



MALAYSIAN SOCIETY FOR TRANSPARENCY AND INTEGRITY (TRANSPARENCY INTERNATIONAL – MALAYSIA)

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TRANSPARENCY INTERNATIONAL MALAYSIA (TI-M) Anti-Bribery and Corruption Policy

1. Policy Statement

TI-Malaysia (“TI-M”) is committed to advancing accountability, integrity and transparency. We aim to be an example of good management, ethical practice and openness to greater transparency and accountability.

As a non-profit organisation, dedicated to combatting corruption and building a society free from corrupt practices, TI-M has a zero tolerance policy towards bribery and corruption. TI-M’s stakeholders, as set out in the Objective & Scope of Policy below, are prohibited from engaging in any form of bribery or corruption and are required to comply with this policy. Adherence to this policy by all TI-M stakeholders is mandatory.

2. Objective & Scope of Policy

This document outlines TI-M’s zero-tolerance policy for any form of corruption by EXCO members, employees, individual or corporate members, funders, partners, associates or other persons affiliated with TI-M such as our vendors, consultants and stakeholders (collectively “stakeholders”).

This policy aims to:

- ensure all stakeholders are aware of TI-M’s zero tolerance policy to bribery and corruption;
- provide assurance to TI-M’s stakeholders that TI-M will treat any report of bribery or corruption relating to TI-M initiatives or projects, or involving TI-M or its stakeholders seriously.

3. Definition of Bribery and Corruption

Bribery is the offering, promising, giving, accepting or soliciting of an undue advantage of any value (financial or non-financial), directly or indirectly, in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person’s duties. Bribery will include the payment of any “facilitation fees”.

Corruption on the other hand is the abuse of entrusted power for private gain, and can include bribery.

4. Whistleblowing & Complaint Mechanism

Stakeholders are required to report any actual, suspected or anticipated incidents of bribery or corruption. Reports should be made pursuant to TI-M’s Whistleblowing & Complaint Policy and Whistleblowing & Complaint Procedure and will be treated with confidentiality.

Members of the public are also able to report any actual, suspected or anticipated incidents of bribery or corruption by TI-M stakeholders, involving TI-M initiatives or projects, to the same channel.

TI-M will treat all complaints of incidents seriously and promptly investigate all allegations of bribery or corruption.

5. Investigation & Action

A complaint of bribery or corruption, or any suspicion or allegation of bribery or corruption brought to the notice of EXCO will be handled pursuant to TI-M's Whistleblowing & Complaints Policy and Whistleblowing & Complaints Procedure. If the Secretary General, in concurrence with the EXCO members are of the view that pursuant to the internal investigation there exists sufficient evidence to show bribery or corruption has occurred or is occurring:

- the matter should be reported to the Malaysian Anti-Corruption Commission or other relevant enforcement agency;
- TI headquarters may be notified of the outcome of investigation;
- an assessment will be conducted on control measures to implement and to prevent further instances of bribery or corruption; and
- EXCO will take any other action it deems fit as may be relevant to the person's role with TI-M, including legal action and termination of employment or membership.

The nature of the actions by TI-M will depend on the gravity and extent of the incident. Suitable deterrent actions will be applied to ensure that incidents of bribery and corruption are treated seriously, given TI-M's position against corruption.

6. Implementation of this policy

This policy will be made available or disseminated to relevant stakeholders. All new employees must be trained on the content of this policy as part of their induction into the company. It is the responsibility of every manager or senior staff at the secretariat to ensure that all his/her employees are aware of the policy.

7. Monitoring and evaluation

TI-M recognises the importance of monitoring and measuring the effectiveness of this policy. Secretary-General, managers or senior staff and those responsible for dealing with bribery and corruption cases will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made to the EXCO members. This will be done on a yearly basis.