

Anti-Bribery and Corruption Policy

1 Introduction

1.1 Scope

This Policy sets out V-WORK's arrangements against bribery and corruption in our operational practices.

This policy applies to all staff, including staff, contractors and interns etc. working for, or under the control of, V-WORK.

1.2 Control of hardcopy versions

The digital version of this document is the most recent version. It is the responsibility of the individual to ensure that any printed version is the most recent version. The printed version of this manual is uncontrolled, and cannot be relied upon, except when formally issued by the [Document Controller](#) and provided with a document reference number and revision in the fields below:

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1.3 References

Standard	Title	Description
n/a	n/a	n/a

1.4 Terms and Definitions

- “staff” and “users” means all of those who work under our control, including employees, contractors, interns etc.
- “we” and “our” refer to V-WORK

1.5 Responsibilities

The [Director](#) is responsible for all aspects of the implementation and management of this policy, unless noted otherwise.

Managers and supervisors are responsible for the implementation of this policy, within the scope of their responsibilities, and must ensure that all staff under their control understand and undertake their responsibilities accordingly.

2 Anti-Bribery and Corruption Policy

V-Work Sdn Bhd ('V-Work') is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure all forms of bribery, corruption, and fraud are prevented. V-Work has zero tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships we build with our employees. V-Work will constantly uphold all laws relating to anti-bribery and corruption.

2.1 To whom does this policy apply?

This policy applies to all employees, managers, and owners of V-Work, including temporary or contract employees. Employees must ensure that they do not become involved in any way in the payment of bribes. This policy sets out the minimum standards to which all employees of V-Work must adhere at all times.

2.2 Definitions

Bribery can be described as: giving or receiving anything from any person (usually money, a gift, loan, reward, favour, commission or entertainment), as an improper inducement or reward for obtaining business, employment or any other benefit. Bribes can therefore include, but are not limited to:

- gifts and excessive or inappropriate entertainment, hospitality, travel and accommodation expenses exceeding the value of RM500;
- facilitation payments and kickbacks, whether by employees or business partners such as recruiters, labour service providers or consultants; and
- other 'favours' provided to supervisors, such as making unwanted advances, payments or promises.

2.3 Company Commitment

All employees of V-Work must adhere to the company ethos of bribery and corruption. No employee or manager will be allowed to take part or become involved in any form of bribery, corrupt behaviour, or fraud, including the following:

- Offer, pay, or give anything of value exceeding RM500 to any person through which one will unethically gain something in return that is not provided for in terms of their employment contract.
- Attempt to mislead or induce any person to do something illegal or that goes against the company policy.
- Mislead or intentionally lie to any person to gain an advantage above and beyond their employment agreement.
- Violate any rules by shifting blame or responsibility onto another employee/person.
- Fraudulent practices against the company ethos or legislation.

V-Work is committed to removing and combatting any inappropriate behaviour immediately and will not tolerate such behaviour from employees, managers, or customers/clients in any way or form.

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. We highly recommend you report to our company secretary at Level 5, Tower 8, Avenue 5, Horizon 2, Bangsar South City, Kuala Lumpur, 59200 Wilayah Persekutuan, Malaysia.

This policy hereby binds the company to its commitment to regularly discuss and mitigate factors related to any form of bribery, corruption, or fraudulent behaviour.

2.4 Whistleblowing

Anyone is empowered to report any incidences of bribery or corruption to our company secretariat office at V-Work Company Secretary, Level 5, Tower 8, Avenue 5, Horizon 2, Bangsar South City, Kuala Lumpur, 59200 Wilayah Persekutuan, Malaysia.

Whistleblowers are advised to provide sufficient details which include the following:

- a description of the improper conduct and the people/parties who are involved;
- a background of the incident, including the relevant dates and location of occurrence;
- how the improper conduct was detected;
- reason(s) why the whistleblower is particularly concerned about this
- supporting documents or particulars of witnesses, if any.

All reasonable efforts will be taken to protect the confidentiality of the report and the identity of the whistleblower.

Since an allegation of bribery or corruption may result in serious repercussions for the person(s) reported, any person that lodges such a report shall ensure that it is made in good faith:

- The reporter must have reasonable and probably grounds to believe that an act of bribery or corruption has taken place, and that the information reported is true.
- The report should not be petty, trivial, frivolous or vexatious in nature.
- The report should not be made for personal gain.

As long as the report is made in good faith, the whistleblower shall be protected against retaliatory action and threats of retaliatory actions, such as unfair dismissal, disciplinary action, victimisation, demotion, suspension, harassment, or discrimination.

Any employee who makes a report not in good faith shall not enjoy whistleblowing protections and may be subject to disciplinary actions.

3 Breaches of policy

V-WORK will take all necessary measures to remedy any breach of this policy including the use of our disciplinary or contractual processes where appropriate.

4 Records

Records retained in support of this procedure are listed in the ISMS Controlled Documents Register [VW/ISMS/R/ISO] and controlled according to the Control of Management System Records Procedure [VW/ISMS/SOP/C7.2].