

ARKITEK FAA SDN BHD

ANTI-BRIBERY AND CORRUPTION COMPLIANCE DOCUMENTS

This policy pack contains:

1. Foreword
2. Written Employee Code of Conduct
3. Written Anti-Bribery and Corruption Policy
4. Policy and Process for Reporting of Bribery / Improper Conduct

Document Status: Draft for Management Approval / Internal Adoption

Version: 2.0 | Proposed Effective Date: Jan 2025

Approved by: Ar Hj Mohd Hafiz Bin Dato Ar Hj Mohd Fazillah

Designation: Director

Date: 15 Jan 2025

Foreword



Dear colleagues,

At Arkitek FAA, our commitment to integrity and ethical conduct forms the bedrock of our reputation and success. We believe that our strength as a premier architectural firm lies not only in our innovative designs but also in the trust and respect we earn from our clients, partners, and community.

As we navigate the dynamic landscape of the architectural industry, it is paramount that we uphold the highest standards of professionalism and transparency. This Anti-Bribery Policy Handbook is a testament to our unwavering dedication to these principles. It underscores our proactive approach in fostering a culture of honesty, accountability, and ethical behaviour across all levels of our organization.

The implementation of the Anti-Bribery Management System (ABMS) is a significant step forward in our journey towards excellence. The ABMS provides a robust framework for preventing, detecting, and addressing bribery and corruption in all its forms. It equips us with the tools and guidelines necessary to ensure that every decision we make and every action we take reflects our commitment to ethical practices.

We are all custodians of Arkitek FAA's values and reputation. As you engage with this handbook, we encourage you to embrace its principles wholeheartedly. Let us work together to create an environment where integrity is celebrated, and where our collective efforts continue to set the benchmark for ethical conduct in the architectural industry.

Thank you for your dedication and commitment to upholding the standards that make Arkitek FAA a beacon of trust and excellence.

Sincerely,

Dato' Ar. Hj. Mohd Fazillah Mohd Ali

Executive Chairman

Document Control

Company	Arkitek FAA Sdn Bhd
Document Title	Anti-Bribery and Corruption Compliance Documents
Version	2.0 - Enhanced Policy Pack
Proposed Effective Date	May 2026
Document Owner	Management / Administration Department / Designated Integrity Officer
Approval Authority	Board of Directors / Directors
Review Frequency	At least once every three years, or earlier if required by law, client requirement, incident, audit finding, or management decision

Document Purpose

This document pack formalises Arkitek FAA Sdn Bhd's written employee code of conduct, written anti-bribery and corruption policy, and policy and process for reporting bribery or improper conduct. It is intended to support internal governance, employee awareness, vendor registration, client due diligence, and compliance verification requirements.

This document is prepared as a practical policy pack for a professional architectural consultancy. It should be adopted by Management and communicated internally before being represented as an approved company policy.

Manual Contents

1. Top Management Commitment Statement
2. Document 1: Written Employee Code of Conduct
3. Document 2: Written Anti-Bribery and Corruption Policy
4. Document 3: Policy and Process for Reporting of Bribery / Improper Conduct
5. Appendix A: Staff Acknowledgement Form
6. Appendix B: Bribery / Improper Conduct Reporting Form
7. Appendix C: Gift, Hospitality and Conflict of Interest Declaration Form
8. Appendix D: Third-Party Integrity Clause
9. Appendix E: Implementation Checklist

Top Management Commitment Statement

Arkitek FAA Sdn Bhd adopts a zero-tolerance approach towards bribery, corruption, fraud, abuse of power, conflict of interest, false claims, facilitation payments, and improper business conduct.

The Board of Directors and Management are committed to conducting the Company's business with integrity, transparency, accountability, and professionalism. The Company expects all employees, directors, consultants, sub-consultants, suppliers, contractors, agents, representatives, and any person acting for or on behalf of the Company to comply with this policy pack.

Management shall provide appropriate leadership, communication, and oversight to ensure that this policy is understood and implemented. No employee or associated person shall suffer demotion, penalty, retaliation, or adverse treatment for refusing to pay or receive a bribe or for reporting a concern in good faith, even where such refusal may result in delay, inconvenience, or loss of business opportunity.

Adequate Procedures Alignment

This policy pack is designed to align with the Malaysian anti-bribery and corruption compliance expectation that commercial organisations should have adequate procedures to prevent corrupt practices. The Company shall apply a proportionate, risk-based approach suitable to its size, nature of business, project profile, authority dealings, consultant appointments, procurement activities, and client requirements.

Principle	Application in this Policy Pack
Top-level commitment	Management commitment statement, approval, communication and oversight.
Risk assessment	Identification of corruption risks in authority submissions, procurement, certification, valuation, gifts, support letters and third-party dealings.
Undertake control measures	Controls on gifts, facilitation payments, conflicts, third parties, approvals, records and reporting.
Systematic review, monitoring and enforcement	Periodic review, record keeping, investigation process and disciplinary consequences.
Training and communication	Staff acknowledgement, briefing, circulation and periodic reminders.

Document 1: Written Employee Code of Conduct

1.1 Purpose

This Employee Code of Conduct sets out the standards of ethical and professional behaviour expected of all employees, directors, consultants, temporary staff, representatives, and persons acting on behalf of Arkitek FAA Sdn Bhd.

1.2 Scope

This Code applies to all Company personnel in dealings with clients, government bodies, local authorities, statutory bodies, regulators, consultants, contractors, suppliers, business partners, and the public.

1.3 Core Standards of Conduct

- Act honestly, fairly, responsibly and with integrity.
- Comply with applicable laws, regulations, client requirements, professional obligations and Company policies.
- Avoid conduct that may damage the reputation, credibility or independence of the Company.
- Treat clients, colleagues, consultants, contractors, suppliers, authorities and the public with respect and professionalism.
- Use Company assets, information and resources responsibly and only for legitimate business purposes.
- Maintain accurate, complete and truthful records, reports, claims, invoices, meeting notes and project documents.

1.4 Compliance with Laws and Professional Obligations

Employees shall comply with applicable laws and regulations, including laws relating to bribery, corruption, fraud, procurement, confidentiality, data protection, employment, safety and professional practice. Where a client or professional requirement imposes a higher standard, employees shall comply with that higher standard.

1.5 Conflict of Interest

Employees shall avoid situations where personal, family, financial or other interests conflict, or may appear to conflict, with the interests of the Company or its clients. Any actual, potential or perceived conflict of interest must be disclosed to Management promptly.

- Do not participate in tender, quotation, evaluation, recommendation, certification or payment decisions where a conflict exists unless Management has reviewed and approved the matter.
- Disclose relationships with tenderers, suppliers, contractors, consultants, authority personnel or any party involved in Company business where the relationship may affect independence.
- Do not use Company position, information or influence for personal gain or for the benefit of family members or connected persons.

1.6 Gifts, Hospitality and Entertainment

Employees shall not solicit, accept, offer, promise or provide gifts, hospitality, entertainment, travel, donations, benefits or favours that may improperly influence, or appear to improperly influence, a business decision.

- Cash, cash equivalents, personal loans, kickbacks, secret commissions and personal benefits are strictly prohibited.
- Reasonable hospitality of nominal value may be allowed only if it is lawful, appropriate, transparent, infrequent, not lavish, not requested by the employee, and not intended to influence a decision.
- Any doubtful gift, hospitality, entertainment or travel offer must be declared to Management.

1.7 Confidentiality and Information Protection

Employees shall protect confidential, technical, commercial, financial and client information obtained during employment or engagement with the Company. Such information shall not be disclosed without proper authority.

1.8 Fair Dealing and Procurement Integrity

Employees involved in procurement, tendering, contract administration, certification, valuation, evaluation, appointment, recommendation or negotiation shall act objectively, independently and without improper influence.

- Do not manipulate quotations, tenders, evaluations, minutes, recommendations, certificates, claims or payment approvals.
- Do not favour any supplier, contractor, consultant, business partner or client representative because of personal relationships, gifts or benefits.
- Any irregularity, pressure or improper request in a procurement or project process must be reported.

1.9 Use of Company Name and Support Letters

Employees shall not issue, request, endorse or circulate support letters, recommendation letters, reference letters or similar documents on behalf of the Company unless properly authorised and required for a legitimate business purpose. Support letters must never be used to obtain improper advantage, influence a decision, bypass due process or create a conflict of interest.

1.10 Reporting Misconduct

Employees have a duty to report suspected bribery, corruption, fraud, conflict of interest, unethical conduct or breach of this Code. Reports shall be made through the process stated in Document 3.

1.11 Breach and Disciplinary Action

Any breach of this Code may result in disciplinary action, including warning, suspension, termination of employment or engagement, recovery of losses, reporting to authorities, or legal action where appropriate.

Document 2: Written Anti-Bribery and Corruption Policy

2.1 Policy Statement

Arkitek FAA Sdn Bhd prohibits all forms of bribery, corruption, kickbacks, facilitation payments, secret commissions, improper gifts, abuse of power, false claims and improper advantages, whether direct or indirect, and whether involving the public sector or private sector.

2.2 Objectives

- To set out the Company's responsibilities and position on bribery and corruption.
- To ensure that employees and associated persons understand their responsibilities in upholding the Company's zero-tolerance stance.
- To reduce the risk of the Company, its employees and associated persons being implicated in bribery or corruption.
- To support client due diligence, vendor registration, project procurement and compliance verification requirements.
- To provide practical controls for an architectural consultancy operating in a Malaysian project, authority and construction environment.

2.3 Scope

This Policy applies to all directors, employees, consultants, agents, representatives, temporary staff, suppliers, contractors, sub-consultants and any person acting for or on behalf of the Company. Third parties are expected to observe equivalent standards when dealing with or representing the Company.

2.4 Compliance with Law

The Company shall comply with applicable anti-bribery and anti-corruption laws and regulations, including the Malaysian Anti-Corruption Commission Act 2009 and any other applicable laws in jurisdictions where the Company operates or provides services.

Personnel are reminded that corruption offences may include soliciting or receiving gratification, offering or giving gratification, false claims, abuse of office or position, and corporate liability offences involving commercial organisations. Where a law is stricter than this Policy, the law shall prevail.

2.5 Definitions

Term	Meaning for this Policy
Bribery	Offering, promising, giving, requesting, receiving or agreeing to receive gratification or anything of value to improperly influence a decision, action, omission or business outcome.
Corruption	Misuse of entrusted power, position, information or authority for personal, business or improper advantage.
Gratification	Money, gift, loan, fee, reward, commission, valuable security, property, interest, employment, contract, service, favour, discount, benefit or other advantage.
Associated person	Any director, employee, consultant, agent, contractor, supplier, sub-consultant, representative or person who performs services for or on behalf of the Company.
Public official	Any officer, employee or representative of a government, local authority, statutory body, regulator, public body, government-linked entity, or any person exercising a public function.

2.6 Prohibited Conduct

- Offering, promising, giving, requesting, receiving or agreeing to receive bribes, kickbacks, secret commissions or improper payments.
- Making facilitation payments to speed up routine administrative, inspection, authority, approval or certification processes.
- Using agents, consultants, contractors, suppliers, intermediaries or third parties to do anything that the Company or its personnel are prohibited from doing directly.
- Providing gifts, entertainment, hospitality, donations, sponsorships or benefits to improperly influence a decision or reward a favourable outcome.
- Concealing improper payments through false invoices, inflated claims, personal accounts, inaccurate records, disguised payments or cash arrangements.
- Retaliating against any person who refuses bribery or reports suspected misconduct in good faith.

2.7 Dealing with Public Officials, Authorities and Approving Bodies

Personnel shall exercise special care in dealings with government bodies, local authorities, statutory bodies, regulators, approving authorities and public officials. No gratification, benefit or advantage shall be offered, promised or given to improperly influence any approval, decision, inspection, certificate, recommendation, payment or official action.

2.8 Gifts, Entertainment, Hospitality and Travel

The Company adopts a conservative approach towards gifts, entertainment, hospitality and travel. These must not be used to obtain or retain business, secure an improper advantage, create a conflict of interest, influence authority processes, or compromise professional independence.

- Never solicit gifts, entertainment, hospitality or travel.
- Never accept or provide cash, cash equivalents, personal loans or secret benefits.
- Do not accept or provide travel expenses, accommodation or paid trips unless there is a legitimate business purpose and prior Management approval.
- Declare any gift, hospitality or entertainment that could be perceived as influencing a business decision.
- When in doubt, decline politely and report the matter to Management.

2.9 Sponsorship and Donation

Sponsorships and donations shall not be used to influence a business outcome, circumvent procurement rules, obtain approvals, secure payment, reward a decision, or cover up an improper advantage. Any sponsorship or donation must be lawful, transparent, properly approved, recorded, and free from conflict of interest.

2.10 Political Contribution

The Company shall not use Company funds, resources or personnel to make direct or indirect political contributions on behalf of the Company unless expressly approved by the Board and permitted by law. Employees shall not create the impression that personal political activities are made on behalf of the Company.

2.11 Facilitation Payments

Facilitation payments are prohibited. If an employee is requested to make an unofficial payment to secure or expedite a routine function, the employee shall refuse and report the request. If there is an immediate threat to health, safety or liberty, the employee may take necessary steps to protect themselves and must report the matter as soon as possible.

2.12 Conflict of Interest

Conflict of interest situations shall be declared and managed. Personnel shall not allow personal, family, financial or business interests to impair their judgement or independence. If there is a potential conflict, the interest of the Company and the integrity of the process must take priority.

2.13 Support Letters

The Company shall not entertain, request, issue or rely on support letters, recommendation letters or similar communications that are intended to influence an authority, client, procurement, appointment, evaluation or approval process improperly. Any unsolicited support letter received in relation to Company business shall be reported to Management and recorded.

2.14 Dealing with Third Parties

The Company expects third parties acting for or on behalf of the Company to share the Company's commitment to integrity and to refrain from bribery, corruption and improper conduct. The Company may conduct due diligence, require integrity declarations, include anti-bribery clauses, request supporting documents, suspend dealings or terminate relationships where integrity concerns arise.

2.15 Books, Records and Internal Controls

All business records, invoices, payments, reimbursements, claims, approvals and supporting documents must be accurate, complete, transparent and retained properly. False, misleading, incomplete or disguised records are prohibited.

2.16 Consequences of Bribery and Corruption

Involvement in bribery or corruption may cause serious legal, financial, contractual, reputational and professional consequences for the Company and individuals involved. Consequences may include disciplinary action, termination, civil recovery, termination of business relationship, reporting to authorities, prosecution, fines, imprisonment, disqualification or professional consequences.

2.17 No Immunity

A person who reports misconduct shall not automatically receive immunity if that person participated in wrongdoing. However, cooperation, honesty and early reporting may be considered by Management when determining appropriate action, subject to law and the circumstances of the case.

2.18 Training, Communication and Awareness

The Company shall communicate this Policy to employees and relevant associated persons. New employees should receive this policy pack during onboarding, and existing employees should be reminded periodically. Training may be conducted according to the Company's size, risk profile, client requirements and project exposure.

2.19 Monitoring, Review and Enforcement

Management shall monitor the implementation of this Policy and review it periodically. The review may consider legal changes, client requirements, audit findings, incidents, whistleblowing reports, project risks, authority dealings and procurement patterns.

2.20 Queries

Any query relating to this Policy shall be referred to Management, the Administration Department or the Designated Integrity Officer appointed by Management.

Document 3: Policy and Process for Reporting of Bribery / Improper Conduct

3.1 Purpose

This Policy and Process establishes a clear and confidential channel for reporting suspected bribery, corruption, fraud, facilitation payment, conflict of interest, unethical conduct, support letter abuse, false claims or breach of Company policy.

3.2 Scope

This reporting process is available to employees, directors, consultants, contractors, suppliers, clients and other third parties who wish to raise a concern relating to the Company's business activities.

3.3 Reportable Matters

- Suspected bribery, corruption, kickbacks, secret commissions or improper payments.
- Requests for facilitation payments or unofficial payments.
- Improper gifts, entertainment, hospitality, travel, donations or sponsorships.
- Conflict of interest or undisclosed personal interest.
- Fraud, falsification of records, inflated claims, false invoices or misleading certificates.
- Improper pressure in authority submissions, procurement, evaluation, certification, payment or contract administration.
- Abuse of support letters, recommendation letters or endorsements.
- Retaliation against a person who reports a concern in good faith.
- Any breach of the Employee Code of Conduct or Anti-Bribery and Corruption Policy.

3.4 Reporting Channels

Channel	Details
Primary Reporting Channel	Managing Director / Executive Director / Design Director
Administrative Channel	Administration / HR / Accounts Department
Email	faanet@arkitekfaa.com
Written Report	Marked "Confidential - Bribery / Improper Conduct Report" and addressed to Management

Where a report involves the usual reporting person, the report should be made directly to another Director or senior member of Management. Where immediate escalation is required, the reporting person may report directly to the Board or external authorities.

3.5 Information to Include in a Report

- Name and contact details of the reporting person, if the person is willing to provide them.
- Description of the suspected misconduct.
- Names of persons involved, if known.
- Date, time, place, project, client, contract, authority, procurement or transaction involved.
- Supporting evidence such as documents, emails, messages, invoices, photographs, meeting notes or call logs, if available.
- Whether any immediate action is required to prevent loss, harm, delay, retaliation or further misconduct.

3.6 Confidentiality

Reports shall be handled confidentially to the extent reasonably practicable. Information shall only be disclosed to persons who need to know for review, investigation, decision-making, legal advice, audit, client notification, authority reporting or corrective action.

3.7 Good Faith Reporting and Protection Against Retaliation

The Company will not tolerate retaliation, intimidation, harassment, victimisation or adverse treatment against any person who raises a concern in good faith, even if the concern is not ultimately proven. Any retaliatory act may result in disciplinary action.

3.8 Reporting Process

10. Receipt of Report: The report is received by Management or the designated reporting channel.
11. Acknowledgement: Where contact details are provided, receipt may be acknowledged within a reasonable time.
12. Initial Assessment: Management assesses whether the matter falls within this policy and whether urgent action is required.

13. Preservation of Evidence: Relevant documents, emails, project files, approvals, claims or records are secured where appropriate.
14. Investigation: Management appoints suitable personnel or external advisers to review the matter where appropriate.
15. Decision and Action: Management decides on corrective, disciplinary, contractual, legal, reporting or preventive action.
16. Closure and Record Keeping: The Company records the report, findings, decision and action taken, subject to confidentiality requirements.

3.9 Investigation Principles

- Investigations shall be conducted fairly, objectively and without unnecessary delay.
- Persons involved shall be treated with fairness and confidentiality.
- Evidence shall be preserved and reviewed properly.
- Management may seek legal, audit, HR, technical or professional advice where required.
- Investigation findings shall be documented in a manner proportionate to the seriousness of the matter.

3.10 External Reporting

Where required by law, client requirement, contract or Management decision, the Company may report a matter to the relevant authority, regulator, client, enforcement agency or professional body.

3.11 False or Malicious Reports

Reports made in good faith will be protected even if not proven. However, deliberately false, malicious or dishonest reports may result in disciplinary or other action.

3.12 Record Keeping

The Company shall maintain confidential records of reports, assessments, investigations, decisions and actions taken. Access to such records shall be restricted to authorised persons.

Appendix A: Staff Acknowledgement Form

I acknowledge that I have received, read and understood the Arkitek FAA Sdn Bhd Anti-Bribery and Corruption Compliance Documents, comprising the Employee Code of Conduct, Anti-Bribery and Corruption Policy, and Policy and Process for Reporting of Bribery / Improper Conduct.

I agree to comply with the policies and to report any suspected bribery, corruption, conflict of interest, facilitation payment, fraud or improper conduct in accordance with the reporting process.

Name: _____

Designation: _____

Department: _____

Signature: _____

Date: _____

Appendix B: Bribery / Improper Conduct Reporting Form

Date of report	
Name of reporting person (optional)	
Contact details (optional)	
Project / matter / client involved	
Person(s) involved	
Date, time and place of incident	
Description of concern	
Supporting documents attached	Yes / No
Immediate action required	
Received by / date	

Appendix C: Gift, Hospitality and Conflict of Interest Declaration Form

Name	
Designation	
Date of declaration	
Type of declaration	Gift / Hospitality / Entertainment / Travel / Conflict of Interest / Other
Party involved	
Project / client / tender / authority matter	
Description and estimated value	
Reason / context	
Decision requested	Approve / Decline / Return / Record only / Other
Management decision	
Approving person / date	

Appendix D: Third-Party Integrity Clause

The Consultant / Contractor / Supplier / Service Provider acknowledges that Arkitek FAA Sdn Bhd adopts a zero-tolerance approach towards bribery and corruption. The third party shall not offer, promise, give, request, receive or agree to receive any bribe, kickback, facilitation payment, secret commission, improper gift, benefit or advantage in connection with any work, appointment, procurement, authority dealing, certification, claim, payment or business transaction involving Arkitek FAA Sdn Bhd.

The third party shall comply with applicable anti-bribery and anti-corruption laws and shall immediately notify Arkitek FAA Sdn Bhd of any suspected bribery, corruption or improper request connected with the engagement. Arkitek FAA Sdn Bhd reserves the right to suspend or terminate the engagement and take appropriate action where a breach or suspected breach arises.

Appendix E: Implementation Checklist

Item	Action	Status
Management approval	Sign cover page and adopt policy pack.	
Designated person	Appoint Management / Administration representative to keep ABAC records.	
Internal circulation	Circulate PDF to all employees and directors.	
Staff acknowledgement	Collect signed acknowledgement forms.	

Item	Action	Status
Reporting channel	Confirm designated email / written reporting channel.	
Gift and COI register	Set up simple register for gifts, hospitality and conflict disclosures.	
Third-party clause	Include integrity clause in consultant / contractor / supplier appointment where appropriate.	
Training / briefing	Conduct short internal briefing or toolbox session.	
Review cycle	Review at least every two years or when required.	
Client submission	Provide policy pack to client / PETRONAS upon request after approval.	

Reference Notes

This policy pack has been prepared with reference to Malaysian anti-bribery and corruption compliance expectations, including Section 17A of the Malaysian Anti-Corruption Commission Act 2009 and the Guidelines on Adequate Procedures issued pursuant to Section 17A(5). It has also been structured to respond directly to typical client/vendor compliance requests for a written employee code of conduct, written anti-bribery and corruption policy, and a bribery reporting policy/process.

Note: This is a governance document template for company adoption and should be reviewed by Management and, where necessary, legal counsel before formal use.