

Anti-Corruption Framework



<u>Key Principle</u>	<u>Key Elements</u>
Top Level Commitment	<ul style="list-style-type: none"> • Practice the highest level of integrity and ethics. • Complies fully with the applicable laws and regulatory requirements on anti-corruption. • Establish, Communicate, Implement, Report, Appoint the personnel with responsibility for overseeing the anti-corruption compliance. • Tone from the Top: Establish and maintain zero tolerance of corruption policies and procedures and promote culture of integrity. • Communicate such policies and commitments on anti-corruption to both internal and external parties. • Monitor Implementation and ensure awareness of such anti-corruption policies by employees and business associates. • Have a Reporting procedure (whistleblowing) for any suspected incidents and ensure results of any audit are acted upon by top management. • Appoint compliance officer to be responsible for compliance and provide guidance to other employees and business associates (if necessary).
Risk Assessment	<ul style="list-style-type: none"> • Identify, analyse, assess and prioritise corruption risk having regard to, amongst others, the following: <ol style="list-style-type: none"> a) Financial transactions that may disguise corrupt payments; b) Countries or sectors that pose a higher corruption risk; c) Non-compliance of external parties acting on behalf of the organisation; d) Relation with third parties (e.g. agents, vendors, contractors and suppliers) which are likely to expose the organisation to corruption; and e) Weak areas in the organisation’s governance and internal controls. • Conduct risk assessment periodically (recommended that a comprehensive risk is done every 3 years).

<u>Key Principle</u>	<u>Key Elements</u>
Undertake Control Measures	<ul style="list-style-type: none"> • Having appropriate controls and measures that are reasonable and proportionate to the nature and size of the organisation. • Conduct due diligence on any relevant parties or personnel (e.g. Board members, employees, agents, vendors, contractors, suppliers, consultants and senior public officials) prior to entering into any formalised relationships. • Establish an independent, accessible and confidential trusted reporting channel (whistleblowing channel).
Systematic Review, Monitoring and Enforcement	<ul style="list-style-type: none"> • Regular Reviews of Anti-Corruption Programme through internal or external audit. • Improve the existing anti-corruption controls based on the reviews. • Plan, establish, implement and maintain a monitoring programme. • Identify competent person to perform an internal audit of anti-corruption measures. • Consider external audit at least once every 3 years. • Monitor the performance of personnel in relation to Anti-Corruption Policies and Procedures. • Conduct Disciplinary Proceedings Against Personnel who violates the Anti-Corruption Programme.
Training & Communication	<ul style="list-style-type: none"> • Develop and disseminate internal and external training covering the policy, training, reporting channel and consequences of non-compliance. • Communicate the Anti-Bribery and Corruption Policy to all personnel and business associates.

Components of Anti-Corruption Framework

Top Level Commitment	Risk Assessment	Undertake Control Measures	Systematic Review, Monitoring and Enforcement	Training & Communication
<ul style="list-style-type: none"> • Board Charter Code of Conduct • Business Code of Conduct and Ethics • Procedure which requires Declaration of conflict of interest • Whistleblowing Policy • Anti-Bribery and Corruption Policy • No Gifts and Entertainment Policy • Employee Handbook • Referral policy to the relevant authority of a serious breach • Standard of procedure for due diligence Internet and communication policy • Written confirmation and undertakings of anti-corruption in contractual documents 	<ul style="list-style-type: none"> • Corruption Scheme Identification • Corruption Risk and Anti-Corruption Risk Rating • Corruption Risk Register, which includes anti-corruption controls, monitoring and detecting corruption risks • Residual Risk Rating & Risk Response 	<ul style="list-style-type: none"> • Anti-Corruption Risk Mitigating Controls • Corruption Scheme-Specific Controls • Entity Level Controls • Preventive and Detective Controls • Anti-Corruption Control Mapping • Tracking of Gifts, Hospitality and Entertainment • Segregation of Duties 	<ul style="list-style-type: none"> • Review and improvement of the efficiency and effectiveness of the anti-corruption programme • Internal Audits and external audits • Independent Whistle Blowing and Reporting Channel • Monitoring the performance and compliance of personnel in relation to any anti-corruption policies and procedures • Disciplinary actions / proceedings for non-compliance 	<ul style="list-style-type: none"> • Anti-Corruption as an agenda in Board meetings • Training to employees and business associates • Organising programs featuring Anti-Corruption elements