



ONE MEDICARE SDN. BHD. (201201035314)

ANTI-BRIBERY AND CORRUPTION

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1.0 INTRODUCTION

One Medicare Sdn. Bhd. ("One Medicare") Anti-Bribery and Corruption Policy is issued pursuant to sub-section (5) of section 17A of the Malaysian Anti-Corruption Commission Act 2009 (Act 694) ("MACC Act 2009"), as stated in the Malaysian Anti-Corruption Commission (Amendment) Act 2018 ("Amendment Act 2018").

The provision of section 17A under MACC Act 2009 (Amendment Act 2018) established the principle of an organisation's criminal liability (corporate liability) for the corrupt practices of its associated persons (i.e. the director, business partner or an employee of the organisation or the person who performs services for or on behalf of the organisation) where such corrupt practices are carried out for the organisation's benefit or advantage. Thus, One Medicare shall implement the Anti-Bribery and Corruption policies and procedures across all employees, Directors and third parties.

This Anti-Bribery and Corruption Policy ("Policy") sets out the parameters to prevent the occurrence of bribery and corrupt practices in relation to the businesses of the Company.

2.0 PURPOSE

The purpose of this policy and procedure are:

- i. To ensure all Directors, Employees and Associates of One Medicare observe and uphold the Company's position on bribery and corruption;
- ii. To provide information and guidance on how to recognise and deal with bribery and corruption; and
- iii. To ensure all Directors, Employees and Associates take reasonable and appropriate measures to prevent the occurrence of bribery and corrupt practices in relation to the businesses of the Company.

3.0 SCOPE

This Policy is applicable to the Company at all levels and grades, which includes employees and any person associated with the Company and third parties.

Each employee has a duty to read and understand the Policy. Violation of any of the Policy's provisions may result in disciplinary action, including termination of employment.

4.0 DEFINITION

4.1 Associates

A person that refers to board of directors, chief executive officer, chief financial officer, general managers, senior managers, managers, executives, officers, employees, consultants, contractors, trainees, volunteers, interns, agents, sponsors, or any person associated with the Company or any of the branches or subsidiaries where the engagement has relation in between the commercial organisation and its business associates which shall have the same meaning as per MACC Act.

4.2 Bribery

Bribery is an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory or personal advantage and can take the form of gifts, loans, fees, rewards or other advantages.

4.3 Corruption

Corruption is the act of giving or receiving of any gratification or reward in the form of cash or in-kind of high value for performing a task in relation to his/her job description.

Corruption can also be defined as the abuse of entrusted power for personal gain.

4.4 CEO

CEO refers to Chief Executive Officer for One Medicare.

4.5 Conflict of Interest

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 One Medicare.

4.6 Discretionary Authority Limit (DAL)

The approved documents stipulating the financial limits and discretion allowed for person responsible in each division/department and the hierarchy of approving authority.

4.7 Gratification

Gratification is defined in the MACC Act as follows:

- i. 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;
- ii. any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- iii. any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- iv. any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- v. any forbearance to demand any money or money's worth or valuable thing;
- vi. 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,



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- 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
- vii. any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).

4.8 Head of Division/Department (HOD)

The person in-charge of a division/department as stipulated in the approved organization chart.

5.0 RESPONSIBILITY AND AUTHORITY

The responsibility to review, amend, update, obtain approval to implement or delete this procedure lies with the originator of this procedure.

6.0 POLICY STATEMENT

One Medicare Sdn. Bhd. ("One Medicare") is committed to conduct our business with integrity. With such a commitment, we have developed this Policy and as our employees, associates, clients, and service providers, you must comply with the terms as contained herein.

We take a zero-tolerance approach to bribery and corruption, regardless of the amounts involved and at whatever level of the organization. One Medicare takes zero tolerance policy against all forms of bribery and corruption and conduct its business in a legal and ethical manner.

One Medicare will take reasonable and appropriate measures to ensure that its businesses do not participate in any corrupt activities for its advantage or benefits.

One Medicare requires all Employees (including full-time, contract and temporary staff) ("Employees") and Associates of the Company to be committed to act professionally and with integrity in their business dealings.

The Policy is not intended to be exhaustive, and there may be additional obligations that Employees and Associates are expected to adhere to or comply with when performing their duties. For all intents and purposes, the Directors, Employees and Associates 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.

7.0 FORMS OF BRIBERY AND CORRUPTION

7.1 Gifts, Entertainment and Hospitality

7.1.1 One Medicare adopts a “No Gift Policy” whereby all employees shall not solicit or accept any gifts from any third party that may have direct or indirect business interest with One Medicare.

7.1.2 Any gift of cash or cash value (e.g. vouchers, coupons, travel, leisure activities, etc.) is strictly prohibited at all times.

7.1.3 If employees are offered or receive a gift from an external party, the employees are required to politely return the gift, and inform the giver of One Medicare’s “No Gifts” Policy.

7.1.4 In circumstances where it is not possible to refuse or return a gift, the employee must declare and surrender such gift to HOD. HOD will in turn seek the CEO’s direction on what is the best way to dispose the gift. The CEO, subject to his due considerations, will have the right to decide based on the following:

- i. Allow it to be retained by the employee; or
- ii. Donate the gift to charity; or
- iii. Register it as a company property to be used publicly by all employees.
- iv. Display the gift in the Company.
- v. Others.

7.1.5 However, the Company recognises the following as acceptable gifts:

- i. Gifts to all participants and attendees for example, work related seminars, conferences, trade and business events;
- ii. Gifts presented at work-related conferences, seminars and/or business events;
- iii. Gifts is given as part of One Medicare’s Corporate Social Responsibility program;
- iv. Refreshments or meals during meetings or as participants of work-related conferences and/or seminars; and
- v. Meals for business purposes.

7.1.2 Entertainment

7.1.2.1 One Medicare recognises that providing entertainment is a legitimate way of building business relationships with external clients and other third parties. As such, only eligible employees are allowed to entertain business partners through a reasonable act of hospitality as part of business networking as well as a measure of goodwill towards the recipients.

7.1.2.2 Employees are strictly prohibited from offering to provide entertainment with a view to improperly cause undue influence on any party in exchange for some future benefits.

7.1.2.3 All expenses incurred to provide the entertainments must be properly approved, kept, documented, and recorded for audit purposes.



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7.1.3 Hospitality

- 7.1.3.1 All Employees and Associates are prohibited from offering or accepting hospitality in the form of travel, transportation and accommodation, entertainment and recreation (leisure activities).
- 7.1.3.2 All Employees and Associates are allowed to offer or accept meals from business partners and other parties engaged with One Medicare provided it is for business related purposes, in connection to the operation of One Medicare.
- 7.1.3.3 Should any dispute pertaining to this SOP arise, the final and decisive interpretation, clarification and decision will be made by the CEO.

7.2 Facilitation Payments

- 7.2.1 Facilitation payments are unofficial payments or other advantages made to secure or expedite the performance of a routine action by an officer of public body or decision maker.
- 7.2.2 Facilitation payments are illegal under the MACC Act as it falls within the meaning of gratification or bribery.
- 7.2.3 Director, Employee and Associate shall not promise or offer, or agree to give or offer, facilitation payments to an officer of any public body or decision maker.
- 7.2.4 If One Medicare employees receive requests for facilitation payment, you must first refuse to pay and immediately report the incident to either the Head of Department or directly to the CEO.
- 7.2.5 If One Medicare Employees are aware of any Employee that request for facilitation payment from business associates, you must report the matter immediately through the whistleblowing channels.
- 7.2.5 Any business partners who receive request for facilitation payments from One Medicare Employee, must decline to pay and report the issue via the whistleblowing channel.

7.3 Business Partners and Their Conduct

- 7.3.1 All business partners, including agents, suppliers and joint venture partners should be made aware of this Policy and the arrangements with them shall be subject to clear contractual terms, including specific provisions requiring them to comply with minimum standards and procedures relating to bribery and corruption.
- 7.3.2 The Commercial Department is tasked to monitor our business partners' performance from time to time to ensure compliance with this Policy, and where breach or suspected breach arises, immediate action must be taken.
- 7.3.3 Failure to comply with this Policy by our Business Partners may lead to immediate termination of contract and Company may claim for damages.

7.4 Charitable Contribution and Donation

- 7.4.1 Charitable support and donations are acceptable whether in kind services, knowledge, time, or financial contributions. However, all associates must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery.
- 7.4.2 All CSR, donations and sponsorship requests must be carefully examined for legitimacy reasons and not be made to improperly influence a business outcome.
- 7.4.3 No donation can be offered or made without the prior approval from the CEO.
- 7.4.4 All requests for charitable donations and sponsorships must be made through One Medicare's Corporate Communication Department.
- 7.4.5 The records of all charitable contributions shall be kept by the Corporate Communication Department for audit purposes.

8.0 CONFLICT OF INTEREST

- 8.1.1 As an Employee of the Company, Employee should avoid situations where the Employee's own interests' conflict with the best interests of the Company, or as it may appear to someone else.
- 8.1.2 A conflict of interest may occur, for instance, if the Employee or a member of their immediate family or a business or other group with which Employees are associated, would be affected materially by decisions made by the Employee as part of the Company's responsibility.
- 8.1.3 A conflict of interest might also occur if Employee or a family member or associate stood to gain from the Company's confidential information to which the Employee has access as part of their job.
- 8.1.4 A clear case of conflict arises if the Employee accepts gifts or valuable favours from individuals or firms doing or wanting to do business with the Company or attempting to influence some the Company's decision.
- 8.1.5 If employees are in a conflict-of-interest situation, or think they may be, they should discuss it with their Head of Department in confidence and declare accordingly. Employees can also discuss the situation with the Human Resource Department.



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9.0 STAFF TRAINING AND DECLARATION

- 9.1 One Medicare shall conduct an awareness program for all One Medicare employees regarding Anti-Bribery and Corruption Policy.
- 9.2 Training shall also be provided to new employees/hires to the Company as part of the One Medicare On-boarding Program.
- 9.3 All One Medicare employees 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 Resource department for the duration of the personnel's employment.

10.0 RECORD-KEEPING

- 10.1 The Company shall retain for at least seven (7) years, all records, operational work documents, other documents, and transactions to enable One Medicare to comply with any requests from the relevant authorities.

11.0 COMPLIANCE TO THE LAW

- 11.1 The Company will comply with all applicable laws, rules and regulations of the governments within which the Company operates. Directors and Employees and Associates are expected to understand and comply with the Malaysian Anti-Corruption Commission Act 2009 (including any amendment thereof).
- 11.2 The Company reserves the right to report any actions or activities suspected of being criminal in nature to the police or other relevant authorities.

12.0 REPORTING OF VIOLATIONS OF THE POLICY

- 12.1 Any Employee and Associates who knows of, or suspects, a violation of the Policy, is encouraged to whistle blow or report the concerns through the mechanism set out under the Whistle Blowing Policy. The provision, protection and procedure of the Whistle Blowing Policy for reporting of the violations of the Policy are available in the Whistle Blowing Policy SOP.
- 12.2 No individual will be discriminated against or suffer any sort or manner of retaliation for raising genuine concerns or reporting in good faith on violations or suspected violations of the Policy.
- 12.3 All reports will be treated confidentially.

13.0 REVIEW OF THE POLICY

- 13.1 The Company will monitor compliance with the Policy and review the Policy regularly to ensure that it continues to remain relevant and appropriate.

14.0 REFERENCE

- i. Malaysian Anti-Corruption Commission Act 2009 (Act 694) ("MACC Act 2009").
- ii. Malaysian Anti-Corruption Commission (Amendment) Act 2018 ("Amendment Act 2018").
- iii. Institut Integriti Malaysia.
- iv. OMSB Employees Handbook.
- v. OMSB Corporate Communication Standard Operating Procedure (SOP).
- vi. OMSB Whistleblowing Policy.

15.0 ATTACHMENT

Attachment I - Gifts/Hospitality Declaration Form