



TARC EDUCATION FOUNDATION
(Reg. No. 201301003979)

ANTI-BRIBERY
&
ANTI-CORRUPTION
(“ABAC”)
POLICY

TARC EDUCATION FOUNDATION (Reg. No. 201301003979) **ANTI-BRIBERY & ANTI-CORRUPTION (“ABAC”) POLICY**

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Message from the Board of Trustees

To All Staff and Stakeholders,

TARC Education Foundation (TARC EF) and its Institution of Higher Learning TUNKU ABDUL RAHMAN UNIVERSITY OF MANAGEMENT AND TECHNOLOGY (TAR UMT) **do not tolerate and are against all forms of bribery and corruption** within all business activities.

This ABAC Policy shall be the reference and guide to the Board of Trustees, the Board of Governors, the Senate, the Senior Management Committee and Management Committee on standards when dealing with matters appertaining to bribery and corruption.

Datuk Seri Ir. Dr. Wee Ka Siong,
Chairman,
Board of Trustees,
TARC EDUCATION FOUNDATION
(Reg. No. 201301003979)
Date: 11 November 2020

TARC EDUCATION FOUNDATION (Reg. No. 201301003979) **ANTI-BRIBERY & ANTI-CORRUPTION (“ABAC”) POLICY**

1. Introduction

Section 17A of the Malaysian Anti-Corruption Commission (Amendment) Act 2018 (MACC Act) (“S.17A”) takes effect from 01-June-2020.

S.17A is to govern corporate liability that may result from a corporation’s personnel corruption or bribery.

Consequently, and pursuant to the MACC Act and Guidelines, TARC EF has taken the precautionary steps as defence procedures against the said corporate liability as hereinunder.

2. Definitions

Under TARC EF’s ABAC Policy, the Terms hereunder shall be defined as follows:

Bribery shall include but not limited to mean; the demand, offering, promising, providing, accepting or otherwise soliciting an inducement for an unwarranted advantage, whether pecuniary or otherwise.

Inducement shall include but not limited to mean; any and all forms of gifts, loans, fees, forbearance, advantages, services or otherwise rewards intended to be a bribery.

Associated Persons

Section 17A(6) of the MACC Act 2009 provides that associated persons include the directors, partners and employees of the commercial organisation and persons who perform services for and on behalf of the commercial organisation.

For the purposes of this ABAC Policy, the term “Personnel” shall include associated persons under S.17A(6) above.

Corruption

Corruption is dishonest behaviour by those in positions of power, such as managers or government officials. Corruption can include giving or accepting bribes or inappropriate gifts, double-dealing, under-the-table transactions, manipulating elections, diverting funds, laundering money, and defrauding investors.

For the purpose of this ABAC Policy, “Corruption” is defined primarily as any action which would be considered as an offence of giving or receiving “Gratification” under the MACC Act.

Stakeholders

- a. Students
- b. Alumni
- c. Parents
- d. Agents
- e. Vendors
- f. Contractors

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- g. Suppliers
- h. Consultants
- i. Public Officers
- j. Clients or Customers

Gratification pursuant to Section 3 of MACC Act

- (a) Money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
- (b) Any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- (c) Any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- (d) Any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- (e) Any forbearance to demand any money or money’s worth or valuable thing;
- (f) Any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and
- (g) Any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).

Integrity

Behaviours and actions consistent with a set of moral or ethical principles and standards, embraced by individuals as well as institutions, that create a barrier to corruption.

3. Objectives

- a. TARC EF conduct its business in full compliance of **all applicable laws**, guidelines and rules and regulations for the time being in force and TARC EF abhors and denounces all forms of corruption.
- b. As such, TARC EF maintains “**zero tolerance**” against all forms of bribery and corruption.
- c. TARC EF demands full compliance from its Personnel and **Stakeholders** to the MACC Act and other similar laws, in relation to countering bribery and corruption.

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- d. No Personnel will suffer demotion, penalty and or other adverse consequences **for refusing to pay or receive bribes** or engage in corrupt practises, even if such refusal is detrimental to TARC EF’s business.
- e. TARC EF’s recruitment, training, performance evaluation, remuneration, recognition and promotion for all Personnel, shall be designed inter-alia to also recognise **integrity**.
- f. TARC EF shall conduct **due diligence** on Personnel.
- g. TARC EF awards contracts and employee positions based purely on merits, warranted vacancies and collective needs. **Support letters or unsolicited recommendations** in all forms from all parties, shall not be recognised nor accepted as part of the human resource recruitment or business decision making processes.

3.1 Applicable Laws, Rules and Regulations

The ABAC Policy addresses compliance to all applicable laws, rules and regulations including but not limited to: -

- a. The MACC Act, 2009
- b. Whistleblower Protection Act 2010 (“WPA”)
- c. The Penal Code
- d. Companies Act 2016

3.2 ABAC Policy Availability

A copy of this TARC EF ABAC Policy shall be made available at <https://www.tarc.edu.my/abac-policy.jsp>

3.3 Effective Date

This Policy shall come into effect on the date of the Board of Trustees Resolution first above written AND shall bind all TARC EF Personnel and Stakeholders as the case may be AND shall be deemed published, communicated and duly noticed by the said all TARC EF Personnel and Stakeholder upon this Policy being made available at <https://www.tarc.edu.my/abac-policy.jsp>

3.4 Principles under S.17A MACC Act

TARC EF intends to discharge its corporate liability by having adequate measures under S.17A(4) of the MACC Act adhering to the T.R.U.S.T Principles.

4. Top Level Commitment

4.1 The Anti-Bribery & Anti-Corruption (“ABAC”) Policy

The Board of Trustees resolved in a resolution dated **11 Nov 2020**, to establish this Policy adhering to the T.R.U.S.T Principles as defence mechanism against corporate liability as follows: -

- 1. Top Level Commitment.**
- 2. Risk Assessment.**

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3. **Undertake Control Measures.**
4. **Systematic Review, Monitoring and Enforcement.**
5. **Training and Communication.**

This ABAC Policy serves to guide TARC EF Personnel and Stakeholders to combat and prevent all forms of bribery and corruption in its operations.

The ABAC Policy shall address concerns on the following key corruption risks procedures: -

1. Conflict of Interest	5. Financial Controls
2. Gifts, Entertainment, Hospitality & Travel (“GEHT”)	6. Non-Financial Controls
3. Donations & Sponsorships (“D&S”)	7. Anti-Corruption Monitoring Framework
4. Facilitation Payments	8. Record Keeping

4.2 Ethical and Professional Values and Contractual Obligations

Ethical and professional values and contractual obligations, as the case may be demand that each Personnel shall employ the highest level of personal integrity, honesty, discipline, transparency and commitment to act to TARC EF’s best interest. Any breach of such ethical and professional values and contractual obligations shall be reported to the following person(s), or such other officer(s) designated by TARC EF from time to time: -

No.	Violation By	Report To
a.	Any Member of the Board of Trustees	Chairman of the Board of Trustees
b.	Any Member of the Board of Governors	Chairman of the Board of Governors
c.	Any Member of the Senate, the Senior Management and the Management Committee	The President, TAR UMT
d.	Any other TARC EF Personnel	Director, Human Resource Department, TAR UMT

a) **Policies and Procedures**

All Head of Departments shall use reasonable care to ensure that effective processes of business controls are in place in their respective area of responsibility.

Personnel shall strictly adhere to this ABAC Policy AND all other policies and procedures of TARC EF and or TAR UMT respectively.

Non-compliance shall be treated seriously and may result in disciplinary action, which action may include but not limited to warning, demotion, withholding of increment and or bonus, suspension, dismissal, and or legal action.

b) **Confidential Information**

All Personnel shall exercise caution and care in handling any information obtained in the course of their duties.

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Such information may be confidential or sensitive in nature and in relation to TARC EF, TAR UMT and or business associates.

All Personnel shall be prohibited from disclosing any such information unless expressly authorised to do so by their relevant Heads of Department.

4.3 Conflict of Interest

Conflicts of interest arise in situations where an individual, has a personal interest that interferes or may be seen as interfering with that individual’s objectivity when performing duties or exercising judgement on behalf of TARC EF, including but not limited to, for the benefit, whether actual or perceived, of his or her family/household and or friends.

The use of position, resources, assets, confidential information, and intelligence gained for personal gain or to TARC EF’s disadvantage are prohibited.

All Personnel of TARC EF shall avoid the situation where a conflict of interest may occur. In the event of an actual or perceived conflict of interest, Personnel shall follow these procedures: -

- a. Complete the **Conflicts of Interest Disclosure Form**, in the format of Form A hereto.
- b. Report to the **Designated Person** stated in Clause 8.3 below.

4.4 Gift, Entertainment, Hospitality & Travel (“GEHT”)

TARC EF **prohibits the giving and receiving** of Gift, Entertainment, Hospitality & Travel (“GEHT”) to influence business decisions.

Employees **are discouraged** from giving or accepting GEHT to or from any External Party especially that: -

- a. Influence or appear to influence any business decision.
- b. Connected with contractual negotiations, tender awards or similar circumstances and or gain an unfair advantage.

The **occasional acceptance or offer of modest GEHT** may be a legitimate custom or practice in a business relationship. As such, **eligible personnel are allowed to entertain external parties** through a reasonable act of hospitality as part of networking as well as a measure of goodwill towards the external parties.

Corporate hospitality includes but not limited to conferences, forums, presentations, awards, gala dinners, concerts or other activity-based events may be **recognised as a legitimate way to network and build goodwill**.

Personnel at all levels are **strictly prohibited to provide GEHT with corrupt intention or improper cause, undue influence on any party in exchange for any benefit**.

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In the event of actual GEHT, Personnel shall: -

- a. Complete **the Gift, Entertainment, and Hospitality & Travel (GEHT) Form**, in the format of Form B hereto.
- b. Maintain GEHT expenses within the permissible limits, when carrying out GEHT activities (please refer to **the Approval Matrix** in Appendix hereto).
- c. Report to **the Designated Person** stated in Clause 8.3 below.
- d. The Designated Person shall approve any one of the **appropriate treatments** of GEHT below: -
 - i. Retained by Employee.
 - ii. Retained for Departmental display.
 - iii. Sharing with other Employees.
 - iv. Donation to Charity.
 - v. Return to Offeror.
 - vi. Others as deemed appropriate for the circumstances thereto.

4.5 Donations & Sponsorships (“D&S”)

- a. TARC EF as a Company Limited By Guarantee (CLBG) and being accorded tax exempt status under S.44(6) of the Income Tax Act 1967 shall only receive bona fide donations from all donors.
- b. **The receiving or provision of Sponsorships as Corporate Social Responsibility (CSR)** shall be made in accordance with existing corporate and academic policies and practices, as the case may be.

When in doubt, please seek advice as stated in Clause 8.3 below.

4.6 Facilitation Payments

Facilitation payments involving **cash or other pecuniary advantages** to secure or expedite the performance of a routine or administrative duty or function.

Any and all forms of Facilitation Payments are deemed as a bribe and is a form of corruption, amount notwithstanding, AND is strictly prohibited.

In the event facilitation payments are requested or offered, Personnel shall report it to **the Designated Person** stated in Clause 8.3 below and the payment must be recorded immediately thereafter and transparently.

4.7 Financial Controls

TARC EF has in place comprehensive financial controls, such as separation of duties and approving powers or multiple signatories for financial transactions.

4.8 Non-Financial Controls

TARC EF's non-financial controls, such as **separation of duties according to the appointed Authorities and approving powers** for non-financial transactions involving TAR UMT are in place for maintaining effective operation.

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4.9 Anti-Corruption Monitoring Framework

TARC EF carries out **periodic monitoring** with the Board of Trustees.

The **ABAC Compliance Manager** stated in Clause 8.3, shall be responsible for supervising, monitoring and updating on the **ABAC Policy, risk assessment and counter measure procedures** to ensure the existing programmes are relevant, effective and efficient to combat bribery and corruption.

4.10 Record Keeping

TARC EF carries out **yearly and regular audits** on all available accounting, record-keeping and financial reporting requirements through its Internal Audit Division and the Board of Trustees’ Audit and Risk Committee.

5. Risk Assessment

5.1 ISO 31000:2018 Risk Management: Guidelines (“ISO 31000”)

To the best of its resources and subject to a legal demand, TARC EF will assess the key corruption risks by adopting the best practices of **ISO 31000:2018 Risk Management: Guidelines (“ISO 31000”)**.

The ISO 31000 risk management framework comprises of a systematic application of processes: -

- a. Establish Context
- b. Risk Identification
- c. Risk Analysis
- d. Risk Evaluation
- e. Risk Treatment

5.2 Establish Context

This is defining the **external and internal** parameters to be considered when managing risk, and setting the scope and standards, laws, policies and other requirements.

5.3 Risk Identification

Risk identification involves the identification of tangible or intangible **risk sources, events** with one or more occurrences, and can have several causes, their causes and their potential consequences.

Risk identification is performed based on historical data, theoretical analysis, informed and expert opinions, stakeholder's needs and may involve: -

- i. Opportunity for corruption and fraud activities from weaknesses in TARC EF’s governance framework, internal systems or procedures.
- ii. Financial transactions disguising corrupt payments.
- iii. Business activities in higher corruption risk countries or sectors.
- iv. Non-compliance by External Parties (Associated Person) acting on behalf for legal & regulatory related anti-corruption procedures.

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- v. Relationship with third parties (agents, vendors, contractors and suppliers) in the supply chain.

5.4 Risk Analysis

A process to comprehend the nature of risk and to determine the combination of **consequences** and **likelihood**.

“**Consequences**” refers to an outcome of an event affecting objectives, whether its certain or uncertain, qualitatively or quantitatively.

“**Likelihood**” refers to the chance of something happening, whether defined, measured or determined objectively or subjectively, qualitatively or quantitatively.

5.5 Risk Evaluation

A process of comparing the results of Risk Analysis with the objectives to determine whether the risk and/or its magnitude is acceptable or tolerable.

5.6 Risk Treatment

Deals with negative consequences, which are sometimes referred to as “risk mitigation”, “risk elimination”, “risk prevention” and “risk reduction”.

Risk Treatment can create new risks or modify existing risks that are to be approved by the Directors.

Risk Treatment can involve: -

- i. **avoiding the risk** by deciding not to start or continue with the activity that gives rise to the risk;
- ii. **taking or increasing risk** in order to pursue an opportunity;
- iii. **removing** the risk source;
- iv. **changing or reducing** the likelihood and the consequences;
- v. **sharing the risk** with another party or parties; and
- vi. **retaining** the risk by informed decision.

5.7 Risk Assessment Review

TARC EF maintains a **stand-alone Risk Register** on **key corruption risk** and shall be reviewed **every three (3) years or as and when** important material events occur during **yearly periodic audit** or otherwise.

Material events may include change in law or business circumstances, and the happening of significant business events.

6. Undertake Control Measures

TARC EF undertakes reasonable control and contingency measures reasonable and proportionate to the scale of business operations to address any corruption risks arising from weaknesses in its governance framework, processes and procedures.

Such control and contingency measures include: -

- a. Due diligence
- b. Whistleblowing channels

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6.1 Due Diligence

Prior to entering into any formalised commercial or agency relationships for and on behalf of TARC EF or prior to entering into any formalised employment relationship with a potential employee (Personnel); as a matter of practice, TARC EF conducts due diligence with regards to the **Internal or External Parties** below respectively: -

- | | |
|------------------|----------------|
| a. Board Members | e. Vendors |
| b. Employees | f. Contractors |
| c. Customers | g. Suppliers |
| d. Agents | h. Consultants |

TARC EF adopts a combination of Due Diligence Methods below: -

- a. **External Parties Declaration Form in the format of Form D** hereto.
- b. Obtain factual documentation from reliable external sources including but not limited to CTOS and SSM.
- c. Interview with the Internal and External Parties.
- d. Hire external advisors (legal, accounting, forensic or others).
- e. Others (from time to time and as the case may be).

6.2 Whistleblowing Channels

TARC EF encourages highest integrity from all its Personnel and External Parties.

TARC EF takes a serious view of any corrupt practices by any of its Personnel and External Parties, with respect to TARC EF's interests.

The Whistleblowing Channels are established for **all Parties** to report, **in good faith, suspected or attempted or real corruption without fear of retaliation.**

TARC EF has established secured information system and guarantees confidentiality for such information and the reporter's identity.

Procedure for whistleblowing is set out below: -

- a. Complete the **“Whistleblowing Form”** in the format in **Form C** hereto.
- b. Send the completed **“Whistleblowing Form”** by email to whistle@tarc.edu.my

7. Systematic Review, Monitoring and Enforcement

7.1 Regular Review

The Board of Trustees will be responsible to ensure regular review of the ABAC Policy for efficiency, effectiveness and its enforcement.

The review may be carried out by **the Internal Auditor or the Internal Compliance Person or an outsourced external party**, with the objective to improve controls of the ABAC Policy and procedures herein.

7.2 Monitoring Programme

TARC EF shall ensure the monitoring programme covers all aspects in the ABAC Policy. **The Internal Auditor or the Internal Compliance Person or an outsourced external party** shall report to the Board of Trustees as the ultimate oversight of the monitoring programme for continuous improvement of the ABAC Policy.

7.3 Disciplinary Proceeding

Non-compliance with the ABAC Policy and procedures may lead to disciplinary action, which action shall be subjected to TARC EF's existing Human Resource disciplinary proceedings and outcomes.

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8. Training and Communication

8.1 Communication Policies

This ABAC Policy, and its' update, is made available to the Personnel, Stakeholders and all other interested Parties online at <https://www.tarc.edu.my/abac-policy.jsp>

8.2 Trainings

TARC EF provides the ABAC Policy and its' update training for all new Personnel and Business Associates in the following training formats: -

No.	Training Format	Purpose
1.	Induction Programmes.	For new Employees.
2.	Corporate Training Programmes	For Business Associates.
3.	In-House Courses.	For ABAC Policy and procedures update.

TARC EF may at any time recommend that certain trainings be repeated if deemed necessary based on circumstantial requirements.

8.3 Reporting Channels

TARC EF appoints the ABAC Compliance Manager who shall be

- Responsible to all anti-corruption compliance matters, including provision of advice and guidance to Personnel and Stakeholders in relation to the corruption programme; and
- Report to Board of Trustees on the results of any audit, reviews of risk assessment, control measures and performance.

Policy & Forms	Designated Person	Contact Information
1. ABAC Policy 2. Conflict of Interest Disclosure Form 3. Gift, Entertainment, Hospitality & Travel (GEHT) Form 4. Donations & Sponsorships (D&S) Form 5. External Parties Declaration Form 6. Whistleblowing Form	ABAC Compliance Manager	Mr Chan Yee Hang Legal Manager 03-4145 0123 ext. 3834

Please fill in the correct information on the relevant forms, which is available online at <https://www.tarc.edu.my/abac-policy.jsp> and email the same to the designated person below.

All forms shall be treated in strict confidence.

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TARC EF practices an “**open-door**” policy and encourages all Employees to share concerns and suggestions with the Designated Person listed below.

Reports made in good faith, either anonymously or otherwise, shall be addressed in a timely manner and without incurring fear of reprisal regardless of the outcome of any investigation.

Employee Level	Designated Person (Name & Designation)	Contact Information
All Personnel (except Members of the Board of Trustees and the Board of Governors who shall report to the respective Chairman, and Members of the Senate, the Senior Management and the Management Committee who shall report to the TAR UMT President)	ABAC Compliance Manager	Mr Chan Yee Hang Legal Manager 03-4145 0123 ext. 3834
Stakeholders	ABAC Compliance Manager	Mr Chan Yee Hang Legal Manager 03-4145 0123 ext. 3834

Updated as on 24 July 2023

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Form A: CONFLICT OF INTEREST DISCLOSURE FORM

PART 1 – DECLARATION		
1.	Type of Conflict of Interest:	*Real/ Potential * - <i>strike-off where not applicable</i>
2.	Conflict of Interest	Approval Authority
()	Outside Employment and / or Activities Outside TARC EF / TAR UMT	Director of Human Resources
()	Family Members or Close Personal Relationships	Director of Human Resources
()	Investment Activities	Chief Financial Officer
()	Board of Governors	Chairman, Board of Trustees
()	Dealings with *Customers/ Agents/ Vendors/ Contractors/ Suppliers/ Consultants/ Public Officers	Respective Head of Department
()	Others	Respective Head of Department
3.	Describe the Conflict of Interest:	
4.	Proposed Action To Be Taken To Resolve:	

It is the responsibility of the employee to keep a copy of the approved form for audit purposes. Employees must also provide a copy to the corresponding Head of Department for reference purposes.

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LODGED BY			RECOMMENDED BY	
(Signature)			(Signature)	
1.	Name:		Name:	
2.	Designation:		Designation:	
3.	Department:		Department:	
4.	Date:		Date:	

PART II – APPROVAL BY ABAC COMPLIANCE OFFICER	
Approved / Not Approved <i>(Notes (if any))</i>	
Signature	
.....	

NOTES: CONFLICTS / POTENTIAL CONFLICTS of INTERESTS BY:	
a) Members of Board of Trustees	Approved by: Company Secretary
b) Members of Board of Governors	Approved by: Chairman, Board of Trustees

The Approval Matrix for **CONFLICT OF INTEREST DISCLOSURE** is available hereto in **Appendix**.

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Form B: GIFT, ENTERTAINMENT, HOSPITALITY & TRAVEL (GEHT) FORM

PART I – TO BE COMPLETED BY EMPLOYEE

1.	Purpose:	*Giving/ Receiving
2.	Business Relationship:	*Customers/ Agents/ Vendors/ Contractors/ Suppliers/ Consultants/ Senior Public Officers * - <i>strike-off where not applicable</i>
3.	Name & Title:	
4.	Company Name:	
5.	Describe Occasion:	
6.	GEHT Description:	
7.	GEHT Value/ Estimated Value:	RM

PART II – TREATMENTS FOR RECEIVING GEHT

<input type="checkbox"/>	Retained by Employee:	
<input type="checkbox"/>	Retained as Departmental Display:	
<input type="checkbox"/>	Share with Other Employees:	
<input type="checkbox"/>	Donate to Charity:	
<input type="checkbox"/>	Return to Offeror:	
<input type="checkbox"/>	Others (please specify)	

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LODGED BY		RECEIVED BY	
(Signature)		(Signature)	
1.	Name:	Name:	
2.	Designation:	Designation:	
3.	Department:	Department:	
4.	Date:	Date:	

PART III – APPROVAL BY ABAC COMPLIANCE OFFICER
Approved / Not Approved (<i>Notes (if any)</i>)
Signature

NOTES:
<p>a) GEHT of any value by or for any Member(s) of the Board of Governors (BOG) to be reported to the BOG during its next meeting and minuted.</p> <p>b) GEHT of any value by or for any Member(s) of the Board of Trustees to be reported to the Board of Trustees (BOT) during its next meeting and minuted.</p>

The Approval Matrix for **GIFT, ENTERTAINMENT, HOSPITALITY & TRAVEL (GEHT)** is available hereto in **Appendix**.

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Form C: WHISTLEBLOWING FORM

PART I – COMPLAINT DETAILS		
1.	Name of Person Alleged:	
2.	Designation of Person Alleged:	
3.	Allegation Description: <i>(Please include supporting attachment, if any)</i>	
4.	Other Parties Involved: <i>(Name & Designation)</i>	
5.	Incident Date & Time:	
6.	Location of Incident:	
7.	Estimated Value Involved:	RM

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PART II – COMPLAINANT DETAILS

1.	Name:	
2.	Designation:	
3.	Email: <i>(Private email is accepted)</i>	
4.	Date:	

Send the original “Whistleblowing Form” to: -

PART III – BY ABAC COMPLIANCE MANAGER

Approved / Not Approved *(Notes (if any))*

Signature

.....

Send the completed “Whistleblowing Form” by email to whistle@tarc.edu.my

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[EXTERNAL PARTIES LETTER HEAD]

EXTERNAL PARTIES DECLARATION FORM

We, as customer/agent/vendor/contractor/supplier/consultant of TARC Education Foundation (Reg. No. 201301003979) and/or Tunku Abdul Rahman University of Management and Technology (hereinafter collectively referred to as “TARC EF”), as the case may be, hereby declare the following:

1. We shall comply with:-
 - a. All applicable laws and regulations relating to Anti-Bribery & Anti-Corruption (“ABAC”), Conflict of Interest, Whistleblowing and Personal Data Protection.
 - b. The following anti-corruption principles:-
 - i. Upholding values of integrity, transparency, accountability and good corporate governance;
 - ii. Preventing corruption and combating any form of corrupt practices; and
 - iii. Supporting anti-corruption initiatives led by governmental and regulatory authorities.

(hereinafter collectively referred to as “the Requirements”)

2. We affirm that we have not been convicted, nor are we currently under investigation, inquiry, or enforcement proceedings by relevant authorities for any actual or suspected breaches. We shall promptly report any such breaches, as soon as reasonably practicable and to the extent permitted by law, to TARC EF.
3. We undertake to inform TARC EF promptly of any breach or alleged/suspected breach of the Requirements and cooperate with TARC EF in any resulting investigation involving TARC EF’s personnel.
4. We understand and acknowledge that the provisions set out in this declaration form are integral parts of the terms and conditions of our contract/agreement/job, notwithstanding any provision stated otherwise therein.
5. We further acknowledge that TARC EF reserves the right to suspend or terminate the contract/ agreement/job and disqualify us from tendering for future contracts/agreements/jobs should we be found in breach of the Requirements or any other terms and conditions stipulated by TARC EF pursuant to the contract/agreement/job.

AUTHORISED BY		
(Signature)		(Affix Company Stamp)
1.	Authorized Signatory Name:	
2.	Designation:	
3.	Date:	

TARC EDUCATION FOUNDATION (Reg. No. 201301003979)
ANTI-BRIBERY & ANTI-CORRUPTION (“ABAC”) POLICY

Appendix: APPROVAL MATRIX

1. CONFLICT OF INTEREST DISCLOSURE FORM				
No.	Conflict of Interest	No Approval	Recommendation Authority	Compliance Manager
1.	Outside Employment and Activities Outside TARC EF/ Group	-	Director of Human Resources	-
2.	Family Members or Close Personal Relationships	-	Director of Human Resources	-
3.	Investment Activities	-	Chief Financial Officer	-
4.	Dealings with *Customers/ Agents/ Vendors/ Contractors/ Suppliers/ Consultants/ Senior Public Officers	-	Respective Head of Department	-
5.	Others	-	Respective Head of Department	-

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2. GIFTS, ENTERTAINMENTS, HOSPITALITY & TRAVEL (GEHT) FORM

No.	GEHT	No Approval	Head of Department	President	President after Consulting Compliance Manager
1.	Gifts	<RM300	=>RM300 to RM1,000	=>RM1,000 to RM5,000	=>RM5,000
2.	Entertainments	<RM300	=>RM300 to RM1,000	=>RM1,000 to RM5,000	=>RM5,000
3.	Hospitality	<RM300	=>RM300 to RM1,000	=>RM1,000 to RM5,000	=>RM5,000
4.	Travel	<RM300	=>RM300 to RM1,000	=>RM1,000 to RM5,000	=>RM5,000
5.	GEHT To Public Officer	NOT ALLOWED			

3. EXTERNAL PARTIES DECLARATION FORM

No.	EXTERNAL PARTIES DECLARATION	No Approval	Head of Department	Any One Director/ Partner	Board/ All Partners
1.	Contractual Value of Business	<RM10,000.00			