

**HOLISTIC INTEGRATED SERVICES BERHAD (828089-D)
ANTI-CORRUPTION POLICY**

Approved by: HIS BOD on 27th April 2021.
Effective Date: 27th April 2021.

<p>PREAMBLE:</p>	<p>The diversion of resources or miss-use of power compromises our values and our accountability to donors, partners and the communities that we are serving.</p> <p>Suggestions that HISTEAM is linked to corruption can be damaging to reputation – undermining the morale of staff and the trust and support of beneficiaries, partners, the wider public and donors. Corruption also poses legal risks both for the organisation and individuals involved. We must act, and be seen to act, in a way that is honest and transparent.</p> <p>This policy supports existing Partnership MOUs and internal policies and standards (such as Financial Procedures, Staff Manuals), reinforcing HISTEAM’s commitment to foster an organizational culture in which corruption is never acceptable. It further clarifies standards of conduct for the prevention of corruption and provides a common foundation for the development of procedures to manage HISTEAM’s corruption risk across the Partnership.</p>
<p>DEFINITIONS:</p>	<p>Corruption is defined as ‘the abuse of entrusted power for gain’. It includes practices such as bribery, fraud, extortion, collusion and money laundering. It also includes an offer or receipt of any gift, loan, fee, reward, or other advantage to or from any person as an inducement to do something that is dishonest, illegal, or a breach of trust in the conduct of the organization’s activities. This may include cash or in-kind benefits, such as free goods, gifts, and holidays, or special personal services provided for the purpose of an improper advantage or that may result in moral pressure to receive such an advantage.</p>
<p>POLICY:</p>	<ol style="list-style-type: none"> 1. Corruption on the part of any Holistic Integrated Services Berhad (hereafter refer as HISTEAM) employee, board member or volunteer (collectively “HISTEAM Persons”) or any third party (consultant, vendor, partners, etc.) in their engagement with HISTEAM entities, is prohibited. 2. No HISTEAM Person, or any third party acting on behalf of HISTEAM or dealing with HISTEAM, shall offer to pay a bribe, or pay a bribe, nor shall they solicit the payment of a bribe, or accept a bribe in conjunction with any aspect of HISTEAM’s activities. 3. Payments otherwise prohibited should be considered only if there is immediate threat to personal safety in which case the payment must be immediately reported to management and clearly identified in the accounting records as such. 4. HR Department will run the corruption awareness programmes at least once a year for all staff and other activities to foster an organizational culture in which corruption is never acceptable. 5. All HISTEAM entities will ensure employees, board members, volunteers, and third parties that engage with HISTEAM are made aware

	<p>of the Anti Corruption Policy.</p> <ol style="list-style-type: none">6. All HISTEAM entities will implement a “whistleblower” policy and procedures to provide employees, board members, volunteers, and third parties with a mechanism to report evidence of misconduct, including corruption, and to encourage such reporting.7. All HISTEAM entities will develop a corruption response plan documenting how incidents will be investigated, reported and closed.8. Employees of HISTEAM who commit a corrupt act, fail to report knowledge of corruption or fail to manage the risk of corruption will be subject to disciplinary action up to and including termination of employment. Members of Board Of Directors who fail to comply with this policy are subject to removal. Third parties who fail to comply with this policy will have their agreements and/or contracts with HISTEAM terminated. HISTEAM may also seek restitution or prosecution or other legal remedies.9. HISTEAM entities will immediately report all instances of suspected and actual corruption to a designated member of the Board who is responsible and accountable for ensuring the incident is investigated appropriately. <p>The Board delegates to the CEO the responsibility and authority to develop Partnership management policies as necessary to ensure the effective implementation of this policy.</p>
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