



PUSPAKOM

Your Safety, Our Priority

A Member of

DRB-HICOM

PUSPAKOM

ANTI-BRIBERY POLICY



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1.0 INTRODUCTION

PUSPAKOM applies zero tolerance against all elements related to bribery, corruption, abuse of power and misappropriation. This Anti Bribery Policy addresses commitment of PUSPAKOM to integrity and in promoting a culture of transparency, openness, honesty, ethical in the conduct of its operations and business activities.

This Policy provides principles, guidelines and requirements on how to deal with bribery and corrupt practices that may arise in the course of daily business and operation activities within PUSPAKOM.

It also intended to assist everyone in PUSPAKOM in conducting the business and operation activities legally, ethically and with integrity.

2.0 APPLICATION

This policy is intended to apply to all management and employees of PUSPAKOM and all vendors, contractors, suppliers, distributors, consultants and other third parties who carry out work/services for/on behalf of PUSPAKOM as well as customers and customer's representatives who obtain PUSPAKOM services where all such parties are required to adhere to the policies.

3.1 Bribery

Offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to that person's duties

3.2 Gift

Money, movable or immovable property, vehicle, shares, travel tickets, entertainment, service, club membership, any form of discounts or commissions, hampers, jewellery, ornament, any gifts, souvenirs, or anything of value which is given to or received by an officer, his or her spouses or any other person on his behalf, without any or insufficient consideration known to the officer.

3.3 Hospitality

A generous and friendly treatment, reception or entertainment that can be perceived by a third party, to be for the purpose of bribery even if neither the giver nor the receiver intended it to be for this purpose.

3.4 Donation

An especially charitable gift, contribution, subscription, present, hand out, grant, offering, gratuity, endowment or other similar donation that can be perceived by a third party, to be for the purpose of bribery even if neither the giver nor the receiver intended it to be for this purpose. It can include giving or providing cash, venues, equipment, personnel time or other benefit.

PUSPAKOM SDN. BHD. is a subsidiary of DRB-HICOM BERHAD, and as an authorized body for vehicle roadworthy inspection, pledges to promote the culture of transparency, fairness, and accountability at the workplace to keep up a high standard of integrity and governance. In the effort to consistently and continuously fight against the risk of bribery, PUSPAKOM are committed to:-

- ✓ Provide and maintain an anti-bribery working environment for all employees and stakeholders;
- ✓ Comply to the anti-bribery law, act, rules & regulations, procedure and other instructions;
- ✓ Create a process of identification, analyse and successfully achieve Anti-Bribery Management System Objectives within the timeframe;
- ✓ Satisfy all requirements in MS ISO 37001:2016 Anti-Bribery Management System;
- ✓ Provide avenue and encourage raising concerns regarding bribery conduct through Whistleblowing Policy;
- ✓ Continually improve Anti-Bribery Management System;
- ✓ Authorize Anti-Bribery Working Committee as an independent body; and
- ✓ Impose appropriate action against any act of not complying with applicable anti-bribery policy

5.1 Giving and Receiving Business Contribution

- 5.1.1 PUSPAKOM employees shall not accept any form of bribe, gifts or rewards from any parties. PUSPAKOM employees shall not accept anything that is deemed to influence the decisions or judgement for PUSPAKOM.
- 5.1.2 PUSPAKOM employees also shall not give gifts, loans or other benefits to customers (or customer representatives) or prospective customers to obtain sales or profitable business from customers.
- 5.1.3 PUSPAKOM employees shall not solicit, nor accept gifts on behalf of the company or any other group or unit from another company such as training or sponsoring any sports or charity event. This includes requests for sponsorship for any purposes.

5.2 Business Contributions

5.2.1 In principle, all PUSPAKOM employees are prohibited from putting themselves indebted and compromising in any business dealings. Therefore, all PUSPAKOM employees shall not accept gifts from all vendors, contractors, suppliers, distributors, consultants and other third parties who may influence or be deemed to influence any decision made. Decisions must be made objectively based on merit and should benefit the company. Any decision making may not be detrimental to the company or based on self-interest, choice or undue pressure from any party.

5.3 Approval Required from Group Managing Director's (GMD) Office of DRB-HICOM Berhad

5.3.1 Unless a small value souvenirs (for example diaries, calendars and so on), it is a company policy that all gifts from a third party must be managed so as not to abuse or to put someone indebted (to any party). For this reason, no gifts can be received without permission from the GMD office.

5.4 Business Norms

- 5.4.1 In situations where gift-giving practices are different among different cultures, where in some situations it may be difficult to refuse or return a gift. This may include gifts offered during a ceremony or official launches. In such cases, employees need to use their practice good business sense and discretion and preferably seek advice from the GMD Office, if necessary.
- 5.4.2 In some business situations such as corporate ceremonies, visits and functions may require giving of gifts. PUSPAKOM's gifts must be lawful, reasonable and approved by PUSPAKOM's management.
- 5.4.3 Appropriate corporate gifts include business luncheon/meals, company souvenirs or provision of company transportation for corporate events. Entertainment that is reasonable in the context of business can be considered acceptable.
- 5.4.4 Lavish or frequent entertainment and enjoying a lifestyle that is not in line with their respective status may affect the individual judgment/consideration on behalf of PUSPAKOM. If an invitation does not appear to be appropriate, the offer must be refused or pay the cost of the entertainment to avoid any future indebtedness.

6.0 PROCUREMENT POLICY

6.1 Procurement Process

- 6.1.1 All employees including procurement functions and all vendors, contractors, suppliers, distributors, consultants and other third parties shall comply with the Procurement Policy, Whistleblower Policy and Gift, Hospitality & Donation Policy.
- 6.1.2 Procurement methods and systems must comply with specified requirements & procedures as per the Procurement Policy and Procedure
- 6.1.3 All employees shall avoid situations in which personal interest could conflict or appear to conflict with the company's business. All times employees cannot use personal influence or positions to get the job from the company or enter into any undertaking with third party in which his or her family members and friends have an interest direct or indirectly. All functions involve in the procurement process shall make necessary declaration of interest in such situations before the conduct of the procurement process.

6.2 Due Diligence

- 6.2.1 Appropriate assessment shall be conducted to individuals or third parties to ensure the business and background of the potential business partners are free from bribery elements or conflict of interest prior to procurement process.

6.0 PROCUREMENT POLICY (cont'd)

6.3 Award Approval

- 6.3.1 Approvals for procurement award must be in accordance with the PUSPAKOM's Limit of Authority.

6.4 Verification of works

- 6.4.1 The job verification process shall be conducted to ensure all works, services, deliveries and supplies are completed according to the approved procurement requests.

7.0 RECRUITMENT POLICY

7.1 Recruitment Process

The recruitment process for all positions at PUSPAKOM is done transparently by using the following methods:-

- 7.1.1 Initial screening will be conducted on most qualified and suitable candidates and the candidates who meet the prescribed qualification requirements will be called and evaluated in an interview session;
- 7.1.2 Interview panel shall not have any relationship with the candidate;
- 7.1.3 Candidates need to disclose in the job application form any known relationship with any of the employees who are still employed in the company;
- 7.1.4 The Human Capital Division will make further screenings such as evaluation of financial standings, background and reference checks with previous employers on the selected candidates. More detailed background checks will be made on the candidates for management or critical positions;
- 7.1.5 All candidates will be requested to undergo medical screening at the Company's panel hospital/clinic before being offered for the job. Employment will be subject to the candidate passing the medical screening;
- 7.1.6 Upon duty reporting, new employees are required to submit the signed employment acceptance letter, PUSPAKOM's Code of Ethics & Business Practices, personal information and asset declaration.

7.0 RECRUITMENT POLICY (cont'd)

7.1.7 Newly-joined employees will need to undergo induction sessions within specific period from the date of joining the company which includes the introduction of the Company, terms and conditions of employment, work ethics which also includes aspects of integrity and other aspects of employment as well as the introduction of key function departments within Company.

8.0 WHITSLEBLOWING POLICY

8.1 PUSPAKOM'S Whistleblowing Policy

- 8.1.1 PUSPAKOM implements the Whistleblowing Policy to encourage employees, customers, customer's representatives, vendors, contractors, suppliers, distributors, consultants and other third parties to report any violation in code of conduct or any suspected or actual corruption, illegal conduct, wrongdoings and abuse of power cases or any form of malpractices to the proper channel for immediate action without fear of being victimised.
- 8.1.2 The Whistleblower's identity and information will be protected and kept confidential and will not be disclosed.
- 8.1.3 The protection to the Whistleblower will be given if disclosure is true, honest and in good faith. No protection will be provided if it is known that the disclosure has been made for personal or malicious purposes.
- 8.1.4 Protection to the Whistleblower - three key aspects of protection as in the Whistleblower Protection Act 2010 (Act 711) namely:-
- (a) protection of confidential information;
 - (b) immunity from civil and criminal action; and
 - (c) protection against detrimental action

8.2 Implementation Procedures

- 8.2.1 Every complaint, report or information can be channelled via mail, email or telephone or a face-to-face meeting. It is imperative where possible that a meeting with the complainant be made to ensure the credibility and validity of the information received.
- 8.2.2 It will be the task of the investigation team to assess, investigate and report on the complaint to the Chief Executive Officer and recommend a course of action in a prompt and fair manner.
- 8.2.3 Whistleblower who are making a report in bad faith or based on unfounded allegations or containing trivial, malicious, slanderous and frivolous claims may subject to disciplinary action.
- 8.2.4 Further details can be found or cross referenced with the Whistleblowing Procedure.

ANTI RASUAH



CEGAH!

JANGAN MENYESAL

“ Jangan Beri, Jangan Terima ”

Sebarang aktiviti yang mencurigakan sila laporkan terus ke :
☎ 03 - 2052 8989 ✉ whistleblower@puspakom.com.my

 **PUSPAKOM**

Ahli Kumpulan

DRB-HICOM