



Anti-Corruption Compliance Program





Anti-Corruption Compliance Program

Effective Date: 1 Jan 2023

Contents

1. Introduction	3
2. Policy Statement	3
3. Definitions.....	4
4. Responsibilities	4
5. Risk Assessment	4
6. Prevention Measures.....	5
7. Reporting and Investigation	5
8. Training and Communication	5



1. Introduction

Corruption poses significant risks to the reputation, integrity, and success of N-Base Sarawak) Sdn Bhd. To uphold the highest ethical standards and comply with all applicable laws and regulations, we have developed this Anti-Corruption Compliance Program. This program outlines our commitment to prevent, detect, and respond to corruption in all business activities and establish a culture of integrity throughout our organization.

2. Policy Statement

N-Base (Sarawak) Sdn Bhd is dedicated to conducting its business in an honest, transparent, and ethical manner. We strictly prohibit any form of corruption, bribery, or facilitation of improper payments, whether involving government officials, private sector entities, or individuals. This policy applies to all employees, officers, directors, consultants, agents, and third parties acting on behalf of our company.

3. Definitions

To ensure a common understanding, the following key terms are defined:

- **Corruption:** Any abuse of entrusted power for personal gain or advantage, including bribery, extortion, fraud, embezzlement, and money laundering.
- **Bribery:** The offer, promise, giving, solicitation, or acceptance of anything of value to influence the actions or decisions of an individual in a position of trust.
- **Facilitation Payments:** Small payments made to expedite routine administrative actions, which are illegal and strictly prohibited by this program.

4. Responsibilities

4.1 **Management:** Senior management is responsible for setting the tone at the top, providing adequate resources, and promoting an ethical culture that supports the compliance program's objectives.

4.2 **Compliance Officer:** A designated Compliance Officer will oversee the implementation and maintenance of the program, ensuring its effectiveness and providing guidance to employees.

4.3 **Employees and Third Parties:** All individuals associated with N-Base (Sarawak) Sdn Bhd must comply with the program, report any suspected violations, and cooperate fully with investigations.

5. Risk Assessment

We will conduct regular risk assessments to identify corruption risks associated with our business activities, relationships, and geographic locations. This assessment will inform the development of risk mitigation strategies and controls to minimize the potential for corruption.

6. Prevention Measures

To prevent corruption, we will implement the following measures:

6.1 Policies and Procedures: Clear and comprehensive policies and procedures will be established, addressing key areas such as gifts, entertainment, donations, sponsorships, procurement, and interactions with government officials.

6.2 Due Diligence: We will conduct due diligence on third parties, including suppliers, agents, and business partners, to ensure they meet our anti-corruption standards.

6.3 Gifts and Entertainment: Strict guidelines will be established regarding the acceptance and offering of gifts, hospitality, or entertainment to avoid any potential conflicts of interest or corrupt practices.

6.4 Conflicts of Interest: Employees will be required to disclose any actual or potential conflicts of interest, and appropriate steps will be taken to mitigate such conflicts.

6.5 Financial Controls: Effective financial controls and accounting procedures will be implemented to ensure transparency and prevent fraudulent activities.

7. Reporting and Investigation

We encourage employees, third parties, and stakeholders to report any suspected or observed acts of corruption. We will establish a confidential and secure reporting mechanism to facilitate the reporting process. All reports will be promptly, and thoroughly investigated, and appropriate actions will be taken to address confirmed violations.

8. Training and Communication

To foster awareness and understanding of our anti-corruption compliance program, we will provide comprehensive training to all employees and relevant.