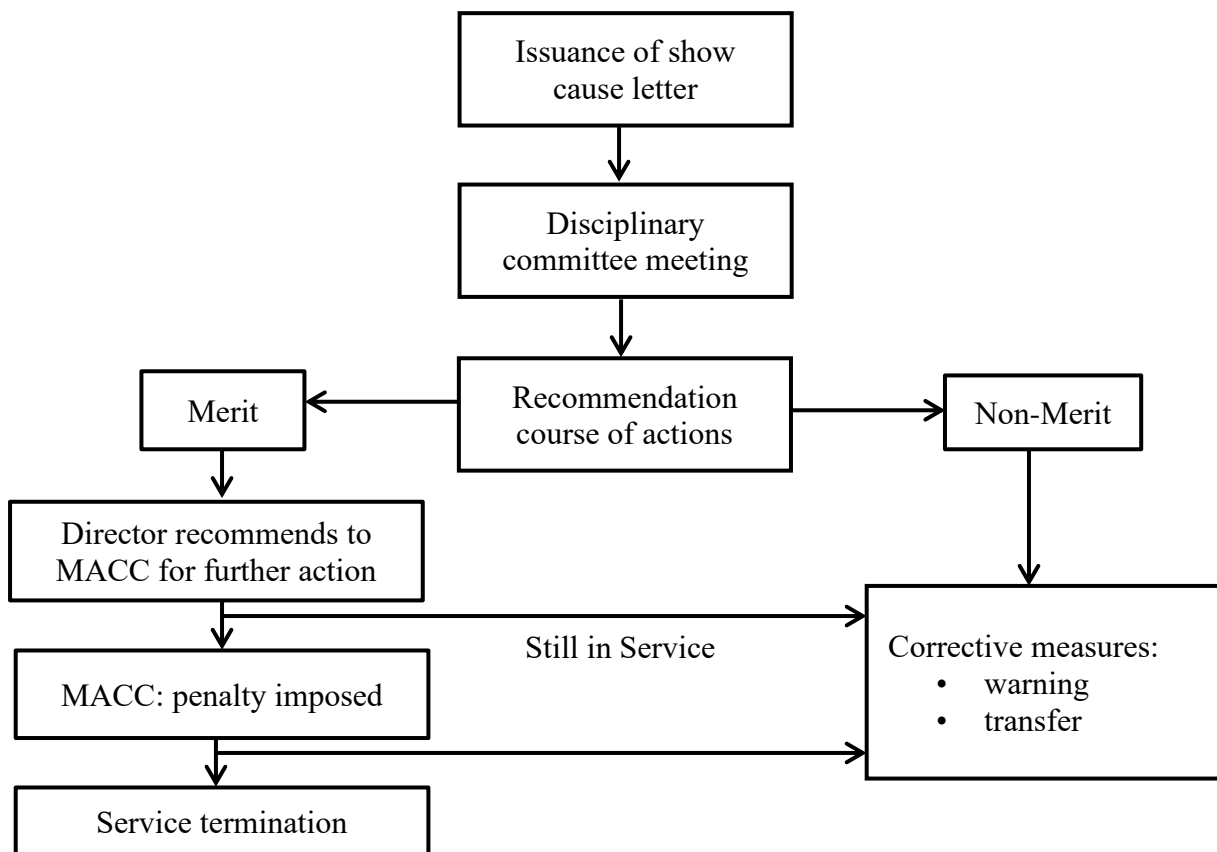


Figure 2. Flow chart showing disciplinary actions

6.3 Corrective Measures

Corrective measures must be undertaken to accused employee but termination of service is avoided. The employee be issued with warning letter and perhaps transferred to other section in anyway deemed fit by the Director. The employee also must be directed to attend counselling for consultation or motivational course to raise her/his self-awareness to avoid bribery and corruption.

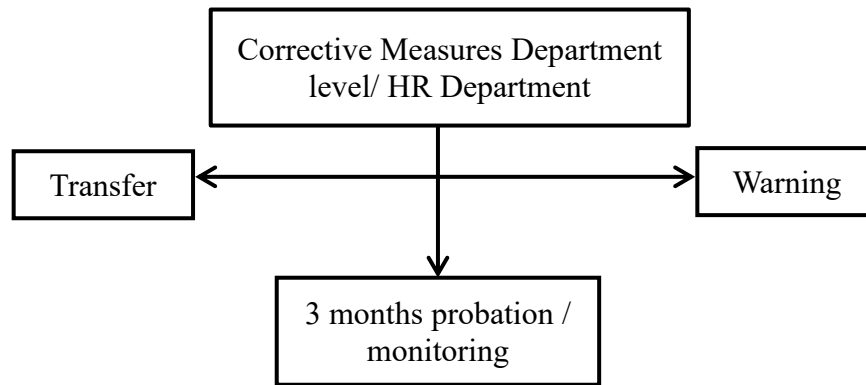


Figure 3. Flow chart showing the correction measures

6.4 Record Keeping

- i. ARSB will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. ARSB will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.
- ii. ARSB shall maintain documentation related to the adequate procedure for 7 years. The documentations are internal investigations, disciplinary actions taken and implemented corrective measures and any documentation related with this procedure. All documentations declared as 'confidential' and keep in the locked cabinet confidential file.
- iii. As a measure to satisfy the requirement of document retention, any disposal of relevant documents will require consent and approval from ARSB's Director. Each department must inform Director and obtain his prior approval for any disposal of relevant documents.

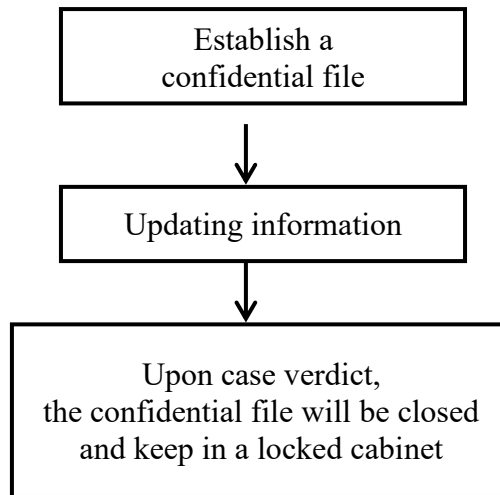


Figure 4. Flow chart of the procedure for record keeping

6.5 Protection

Any complaints on suspected corrupt practices made be kept confidential in accordance to the Whistleblower Protection Act 2010.

6.6 Preventing Measures

- i. Conduct anti-corruption awareness programme to all ARSB's personnel and other stakeholders including government agencies, clients, supplier, vendors and contractors, consultants, visitors, communities, researchers, NGOs and companies to prevent corruption in the department.
- ii. Place anti -corruption posters in appropriate places such as in office and base camp (**Appendix 1-3**).
- ii. This includes integrity seminar, corruption free oath and *Anti-Corruption Committee* (**Appendix 4**) meeting as well as collaboration anti-corruption programme with MACC.

REFERENCE

Malaysian Anti- Anti-Corruption Act 1997 (Act 575) (MY.).
Corruption Commission Act 2009 (Act 694) (MY.).
Malaysian Anti-Corruption Commission (Amendment) Act 2018 (Act A1567) (MY.).
Whistleblower Protection Act 2010 (Act 711) (MY.).

Appendix 1. Poster Anti-Corruption

KEWAJIPAN MELAPORKAN RASUAH

Sistem Pengurusan Aduan (CMS)
portaladuan.sprm.gov.my

Kunjungi mana-mana pejabat SPRM yang berhampiran
www.sprm.gov.my

Emelkan maklumat rasuah kepada:
info@sprm.gov.my

Talian bebas tol:
1800-88-6000


Hantarkan info rasuah melalui faks ke talian:
+603-8870 0934

Muatnaik info rasuah melalui aplikasi MACC Mobile:
Apps Store atau Google Play

Hantarkan info rasuah melalui SMS ke talian:
+6019-6000 696

Poskan surat ke alamat SPRM:
Peti Surat 6000

SURUHANJAYA PENCEGAHAN RASUAH MALAYSIA


A poster with a blurred green background. In the lower-left foreground, a person is seen from behind, wearing a dark blue and grey hoodie, holding a camera up to their eye as if taking a photo. The text is overlaid on the right side of the image.

AWAS!
ANDA SEDANG DIPERHATIKAN

Jangan beri, Jangan terima
RASUAH

Pemberian atau penerimaan suapan adalah satu jenayah serius yang boleh didakwa

SURUHANJAYA PENCEGAHAN RASUAH MALAYSIA



www.sprm.gov.my



1 800 88 6000

APA ITU RASUAH?



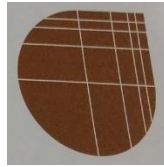
Penerimaan atau pemberian suapan sebagai upah atau dorongan untuk seseorang individu kerana melakukan atau tidak melakukan sesuatu perbuatan yang **BERKAITAN DENGAN TUGAS RASMI**. Suapan terdiri daripada Wang, Hadiah, Bonus, Undi, Perkhidmatan, Jawatan Upah, Diskaun.

**SILA LAPORKAN APA-APA PELANGGARAN
TATA LAKU DAN PERBUATAN RASUAH KEPADA
PIHAK PENGURUSAN ASRAMA RAYA SDN BHD**

**RASUAH ITU SATU
JENAYAH!!**

**Akta
Suruhanjaya
Pencegahan
Rasuah
Malaysia 2009
(Akta SPRM
2009) (Akta
694)**

Appendix 4. Asrama Raya Sdn Bhd (ARSB) Anti-Corruption Committee



ASRAMA RAYA SDN BHD (ARSB)

ANTI-CORRUPTION COMMITTEE

- President : Mr. Ng Kay Yip (ARSB Director)
- Vice President : Mr. Tai Jen Ning
(ARSB Head of Integrity & Internal Audit Department)
- Date : 2 January 2024
- Committee Members :
1. Mr. Chan Kim Men
 2. Mr. Kok Foo Sim
 3. Mr. Yong Lee Hua
 4. Mr. Chan Wei Yern
 5. Ms. Pong Kuan Kin
 6. Ms. Nor Shahira Natasha Sahrom
 7. Mr. Siow Pok Ba
 8. Mr. Abd Wahab Jusoh
 9. Mr. CW Ahmad Termizi CW Mokhtar

Updated on 4 January 2024