



TERENGGANU INC

Organisational Anti-Corruption Plan

Terengganu
Incorporated Sdn. Bhd.

2023 -2025

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FOREWORD BY CHAIRMAN

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Assalamualaikum Warahmatullahi Wabarakatuh dan Salam Sejahtera...

Good corporate governance is the foundation of an organisation success and long-term viability. It instils confidence and trust among stakeholders and the community. Terengganu Inc has always been committed to acting professionally, fairly and with integrity in all its business dealings and relationships, as well as adopting and enforcing effective anti-bribery and anti-corruption policies wherever it works.

The Organisational Anti-Corruption Plan of Terengganu Inc is our way of expressing our commitments towards continuous improvement. Terengganu Inc will also be able to perform more efficiently and be a respectable company.

Terengganu Inc Organisational Anti-Corruption Plan strives to combat corruption, strengthen governance and cultivate culture of integrity in our business environment. I urge Terengganu Inc directors and employees to work together in achieving Malaysia's aspiration towards a Corrupt-Free Nation and make Terengganu Inc known for its Integrity.

YAB Dato' Seri Dr Ahmad Samsuri bin Mokhtar
Chairman

STATEMENT OF COMMITMENT BY PRESIDENT & EXECUTIVE DIRECTOR

Ossalamualaikum Warahmatullahi Wabarokatuh dan Salam Sejahtera...

As State Government strategic investment arm, Terengganu Inc must lead a good example. Hence, all Terengganu Inc employees are required to act with high level of integrity and professionalism. Terengganu Inc employees should always choose to do the right thing voluntarily rather than out of obligation.

By upholding integrity, our business would prosper and the whole nation would be able to enjoy the resultant benefits. On the other hand, if we do not operate with integrity, we may collapse and experience long term financial consequences.

It is crucial that everyone participates in the fight against corruption. Terengganu Inc Organisational Anti-Corruption Plan lays forth a strategy for preventing corruption, ensuring good governance and maintaining integrity in delivering our services. This document is proof of our commitment and a way for us to show our support for the national effort to combat corruption.

Burhanuddin Hilmi bin Mohamed @ Harun
President & Executive Director

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1

INTRODUCTION



1.1 Corporate Statement

The Reorganisation Exercise Agreement dated 1 March 2007 marked the inauguration of Terengganu Inc as the strategic investment holding company which focuses on the ownership and management of various investment, commercial and business activities under the State Government by way of consolidation of all the identified assets acquired from six (6) State Agencies; Menteri Besar, Terengganu ("MB Inc"), Perbadanan Memajukan Iktisad Negeri Terengganu ("PERMINT"), Lembaga Tabung Amanah Warisan Negeri Terengganu ("LTAWNT"), Lembaga Pemegang Amanah Yayasan Negeri Terengganu ("Yayasan Terengganu"), Lembaga Pemegang Amanah Yayasan Islam Terengganu ("Yayasan Islam") and Yayasan Pembangunan Keluarga Terengganu ("Yayasan Keluarga").

Throughout the years, Terengganu Inc continuously transforms itself by reinforcing and streamlining the organisational processes, systems and capacities for the purpose of becoming a well-established corporation with the ability to withstand as well as to leverage the dynamic and ever-shifting economic landscape.

Terengganu Inc will remain focused on accelerating business growth within areas such as Plantations, Oil & Gas, Energy & Natural Resources and Infrastructure, Construction & Engineering, Healthcare and Tourism.

1.2 Vision, Mission and Guiding Principles & Philosophy.

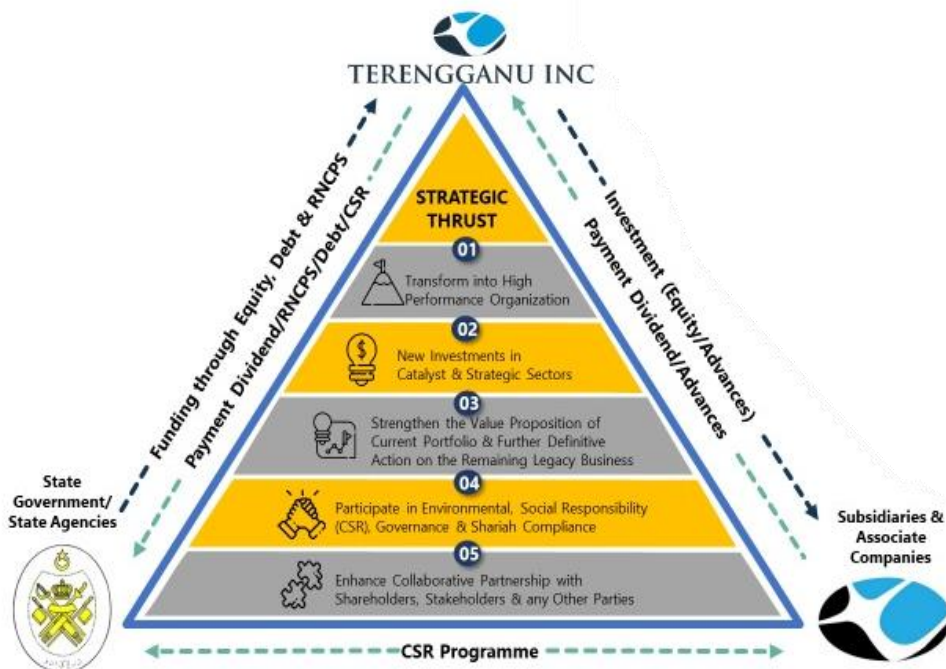
Vision

To be the prominent strategic investment arm that delivers sustainable value for Terengganu

Mission

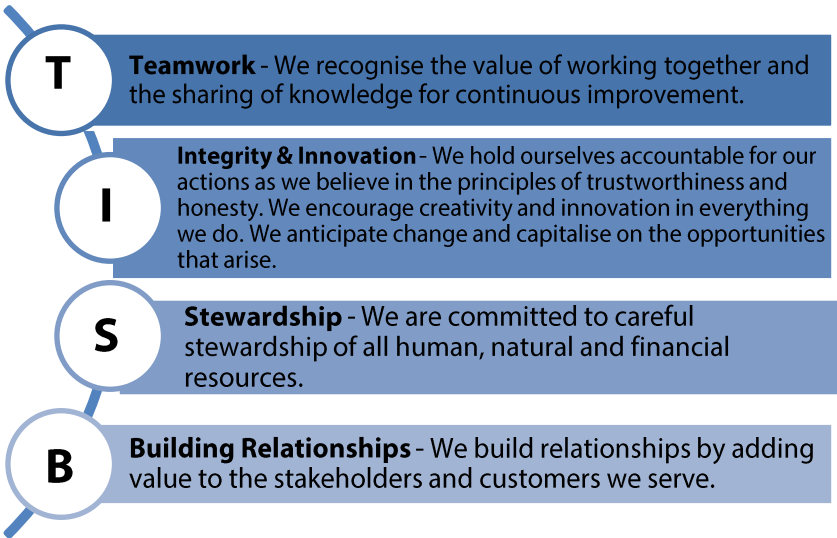
- To strengthen the Company's financial performance.
- To be competitive in the State's strategic sectors.
- To be a high performance organisation.
- To carry the State's aspirations and create value for stakeholders.

Guiding Principles & Philosophy



1.3 Our Core Values

In support of our mission and vision, four (4) core values will guide and shape Terengganu Inc's operations and workplace culture.



1.4 Requirement for OACP Development

The MACC defines corruption as the act of giving or receiving of any gratification or reward in the form of cash or in-kind for performing a task or otherwise in relation to his/her job description.

In 2018¹, the government issued a directive to require all state-owned enterprises (SOEs) to establish an Integrity and Governance Unit ("IGU") in order to strengthen internal controls and prevent the risk of corruption and abuse of power. The MACC is mandated to monitor the implementation of this directive.

The National Anti-Corruption Plan (NACP) 2019-2023 under Strategy 6.2.1 (initial) that was launched on 29th January 2019 made it compulsory for Statutory Bodies, Government-Linked Companies, Limited Companies with Guarantee and private sector to develop OACP.

However, based on the result of the Mid-Term Review of the NACP released on 6th May 2021, the word "compulsory" has been dropped and the period has been extended from January 2021 to 2023 for the private sector to develop OACP.

¹ On 8 June 2018, Malaysia's 7th Prime Minister decided that a comprehensive anti-corruption plan must be developed immediately in order to address corruption-related issues in Malaysia. As a result, the National Anti-Corruption Plan (NACP) was created. NACP is a national policy on corruption prevention which focuses on governance, integrity and anti-corruption elements. It was launched on 29 January 2019 by the YAB Tun. Dr. Mahathir bin Mohamad, Prime Minister of Malaysia. The vision of NACP is to create a nation free from corruption through 3 missions, 3 goals, 6 priority areas, 6 strategy and 115 initiatives.

1.5 Corruption Risk Management ("CRM") Workshop

For the purpose of CRM development, IGU of Terengganu Inc has organised several workshops with the coordination of MACC. The workshops were facilitated by MACC officers and attended by representatives from all departments. In addition, inputs from MACC were obtained and incorporated into the CRM Report accordingly.

1.6 Organisational Anti-Corruption Plan ("OACP") Workshop

16 participants (including IGU from Terengganu Inc subsidiaries) had successfully completed OACP online training from 6 to 9 September 2021 with MACC. Participants were divided into groups to discuss the assigned topics among team members from different companies.

The discussion was carried out based on key process areas namely; Strategic Planning & Investment; Finance & Procurement Management; Corporate Services; and Governance & Human Capital. The four-day workshop focused on data analysis, risk assessment and development of action plan or initiative to address any loophole and explore potential rooms of improvement in integrity, governance and anti-corruption.

1.7 Issues and Challenges

According to Transparency International Malaysia's Corruption Perception Index ("CPI") Report for 2022, Malaysia is ranked 61st among 180 countries. This index focuses on elements of corruption in the public sector, as well as politician's involvement for personal gain.

Among key challenges faced by any organisation in fighting corruption are:

- Abuse of Power;
- Lack of Internal Control;
- Difficulties in Detecting Corrupt Practices and Malpractices;
- Lenient and Inconsistent Punishment;
- Lack of Ethical Practices;
- Political Interference in Organisation Operation; and
- Governance Issues.

Considering the trend of corruption at national level, Terengganu Inc and its Group must heighten the efforts in combating corruption and to ensure that services are delivered ethically with high level of integrity.

1.8 Corruption Perception Index (CPI)

Since its inception in 1995, the CPI, Transparency International's flagship research product, has become the leading global indicator of public sector corruption. Malaysia has recently seen a slew of fraud and corruption cases.

Malaysia's scoring for 2022 stood at 47/100, the third consecutive drop in the last four (4) years. More efforts are required to reverse the trend and every segment of the community must play their roles in ensuring corruption is minimised or eliminated.

Year	Ranked	Score
2015	54	50
2016	55	49
2017	62	47
2018	61	47
2019	51	53
2020	57	51
2021	62	48
2022	61	47

Source(s): Transparency International Malaysia

1.9 Factors Contributing to Corruption within Organisation

Corruption may occur at all levels regardless of status or position of giver or receiver.

The Fraud Triangle² theory outlines the three conditions that lead to higher instances of occupational fraud: motivation, opportunity, and rationalisation. When an employee has a reason for committing fraud, gets a chance to do so without getting caught, and able to justify their behavior, they're more likely to commit an occupational crime.



Organisations should identify the “motivation” factor and offer solution, tightening internal controls, create a zero-tolerance policy towards fraudulent behavior and remind employees & customers of this policy on regular basis.

² The original theory developed by Donald Cressey in 1953 who modified it many times, most recently in the early 1970s.

1.10 Implementation of Integrity and Governance Policy

Terengganu Inc is committed to carry out its business in accordance with high standards of professionalism, honesty, integrity and ethics. In portraying this commitment, Terengganu Inc establishes policies and guidelines as binding rules to guide our conduct toward our business partners, colleagues, stakeholders and the public for an orderly business operation apart from ensuring that integrity is maintained.

In accordance with established requirements under MACC Act 2009 (Act 694), Section 17A – Offence by Commercial Organisation (Corporate Liability) and Malaysian Whistleblower Protection Act 2010 (Act 711), Terengganu Inc has taken an important step forward by establishing and reviewing relevant policies i.e., Whistleblowing Policy, No Gift Policy, Anti-Bribery and Corruption (“ABC”) Policy and Limits of Authority. The main objectives of these policies are to enhance internal control, avoid malpractices and improve corporate governance within Terengganu Inc. Terengganu Inc has zero tolerance on any forms of bribery and corruption. The commitment towards prevention of corrupt practices is demonstrated in the Anti-Bribery and Corruption Policy of the Company.

In order to spur ethical and integrity working culture, Terengganu Inc provides guidelines on how employees are expected to conduct themselves. The Code of Business Ethics (“COBE”) is developed to serve as the primary guideline for all employees. This Code emphasises and advances the principles of discipline, good conduct, integrity and professionalism as part of Terengganu Inc's core values.

2

RISK IDENTIFICATION



2.1 Data Collection

**1**

Qualitative Data

Refers to internal and external statistics such as:

- MACC Report.
- Complaint received.
- Disciplinary Record.
- Enterprise Risk Management (ERM).
- Corruption Risk Management (CRM).

Quantitative Data

2

Refers to information gathered from survey or findings:

- Employee OACP Survey.
- Internal Audit Report.
- External Audit Report.
- Workshop Brainstorming.



2.2 Data Analysis

In identifying risks related to governance, integrity and anti-corruption in Terengganu Inc that may affect business operation and reputation, data analysis was carried out. Among data observed are:

i. Qualitative Data - Semi-Annual Report to MACC

LAPORAN FUNGSI TERAS UNIT INTEGRITI DAN GOVERNAN BAGI PENGGAL KEDUA TAHUN 2022			
FUNGSI 1 : PENGURUSAN ADUAN			
Sila isikan bilangan (angka) yang berkenaan dalam ruangan yang disediakan.			
1.1	KAEDAH PENERIMAAN ADUAN	JULAI - DISEMBER	
	E-Mel	1	
	Pengadu Datang Sendiri	0	
	Panggilan Telefon/ Aplikasi WhatsApp	0	
	Surat Layang	0	
	Surat Menyurat	0	
	Laporan Audit/Pematuhan/Jabatan Risiko	0	
	Aduan daripada Anak Syarikat	1	
	Aduan daripada Agensi Induk/Syarikat Induk	0	
	Saluran Whistleblowing	0	
	Lain-	0	
	Lain (nyatakan):		
	JUMLAH	2	
1.2	KLASIFIKASI ADUAN MENGIKUT FUNGSIAN	JULAI - DISEMBER	
	Jualan dan Pemasaran (Sales and Marketing)	0	
	Pengeluaran (Production)	0	
	Pengurusan Sumber Manusia (Human Resources Management)	2	
	Pengurusan Kewangan (Financial Management)	0	
	Perolehan (Procurement)	0	
	Kontrak dan Perjanjian (Contract and Agreement)	0	
	Pelaksanaan Projek (Project Implementation)	0	
	Lain-lain (nyatakan) :	0	
	JUMLAH	2	

1.3	KUMPULAN PEGAWAI YANG DITOHHMAH	JULAI - DISEMBER
	Lembaga Pengarah (BOD)	0
	Ahli-Ahli Jawatankuasa Lembaga Pengarah	0
	Pengurusan Tertinggi (HOD)	2
	Eksekutif	0
	Bukan Eksekutif	0
	Lain-lain	0
	JUMLAH	2

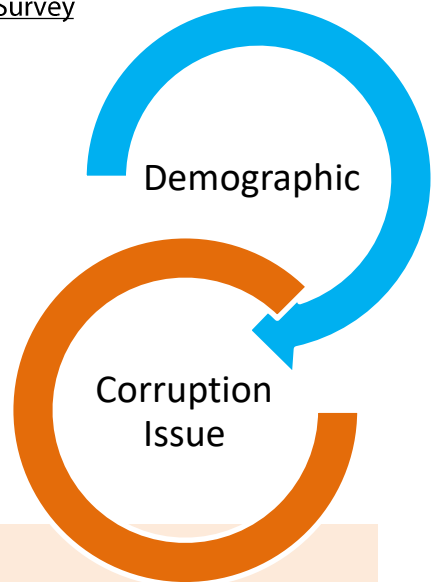
1.4	JENIS KESALAHAN	JULAI - DISEMBER
	Menerima dan Meminta Rasuah	0
	Memberi dan Menawar Rasuah	0
	Tuntutan Palsu	0
	Salah Guna Jawatan Dan Kedudukan	0
	Pengubahan Wang Haram	0
	Penyalahgunaan Aset Organisasi	0
	Memalsukan Data atau Maklumat Organisasi	0
	Pecah Amanah	0
	Pelanggaran Tatatertib Organisasi	2
	Kesalahan Jenayah Lain (yang tidak dinyatakan di atas)	0
	JUMLAH	2

1.5	TINDAKAN TERHADAP ADUAN	JULAI - DISEMBER
	Edar Kepada SPRM	0
	Edar Kepada Agensi Penguatkuasaan Lain	0
	Edar Kepada Organisasi Luar (cth : SSM/BNM/SC/BURSA MALAYSIA)	0
	Edaran Dalaman Organisasi	0
	Tindakan Pengesanan Dan Pengesanan	2
	Penambahbaikan sistem dan prosedur (Polisi, SOP dan Manual)	0
	Lain-Lain Tindakan	0
	Tiada Tindakan Lanjut (NFA)	0
	JUMLAH	2



ii. Quantitative Data - Employee OACP Survey**61 respondents**

Female 33,
Male 28.
Vice President/HOD - 13,
Assistant VP - 6,
Senior Associate - 15,
Associate - 20,
Non-executive - 7



- 95.1% respondents said **they had never received any gift** from any party with an official interest in the organisation.
- 47.5% said their positions and functions **are exposed to room and opportunity for corruption** offences.
- 11.5% said **not knowing false claims are also corruption offences** under the Malaysian Anti -Corruption Commission Act 2009 ("MACC Act").
- No (0%) individual **had ever given bribe** to do or not to do something related to official duties.
- 1.6% said **they had been offered bribe** to do or not to do something related to official duties.
- Only 8.2% said the **issue of corruption** in this organisation **is in high need of attention**.

The results of the survey may suggest that corruption at the organisation is under control. However, continuous efforts must be undertaken to ensure the matter is effectively addressed.

Quantitative Data: Employee OACP Survey



- **100%** of the respondents **said that they know the existence** of law / policies / regulations / circulars / instructions / standing orders / guidelines / standard operating procedures or task lists that is related to their position in the company.
- **91.8%** said that **the company provide adequate information** on law / policies / regulations / circulars / instructions / standing orders / guidelines / standard operating procedures or task lists related to their position in the company.
- **96.7%** said that law / policies / regulations / circulars / instructions / standing orders / guidelines / standard operating procedures or task lists provide by the organisation are **in line with their current position and job scope**.
- **21.3%** of the respondents said the **organisation practices any work procedures that are hereditary** and not based on laws / policies / regulations / circulars / instructions / standing orders / guidelines / standard operating procedures or task lists.

The organisation must ensure the policies and work procedures to remain relevant so that tasks can be performed effectively and comply with applicable regulations.

2.3 Risk Areas

Identification of risk area within business process is crucial to ensure issues can be resolved adequately and prevention measures are sufficient. When issues are proactively address, it promotes efficient deliverables and continuous improvement.

Terengganu Inc business processes are categorised based on four (4) key activities; Finance & Investment, Procurement Management, Corporate Services and Governance & Human Capital.

Finance & Investment	In Finance, risk refers to degree of uncertainty and/or potential financial loss; whereby, investment evaluation and monitoring involve several processes such as approval, budget monitoring, acquisition, authority approval, and many more. Among the common concerns are the ability to meet business objective within stipulated cost and timeline.
Procurement Management	Procurement management refers to Terengganu Inc's purchase of goods and services. Procurement is one of key areas prone to corruption and most likely to face interference from interested parties.
Corporate Services	This area focuses on data security and integrity; reputational risk associated with corporate and social obligation such as Corporate Social Responsibility (CSR); and overall management of Terengganu Inc's policies and guidelines.
Governance & Human Capital	Governance provides mechanism for check and balance to ensure Terengganu Inc is operating at optimum level and in compliance with all necessary requirements; while Human Capital and Administration focusses on development of human capital and management of Terengganu Inc asset.

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3

**INTENSIFY
ANTI-CORRUPTION
EFFORTS**



3.1 (i) OACP Framework

Vision	Terengganu Inc is free from corrupt practices, transparent in all transactions and accountable in all activities.			
Mission	Strengthening Governance, Integrity and Anti -Corruption of Terengganu Inc through compliance with laws, regulations and directives in force to ensure Terengganu Inc people always serve in a transparent, trustworthy, and corruption-free.			
Goals	<ul style="list-style-type: none"> • Effective Performance Management • Enhance competency and promotes excellent service delivery • Cultivate good governance and culture of integrity 			
Key Activity	Finance & Investment	Procurement Management	Corporate Services	Governance & Human Capital
Strategic Objective	Enhance competency, accountability and credibility	Enhance transparency and integrity	Enhance and strengthen processes and accountability	Cultivate integrity-based environment

3.1 (ii) Framework To Achieve OACP Objectives

Strategy 1: Enhance competency, accountability and credibility

- Implement and deliver project efficiently, with quality and cost effective.

Strategy 2: Enhance effectiveness and accountability

- Enhance transparency and awareness on procurement practices.
- Improve monitoring and compliance to the existing policies and procedures.

Strategy 3: Establish, enhance and strengthen processes and accountability

- Ensure process effectiveness and compliance to procedures and legal requirements.

Strategy 4: Cultivate integrity-based environment

- Elevate employee integrity, accountability and competency.
- Cultivate good governance.



3.1 (iii) OACP Committee Structure

The following is the structure of the committee

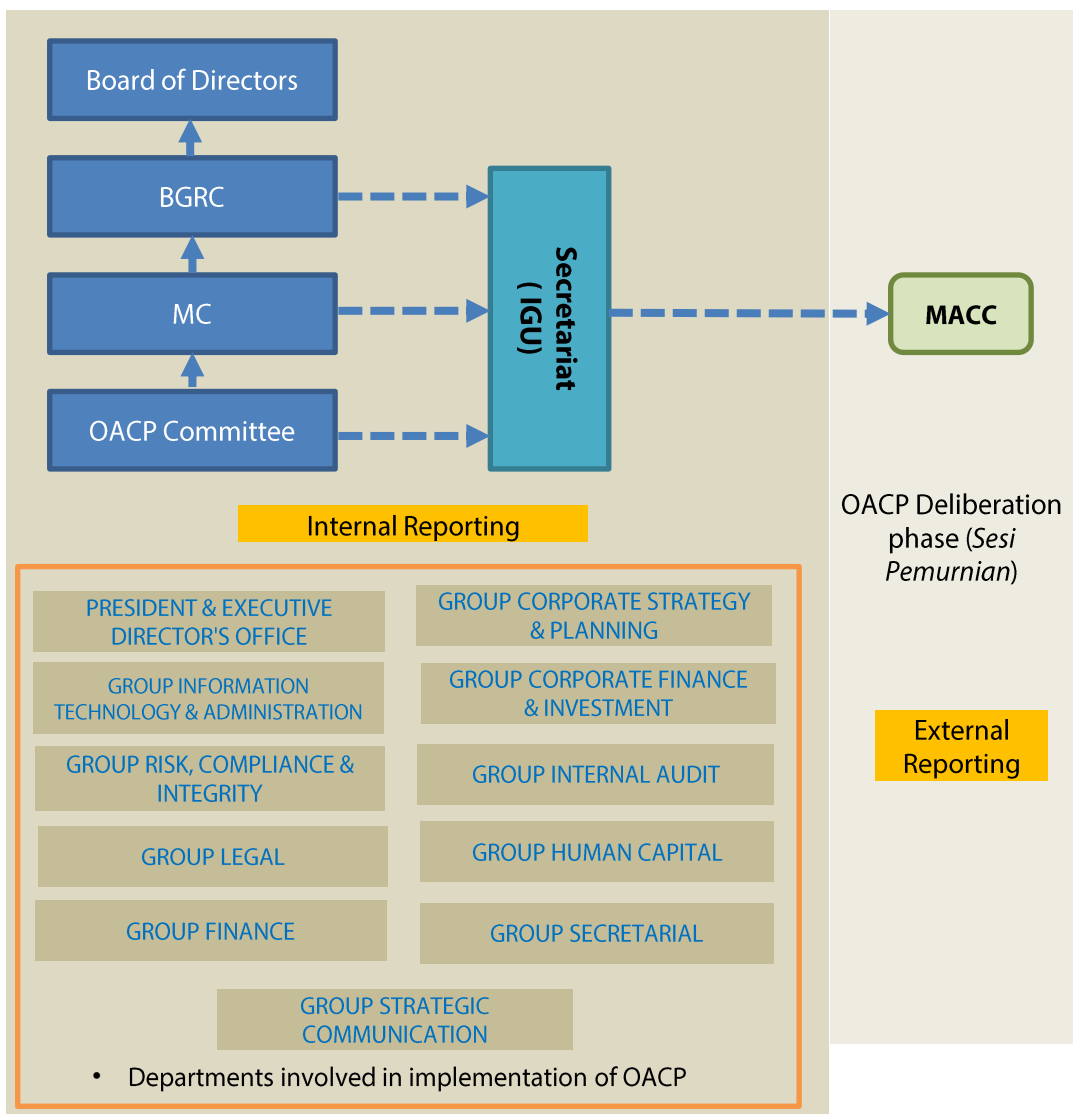
Chairman	• President & Executive Director			
ED Office	• Representative			
Secretariat	• Group Risk, Compliance & Integrity			
Key Activities	Finance & Investment	Procurement Management	Corporate Services	Governance & Human Capital
Member(s)	• Head of Group Finance	• Head of Group Information Technology & Admin	• Head of Group Legal	• Head of Group Human Capital

The OACP Committee shall be responsible for the following tasks:

- Hold meetings with a minimum of four (4) times a year. Additional meetings may be convened as and when required;
- Develop the OACP;
- Communicate the plan to key stakeholders;
- Track the implementation progress of the initiatives and report the progress of the implementation plan to the relevant committee(s); and
- Conduct review of the plan after implementation and propose improvement to the plan from time to time (if required).

3.1 (iv) Implementation, Monitoring and Evaluation

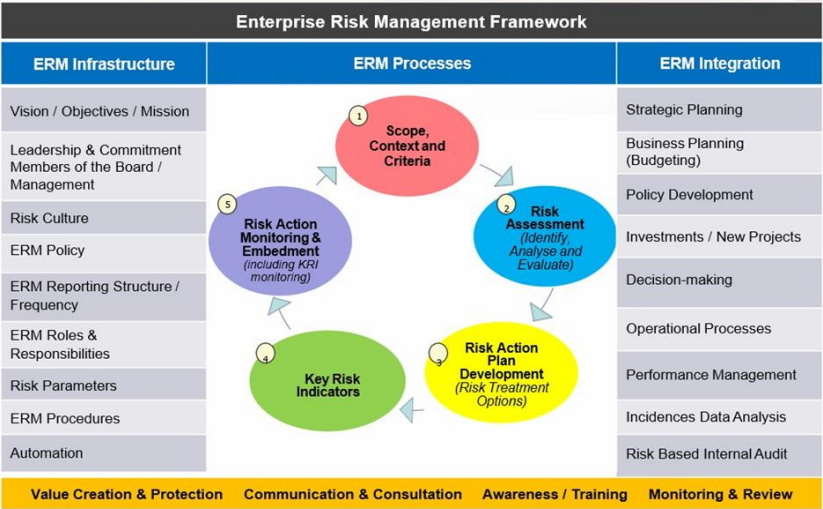
IGU under the Group Risk, Compliance & Integrity ("GRCI") Department will oversee the implementation, monitoring and evaluation of the OACP.



3.2 (I) Group Level – Enterprise Risk Management

Enterprise Risk Management³ ("ERM")

Terengganu Inc had developed the Group Risk Management policy in 2021, whereby implementation of the policy has been facilitated by the accompanying ERM Framework.



Risks related to corruption were identified i.e., Integrity Risk and Corruption Risk and the relevant risk mitigation actions have been recognised, implemented, monitored and reported regularly.

³ ERM is a structured discipline approach aligning strategy, processes, people, technology and knowledge with the purpose of evaluating and managing the risks the Group faces as it creates value.

3.2 (II) Company Level – Corruption Risk Management & OACP

Corruption Risk Management ("CRM")

CRM had been established in June 2022 whereby specific risks related to corruption for the Company had been identified, managed and reported on regular basis.

Formation of Terengganu Inc's OACP Committee

The OACP Committee had been established in December 2022 to facilitate the development and review of the plan and monitor the implementation of the identified initiatives.

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4

**ACTION PLAN AND
INITIATIVES**

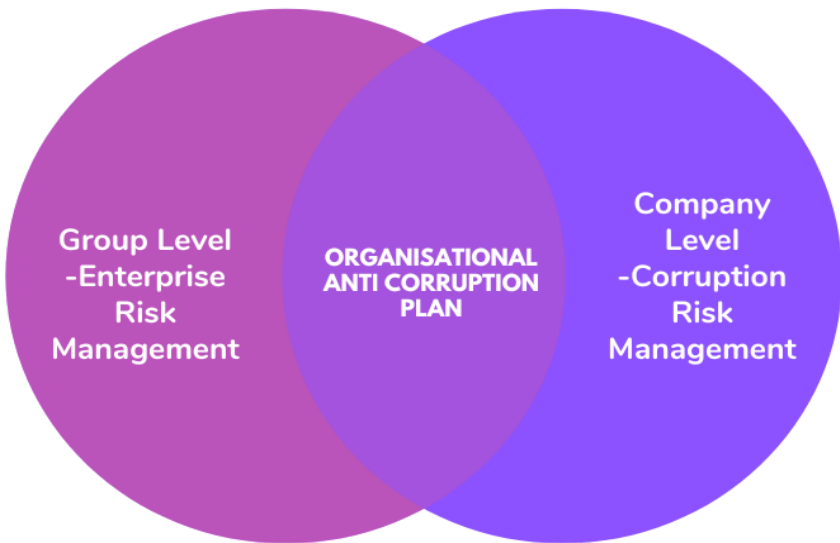


4.1 Strengthening Governance, Integrity and Anti-Corruption

At the Company level, a rigorous risk assessment and monitoring program is conducted via the Corruption Risk Management ("CRM") where specific risks on corruption are identified and mitigated accordingly.

Corruption risk for the Group is managed via the ERM initiative where regular assessment is conducted to ascertain the level of risk, adequacy of the current internal controls and the need for additional controls to mitigate the risk.

The combination of both the CRM and ERM initiatives will enhance the effectiveness of the anti-corruption plan at the Group and Company level.



4.2 Company Level – Corruption Risk Management (“CRM”)

CRM is a specific set of procedures and requirements to detect, assess, and mitigate corruption risks within an organisation.

It is an important part of implementing this anti-corruption plan.

In Terengganu Inc, a total of seven (7) risks related to corruption have been identified, together with 25 initiatives to manage the risk.



FOCUS AREA	Finance & Investment		
STRATEGY 1	Enhance competency, accountability and credibility		
OBJECTIVE	Implement and deliver project efficiently, with quality and cost effective		
RISK	INITIATIVES	LEAD	PERIOD
<ul style="list-style-type: none"> Making false claim. 	<ul style="list-style-type: none"> Enforce the eligibility of claim according to grade as per Employee Handbook. 	<ul style="list-style-type: none"> GF / GHC 	2023 – 2025 (On-going)
	<ul style="list-style-type: none"> Enforce the existing procedures for claim as per the Limits of Authority Policy. 	<ul style="list-style-type: none"> GF / GHC 	2023 – 2025 (On-going)
	<ul style="list-style-type: none"> Conduct awareness programs for staff. 	<ul style="list-style-type: none"> GRCI 	2023 - 2025 (On-going)
	<ul style="list-style-type: none"> Practice maker–checker mechanism for claim approval in the WorkSmartly System. 	<ul style="list-style-type: none"> GHC / GF 	2023 - 2025 (On-going)

FOCUS AREA	Finance & Investment		
STRATEGY 1	Enhance competency, accountability and credibility		
OBJECTIVE	Implement and deliver project efficiently, with quality and cost effective		
RISK	INITIATIVES	LEAD	PERIOD
<ul style="list-style-type: none"> Misuse of position 	<ul style="list-style-type: none"> Enhance Investment and Divestment SOP regularly. 	<ul style="list-style-type: none"> GCSP 	2023 - 2025 (On-going)
	<ul style="list-style-type: none"> Review the Internal Control Framework Policy periodically as promoted by the Malaysian Code of Corporate Governance ("MCCG"). 	<ul style="list-style-type: none"> GRCI 	2023-2025 (On-going)
	<ul style="list-style-type: none"> Conduct awareness programs for Management and staff. 	<ul style="list-style-type: none"> GRCI 	2023 – 2025 (On-going)
	<ul style="list-style-type: none"> Declaration of conflict of interest for new recruit. 	<ul style="list-style-type: none"> GHC 	2023 - 2025 (On-going)
	<ul style="list-style-type: none"> Regular review of the Limits of Authority Policy. 	<ul style="list-style-type: none"> Respective Department 	2023 - 2025 (On-going)

FOCUS AREA	Procurement Management		
STRATEGY 2	Enhance effectiveness and accountability in procurement management		
OBJECTIVE	<ul style="list-style-type: none">Enhance transparency and awareness on procurement practicesImprove monitoring and compliance to the existing policies and procedures.		
RISK	INITIATIVES	LEAD	PERIOD
<ul style="list-style-type: none">Incompetent or non-cost-effective vendors being selected.	<ul style="list-style-type: none">Conduct regular performance evaluation on vendor.	<ul style="list-style-type: none">GITA	2023-2025 (On-going)
	<ul style="list-style-type: none">Conduct user acceptance test before purchase of IT product.	<ul style="list-style-type: none">GITA	2023 - 2025 (On-going)
	<ul style="list-style-type: none">Review and enhance Procurement Policy and SOP periodically.	<ul style="list-style-type: none">GITA	2023 - 2025 (On-going)

FOCUS AREA			
Corporate Services			
STRATEGY 3			
Establish, enhance and strengthen processes and accountability			
OBJECTIVE			
<ul style="list-style-type: none"> Ensure process effectiveness and compliance to company's policies and procedures and statutory requirements 			
RISK	INITIATIVES	LEAD	PERIOD
<ul style="list-style-type: none"> Unfavorable contract terms 	<ul style="list-style-type: none"> Establish Legal SOP to address the unfavorable contract terms issues. 	<ul style="list-style-type: none"> GL 	2024
	<ul style="list-style-type: none"> Monitor/implement the terms and condition in the executed agreement by the respective project owner. 	<ul style="list-style-type: none"> Respective HODs 	2023-2025 (On-going)
	<ul style="list-style-type: none"> Conduct knowledge sharing on legal matters. 	<ul style="list-style-type: none"> GL 	2023 – 2025 (On-going)
<ul style="list-style-type: none"> Misuse of donation, sponsorship & Corporate Social Responsibility (CSR) funding 	<ul style="list-style-type: none"> Conduct regular review of the Sponsorship and Donation Policy. 	<ul style="list-style-type: none"> GSC 	2023 – 2025 (On-going)
	<ul style="list-style-type: none"> Ensure that budgets and programme proposals are approved according to the Limits of Authority. <ul style="list-style-type: none"> No donation for political party. Prohibit contribution or excessive donation to parties with potential conflict of interests. 	<ul style="list-style-type: none"> GSC 	2023 - 2025 (On-going)
	<ul style="list-style-type: none"> Conduct awareness program on the exposure to corruption issue related to sponsorship and donation 	<ul style="list-style-type: none"> GRCI 	2023 - 2025 (Ongoing)

FOCUS AREA	Governance & Human Capital		
STRATEGY 4	Cultivate integrity-based environment		
OBJECTIVE	<ul style="list-style-type: none"> Elevate employee integrity, accountability and competency. Cultivate good governance. 		
RISK	INITIATIVES	LEAD	PERIOD
<ul style="list-style-type: none"> Conflict of Interest 	<ul style="list-style-type: none"> Conduct regular monitoring on the implementation of integrity related policies i.e., Code of Business Ethics, Anti-Bribery and Corruption, Whistleblowing and No Gift policies, LOA, Procurement Policy. Enforce Integrity Pact by the relevant departments. Conduct awareness programs for Management and staff . Review and enhance Internal Control Framework by all departments. 	<ul style="list-style-type: none"> GS / GRCI GRCI / GHC / GITA GRCI Respective HODs 	<ul style="list-style-type: none"> 2023 – 2025 (On-going) 2023 - 2025 (On-going) 2023 - 2025 (On-going) 2023 - 2025 (On-going)
<ul style="list-style-type: none"> Ineffective corruption complaint 	<ul style="list-style-type: none"> Raise awareness on the whistleblower channel through email (monthly) and poster (in company's building). Initiate whistleblowing awareness talk. Establish Integrity Portal through Integrated Reporting Website ("IRW") to consolidate all integrity matters and facilitate information sharing on corruption. 	<ul style="list-style-type: none"> GRCI GRCI GRCI 	<ul style="list-style-type: none"> 2023 – 2025 (On-going) 2023 - 2025 (On-going) 2023 – 2025 (On-going)

4.3 Group Level – Enterprise Risk Management (“ERM”)

The relevant risk mitigation actions have been identified in the ERM initiatives⁴, as follows:

RISK	INITIATIVES
<ul style="list-style-type: none"> Integrity Risk 	<ul style="list-style-type: none"> Policies on anti-corruption are extended to subsidiaries for adoption. Monthly Awareness through email for all staff and regular engagement with the IGU Units at the subsidiaries via the Terengganu Inc Group Integrity Governance Unit (“TIGU”) Meeting. Access to confidential information is controlled and subject to approval by the respective HODs. Restricted access to office area via Door Access System. Staff are also reminded to keep confidential information such as minutes of meetings and board paper in a secured environment. Non-Disclosure Agreement is signed when engaging with external parties. IT security infrastructure and equipment such as antivirus and firewall are installed to enhance network security.

⁴ ERM initiatives are under direct monitoring of the Group Risk Management. The ERM reports are tabled to the Board of Directors on quarterly basis.

RISK	INITIATIVES
<ul style="list-style-type: none">• Corruption Risk	<ul style="list-style-type: none">• Regular engagement with Integrity and Governance Unit (“IGU”) at all Subsidiary under Terengganu Inc Group.• Quarterly reporting on the Corruption Risk and Control Register Report to the Board of Governance and Risk Committee.• Anti-Corruption related policies are shared with the subsidiaries for adoption.• Conduct awareness session on anti-corruption policy with external parties e.g., Vendor.

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CONCLUSION



The development of the Terengganu Inc's OACP aims to produce a comprehensive, practical and strategic plan that demonstrates the Company's commitment in combating abuse of power, malpractices and corruption.

Various initiatives and actions that have been identified in this Plan are aimed at combating any act that may lead to the possible occurrence of corrupt practices.

The essence of this Plan which includes four (4) strategies and 25 initiatives that have been identified and monitored under Terengganu Inc's Corruption Risk Management program.

It is also in line with the efforts to realise the Government's aspirations in raising the level of integrity and reduce corruption.

To ensure the success of the Terengganu Inc's OACP, every initiative created will be monitored and reviewed periodically. Any feedback, guidance and suggestion in improving the Plan will be taken into account to ensure that the initiatives formulated remain relevant and continue to guide the organisation in addressing any possible abuse of power, malpractice and corruption.

Terengganu Inc requires a high level of commitment from all directors, management and staff to ensure the continuity and sustainability of this Plan.

ABC Handbook	Anti-Bribery and Corruption Handbook
Board	Board of Directors
BGRC	Board Governance and Risk Committee
COBE	Code of Business Ethics
GCEO	Group Chief Executive Officer
GHOC	Group Head of Company
GRCI	Group Risk, Compliance and Integrity
GHC	Group Human Capital
GCFI	Group Corporate Finance & Investment
GITA	Group IT & Administration
GS	Group Secretarial
GL	Group Legal
GCSP	Group Corporate Strategy & Planning
GSC	Group Strategic Communication
GF	Group Finance
HOD	Head of Department
MACC	Malaysia Anti-Corruption Commission
MC	Management Committee
Terengganu Inc	Terengganu Incorporated Sdn. Bhd.

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