

ERL Group



CEO OFFICE

Management of Anti Bribery and Corruption Reports

Doc. No. **ERL-CEO-0131621-00**

ERL Group.

<i>Location</i>	<i>Reference</i>	<i>Revision</i>	<i>Date</i>	<i>Page No.</i>	<i>Document Title</i>
ERL GROUP	ERL-CEO-0131621-00	00	23 Aug 2022	2 of 6	Management of Anti Bribery and Corruption Reports

Release

	Name	Dept/Position	Date	Signature
Released:	Noormah Mohd Noor	CEO	25 Aug 2022	
Released:	Thomas Baake	CEO	24/08/2022	
Checked:	Alex Tan Kok Fatt	QMR	24 Aug 2022	
Checked:	Low Yoke San	Senior Executive	24 Aug 2022	
Checked:	Anita Razani	Document Controller	24 Aug 2022	
Author:	Haryati Khalil	Q&EMR	23 Aug 2022	

Note: * Released - Chief Executive Officer
 Checked - Head of Management/Department
 Checked - Quality Management Representative (QMR)
 Checked - Document Controller
 Author - Procedure originator

** You are allowed to add rows on the above table if more than one HOM to check the said procedure

Any amendments or additions to this procedure must be indicated on the table below.

Change Record and Configuration Control

Revision	Date	Modification	Name
00	23 Aug 2022	New Procedure	Haryati Khalil

ERL Group

<i>Location</i>	<i>Reference</i>	<i>Revision</i>	<i>Date</i>	<i>Page No.</i>	<i>Document Title</i>
ERL GROUP	ERL-CEO-0131621-00	00	23 Aug 2022	3 of 6	Management of Anti Bribery and Corruption Reports

TABLE OF CONTENTS

Page

1	Purpose	4
2	Scope, Distribution & Access	4
3	Definition & Abbreviation.....	4
4	Procedure	4
5	Summary	5
	Appendices	6

ERL Group

<i>Location</i>	<i>Reference</i>	<i>Revision</i>	<i>Date</i>	<i>Page No.</i>	<i>Document Title</i>
ERL GROUP	ERL-CEO-0131621-00	00	23 Aug 2022	4 of 6	Management of Anti Bribery and Corruption Reports

1 Purpose

This procedure will be used as a guideline for handling any reports received via the dedicated established communication channel as per Anti-Bribery & Corruption (ABC) Policy and Whistle Blower Policy in compliance with ERL Group's zero-tolerance anti-bribery and corruption within the organization.

2 Scope, Distribution & Access

Access to be given to all ERL Group employees.

3 Definition & Abbreviation

ERL Group	Express Rail Link Sdn Bhd [Co. Reg. No: 199601003493 (375839-H)] & ERL Maintenance Support Sdn Bhd [Co. Reg. No: 199901023674 (498574-T)]
ABC	Anti-Bribery & Corruption
CEO	Both Express Rail Link Sdn Bhd and ERL Maintenance Support Sdn Bhd CEO
ABC Internal Audit	Selected ERLSB and E-MAS staff appointed to handle the reports channeled to the Whistleblowing Channels, i.e., ABCaudit@kliaekspres.com and other communication means.
HOD	Head of Management/Department
Investigation Team	The person or Team-In-Charge appointed by CEO to investigate a report
PIC	Person in charge

4 Procedure

The processes established to handle any reports received from the Whistleblower Channels are described below.

- i. Upon receiving any reports from the Whistle Blower Reporting Channel or any other source, the ABC Internal Audit will verify the report's validity. If valid, the ABC Internal Audit will record the report in the Anti Bribery and Corruption Form and Anti Bribery and Corruption Register. If the report is not valid, it will not be recorded.
- ii. The report will then be forwarded to the CEOs.
- iii. The CEOs shall appoint relevant HOD or any person as Investigation Team to investigate the report.

ERL Group

<i>Location</i>	<i>Reference</i>	<i>Revision</i>	<i>Date</i>	<i>Page No.</i>	<i>Document Title</i>
ERL GROUP	ERL-CEO-0131621-00	00	23 Aug 2022	5 of 6	Management of Anti Bribery and Corruption Reports

- iv. The appointed Investigation Team will lead the investigation and submit the report to both CEOs within 14 working days. If more time is required, the Investigation Team will advise the CEOs accordingly with the proposed deadline.
- v. The CEOs will review and decide the next course of action based on investigation findings and recommendations by the Investigation Team. The Investigation Team must re-investigate if the CEOs do not accept the report findings.
- vi. The CEO will assign a PIC to do a Police Report if necessary. A copy of the report will be forwarded to HRD.
- vii. The Concerned Department shall implement corrective and preventive measures if the report is accepted. Relevant procedures may be established/reviewed as corrective and preventive measures. This may include Disciplinary Actions as per Industrial Relations Procedure.
- viii. The Concerned Department to report the implementation status to the Internal Audit Team within a stipulated time frame agreed by the CEO.
- ix. If the actions are not accepted, the CEO shall request new action plans to be proposed and implemented.
- x. The ABC Internal Audit will check the effectiveness of the action taken within three months after the corrective and preventive action implementation is completed and report their audit findings to the CEOs.
- xi. If the ABC Internal Audit findings find the corrective or preventive action is inadequate, the CEOs may request the Concerned Department to re-examine and propose the next step. The process will start again as para ix.
- xii. The ABC Internal Audit will update the Anti Bribery and Corruption Form, Register and the Risks and Opportunities Register accordingly at each investigation stage.
- xiii. Results of any audit, reviews of risks assessment, control measures, and performance are to be reported to the CEO.
- xiv. Regardless of the amount of value and any process deviation, all ABC-related wrongdoings shall be reported to the ERLSB Board of Directors.
- xv. Refer to the Anti Bribery and Corruption Reports Management Process Flow for more information

5 Summary

Nil

ERL Group

<i>Location</i>	<i>Reference</i>	<i>Revision</i>	<i>Date</i>	<i>Page No.</i>	<i>Document Title</i>
ERL GROUP	ERL-CEO-0131621-00	00	23 Aug 2022	6 of 6	Management of Anti Bribery and Corruption Reports

Appendices

Related procedures or documents reference number

Document	Reference Code/Number
Anti Bribery and Corruption Form	ERL-CEO-0131721-00
Anti Bribery and Corruption Register	ERL-CEO-0131821-00
Anti Bribery and Corruption Reports Management Process Flow	ERL-CEO-0131521-00
ABC Internal Audit working chart	ERL-CEO-0989422-00
Note : * Refers to the latest revision	

Anti Bribery and Corruption Form

Report Date :
Reporting Channel :
Received by :

Note:
1.To be filled in by ABC Internal Auditor
2.Please tick X wherever applicable

Investigation Details/ Findings:

Report Summary:

Corrective Action:

Preventive Action:

Preventive Action Effective Yes No

Note: If No, please update follow up details/actions

Status Active Closed

Check by Name _____ Date _____
Concured

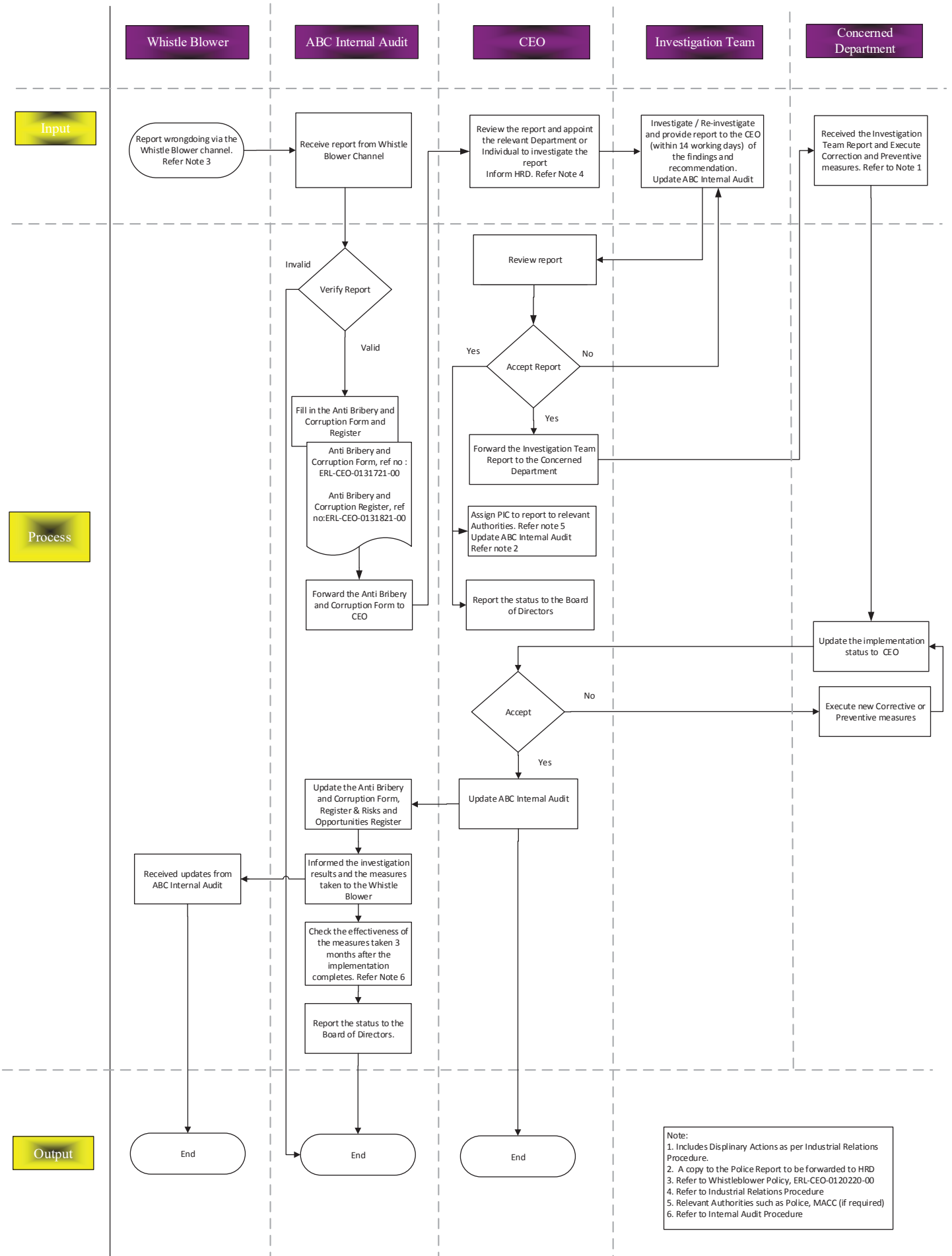
<p>Note: To be sign by at least one CEO</p> <p>Name:</p> <p>Date:</p>	<p>Remarks/Comments</p>
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Attachements

- Copy of e-mail (report) received
- Evidence (if available)
- Others supporting documents

Anti Bribery and Corruption Reports Register

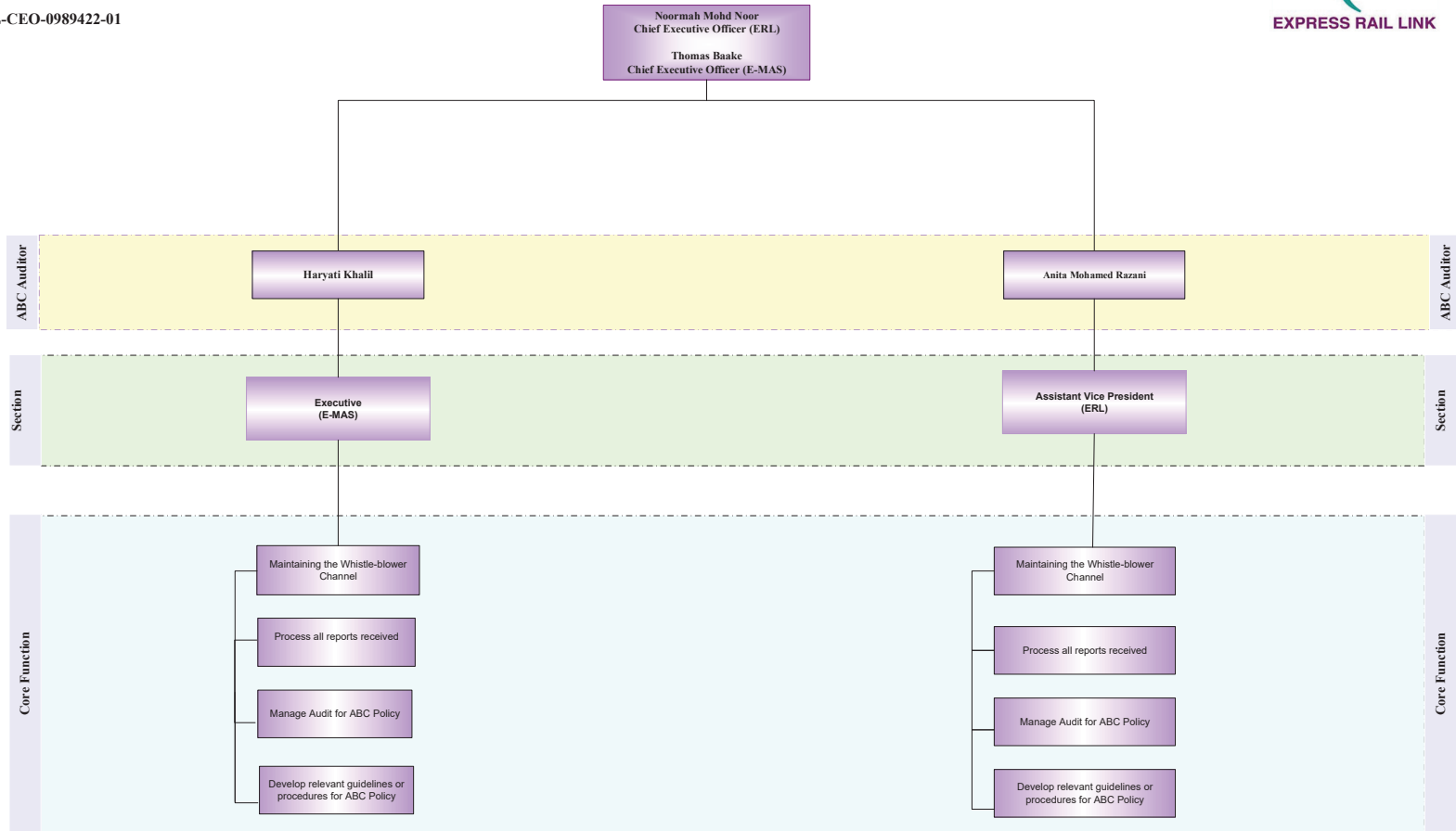
Serial No.	Report Date	Reporting Channel (e-mail/ others)	Findings	Investigation Team	Investigation Findings	Internal Audit Findings (effective/ not effective)	Follow Up Actions Yes/No	Status Open/ Closed	Remarks/Note




Note:
 1. Includes Disciplinary Actions as per Industrial Relations Procedure.
 2. A copy to the Police Report to be forwarded to HRD
 3. Refer to Whistleblower Policy, ERL-CEO-0120220-00
 4. Refer to Industrial Relations Procedure
 5. Relevant Authorities such as Police, MACC (if required)
 6. Refer to Internal Audit Procedure

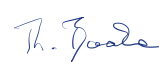
ABC Internal Audit Chart
As of 1-February-2023

Reference No. :- ERL-CEO-0989422-01



Approved by :


Noormah Mohd Noor
 Chief Executive Officer
 Express Rail Link Sdn Bhd


Thomas Baake
 Chief Executive Officer
 ERL Maintenance Support Sdn Bhd