



## **ATC Anti-Bribery and Corruption Policy**

### **Policy statement**

Advance Tertiary College (ATC) has made a commitment to conducting all business of the College in an honest, ethical and professional manner wherever the College operates. This Anti-Bribery and Corruption Policy (“Policy”) is made as a clear demonstration of that commitment.

We are committed to conducting all our business in an ethical and honest manner, and are committed to implementing and enforcing systems that ensure bribery is prevented. We have zero tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, regardless of the country in which we operate.

We will constantly uphold all laws relating to anti-bribery and corruption in Malaysia and in any other jurisdiction we may operate in.

We recognise that bribery and corruption are despicable and criminal acts and as such we are committed to preventing bribery and corruption in our business, and take our legal responsibilities seriously.

### **Scope Area**

This Policy applies in all countries and regions where the College operates and applies to all individuals who work at any level in the College, including other parties who have cooperation with the College.

### **Definition**

Bribery occurs when a person or entity offers, pays or receives money, gifts or other benefits to / from third parties to influence business results or the personal interests of the other party.

### **Our Commitment**

To not accept or receive any gift in any form from Third Parties if it entails an unsanctioned favour to be given in return.

To not offer or transfer any gift in any form to Third Parties for any unsanctioned favours.

To not give, transfer, promise or offer any gift, money, invitation, service or hospitality to Public Officials or Third Parties for any purpose.

To report any offer or transfer of a gift, money invitation, service or hospitality to an employee, including suspected attempted act or act of Bribery or Corruption.

To acknowledge that the prevention, detection and reporting of any attempted act or act of Bribery and Corruption is the responsibility of the employee.

To acknowledge that any employee who violates this Policy will be subject to disciplinary action, which can result in termination of employment.

To agree that this Policy must be read in conjunction with the relevant laws of Malaysia.

### **Monitoring**

The company will periodically evaluate all policies including this Anti-bribery and Corruption Policy and policies relating to the systems of reporting to ensure effective implementation.