



MALAYSIA PETROLEUM RESOURCES CORPORATION GROUP ("MPRC GROUP")

ORGANISATIONAL ANTI CORRUPTION PLAN 2022- 2026

Rev 0

Leadership Mandate By Chairman

Assalamualaikum Warahmatullahi Wabarakatuh and Salam Sejahtera.

Alhamdulillah, be thankful to Allah because with His bounty and grace, the management of Malaysia Petroleum Resources Corporation (MPRC) and Johor Petroleum Development Corporation Berhad (JPDC) have unanimously given their support towards The Group's Anti-Corruption Organizational Plan (OACP) 2022-2026.

The development of this OACP, which is based on the National Anti-Corruption Plan 2019-2023, is a policy document to reflect The Group's commitment and professionalism in creating a work environment that is integrity, corruption-free and has good corporate governance.

The OACP outlines various initiatives based on three priority areas, namely Procurement and Finance, Operations and Human Resources, all of which are identified as high-risk areas in The Group's business dealings. For the success of the initiatives outlined, the MPRC Group leadership welcomes the cooperation and commitment of The Group's employees as well as strategic cooperation with stakeholders, enforcement agencies and relevant agencies.

The leadership has high confidence and hope that with the implementation of the OACP, it will have a positive impact and at the same time crown The Group as a company that adheres to the principles of integrity, transparency, and accountability.

Finally, on behalf of the Top Management of MPRC Group, congratulations and appreciation to all parties involved in developing this OACP. We will continue to be committed to providing support for the success of this OACP.

**YBhg Dato' Dr. Suhaili Idrus
Chairman**

Message from the CEO and President

Assalamualaikum Warahmatullahi Wabarakatuh and Salam Sejahtera

Dear Employees and Stakeholders,

At MPRC Group, we pride ourselves for acting professionally, ethically, honestly, and fairly. The Group's reputation is built on our core values—win-win, integrity, stewardship, and humility—values that our stakeholders and partners expect of us on at the organisation and in dealings with each and every talent employed by The Group.

To enhance our standards and uphold our zero-tolerance approach to bribery and corruption, we have developed the Organisational Anti-Corruption Plan (OACP). The OACP will further strengthen The Group's governance, integrity, and relevant controls within the organisation by identifying priority areas and initiatives to mitigate corruption, integrity risks. It will also map our compliance, governance, and monitoring in compliance with Section 17A of the Malaysian Anti-Corruption Commission Act 2009 (MACCA).

I am certain the OACP will help guide all of us at The Group to achieve our vision as a trusted partner to all our stakeholders we serve by upholding the values and principles we stand for.

May Allah S.W.T. bless all our efforts.

Mohd Yazid Ja'afar
CEO and President

Abbreviation

AKPK	<i>Agensi Kaunseling & Pengurusan Kredit</i> (Credit Counselling and Management Agency)
ARC	Audit & Risk Management Committee
BOD	Board of Directors
BPIA	<i>Bahagian Pengurusan Integriti Agensi</i> (Agency Integrity Management Division)
FIN	Finance Department
GIACC	Governance, Integrity and Anti -Corruption Centre (<i>Pusat Governans, Integriti dan Anti-Rasuah Nasional</i>)
GIC	Government Interest Companies
HRCS	Human Resources & Corporate Services
IA	Internal Audit
IGU	Integrity and Governance Unit
IM	Integrity Manager
JAR	Anti -Corruption Committee <i>Jawatankuasa Anti Rasuah</i>
JKPPT	<i>Jawatankuasa Kerja Pelaksanaan Pelan Tindakan</i> (Action Plan Implementation Working Committee)
JPDC	Johor Petroleum Development Corporation Berhad
LA	Legal Adviser
MACC	Malaysian Anti-Corruption Commission
MPRC	Malaysia Petroleum Resources Corporation
NACP	National Anti -Corruption Plan
OACP	Organizational Anti -Corruption Plan
OPS	Operations Department
P&P	Policy and Procedure
PIN	<i>Pelan Integriti Nasional</i> (National Integrity Plan)
PIPC	Pengerang Integrated Petroleum Complex
SOP	Standard Operating Procedure
SPRM	Suruhanjaya Pencegahan Rasuah Malaysia
The Group	The MPRC Group consisting of MPRC and JPDC
UIGLC	<i>Unit Integriti Government Link Companies, SPRM</i>
UNCAC	United Nations Convention Against Corruption
UNODC	United Nations Office On Drugs and Crime

Executive summary

This OACP 2022-2026 was developed in line with the launch of the National Anti-Corruption Plan by YB Tun Dr Mahathir bin Mohamad on 29 January 2019, Former Prime Minister, and the Prime Minister's Instruction Series 2 No. 1 of 2019 related to the implementation of the National Anti -Corruption Plan.

This OACP is a policy document that outlines the initiatives and actions that need to be implemented to create a corruption -free environment and make integrity a culture in the organization.

Chapter 1 as the curtain opener of the OACP introduces The MPRC Group, consisting of Malaysia Petroleum Resources Corporation (MPRC); a Government Agency under the supervision of the Economic Planning Unit, Prime Minister's Department, and Johor Petroleum Development Corporation Berhad (JPDC), a wholly owned subsidiary of MPRC. This chapter also outlines the possible areas of corruption risks and the group's existing controls.

Chapter 2 describes the challenges faced by The Group on anti-corruption efforts and sources of data for analysis.

Chapter 3 details the MPRC Anti-Corruption Plan Framework. It breaks down the 3 priority areas that have been identified, namely Procurement & Finance, Operations and Human Resources. In addition, this chapter outlines the strategies and initiatives that need to be implemented to ensure the effectiveness of the OACP.

Chapter 4 describes the implementation, monitoring, and evaluation mechanisms of this OACP, including the reporting structure on the progress and effectiveness of the initiatives that have been outlined. This is to identify gaps, if any, and the appropriate adjustments to achieve the desired goals.

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CHAPTER 1

INTRODUCTION

1.1 BACKGROUND



Malaysia Petroleum Resources Corporation (MPRC)

Malaysia Petroleum Resources Corporation (MPRC) is an agency under the Economic Planning Unit (EPU) in the Prime Minister's Department.

Established in April 2011, MPRC provides recommendations and implements initiatives to advance Malaysia's Oil and Gas Services and Equipment (OGSE) industry and drive the sector's development in gas market and new energy space.

MPRC supports EPU in advocating energy transition with gas as an important transition fuel and positioning Malaysia as a gas market hub for the ASEAN region. MPRC also supports EPU in promoting the sustainability agenda in the OGSE industry and beyond.

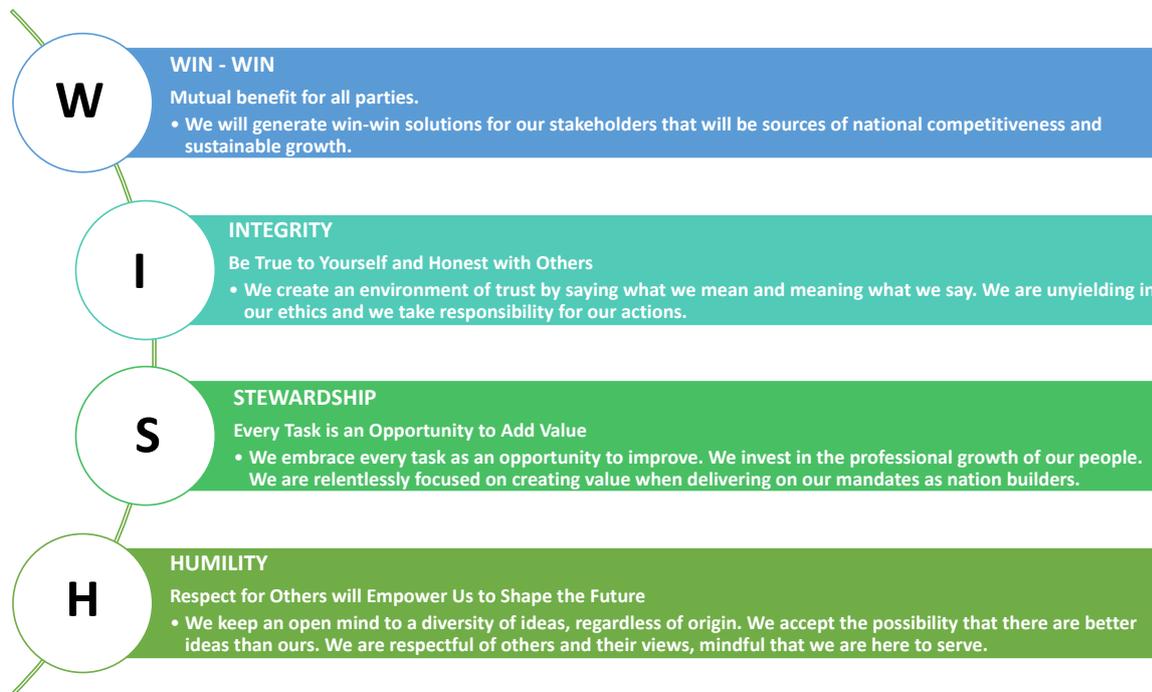
MPRC partners with various government ministries, agencies, industry associations and more to implement industry development initiatives towards developing a robust, resilient, and globally competitive OGSE sector that contributes to Malaysia's sustainable development.

Mission Statement

As an agency to the government, MPRC's missions are:

- To create a dynamic and progressive oil & gas services and equipment industry in Malaysia where companies can compete and grow
- To encourage close cooperation among industry, government, and society so that the oil & gas industry in Malaysia anchors the future prosperity of the country
- To promote more vitality in the oil & gas industry via joint ventures, collaboration, strategic partnerships, and alliances.

MPRC is guided by a set of Core Values that serves as a guide for our decisions and how we conduct ourselves, The Core Values are:

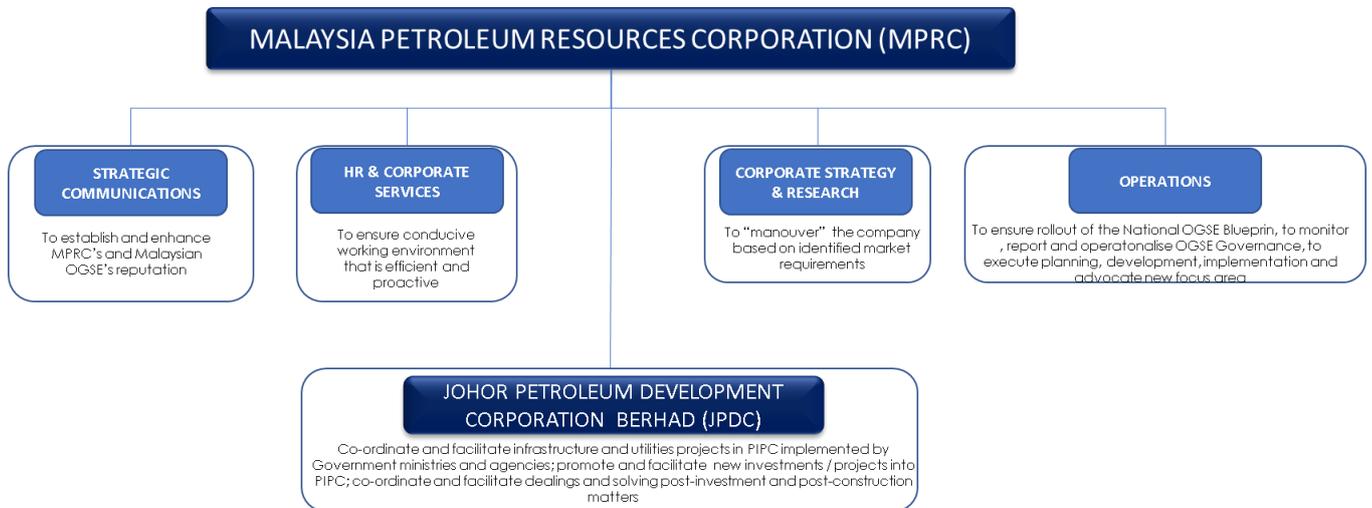


Johor Petroleum Development Corporation Berhad (JPDC)

Johor Petroleum Development Corporation Berhad (JPDC) was incorporated on 9 April 2012 as a federal agency reporting to the Economic Planning Unit (EPU), Prime Minister's Department. JPDC is a wholly owned subsidiary of Malaysia Petroleum Resources Corporation (MPRC).

With a vision to transform Johor into Sustainable, World-Class Downstream Oil and Gas Hub, its mission is to plan and co-ordinate the development of a sustainable downstream oil and gas industrial area in PIPC, promote investments into PIPC and Malaysia, and facilitate participation by Malaysian businesses and workforce in the PIPC development and economic activities.

The Group's Business Activities



1.1.1. The need to deal with corruption

1.1.1.1. Corruption impacts all aspects of the organisation. It hampers the efficiency of the organisation in running its operations, increases the cost of business transactions and undermines confidence in public institutions. Based on the Corruption Perception Index (CPI) released by Transparency International (TI), Malaysia ranked to 57th position among 180 countries in 2020. It shows that the tendency of corruption among Malaysian is relatively high. Corruption may lead to monetary loss, demoted employee morale, damage to the organisation's reputation, organisational resources diverted away from delivering core business and services to the community as well increasing scrutiny, oversight, and regulation.

1.1.1.2. The Prime Minister of Malaysia had announced the need to establish Integrity and Governance Units (IGU) in Government Interest Companies through the Prime Minister's Directive Series No. 1 Year 2018 to facilitate the strengthening of internal controls to prevent malpractice, corruption, and abuse of power. MACC has obtained mandates, under the Agency Integrity Management Division or "Bahagian Pengurusan Integriti Agensi" (BPIA) to monitor the implementation of this new policy.

The Directive has the effect of extending the Integrity Units policy to include all Government-linked companies, companies owned by Ministries and Government agencies including by State Governments (collectively referred to as Government Interest Companies or GIC). Fundamentally, the directive requires all GICs to set up an Integrity and Governance Unit (IGU) within the organisations to promote good governance.

- 1.1.1.3. The MACC Chief Commissioner had been quoted during a press conference on 6 August 2019 highlighting that the number of GICs flagged as “High-Risk” is a matter of concern in which MACC has been encouraging GICs to comply with the various guiding documents. One such document issued by MACC in support of the Directive would be the Guideline for the Management of Integrity & Governance Unit (2019). The requirements under this Guideline are outlined in detail under the Strategic Plan of Integrity and Governance Unit (2019 – 2021) (IGU Strategic Plan) which provides the overview of the mechanism in setting up and running the IGU within organisations.
- 1.1.1.4. On a national level, the National Anti-Corruption Plan 2019 – 2023 (NACP) supports the IGU Strategic Plan by having an institutional anti-corruption approach which underlies the spirit of Article 5 of the United Nations Convention Against Corruption (UNCAC). NACP promotes transparency, accountability, and integrity culture in every Malaysians. The NACP was developed in accordance with the “National Anti-Corruption Strategies: A Practical Guide for Development and Implementation” by the United Nations Office on Drugs and Crime (UNODC). Under the NACP, the priority areas relevant to the implementation of IGUs are public sector administration and corporate governance which guided the development of the core functions under the Guideline.

1.1.2. The Current Law Applicable against Corruption

The Malaysian Anti-Corruption Commission Act 2009 was enacted to provide for the establishment of the Malaysian Anti-Corruption Commission, to make further and better provisions for the prevention of corruption and for matters necessary thereto and connected therewith.

The main offences stipulated in the MACC Act 2009 (Act 694) include:

1. Solicit / Receive Bribe (Gratification) [section 16 & 17(a) MACC Act 2009]
2. Offering/Giving Gratification (Bribe) [section 17(b) MACC Act 2009]
3. Intending to Deceive (False Claim) [Section 18 MACC Act 2009]
4. Acceptor or giver of gratification to be guilty notwithstanding that purpose was not carried out or matter not in relation to principal's affairs or business [Section 23, MACC Act 2009]

(refer diagram 1 below)

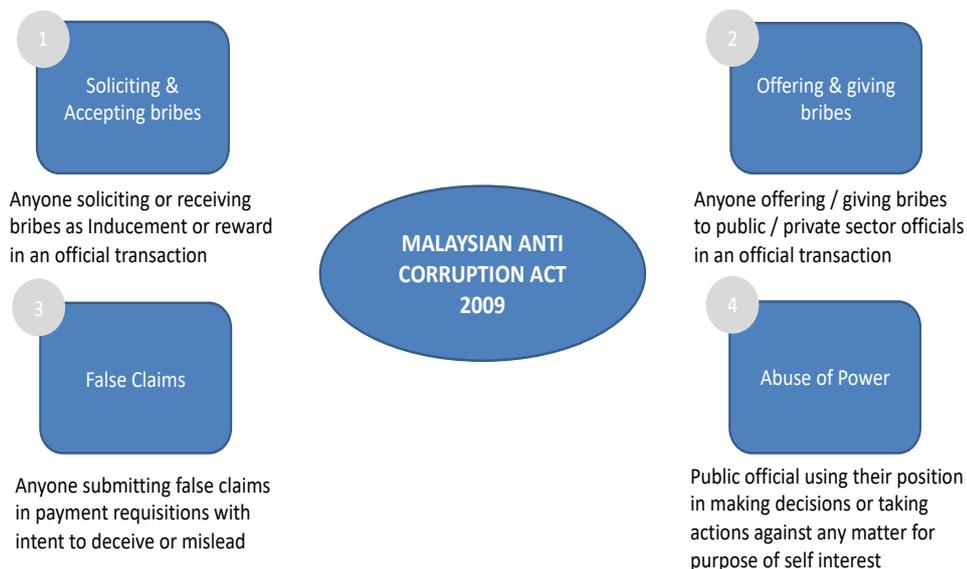


Diagram 1 Shows the main offences under the Malaysian Anti-Corruption Act 2009

The Malaysian Anti-Corruption Commission Act 2009 (MACC Act) was then amended 2018, among others, to introduce corporate liability provision for bribery and corruption under Section 17A, which came into effect on 1st June 2020.

The enforcement of Section 17A of the MACC Act is to fulfil the international requirements under Article 26 of the United Nations Convention Against Corruption (UNCAC), which refers to the liability of legal persons. Now, the MACC Act only focuses on the prosecution of individuals involved in corruption. Section 17A was enacted to enable organisations involved in corruption activities to be subjected to legal action and persons associated with the organisations will be deemed to commit the corresponding offence unless it can be proven that adequate measures have been put in place.

In other words, Organisations/companies whom these individuals work for will also be held liable for not preventing the corrupt acts from happening, and corrupt actions of ordinary employees will have an impact on their organisations/companies.

Those considered associated with a commercial organisation include directors, partners, and employees of the commercial organisation; and any person who performs services for or on behalf of the commercial organisation.

1.2. THE NEED TO TACKLE CORRUPTION

1.2.1. Elements of Corruption

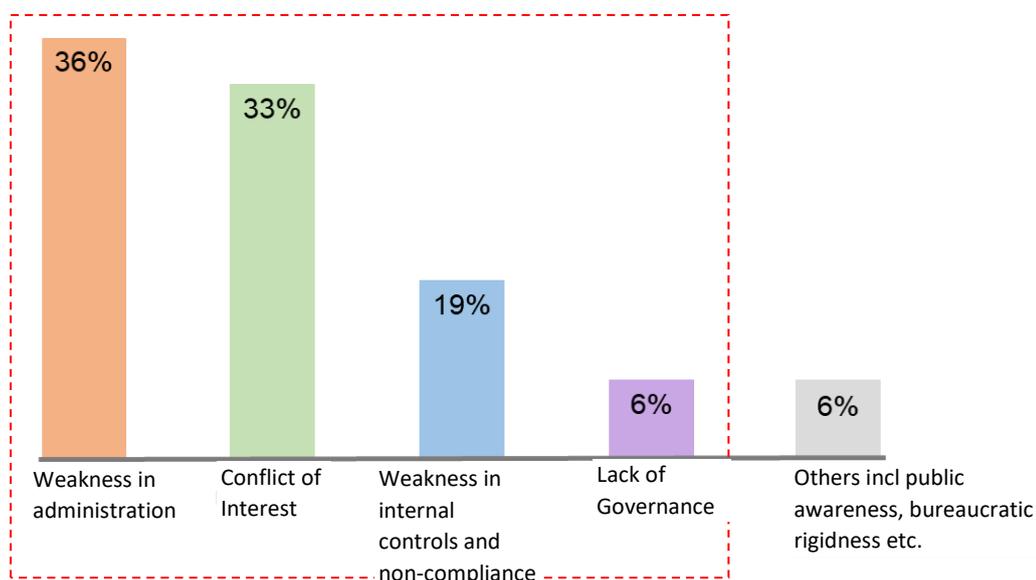
The issue of corruption exists in a variety of circumstances. Economic and social pressures open space and opportunities for corrupt practices that violate ethics. Elements of corruption with examples include:

Governance	Corruption	Integrity
Weaknesses in leadership and administration	Action is taken regardless of the risk to others	Abuse of power/ interference in carrying out daily tasks

1.2.2. Symptoms of Corruption at the National Level

The Malaysian government has emphasized that efforts to combat corruption and abuse of power are important agendas and requires serious attention. This is because the impact of these symptoms has tarnished the country's image and further inhibit the country's economic growth due to the failure and distrust of investors to invest in Malaysia.

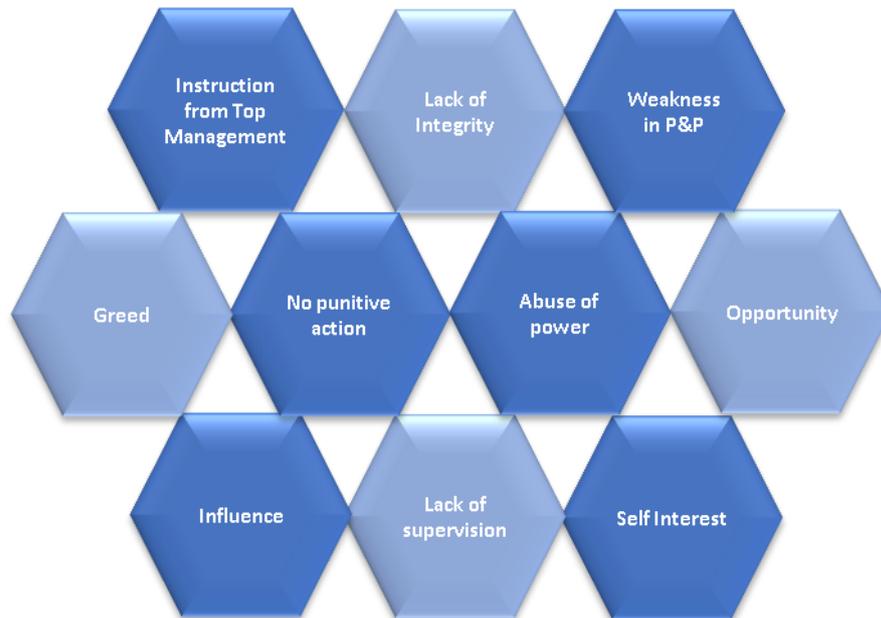
Based on the analysis of corruption information in Malaysia, four main causes of corruption were identified:



1.2.3. Symptoms of Corruption at the Organisational Level

Considering the phenomena of corruption at the national level, The Group needs to play a role in stepping up efforts to combat corruption and ensure that the company is lined up with employee with integrity.

Examples of probable causes of corruption in an organisation include:



Possible reasons these opportunities occur:

I. Weaknesses of Governance

Poor governance issues occur in every organization. This is since there are no rules, or the existing rules are outdated, conflicts of interest and officials that do not have integrity, which in turn leads to corruption and abuse of power.

Good governance in an organization increases transparency, accountability, and integrity in any organizational affairs. It is also able to protect the rights of stakeholders and prevent any leakages and losses.

II. Interference in Organizational Administration and Finance

Every organization or company is advised to ensure that every administrative and financial matters are conducted prudently, based on the principles of good governance practices and compliance with each set of rules.

However, the issue of stakeholder intervention in the administration and financial affairs of the organization is one of the main issues, where they are willing to ignore the law and interfere in the affairs of the organization for personal gain. Among the common interventions are in procurement, human resources, finance, and organizational administration.

III. Non -Transparency and Manipulation of Procurement Matters

Non -transparency and manipulation of procurement matters will result in loss, time waste and financial resources and time, and failure to implement planned projects. This is due to the existence of conflicts of interest, information leakage, in addition to officers that lacks integrity and incompetent in executing their duties.

IV. System Inefficiency and Service Delivery Methods

The efficiency of the company's service delivery system is important to ensure the company's growth and development can be implemented effectively. However, the factors of weak integrity and bureaucracy have led to less effective service delivery, which results the company's services to be viewed negatively.

Reform efforts are important to improve and enhance the company's governance as well as efficient and effective service delivery can be provided to all stakeholders.

V. Limited Use of Technology in Combating Corruption

The use of the latest technology can indirectly ensure transparency and reduce the risk of corruption through seamless digital transactions and create a permanent record for further review that gives the public more confidence in the company. However, its use still depends on the financial allocation and the willingness of management to optimize existing technology.

VI. Less Strict and Inconsistent Actions to Officers

Less firm and inconsistent action against the officer that had committed offense because of failure to comply with existing rules, conflict of interest and insufficient case evidence. In addition, cases were not extended to the authorities for further investigation.

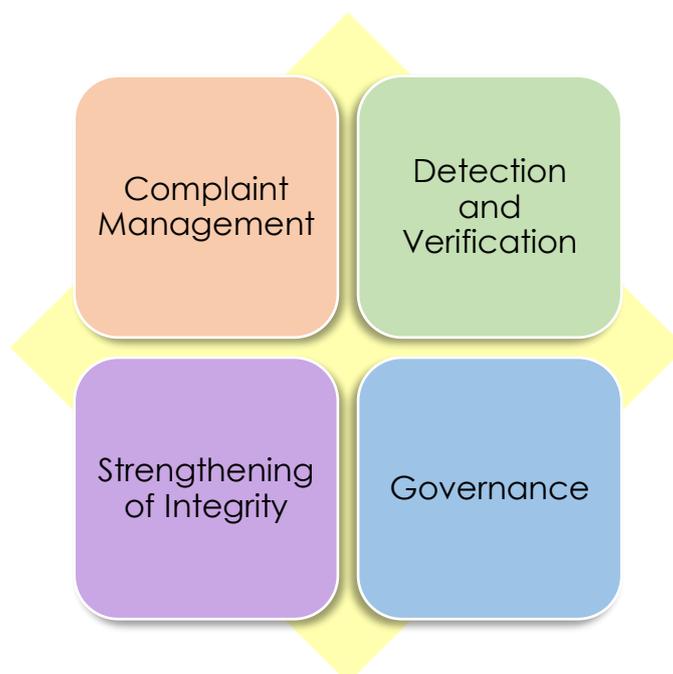
This causes the actions and punishments imposed on employees are taken lightly and employees are not deterred with the actions imposed, creating bad perception and unhealthy environment in the company.

1.3 THE GROUP'S CURRENT INITIATIVES

1.3.1 Establishment of Integrity and Governance Unit

On 25 July 2017, at Invest Malaysia Kuala Lumpur 2017 (IMKL 2017), the Government had agreed that all Government Linked Companies, companies owned by Ministries and Government agencies including the one under the State Government to establish an Integrity and Governance Unit (IGU), which will be regulated by the MACC.

In accordance with Section 17A of the MACC Act 2018, MPRC's Board of Directors had approved the establishment of the Anti – Bribery & Corruption Framework including the establishment of the Integrity and Governance Unit, with the following four (4) main functions:



1.3.2 Board Audit & Risk Management Committee

The MPRC Board Audit and Risk Management Committee supervises the IGU in achieving its objectives and assisting the Board of Directors in monitoring issues on corruption, malpractice, and unethical conduct in The Group. Committee members are appointed by MPRC's Board of

Directors, and they report directly to the Board on corruption-related issues.

1.3.3 Integrity and Governance Policy

The Group always abide to the Government's policies and governance to combat corruption and misconduct. Prior to the development of the OACP, The Group had already implemented several internal controls as mentioned below.

1.3.4 Anti-Bribery & Corruption Policy

The Group's Anti-Bribery and Corruption Policy had been established as a source of reference on corrupt practices and The Group's stance against all corrupt practices.

This policy applies to all directors, employees, contractors, consultants as well as those who perform work and perform services on behalf of The Group.

In particular, the Board of Directors and Top Management of The Group will not allow any party to solicit or receive and / or provide remuneration to benefit themselves or The Group. Compliance is compulsory.

Failure to comply may result in severe consequences including disciplinary action or even termination of employment or contracts. Violation may also constitute a criminal offence under the laws of Malaysia. In such event, The Group may refer the matter to the appropriate authorities, such as MACC.

1.3.5 Information Disclosure Channels – Whistleblowing

Whistleblowing is a form of Disclosure by a Person, i.e., the whistleblower, who raises serious concerns at an early stage about risks of wrongful activities or reporting a wrongdoing, including fraud.

The Group had established information disclosure channels to facilitate employees, The Group's consultants / contractors, as well as the general public, to report any unethical misconduct, irregularities, or failure to comply with The Group's policies and guidelines.

Reports can be made through one of the following information disclosure channels:

1. Correspondence, i.e. letter addressed to the IM
2. Email to the IM at integrity@mprc.gov.my
3. Telephone 603 – 2858 8503 (during normal office hours)

The information required from the Whistleblower, include:

1. Name, telephone number or email of the Whistleblower
2. Name of individual being reported
3. Details of the misconduct (how, why, when the incident occurred)
4. Evidence or witnesses who can assist the investigation

All physical protection, if required, will be provided by the relevant authorities, e.g. PDRM / MACC.

1.3.6 Code of Business Ethics and Conduct

This code was developed as a guide to The Group's work ethic standards. It outlines acceptable and unacceptable conducts from a legal and ethical perspective in conducting day to day activities.

All directors and employees are subjected to The Group's Code of Business Ethics and Conduct. They should also ensure that other individuals including consultants, contractors and any parties conducting business jointly or on behalf of The Group comply with the rules set out in this Code.

The Code of Business Ethics and Conduct shall be updated from time to time, to comply with new developments in business practices and legal requirements.

Chapter 2

The Challenge of Tackling Corruption

2.1 THE CHALLENGES

Corruption and abuse of power can occur regardless of the status or position of the individual involved. When faced with an opportunity for self-benefit, an individual who lacks integrity will not hesitate to commit an ethical breach in service.

The Group had conducted a corruption Risk Assessment workshop to identify risks that may impact The Group's image and operations. The following inputs were used as basis in analysing the risks identified:

- a. Risk Assessment workshop and Corruption Risk Management
- b. Statistics obtained from MACC for the year 2017 – 2021
- c. Internal Audit Report for 2021

Among the issues and challenges faced by The Group are:



2.2 DATA COLLECTION

During the development of this OACP, various data were obtained throughout the risk assessment process to determine the areas that The Group needs to focus on over the next five years. The data is in the form of statistics, reports, studies, and information from relevant sources from the years 2017-2021. Among them:

1. Report of the Malaysian Anti -Corruption Commission (MACC) for The Group

STATISTIK BERKAITAN MALAYSIA PETROLEUM RESOURCES CORPORATION (MPRC) BAGI TAHUN 2017 HINGGA 2021					
TAHUN	MAKLUMAT	KERTAS SIASATAN	TANGKAPAN	PERTUDUHAN	SABITAN
2017	0	0	0	0	0
2018	0	0	0	0	0
2019	0	0	0	0	0
2020	0	0	0	0	0
2021	0	0	0	0	0
JUMLAH KESELURUHAN	0	0	0	0	0

*Kesemua data diperoleh melalui CRIS

**Tidak mengambil kira tangkapan semula bagi maksud pertuduhan di mahkamah (Keputusan Mesyuarat Bulanan Pengarah-Pengarah SPRM Bil.2 Tahun 2017)*

Disediakan oleh:-

Unit Statistik

Cawangan Perisytiharan Harta & Statistik (CPHS)

Bahagian Pengurusan Rekod dan Maklumat (BPRM)

Suruhanjaya Pencegahan Rasuah Malaysia

28.1.2022

2. Internal Audit Report

Main concerns highlighted by auditors were administration issues pertaining to Policy and Procedures which requires review.

Chapter 3

The Group's OACP Framework

3.1 OACP FRAMEWORK & PRIORITY AREAS

The Group recognises the need to address corruption, abuse of power, malpractice, and misconduct of integrity in companies. Negligence in tackling corruption and integrity can not only affect the company's image but can also lead to many flaws and adversely affect The Group's image. Corrupt practices must be eliminated from all The Group's affairs to maintain the good name and trust of The Group.

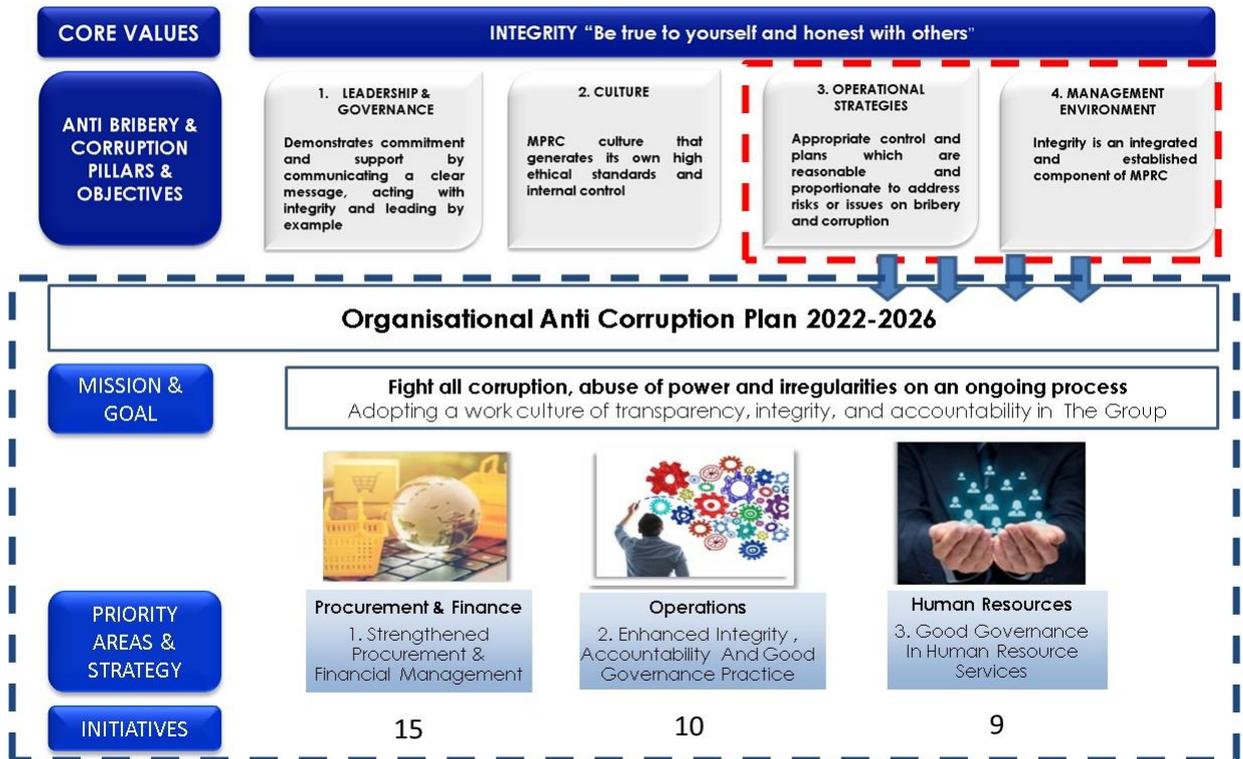
Based on The Group's Anti Bribery Framework, the OACP framework consists of identifying the risks, mitigation plans, categorising its complexity and impact in order to prioritise the initiatives respectively.

The initiatives were based on 5 perspectives:

1. Prevention
Development of system – the action of stopping incident(s) from occurring
2. Enhancement
Guideline already in place – to improve content/ enhance / refine for greater quality , value or extent of outcome
3. Education or awareness
Communication on existence of policy / guidelines for understanding, for knowledge or correct perception
4. Punitive
Action as punishment against the wrongdoers - Inflicting or intended
5. Recognition
As recognition of service, effort or achievement .

To achieve these goals, based on the workshops conducted, The Group sets three key strategies to address the risk of corruption and misconduct of integrity, particularly in the Three (3) risky areas consisting of Procurement & Finance, Operations and Human Resources.

The diagram below illustrates the overall OACP framework based on MPRC's Anti Bribery Corruption Policy framework as a basis.

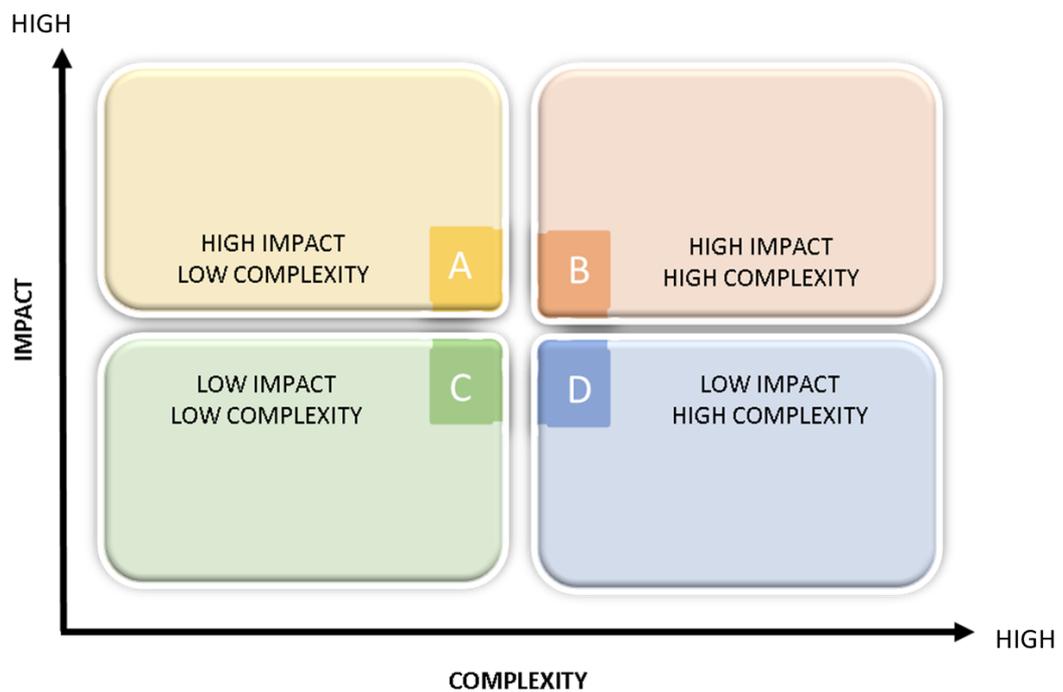


Based on the priority areas determined and risks identified, the list of initiatives are segregated into quadrants to indicate their rate of complexity and impact. The same initiatives may exist in the priority areas identified.

The next section lists the strategies, corresponding initiatives and its prioritisation to mitigate the identified risks.

3.2 QUADRANT ANALYSIS

This quadrant analysis displays the impact and complexity of the implementation of the initiatives used to categorize a total of 34 initiatives to be implemented by The Group. Priority of initiative implementation is from Quadrant A , followed by B, then C and lastly D.



3.3 STRATEGIES AND INITIATIVES

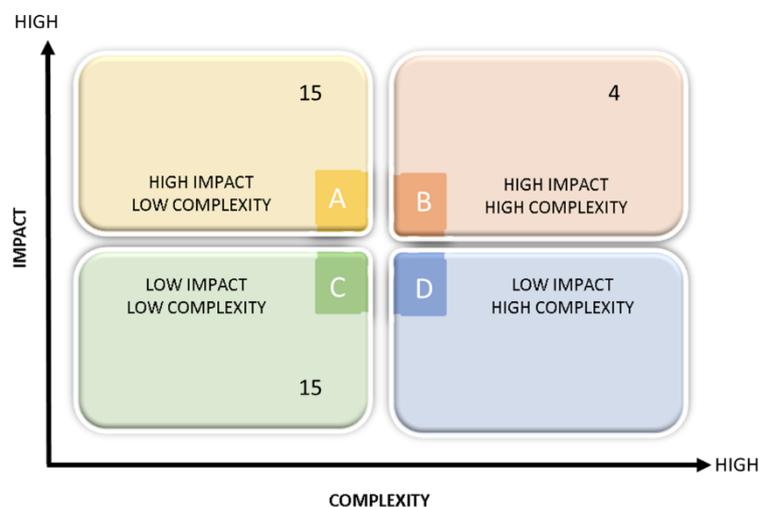


No.	Initiatives	Initiative Owner	Duration	Strategy	Quadrant
1.	Review and refine procurement policy & procedures	HRCS - MPRC CS - JPDC	2 Years (2022-2023)	1	A
2.	Enforce the OGSE DG workflow to reduce the risk of a "single party responsible to make decisions"	Operations, MPRC	4 Years (2022-2025)	1	A
3.	Review and refine OGSE DG policy & procedures to include guideline to handle sensitive information	Operations, MPRC	4 Years (2022-2025)	1	A
4.	Enforce the procurement policy & procedures to reduce the risk of single party responsible to make decisions	HRCS - MPRC CS - JPDC	5 Years (2022-2026)	1	A
5.	Training, education & awareness on procurement policy & procedures	HRCS - MPRC CS - JPDC	5 Years (2022-2026)	1,2	A
6.	Enforce the policy & procedures for project monitoring process	Operations – MPRC & JPDC	5 Years (2022-2026)	1	A
7.	Enforce the procurement Policy & Procedures to ensure no leakage of procurement information	HRCS - MPRC CS - JPDC	5 Years (2022-2026)	1	A

No.	Initiatives	Initiative Owner	Duration	Strategy	Quadrant
8.	Enhancement of whistleblowing mechanism	IGU, HRCS	2 Years (2022-2023)	1	A
9.	Enforce the Policy & Procedures for handling sensitive information in operations	IGU, HRCS	5 Years (2022-2026)	2	A
10.	Enforce the Policy & Procedures for whistleblowing process	IGU	5 Years (2022-2026)	2	A
11.	Develop Policy & Procedures for project reporting and data collection	Operations-MPRC&JPDC	1 Years (2022)	2	A
12.	COI declaration of interviewer towards employment candidates	HRCS MPRC, HR JPDC	5 Years (2022-2026)	3	A
13.	Conduct awareness program on employee claim process	HRCS MPRC, HR JPDC	2 Years (2022-2023)	3	A
14.	Enhance and refine HR Policy & Procedures on succession plan structure	HRCS MPRC, CS JPDC	2 Years (2022-2023)	3	A
15.	Enforce and take punitive actions on wrongdoers	HRCS - MPRC HR - JPDC	5 Years (2022-2026)	1,2,3	B
16.	Enhance and refine recruitment Policy & Procedures to include utilization of recruitment agency	HRCS MPRC, HR JPDC	2 Years (2022-2023)	3	B
17.	Conduct Ikrar Bebas Rasuah	IGU, HRCS	5 Years (2022-2026)	1	C
18.	Create awareness on Procurement Policy & Procedure and consequences of misconduct	HRCS - MPRC CS - JPDC	5 Years (2022-2026)	1,2	C
19.	Create awareness and provide relevant training for safeguarding confidential information	HRCS - MPRC CS - JPDC	5 Years (2022-2026)	1,2	C

No.	Initiatives	Initiative Owner	Duration	Strategy	Quadrant
20.	Create awareness on Whistleblowing and Fraud Policy & Procedures	IGU, HRCS	5 Years (2022-2026)	1,2,3	C
21.	Education & Awareness on payment process and requirements	HRCS - MPRC CS - JPDC	5 Years (2022-2026)	1	C
22.	Education and awareness on AB&C content and scenario guidelines	IGU, HRCS	5 Years (2022-2026)	1	C
23.	Create awareness on data sensitivity and consequences of misconduct	IGU, HRCS, Operations MPRC & JPDC	5 Years (2022-2026)	2	C
24.	Conduct awareness program on MACC Act	IGU	5 Years (2022-2026)	2,3	C
25.	Conduct awareness program on recruitment Policy & Procedures	HRCS MPRC, HR JPDC	5 Years (2022-2026)	3	C
26.	Conduct awareness on grievance process	HRCS MPRC, CS JPDC	5 Years (2022-2026)	3	C

Based on the list of initiatives stipulated above, a total of 34 initiatives are being identified, comprising of 15 initiatives in Quadrant A, whereby the complexity of execution is low with a high impact execution, followed by 4 initiatives in Quadrant B, 15 initiatives in Quadrant C and none in Quadrant D, as illustrated below.



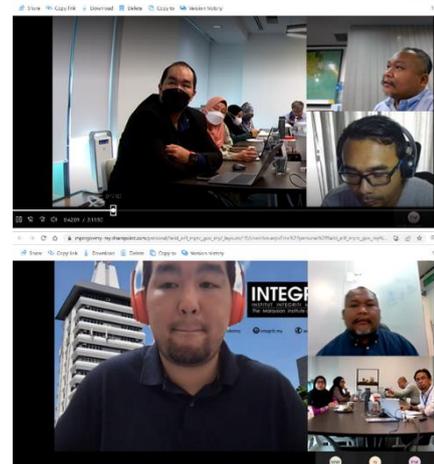
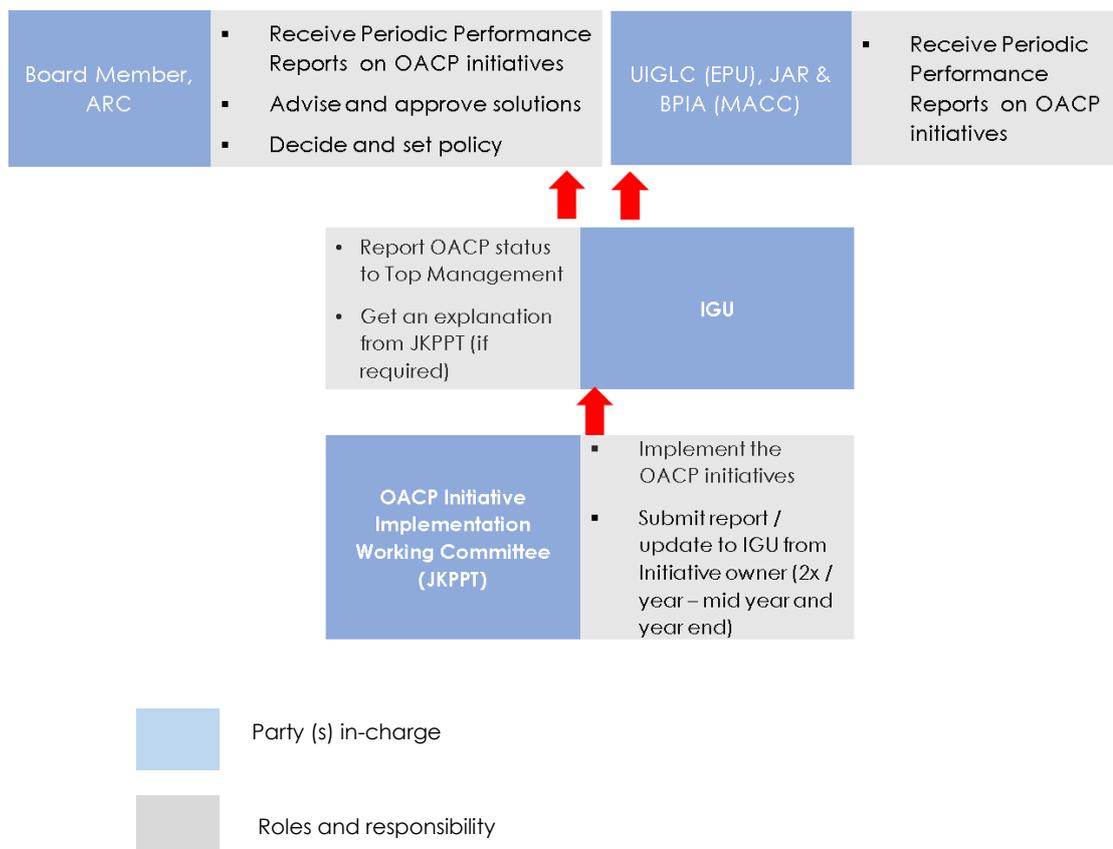
Chapter 4

OACP

Governance, Monitoring and Assessment

4.1 OACP Governance

To ensure that all The Group's OACP initiatives are implemented efficiently, systematically, and comprehensively, the cooperation and involvement of Top Management, MPRC employees, and other stakeholders is essential. This practice is also necessary for accountability purposes, as well as to strengthen coordination efforts.



4.2 MONITORING AND ASSESSMENT METHODS

Monitoring and assessment are critical to the success of The Group's OACP initiatives. Referring to the Guidelines on Anti-Corruption Policy by the United Nations (UN), the monitoring process will provide important information in helping organizations to explore new strategies as well as improve existing strategies according to the needs of the organization. Thus, in the process of identifying the progress and performance of the implementation of each strategy and initiative, all activities will be constantly monitored.

Simply put, to ensure its effectiveness, cooperation between all departments is the most important element of the monitoring mechanism. The Group's IGU as the lead coordinator, will work closely with all relevant stakeholders to facilitate implementation and provide insights when required.

Coordination	
Monitoring	Assessment
<ul style="list-style-type: none"> ▪ Explain the objectives of the program ▪ Match activities and resources with objectives ▪ Translating objectives into performance indicators and targets ▪ Compare actual results with targets (through data collection) ▪ Report progress to Top Management and inform any problems 	<ul style="list-style-type: none"> ▪ Identify the strengths and weaknesses of each activity ▪ Assess whether the activities that support the strategy are goal - oriented ▪ Ensure that activities are carried out as planned ▪ Provide appropriate feedback based on the situation when needed

The initiatives identified are evaluated once at the end of each calendar year. Nevertheless, the review on the initiatives is subject to the capacity of the department implementing the initiative based on the developments reported each time in The Group's Audit and Risk Management meeting. Through this report as well, implementers can present problems and obstacles that need to be overcome for the purpose of re -evaluation.

OACP's Review and Renewal

- 1.** The initiatives formulated will be implemented to successfully tackle potential issues relating to governance, integrity and corruption.

The progress of the implementation will be reviewed twice a year and will be reported to the relevant authorities

- 2.** End of 4th year, review of risks and priority areas and corresponding strategies will be conducted for the development of the next cycle of OACP.

- 3.** The mission and goal of The Group's OACP need to be continuous

Conclusion

To move towards a corruption-free and high-integrity organisation, The Group is committed to continuously strengthen existing governance, integrity, and corruption prevention with its initiatives.

Corruption in an organization must be immediately eradicated through holistic preventive and punitive measures, whether through law enforcement, strengthening of integrity, strengthening of governance, or even the use of the latest technology.

Therefore, for a start, this OACP highlights 34 initiatives that will be implemented to address the potential problem of corruption, misconduct of integrity and governance in The Group. The OACP will also be constantly monitored, and its effectiveness reviewed on an annual basis in line with the changing environment. Therefore, continuous feedback from all parties is obtained to ensure that this OACP is relevant to the current needs.

The Group's Top Management always puts more effort and high commitment in tackling corruption to improve the quality of work and the company's image. However, the success and effectiveness of this OACP depends entirely on the consensus of The Group's employees and stakeholders. Only with this agreement will The Group's OACP achieve its goals and remain relevant for the future.



APPENDIX I

List of Risks and Descriptions by Area and Activity

Priority Area	Main Activity (s)	Risks faced
Procurement & Finance	1. Obtain supplies or services through a tender or bidding process 2. Disbursement of Grant 3. Financial payment	Procurement Policy & Procedure is not updated
		Possible abuse in evaluating and awarding the grant to companies
		Abuse of Power to awarding contracts to potential vendor
		False Claim relating to progress payment
		Leakage of information regarding procurement
		Facilitation Payment to public officials
Operations	1. Ensure that the company's finances are well managed to maintain the company's credibility 2. Ensure governance in all development and programme management	Leakage Confidential Information
		Abuse of Power on status evaluation and award to OGSE Companies
		Leakage whistleblower information
		Undisclosed or misinformation of project reports
		Unauthorized disclosure of Confidential Information / Leakage of Info on projects
		Facilitation payment as an impetus for (Kebenaran Merancang, KM) approval
		Biased decision on development administration
Human Resources	Ensure all employee related matters are handled smoothly in accordance with Policies and Procedures	Abuse of power to approve failed screening candidates
		False Claim by employees
		Abuse of power for HR decisions
		Favouritism on succession planning