1. Introduction

1.1 UTAR Education Foundation [Company No: 200201010564 (578227-M)] (UEF) and Universiti Tunku Abdul Rahman [wholly owned by UEF] ("UTAR" and/or "The University") are committed to be in compliance with all applicable laws and regulations in Malaysia, including the Malaysian Anti-Corruption Commission Act 2009 (revised 2018), the Malaysian Penal Code, the Malaysian Companies Act 2016 and any amendment thereof.

1.2 UEF and the University are committed to be in operation with accountability, integrity and trustworthiness.

1.3 UEF and the University have adopted a "ZERO-Tolerance" approach against any act of bribery and corruption, both internally and externally.

2. Scope

2.1 This Anti-Bribery and Corruption Policy (ABC Policy) is applicable to:

- UEF and the members of UEF,
- UTAR and the employees of UTAR,
- Associates of UEF/UTAR, which refer to any third party (external vendors/suppliers, contractors, consultants, agents, sponsors, volunteers, etc) who deals with and/or performs services for and/or on behalf of UEF and/or UTAR. (The supervisor/person-in-charge of the third party must ensure all of their employees, agents, vendors and/or sub-contractors are aware of and comply with this ABC Policy, where applicable.)

2.2 This ABC Policy is applicable to all activities of UEF/UTAR, whether related to teaching, research, commercial or other activities.

3. Bribery and Corruption

3.1 Bribery and corruption are criminal offences under the Malaysian Anti- Corruption Act (MACC Act). It refers to any action of giving or receiving "gratification" in an attempt to illicitly influence an action or decision of a person who is in a position of trust within an organisation.

3.2 Under the MACC Act, "gratification" is defined as follows:

(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,

(g) Any offer, undertaking or promise, whether conditional or uncontrolled, of any gratification with the meaning of any of the preceding para (a) to (f).

3.3 UEF and UTAR recognise the importance of integrity and ethical values so as to facilitate the development of the University. Thus, all forms of bribery and corruption are prohibited under ABC Policy.

3.4 The members of UEF, employees of UTAR, and associates of UEF/UTAR are prohibited from, whether directly or indirectly, offer, pay, promise, give, demand and/or receive gratification of any kind to/from any public official and/or other individual, as to 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 UEF, UTAR or associates of UEF/UTAR.

3.5 The "ZERO-Tolerance" approach against any act of bribery and corruption applies to all kind of dealings of UEF and/or UTAR with individuals, private sector organisations and public sector entities.

3.6 The "ZERO-Tolerance" approach against any act of bribery and corruption covers all countries and economies, without regard and without exception to customs, local cultures, local practices, competitive conditions and/or operating environments.

3.7 No members of UEF, employees of UTAR, and/or associates of UEF/UTAR will face adverse consequences (such as: penalty, demotion, etc) in retaliation for refusing to provide and/or receive bribes and/or participate in illicit behaviour of any kind.

4. Facilitation Payments

4.1 Facilitation payments refer to payments made to an individual in control of a process or decision to secure or expedite the performance of a routine or administrative function or duty. Facilitation payment is deemed as a form of corruption in Malaysia.

4.2 Members of UEF, employees of UTAR, and/or associates of UEF/UTAR are prohibited to, directly or indirectly, offer, promise, and/or provide facilitation payment of any form to any public official for whatsoever purposes.

4.3 In the event if any of the members of UEF, employees of UTAR, and/or associates of UEF/UTAR are forced to make facilitation payments for whatsoever

purposes, the member of UEF, employee of UTAR, and/or associate of UEF/UTAR must report the matter immediately to the Board of Trustees Chairman or the President/CEO of UTAR respectively. UEF and UTAR reserve the right to take appropriate actions, including but not limited to filing a report to MACC, filing a police report, initiate a legal lawsuit, etc.

5. Tender Process and Procurement Activities

All tender processes and procurement activities must be conducted in a transparent manner and in compliance with the University procurement policies.

6. Sponsorships and Donations

6.1 As a not-for-profit organisation, the operations of UEF and UTAR rely partially on the sponsorships and donations by external organisations and members of the public.

6.2 As a way to ensure integrity, transparency and to prevent potential acts of bribery and corruption, all the sponsorships and donations must be contributed through the official channels of UEF and/or UTAR. (Kindly refer to http://www.utar.edu.my/uef/ for detailed information.)

6.3 All sponsorships and donations in monetary form must be transferred to the official bank account(s) of UEF and/or UTAR. Such sponsorships and donations shall not be transferred to any individual/personal bank account of UEF members and/or UTAR employees. (Kindly refer to http://www.utar.edu.my/uef/ for detailed information.)

7. Gifts

7.1 Gifts include but are not limited to cash, hampers, vouchers, souvenirs/ merchandise or items of value offered by students, suppliers, contractors or any external party.

7.2 In general, as part of commitment to integrity, transparency and good governance, members of UEF, employees of UTAR and/or associates of UEF/UTAR are prohibited from giving or receiving gifts that may influence or be perceived to influence their professional duties and responsibilities.

7.3 Limited exceptions may be permitted under specific circumstances (e.g. ceremonial tokens, festive or cultural gifts of nominal value, official hospitality or customary activities such as business meals or invitations to cultural or sport events) provided that no conflict of interest is involved and the gifts are modest, reasonable and do not exceed RM 200 in estimated value. Gifts that exceed RM 200 in estimated value must be declared and recorded in accordance with the procedures set out in Appendix A: Gift Declaration Form.

7.4 If in doubt, members of UEF, employees of UTAR and/or associates of UEF/UTAR are advised to consult their immediate superior or the relevant authority before accepting or offering any gift.

7.5 Failure to comply with this policy may result in disciplinary action, including reporting to relevant enforcement authorities such as the Malaysian Anti-Corruption Commission and Royal Malaysia Police.

8. Report and Investigation

8.1 Any act or suspicious act of bribery and corruption that is detected should be reported to UEF/UTAR via the following channels respectively:

(a) For any act or suspicious act of bribery and corruption against member(s) and/or associate(s) of UEF, kindly contact:

Board of Trustees Chairman of UEF
Address: UTAR Education Foundation
Suite 705, Block A,
Kelana Business Centre
97, Jalan SS7/2
47301 Petaling Jaya
Selangor Darul Ehsan.

(b) For any act or suspicious act of bribery and corruption against employee(s) and/or associate(s) of UTAR, kindly contact:

Director of the Division of Human Resource (DHR)
Address: Director of DHR
Universiti Tunku Abdul Rahman (Sungai Long Campus)
Jalan Sungai Long,
Bandar Sungai Long
43000 Kajang
Selangor Darul Ehsan.

8.2 In the event that an official report is received by UEF/UTAR, an internal investigation will be carried out to verify the report.

8.3 Once an official report is received, UEF/UTAR reserves the right to take any action as deemed necessary and appropriate, including reporting to Malaysian Anti-Corruption Commission (MACC) and Royal Malaysia Police (PDRM).

8.4 UTAR employee, who had been found to have committed an act of bribery or corruption, will be subject to disciplinary action as deemed appropriate by the University.

8.5 All individuals who report suspected bribery or corruption in good faith will be protected against retaliation, discrimination or adverse consequences.

Confidentiality will be maintained where requested.

9. Training and Communications

9.1 The ABC Policy shall be communicated to all members of UEF, employees of UTAR and associates of UEF/UTAR.

9.2 This ABC Policy is a public document which is available at UTAR website and UTAR Web2 intranet.

10. Record Keeping

10.1 UEF and UTAR shall maintain appropriate internal controls as well as keep accurate and detailed financial and other records.

10.2 Periodic auditing activities (such as internal audit activities and audits conducted by external auditors) will be conducted so as to prevent potential bribery and corruption acts, as well as malpractices of any form.

10.3 All financial and non-financial records related to this policy, including audit reports and reports of bribery or corruption, shall be retained for a minimum of seven (7) years in compliance with the Companies Act 2016.

11. Laws and Regulations

In the event if there is a conflict between this ABC Policy and Malaysia mandatory laws and regulations, the Malaysia mandatory laws and regulations shall prevail.

12. Review

UEF and UTAR reserve the right to review this policy from time to time, with reviews conducted at least once every three (3) years to ensure the policy remains current and effective.

Appendix A

Universiti Tunku Abdul Rahman			
Form Title: **GIFT DECLARATION FORM**			
Form Number: **FM-RGO-005**	Rev No. **0**	Effective Date**: 27/11/2025**	Page No. **1 of 2**

This form shall be completed and submitted only for gift that exceed RM200 in estimated value, as outlined in Clause 7.3 of the Anti-Bribery and Corruption Policy (ABC Policy).

All staff who receive such gift in the course of their official duties are required to complete this form and submit it to the immediate superior within five (5) working days from the date of receipt.

1. Details of Gift and Staff:

Name of Staff:	
Department/ Faculty:	
Date of Gift Received:	
Type of Gift:	☐ Cash ☐ Hampers ☐ Vouchers ☐ Souvenirs/ Merchandise ☐ Other: _____
Description of Gift:	
Purpose of Gift:	
Estimated Value (RM):	
Gift Given By (Name/ Organisation)	

2. Staff Declaration:

I hereby declare that the information provided above is accurate and complete to the best of my knowledge. I understand that failure to comply with the gift declaration requirements may result in disciplinary action, including reporting to relevant enforcement authorities such as the Malaysian Anti-Corruption Commission and Royal Malaysia Police.

Signature:
Date:

3. Acknowledgment and Approval by the Immediate Superior (HOD or above)

☐ I acknowledge receipt of this Gift Declaration Form.

Gift Disposition:

☐ The declared gift will be retained by the recipient.

☐ The declared gift will be redistributed/disposed as follows: _____
(State method and recipient group, if applicable. This also includes cases where the gift is intended for distribution to the University/ Faculty/ Institute/ Centre/ Division/ Department/ Office/ Unit)

Reason for Redistribution/ Disposal (if applicable): _____

Signature:
Name:
Date:
Remarks/ Comments:

Notes:

1) All fields must be completed with accurate and clear information.
2) The estimated value should reflect the approximate market value of the gift.
3) If the declared gift will not be retained by the recipient, the intended method of redistribution or disposal must be stated and approved before such action is taken. Redistribution or disposal must be carried out in a transparent manner and where applicable, documented for audit purposes.