





ANTI BRIBERY AND CORRUPTION (ABC) MANUAL

[Version 1, March 2020]

[This Anti Bribery & Corruption (ABC) Policy Manual is part of the whole PASDEC's Anti Bribery Management System (PABMS) which follows "Ministerial Guideline on Adequate Procedure" in response to Section 17A of Malaysia Anti-Corruption Commission (MACC) Act. It is PASDEC continuous commitments in conducting business with integrity and avoiding bribery or corruption of any forms in all business dealings and Company's operations.]

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1.0 OVERVIEW

1.1 INTRODUCTION

The Anti-Bribery and Corruption Policy ("ABC Policy" and/or "the Policy") has been developed as part of the PASDEC's Anti-Bribery Management System ("PABMS") which has been designed to align with the requirements set out in "Ministerial Guideline on Adequate Procedure". Having a clear and unambiguous policy statement on the Company's position regarding bribery and corruption forms the cornerstone of an effective integrity management system. The policy should thus be read in conjunction with the Company's various policies & guidelines.

1.2 ANTI-BRIBERY AND CORRUPTION COMMITMENT

PASDEC is committed to conducting business dealings with integrity. This means avoiding practices of bribery and corruption of all forms in the Company's daily operations.


PASDEC Group has adopted a zero-tolerance approach against all forms of bribery and corruption. Employees who refuse to pay or receive bribes or participate in acts of corruption will not be penalised even if such refusal may result in losing business.

The Policy leverages on the values and core principles set out in the Pasdec's Code of Business Conduct and Work Ethics. Full compliance of this Policy is mandatory.

1.3 OBJECTIVES

This policy sets out PASDEC Group's overall position on bribery and corruption in all its forms.

The objective of the Policy is to provide information and guidance on standards of behavior to which one must adhere to and how to recognise as well as deal with bribery and corruption.

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1.4 SCOPE

This policy is applicable to PASDEC, its controlled organisations, business associates acting on PASDEC's behalf, the Board of Directors and all PASDEC personnel.

Joint-venture companies in which PASDEC is non-controlling or co-venture and associated companies are encouraged to adopt these or similar principles. External Providers are also expected to comply with this policy in relation to all work conducted with PASDEC, and/or on PASDEC's behalf.

The Policy is not intended to be exhaustive. There may be additional obligations that are expected to adhere to or comply with when performing duties. For all intents and purposes, one shall always observe and ensure compliance with all applicable laws, rules and regulations to which they are bound to observe in the performance of their duties.


1.5 REFERENCES

- a) The Guideline on Adequate Procedure issued pursuant to subsection (5) of Section 17A of the Malaysian Anti-Corruption Commission Act 2009 (Act 694) (MACC Act 2009)
- b) Pasdec's Authority Limit
- c) Pasdec's Code of Business Conduct and Work Ethics
- d) Pasdec's Employees Handbook Manual
- e) Gifts, Hospitality, Donations, and Similar Benefits Policy
- f) Whistleblowing Policy

1.6 DEFINITION

“Audit Committee” means the Audit Committee of the Board of Directors of PASDEC;

“Bribery & Corruption” means any action which would be considered as an offence of giving or receiving 'gratification' under the Malaysian Anti-Corruption Commission Act 2009 (MACCA). In practice, this means offering, giving, receiving or soliciting something of value in an attempt to

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illicitly influence the decisions or actions of a person who is in a position of trust within an organisation.

Bribery may be 'outbound', where someone acting on behalf of PASDEC attempts to influence the actions of someone external, such as a Government official or client decision-maker.


It may also be 'inbound', where an external party is attempting to influence someone within the Company such as a senior decision-maker or someone with access to confidential information.

"Business Associate" means an external party with whom PASDEC has, or plans to establish, some form of business relationship. This may include clients, customers, partners, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors.

"Conflict of Interest" means when a person's own interests either influence, have the potential to influence, or are perceived to influence their decision making at PASDEC.

"Controlled organisation" means an entity where PASDEC has the decision-making power over the organisation such that it has the right to appoint and remove the management. This would normally be where PASDEC has the controlling interest (>50% of the voting share ownership), but it could be where there is an agreement in place that PASDEC has the right to appoint the management, for example a joint venture where PASDEC has the largest (but still <50%) allocation of the voting shares;

"Corporate Gift" means something given from one organisation to another, with the appointed representatives of each organisation giving and accepting the gift. Corporate gifts may also be promotional items given out equally to the general public at events, trade shows and exhibitions as a part of building the Company's brand. The gifts are given transparently and openly, with the implicit or explicit approval of all parties involved. Corporate gifts normally bear the Company name and logo. Examples of corporate gifts include items such as diaries, table calendars, pens, notepads and plaques.

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“Donation & Sponsorship” means charitable contributions and sponsorship payments made to support the community. Examples include sponsorship of educational events, supporting NGOs, and other social causes.


“Exposed Position” means a staff position identified as vulnerable to bribery through a risk assessment. Such positions may include any role involving: procurement or contract management; financial approvals; human resource; relations with government officials or government departments; sales; positions where negotiation with an external party is required; or other positions which the Company has identified as vulnerable to bribery;

“Gratification” is defined in the MACC Act to mean the following:

- (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).

“GIA” means Group Internal Audit and Risk Management Department of PASDEC.

“Hospitality” means the considerate care of guests, which may include refreshments, accommodation and entertainment at a restaurant, hotel, club, resort, convention, concert,

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sporting event or other venue such as Company offices, with or without the personal presence of the host. Provision of travel may also be included, as may other services such as provision of guides, attendants and escorts; use of facilities such as a spa, golf course or ski resort with equipment included;

“PABMS” means PASDEC's Anti-Bribery Management System;

“PASDEC” or “Company” means Pasdec Holdings Berhad and its group of companies;

“Personnel” means directors and all individuals directly contracted to the Company on an employment basis, including permanent and temporary employees.

2.0 ANTI-BRIBERY AND CORRUPTION POLICY


2.1 Bribery and corruption in all its forms as it relates to PASDEC's activities is prohibited.

Bribery and corruption may take the form of anything of value, such as money, goods, services, property, privilege, employment position or preferential treatment.

2.2 PASDEC personnel and its business associates shall not therefore, whether directly or indirectly, offer, give, receive or solicit any item of value, in the attempt to illicitly influence the decisions or actions of a person in a position of trust within an organisation, either for the intended benefit of PASDEC or the persons involved in the transaction.

2.3 The anti-bribery and corruption statement applies equally to its business dealings with commercial ('private sector') and Government ('public sector') entities, and includes their directors, personnel, agents and other appointed representatives. Even the possible appearance of bribery or corruption is to be avoided, in particular when dealing with Government officials.

2.4 The anti-bribery and corruption statement applies to all countries worldwide, without exception and without regard to regional customs, local practices or competitive conditions.

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- 2.5 No employee or external party will suffer demotion, penalty or other adverse consequences in retaliation for refusing to pay or receive bribes or participate in other illicit behaviour.
- 2.6 PASDEC is also committed to conducting due diligence checks on prospective personnel, particularly as it relates to appointments to positions where a more than minor bribery or corruption risk has been identified.

3.0 RECOGNITION OF LEGISLATION

- 3.1 PASDEC is committed to conducting its business ethically and in compliance with all applicable laws and regulations in the countries where it does business.
- 3.2 These laws include but are not limited to the Malaysian Penal Code (revised 1977) (and its amendments), the Malaysian Anti-Corruption Commission Act 2009 and its amendments, and the Companies Act 2016. These laws prohibit bribery and acts of corruption, and mandate that companies establish and maintain accurate books and records and sufficient internal controls.
- 3.3 New provision, Section 17A of Malaysian Anti-Corruption Commission (MACC) Act, passed in Parliament on April 5, 2018 focuses on corruption by commercial organisations. It was enacted to enable companies involved in corruption activities to be subjected to legal action. MACC will enforce this new provision beginning 1 June 2020.

The Act provides that "a commercial organisation commits an offence if any person associated with the commercial organisation commits a corrupt act (i.e. gives, agrees to give, promises or offers to any person any gratification) in order to obtain or retain business or advantage for the commercial organisation".

- 3.4 In cases where there is a conflict between mandatory laws and the principles contained in this and other policies, the law shall prevail.

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4.0 GIFTS, HOSPITALITY, DONATIONS AND SPONSORSHIPS

- 4.1 PASDEC personnel are prohibited from receiving or asking for (soliciting) gifts or hospitality from external parties. Under no circumstances may PASDEC personnel accept gifts in the form of cash or cash equivalent, including gift certificates, loans, commissions, coupons, discounts or any other related forms. Further details are set out in Gifts, Donations and Sponsorship Policy.
- 4.2 Providing donations and sponsorships are permitted. However, the Company prohibits the giving and receiving of donations and sponsorships to influence business decisions.
- 4.3 Any gift-giving, donations, sponsorship or event of hospitality is subject to approval according to Pasdec Authority Limit and must fulfil the following conditions:
- a) They are limited, customary and lawful under the circumstances;
 - b) They do not have or are perceived to have (by either the giver or the receiver), any effect on actions or decisions.
 - c) There must be no expectation of any specific favour or improper advantages from the intended recipients;
 - d) The independent business judgment of the intended recipients must not be affected;
 - e) There must not be any corrupt / criminal intent involved; and
 - f) They must be done in an open and transparent manner.

4.4 HOSPITALITY

In receiving or providing hospitality (including business events, meals, sports and similar events etc.) the conditions as spelt out in 4.3 above applies.

It is acceptable to offer or accept occasional invitations for business events, technical conferences, sports events and other types of hospitality, as well as occasional invitations for meals. However, when you are involved in contract negotiations (e.g., renewals, RFPs, etc.), you may have to decline or refrain from offering such hospitality. When inviting clients, please check the contract for any restrictions on gifts and hospitality.

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4.4.1 Travel and Overnight Accommodation (as Part of Hospitality)

Any hospitality involving international or other long-distance travel and accommodation is by definition regarded as unusually generous. However, if a sound business reason exists, employees may be able to accept invitations to events abroad subject to receiving **prior written approval of Group Managing Director**.

Paying for travel and overnight accommodation for potential or existing clients or any other business contact is not allowed, unless directly related to the promotion, demonstration or explanation of our services or in connection with an occasional client hospitality event. In such an event, you need the prior approval of Group Managing Director. Even when promoting or demonstrating services, paying for travel and accommodation will only be justified if there is no more cost-efficient alternative available. Also make sure that the invitee's employer is informed about the hospitality offered.

4.4.2 Spouses, Family Members or Private Guests

Hospitality for spouses, family members or private guests requires the prior approval of Group Managing Director. Spouses and family members of government officials should never be invited without the prior written consent of the Group Managing Director,


4.4.3 Hospitality if the Host is Absent

Only offer hospitality to a business relation if you act as host and remain present. Only accept hospitality if your business relation acts as host at the event.

Treat a ticket to an event as a gift (and not as hospitality) if you or your business relation does not act as host at the event.

5.0 POLITICAL CONTRIBUTION

Subject to any prevailing law that governed political contribution, the Group may make contribution to political parties. All political contributions require approval from the Board of Directors.

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6.0 FACILITATION PAYMENT


- 6.1 PASDEC adopts a strict policy of disallowing the use of facilitation payments in its business. Facilitation payment is a payment or other provision made personally to an individual in control of a process or decision. It is given to secure or expedite the performance of a routine or administrative duty or function.
- 6.2 Personnel shall decline to make the payment and report to Group Internal Audit (GIA) immediately when they encounter any requests for a facilitation payment. In addition, if a payment has been made and personnel are unsure of the nature, the Head of GIA must be notified immediately, and the payment recorded accordingly.
- 6.3 Only in the event that an employee's security is at stake is it permitted to make the payment. The employee must immediately report the incident to their Head of Department and GIA to record the details and keep a record of what was spent.

7.0 SUPPORT LETTER

PASDEC awards contracts and employee positions purely on a merit basis. Therefore, support letters in all forms shall not be recognised as part of the business decision making process.

8.0 RECRUITMENT, PROMOTION AND SUPPORT OF PERSONNEL

- 8.1 PASDEC recognises the value of integrity in its personnel and business associates. The Company's recruitment, training, performance evaluation, remuneration, recognition and promotion for all PASDEC personnel, including management, shall be designed and regularly updated to recognize integrity.
- 8.2 PASDEC does not offer employment to prospective personnel in return for their having improperly favoured the Company in a previous role.


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9.0 CONFLICTS OF INTEREST

- 9.1 Conflicts of interest arise in situations where there is personal interest that could be considered to have potential interference with objectivity in performing duties or exercising judgment on behalf of the Company. All personnel should avoid situations in which personal interest could conflict with their professional obligations or duties. Personnel must not use their position, official working hours, Company's resources and assets, or information available to them for personal gain or to the Company's disadvantage.
- 9.2 In situations where a conflict does occur, personnel are required to declare the matter as per the Employees Handbook. A copy of Conflict of Interest Declaration form is attached in **Appendix 1**.

10.0 BUSINESS ASSOCIATES DECLARATION

- 10.1 All business associates (including external providers such as consultants, advisors, and agents) acting on behalf of PASDEC are required to comply with this Policy, the PASDEC's Code of Work Ethics and Business Conduct, and all other policies as it relates to them.
- 10.2 In circumstances where PASDEC retains controlling interest, such as in certain joint venture agreements, business associates are required to adhere to the ABC Policy and PASDEC's Code of Work Ethics and Business Conduct. Where PASDEC does not have controlling interest, associates are encouraged to comply the same.
- 10.3 Due diligence should also be carried out with regards to any business associates intending to act on the Company's behalf as an agent or in other representative roles, to ensure that the entity is not likely to commit an act of bribery or corruption in the course of its work with PASDEC.

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- 10.4 Any business associates intending to act on the Company's behalf as an agent or in other representative roles, to ensure that the entity is not likely to commit an act of bribery or corruption in the course of its work with PASDEC.
- 10.5 They have to make self-declaration (Refer **Appendix 2**). The declaration should be retained for at least seven years.


11.0 RESPONSIBILITIES OF PASDEC PERSONNEL

11.1 All PASDEC personnel (including its directors, and directors and personnel of its controlled organisations) are required to carry out those responsibilities and obligations relating to the Company's anti-bribery and corruption stance, alongside those already in existence, which includes the following:

- a) Be familiar with applicable requirements and directives of the policy and communicate them to subordinates;
- b) Promptly record all transactions and payments in PASDEC's books and records accurately and with reasonable detail;
- c) Ask the GIA if any questions about this policy arise or if there is a lack of clarity about the required action in a particular situation;
- d) Always raise suspicious transactions and other "red flags" (indicators of bribery or corruption) to immediate superiors for guidance on the next course of action;
- e) Be alert to indications or evidence of possible violations of this policy;
- f) Promptly report violations or suspected violations through appropriate channels;
- g) Attend required anti-bribery and corruption training as required according to position; and
- h) Not misuse their position or PASDEC's name for personal advantage.

11.2 When dealing with business associates, all PASDEC personnel shall not:

- a) express unexplained or unjustifiable preference for certain parties;
- b) make any attempt at dishonestly influencing their decisions by offering, promising or conferring advantage;
- c) exert improper influence to obtain benefits from them;

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d) directly or indirectly offer or make promise or corrupt payments, in cash or in kind for a specific favour or improper advantage from them.


11.3 During an active or anticipated procurement or tender exercise, personnel participating in the exercise in any way whatsoever, shall not:

- a) receive gifts or hospitality or any kind from any external party participating, planning to participate, or expected to participate, in the procurement or tender exercise;
- b) provide anything other than a corporate gift and token hospitality to any external/third party related to the exercise;
- c) be involved in any discussions regarding business or employment opportunities, for personal benefit or for the benefit of a business associate;
- d) abuse the decision-making and other delegated powers given by the top management; and
- e) bypass normal procurement or tender process and procedure.

11.4 When dealing with external parties in a position to make a decision to PASDEC's benefit (such as a Government official or client), PASDEC personnel shall not:

- a) offer, promise or make any attempt at dishonestly influencing the person's decision by directly or indirectly offer or make promise of corrupt payments, in cash or in kind;
- b) be involved in any discussions regarding business or employment opportunities, for their own personal benefit or for the benefit of the external party;
- c) otherwise abuse the decision-making and other delegated powers given by the top management, in order to illicitly secure an outcome which would be to the commercial advantage to themselves and/or the Company; and
- d) exert improper influence to obtain personal benefits from them.

11.5 PASDEC's managers have a particular responsibility to ensure that the PABMS requirements are applied and complied with within their department or function and to monitor compliance with the policy. They also must ensure that subordinates in 'Exposed Positions' attend relevant training.

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12.0 STAFF DECLARATIONS


- 12.1 All PASDEC personnel shall certify in writing that they have read, understood and will abide by this policy. A copy of this declaration shall be documented and retained by the Human Resources Department for the duration of the personnel's employment. A sample declaration can be found in the **Appendix 3** of this Policy.
- 12.2 The GIA reserves the right to request information regarding an employee's assets and liabilities in the event that the person is implicated in any bribery and corruption-related accusation or incident.

13.0 ANTI-BRIBERY AND CORRUPTION RISKS MANAGEMENT

- 13.1 PASDEC shall conduct regular risk assessments to identify the bribery and corruption risks affecting the business, set anti-bribery and corruption objectives, and assess the effectiveness of the controls in achieving those objectives.
- 13.2 A Bribery Risk Register shall be maintained at the Risk Management Unit and updated periodically upon discussion with operating units.

14.0 ANTI-BRIBERY AND CORRUPTION COMPLIANCE FUNCTION

- 14.1 Regular audits shall be conducted to ensure compliance to this policy. Such audits may be conducted internally by PASDEC or by an external party. Audit documentation should include performance improvement action plans.
- 14.2 Internally, PASDEC shall establish and maintain an anti-bribery and corruption compliance function within the GIA to oversee the design, implementation and management of the PABMS.
- 14.3 The audit on PABMS shall be included in GIA 3 years strategic planning.

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14.4 The GIA shall perform functions below within the Company structure, equipped to act effectively against bribery and corruption:

- a) provide advice and guidance to personnel on the PABMS and issues relating to bribery and corruption;
- b) take appropriate steps to ensure that adequate monitoring, measurement, analysis and evaluation of the PABMS is performed;
- c) report on the performance of the PABMS to the top management and Audit Committee regularly.
- d) Ensure appropriate resources are provided for effective operation of the PABMS.

15.0 TRAINING AND AWARENESS

15.1 PASDEC shall conduct an awareness programme for all its personnel on the Company's position regarding anti-bribery and corruption, integrity and ethics.


15.2 Training shall be provided on a regular basis, in accordance with the level of bribery and corruption risk related to the position. Training should be provided to personnel who are:

- a) new to the Company;
- b) appointed to or currently holding an exposed position.

15.3 Human Resources Department shall maintain records to identify which PASDEC personnel have received training, and produce, communicate and update the training schedule in conjunction with GIA.

16.0 REPORTING OF POLICY VIOLATIONS


16.1 Suitable reporting channels shall be established and maintained for receiving information regarding violations of this policy, and other matters of integrity provided in good faith by PASDEC personnel and/or external parties.

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- 16.2 Personnel who, in the course of their activities relating to their employment at PASDEC, encounter actual or suspected violations of this policy are required to report their concerns using the reporting channels stated in Whistleblower Protection Policy.
- 16.3 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.
- 16.4 Retaliation in any form against PASDEC personnel where the person has, in good faith, reported a violation or possible violation of this policy is strictly prohibited. Any PASDEC personnel found to have deliberately acted against the interests of a person who has in good faith reported a violation or possible violation of this policy shall be subjected to disciplinary proceedings including demotion, suspension, dismissal or other actions (including legal action) which PASDEC may pursue.

17.0 SANCTIONS FOR NON-COMPLIANCE

- 17.1 Non-compliance as identified by the audit and any risk areas identified through this and other means should be reported to the top management and Audit and Risk Management Committee in a timely manner in accordance with the level of risk identified.
- 17.2 PASDEC regards bribery and acts of corruption as serious matters and will apply penalties in the event of non-compliance to this policy. For PASDEC personnel, non-compliance may lead to disciplinary action, up to and including termination of employment.
- 17.3 For external parties, non-compliance may lead to penalties including termination of contract. Further legal action may also be taken in the event that PASDEC's interests have been harmed by the results on non-compliance by individuals and organisations.

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18.0 CONTINUOUS IMPROVEMENT

- 18.1 In maintaining the PABMS, PASDEC is committed to satisfying the requirements set out in Ministerial Guideline on Adequate Procedure issued pursuant to subsection (5) of Section 17A of the Malaysian Anti-Corruption Commission Act 2009 (Act 694) (MACC Act 2009). Any concerns to improve the PABMS can be channeled to GIA.
- 18.2 PASDEC shall monitor the legal and regulatory regimes where it operates and any changes to PASDEC's business environment and risks and identify opportunities for PABMS improvement. A report should be submitted to the top management and Audit and Risk Management Committee on a regular basis for the appropriate action to be taken.
- 18.3 Regular assessments of the PABMS should be carried out to ensure its scope, policies, procedures and controls match the bribery and corruption related risks faced by the Company.

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CONFLICT OF INTEREST DECLARATION

PART I – DECLARATION OF INTEREST

A. I would like to declare the following existing/potential* conflict of interest situation arising from the discharge of my duties concerning the operation of;

- Pasdec Holdings Berhad
- Pasdec Corporation Sdn. Bhd.
- Pasdec Land. Sdn. Bhd.
- Pasdec Bina Sdn. Bhd.
- Pasdec Putra Sdn. Bhd.
- Other subsidiary or associate company,

Please specify _____

Please tick where applicable

B. Persons/companies with whom/which I have official dealings and/or private interests :

C. Brief description of my duties which involved the persons/companies mentioned in item B. above

D. Declarer's Signature

 Name:
 Position:
 Date;

PART II - RECORD OF RESOLUTION OF BOARD OF DIRECTOR OR MANAGEMENT EXECUTIVE COMMITTEE

With respect to the above declaration, the Board of Directors/Management Executive Committee of Pasdec Holdings Berhad passed the following resolution:

(name of the person making the declaration) should refrain from performing or getting involved in performing the work/duty, as described in Part A, which may give rise to a conflict.

(name of the person making the declaration) may continue to handle the work/duty as described in Part A, provided that there is no change in the information declared above.

Others *(please specify)*

Resolution passed on _____

(Signature)
Secretary

DECLARATION FORM

1. I/We are the contractor/sub-contractor/vendor/supplier/solicitor/agent/consultant/joint venture partner/ introducer/ government intermediaries of PASDEC Holdings Berhad and/or its subsidiary ("PASDEC").
2. I/We hereby declare that:
 - (i) I/We will comply with all applicable laws and regulations relating to Anti-Corruptions & Bribery.
 - (ii) I/We have read from Pasdec's website; PASDEC's Code of Business Conduct & Work Ethics Policy, PASDEC's Anti-Corruption & Bribery Policy and Pasdec's Whistleblower Protection Policy and will comply with the provision in the Policies and Procedures.
 - (iii) I/We will uphold the following anti-corruption principles:
 - a. Committing to promote values of integrity, transparency, accountability and good corporate governance.
 - b. Prevention of corruption and fighting any form of corrupt practice.
 - c. Supporting anti-corruption initiatives led by the government and the authorities. (hereinafter collectively referred to as "the requirements") in all our dealings.
3. I/We have not been convicted nor are we subject to any investigation, inquiry or enforcement proceedings by the relevant authorities of any actual or suspected breach and will report any actual or suspected breach as soon as reasonably practicable and to the extent permitted by the law, to PASDEC.
4. I/We undertake to promptly inform PASDEC of any breach and/ or alleged/ suspected breach of the requirements and cooperate with PASDEC in any investigation of such breach involving PASDEC's personnel.
5. I/We acknowledge that the provisions set out in this declaration form shall form part of the terms and conditions of our appointment and/ or contract of service.
6. I/We further acknowledge that PASDEC has the right to suspend or terminate the contract/ agreement/ job and disqualify us from tendering and/or involving for future contracts/ jobs if we were found to have breached the requirements or any other terms and conditions implemented by PASDEC pursuant to the contract/ agreement/job.

Signature of Authorized Person: _____

Name of Company's Authorized Person: _____

Company's Name : _____

Company's Stamp : _____

Date: _____



**ANTI-BRIBERY AND CORRUPTION POLICY
WHISTLEBLOWER PROTECTION POLICY**

DECLARATION FORM

I _____ employee no. _____
my Kad no. _____ , hereby declare that I have read and
understood;

1. PASDEC's Anti-Bribery and Corruption Policy and
2. Pasdec's Whistleblower Protection Policy.

I, at all time, will abide by the requirements and provisions set out in the Policies, as
required by my employment contract.

Name:
Designation:
Date: