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PAAB ANTI-CORRUPTION PLAN 2021 - 2024

23

30
JUNE



MID-TERM REVIEW

STATEMENT OF COMMITMENT

TOP MANAGEMENT OF PAAB

PAAB Anti-Corruption Plan (PAAB ACP) 2021-2024 which was successfully established in August 2021, is one of anti-corruption efforts that represents management's commitment towards transparency, accountability, and integrity. This plan is established to ensure business conducted in highly ethical practice, fair and full compliance with applicable laws and regulations.

PAAB ACP 2021 – 2024 aims to enhance PAAB standards and uphold zero-tolerance approach to bribery and corruption. This plan will further strengthen PAAB's governance, integrity, and relevant controls within the organization by identifying priority areas and initiatives to mitigate related risk. Through review and evaluation process, Mid-Term Review of PAAB ACP 2021 - 2024 is produced to highlights achievements and improvements made since its implementation.

In achieving PAAB ACP 2021 – 2024 goals, commitment and cooperation from all Divisions & Departments are crucial for a successful and effective implementation of the initiatives. Through effective execution, we are confident that PAAB ACP 2021 – 2024 will have a positive impact on our vision and mission.

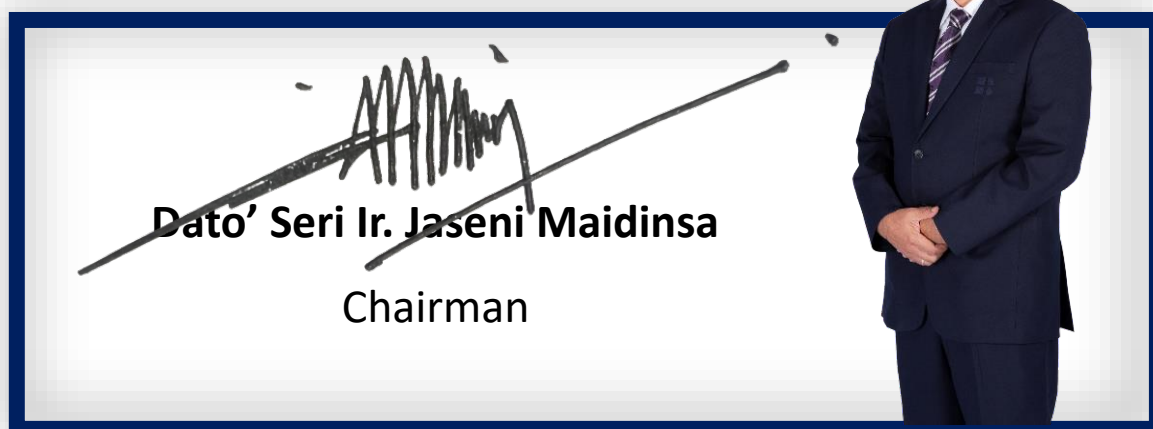


TABLE OF CONTENT



Chapter 1

- **Introduction**
- **Objective**



Chapter 2

- **Summary**
- **Action Plan & Initiatives**



Chapter 3

- **Monitoring & Evaluation**



Chapter 4

- **Appreciation**

Abbreviations

AD	Account Department
ADMIN	Administration Department
CCD	Corporate Communication Department
CD	Contract Department
COO's Office	Chief Operating Officer's Office
COMD	Commercial Division
FPD	Facility & Planning Department
HR	Human Resource
IGD	Integrity & Governance Department
ITD	Information Technology Department
LD	Legal Department
PD	Procurement Department
PMD	Project Management Department
QA	Quality Assurance
RMD	Revenue Management Department
SPD	Special Project Department
TED	Tender Evaluation Department
TSD	Tender Secretariat Department
TD	Treasury Department

CHAPTER 1

- INTRODUCTION
- OBJECTIVE



MID-TERM REVIEW PAAB ACP

INTRODUCTION

PAAB Anti-Corruption Plan (PAAB ACP 2021-2024) is a document created in response to the initiative in the National Anti-Corruption Plan (NACP), and its implementation began in August 2021. As part of the PAAB ACP implementation control mechanism, monitoring and reporting is conducted on a quarterly basis.

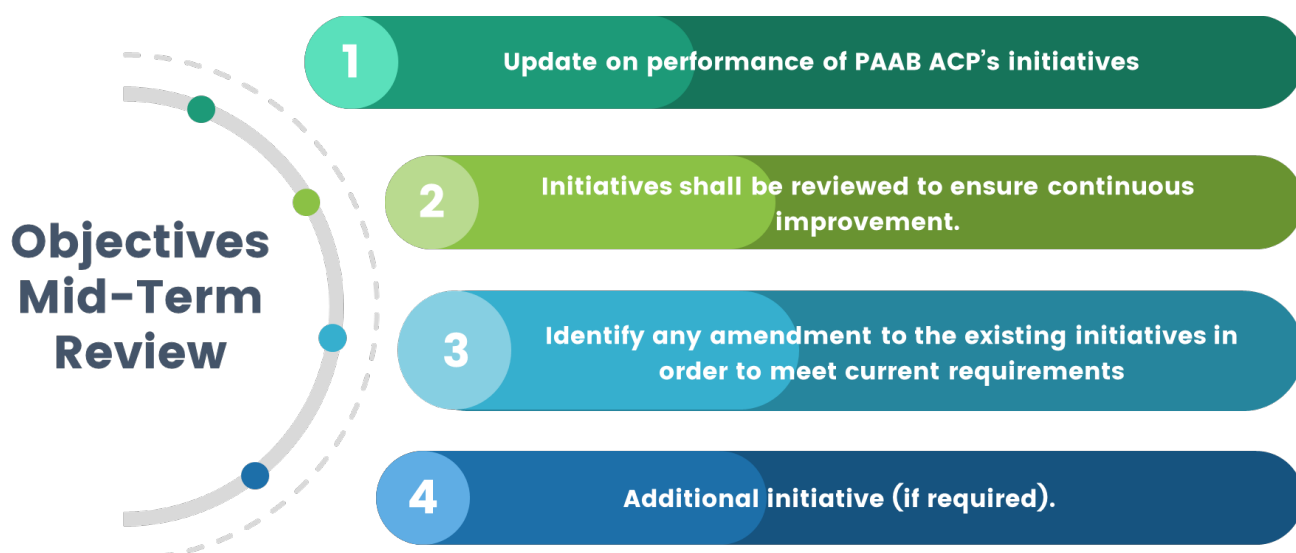
Objective of this Mid-Term Review is to provide an update on the progress of the PAAB ACP initiative. As this plan is a live document, process owner to determine whether the initiative should be revised, dropped, retained, or added with a new initiative to ensure the initiative is relevant to current needs, adequate in resolving weaknesses and related to the current process/situation.

Mid-Term Review PAAB ACP 2021-2024 was carried out in three (3) phases:

- Phase 1: Preliminary Review with Key Business Processes.
- Phase 2: Consultation and Final Draft Review with OACP Committee.
- Phase 3: Approval by Governing Body.

OBJECTIVES MID-TERM REVIEW

On 21 June – 10 July 2023, Integrity & Governance Department (IGD) conducted 6 Review Sessions of PAAB ACP 2021-2024 with representatives from each Division/Department in PAAB and Organisational Anti-Corruption Plan (OACP) Committee. The review was successfully implemented with high commitment, and as a result, this plan has been revised with minimum adjustments to the original timeline. Objectives of Mid-Term Review includes the following aspects:



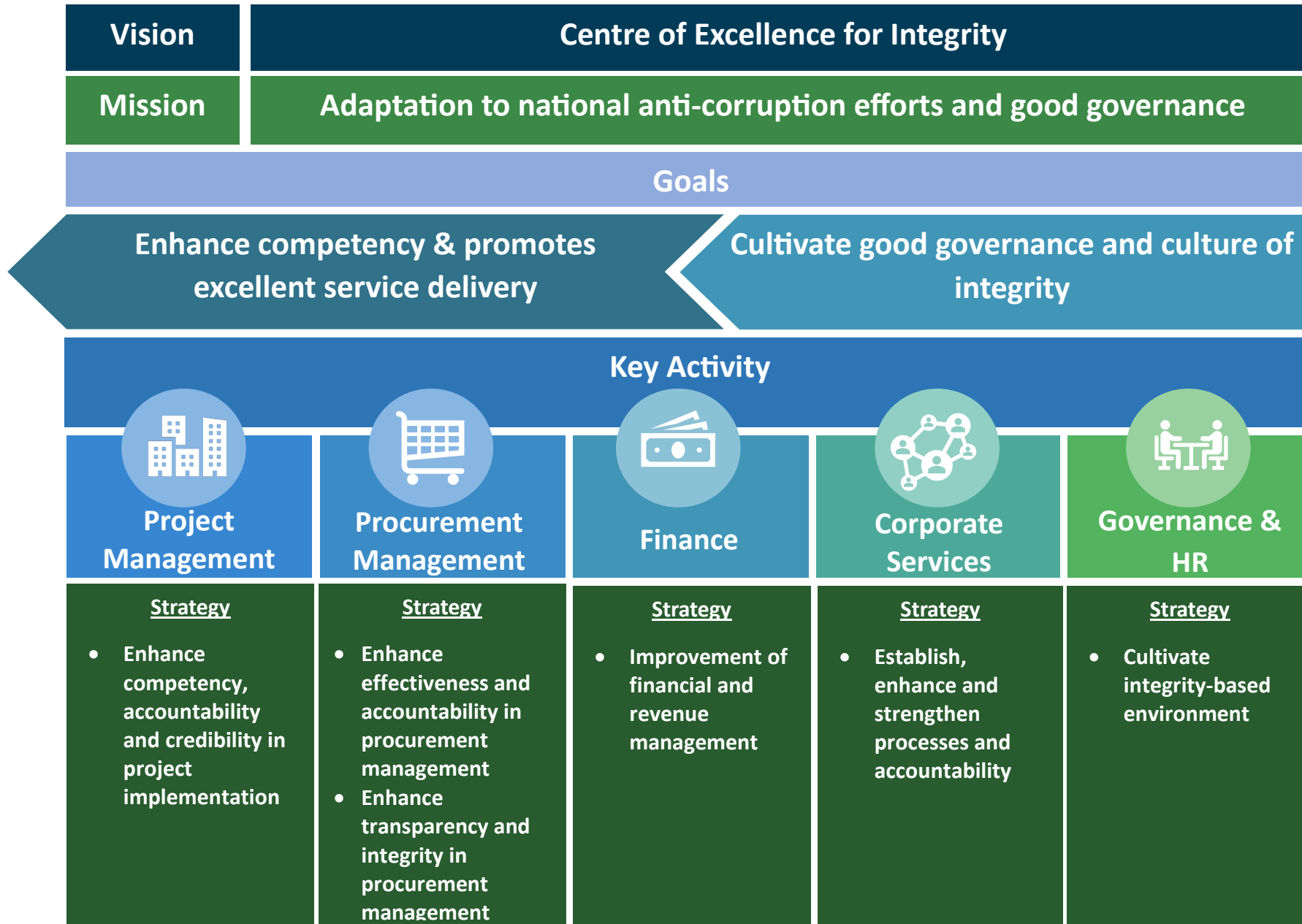
This Mid-Term Review should be read together with the PAAB Anti-Corruption Plan 2021 – 2024 .

CHAPTER 2

- SUMMARY MID-TERM REVIEW
- ACTION PLAN & INITIATIVE



FRAMEWORK PAAB ACP



MID-TERM REVIEW PAAB ACP

SUMMARY



Implementation of PAAB ACP

Key Activity: Project Management

Strategy 1: Enhance competency, accountability and credibility in project implementation				
Strategic Objective: Implement and deliver project efficiently, with quality and cost effective				
Ref.	Initiatives	Department	Timeline	Status
1.1	Conduct stakeholder engagement for issue management.	COO's Office	2 years Jan 2022 – Dec 2023	Ongoing
1.2	Conduct port-mortem on completed project.	PMD, SPD, FPD	1 year 3 months Jan 2022 – Mar 2023	Completed
1.3	Enhance Guideline for Project Management Division Work Flow Manual to reduce weakness in governance, integrity and anti-corruption.	PMD	1 year 3 months Oct 2021 – Dec 2022	Completed
1.4	Ensure Contractor / Consultant Performance Assessment is conducted consistently and more accurately / transparent.	PMD, SPD	1 year Oct 2021 – Sept 2022	Completed

Key Activity: Procurement Management

Strategy 2: Enhance effectiveness and accountability in procurement management				
<u>Strategic Objective:</u> Strengthen procurement framework				
Ref.	Initiatives	Department	Timeline	Status
2.1	Establish guideline on due diligence prior to engagement.	TED	1 year Jan 2022 – Dec 2022	Completed
2.2	Enhancement in management of confidential information.	COMD	1 year Jan 2022 – Dec 2022	Completed
2.3	Enhance check and balance in verification of documents.	CD	1 year 3 months Oct 2021 – Dec 2022	Completed
2.4	Enhance knowledge and skills in procurement management.	COMD	1 year 3 months Oct 2021 – Dec 2022	Completed
2.5	Establish referral guideline on how to address letters of support in tender process.	TED	1 year 3 months Oct 2021 – Dec 2022	Completed
2.6	Enhancement of Integrity Pact in evaluation and decision-making process.	TED	1 year 3 months Oct 2021 – Dec 2022	Completed
2.7	Establish "Do's and Don'ts" guidelines for consultant and PAAB employees.	COMD	1 year 3 months Oct 2021 – Sept 2022	Completed
2.8	Enhance checklist for approval on procurement (OPEX).	PD	1 year Jan 2022 – Dec 2022	Completed

Key Activity: Procurement Management

Strategy 3: Enhance transparency and integrity in procurement management.

Strategic Objective: Improve monitoring and compliance to the existing policies and procedures

Ref.	Initiatives	Department	Timeline	Status
3.1	Enhancement of Procurement Manual and promotion of awareness on procurement process	COMD	1 year 3 months Oct 2021 – Dec 2022	Completed
3.2	Enhancement of restricted access for Evaluation Room.	ADMIN	1 year Oct 2021 – Sept 2022	Completed
3.3	Expand on the implementation of e-procurement.	PD	2 years 6 months Jan 2022 – June 2024	Ongoing
3.4	Monitoring on the procurement of supply and services.	PD	1 year Jan 2022 – Dec 2022	Completed
3.5	Provide adequate tender box.	TSD	9 months Oct 2021 – June 2022	Completed
3.6	Review of LOA (new projects) for potential incorporation of Corporate Liability requirement.	TED	1 year Jan 2022 – Dec 2022	Completed
3.7	Establish integrity kit to vendor.	IGD	1 year Jan 2022 – Dec 2022	Completed

Key Activity: Finance

Strategy 4: Improvement of financial and revenue management				
Strategic Objective: Increase efficiency, transparency and compliance				
Ref.	Initiatives	Department	Timeline	Status
4.1	Review existing SOP (Accounts) to enhance control and check and balance for detection of fraudulent item.	AD	1 year Jan 2022 – Dec 2022	Completed
4.2	Quarterly reconciliation of Project cost vs Good Received and Invoice Received (GRIR) report.	AD	1 year Jan 2022 – Dec 2022	Completed
4.3	Preparation of Quarterly Accrual Report	AD	1 year Jan 2022 – Dec 2022	Completed
4.4	Enhancement and reinforcement of Discretionary Authority Limit (DAL)	AD	1 year 3 months Oct 2021 – Dec 2022	Completed
4.5	Enhance policy and procedure with Project Team on the current system and procedure in PRMS.	RMD	1 year Jan 2022 – Dec 2022	Ongoing
4.6	Implementation of robust system to monitor end to end project implementation to lease rental charging.	RMD	3 years Jan 2022 – Dec 2024	Ongoing
4.7	Enhancement of SOP for Investment.	TD	1 year 3 months Oct 2021 – Dec 2022	Completed

Key Activity: Corporate Services

Strategy 5: Establish, enhance and strengthen processes and accountability

Strategic Objective: Ensure process effectiveness and compliance to procedures and legal requirements.

Ref.	Initiatives	Department	Timeline	Status
5.1	Awareness on SOP for Corporate Communication Activities to key personnel.	CCD	1 year Jan 2022 - Dec 2022	Completed
5.2	Enhance existing Policy for Confidentiality and Personal Data Protection and conduct awareness on policy.	LD	1 year Jan 2022 - Dec 2022	Completed
5.3	Awareness on IT Data Security and Integrity.	ITD	2 years Jan 2022 - Dec 2023	Ongoing
5.4	Gear towards digitalization of processes and reporting (by Phase).	ITD	3 years Jan 2022 - Dec 2024	Ongoing
5.5	Systematic monitoring and updates of PAAB policies, procedure and guideline to ensure its relevant and effectiveness.	QA	2 years Jan 2022 - Dec 2023	Ongoing

Key Activity: Governance & Human Resource

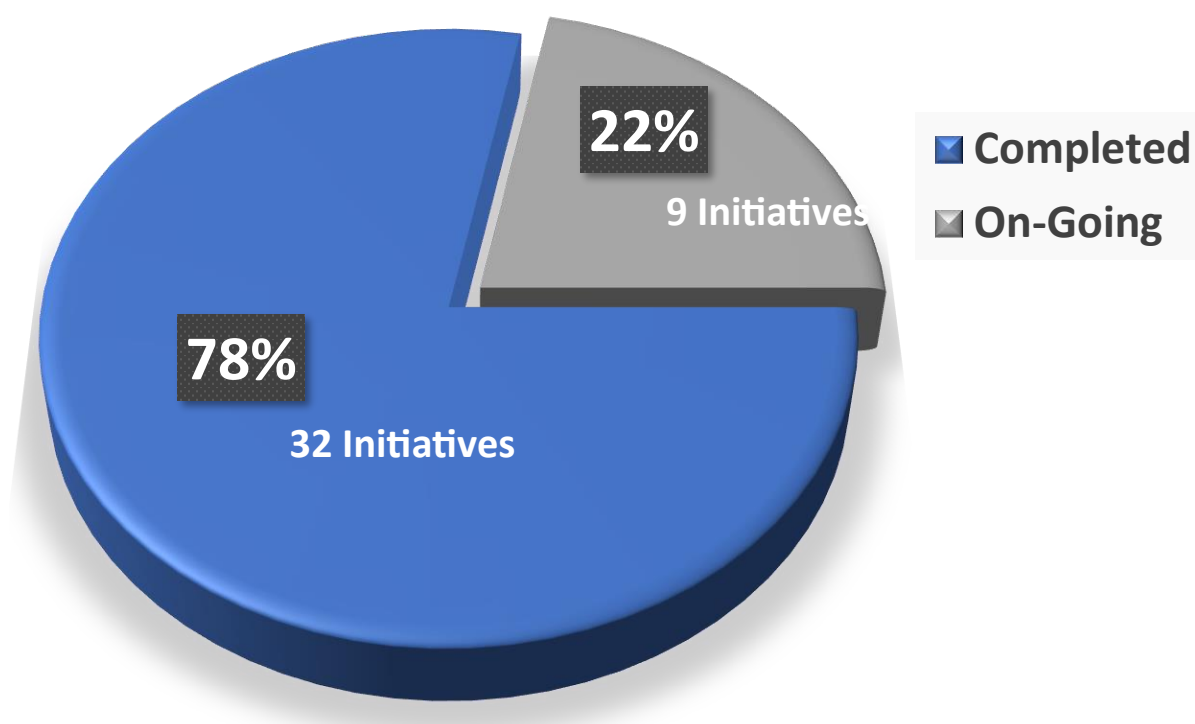
Strategy 6: Cultivate integrity-based environment				
Strategic Objective: Elevate employee integrity, accountability and competency				
Ref.	Initiatives	Department	Timeline	Status
6.1	Promotion of awareness on Human Resource Policies and Procedure.	HR	1 year 3 months Oct 2021 – Dec 2022	Completed
6.2	Enhance decisive punitive action, monitoring and supervision.	HR	1 year 3 months Oct 2021 – Dec 2022	Completed
6.3	Promote Awareness on the following during Employee Re-Orientation Programme: - Employee Discipline - Grievance Procedure	HR	1 year 3 months Oct 2021 – Dec 2022	Completed
6.4	Competency development in line with job requirements.	HR	2 years Jan 2022 – Dec 2023	Ongoing
6.5	Promotion of whistleblowing channel.	IGD	1 year 3 months Oct 2021 – Dec 2022	Completed
6.6	Promotion and enforcement of policies and procedures related to integrity, governance and anti-corruption.	IGD	9 months Oct 2021 – June 2022	Completed
6.7	Continuous implementation of integrity strengthening programmes.	IGD	9 months Oct 2021 – June 2022	Completed

Key Activity: Governance & Human Resource

Strategy 6: Cultivate integrity-based environment				
<u>Strategic Objective</u>: Cultivate good governance				
Ref.	Initiatives	Department	Timeline	Status
7.1	Enhancement of performance evaluation for employee promotion for better transparency and fair.	HR	1 year 3 months Oct 2021 – Dec 2022	Completed
7.2	Establishment of procedure and implementation on job rotation	HR	2 year 3 months Oct 2021 – Dec 2023	Ongoing
7.3	Certification for MS ISO 37001 Anti-Bribery Management System.	IGD	1 year Apr 2022 – March 2023	Completed

ACHIEVEMENT of PAAB ACP

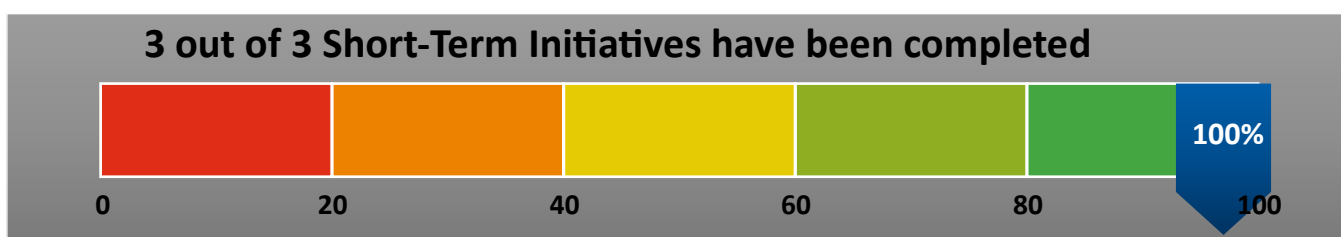
Overall Analysis of Initiatives Progress for Year 2021 – 2023 (Until 30 June 2023)



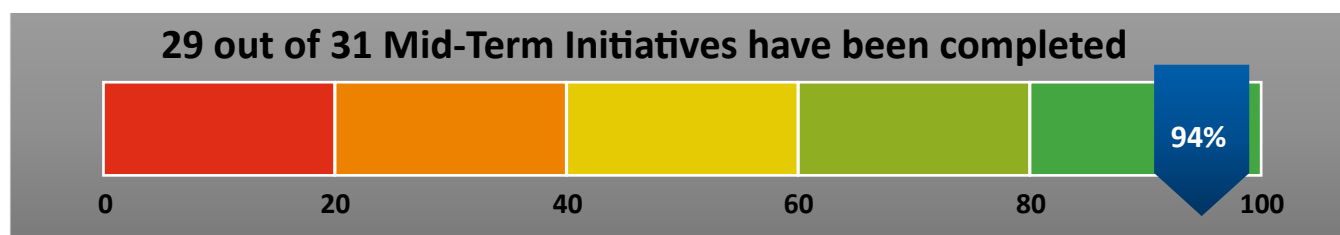
Key Business Process	Completed			On-going	Total
	2021	2022	2023	2023	
Project Management	0	2	1	1	4
Procurement	0	13	1	1	15
Finance	0	5	0	2	7
Corporate Services	0	2	0	3	5
Governance & HR	3	4	1	2	10



Short-Term Initiatives (6 Months – 1 Year)



Medium-Term Initiatives (1 – 2 years)



MID-TERM REVIEW PAAB ACP

SUMMARY

After Mid-Term Review



Key Activity : Procurement Management (Revised)

Strategy 3: Enhance transparency and integrity in procurement management.				
Strategic Objective: Improve monitoring and compliance to the existing policies and procedures				
Ref.	Initiatives	Department	Timeline	New Timeline
3.3	Expand on the implementation of e-procurement.	PD	2 years 6 months Jan 2022 – June 2024	3 Years Jan 2022 - Dec 2024



Key Activity : Finance (Revised)

Strategy 4: Improvement of financial and revenue management					
Strategic Objective: Increase efficiency, transparency and compliance					
Ref.	Initiatives	Department	New Department	Timeline	New Timeline
4.5	Enhance policy and procedure with Project Team on the current system and procedure in PRMS.	RMD	CEO's Office	1 year Jan 2022 – Dec 2022	2 years 6 months Jan 2022 - June 2024



CHAPTER 3

• MONITORING & EVALUATION



MONITORING MECHANISM

1

- Any changes and amendment to the initiatives (if any) will be reviewed and approved on a yearly basis by PAAB's Board of Directors (BOD). Progress updates shall be periodically discussed at BOD level using available platform such as BOD meetings and Integrity & Compliance Committee (ICC) meetings.

2

- Overall implementation of PAAB ACP is also updated on quarterly basis during "Jawatankuasa Anti-Rasuah" (JAR) Meeting at Ministry level.

3

- IGD as the Secretariat for OACP, shall monitor, assess and report on the status of implementation, effectiveness and incorporate suggestions for improvement during ICC meeting and BOD meeting.

4

- Monitoring on the progress of action plan / initiatives shall also be deliberate at engagement session with respective Division / Department Meeting and OACP Committee Meeting. Each Division / Department report updates IGD on the status of each initiative on quarterly basis.

EVALUATION MECHANISM

1

- Employee state of awareness on corruption, governance and integrity matters determines their cooperation in reporting of any misconduct. This can be observed using existing complaint channel, survey methods and focus group engagement.

2

- Statistics on disciplinary record / corruption cases. Continuous absence of misconduct related to corruption cases shall serve as an indicator that PAAB ACP is successfully implemented and managed to drive change in the organization.

3

- Reduction in gap in internal control framework can be assessed through audit surveillance. By reducing the gap, weakness in integrity, governance and corruption matters can be addressed proactively.

CHAPTER 4

• APPRECIATION



Sincere gratitude and appreciation to:

Integrity & Compliance Committee

**Datuk Suzana Atan
Nor Yati Ahmad
Dato' Ir. Nor Hisham Mohd Ghazali**

PAAB Management

**Ir. Zulkiflee Omar
Ir. Zainal Nagin
Mohamad Mohamad Nor
Mohd. Fauzi Omar
Ir. Shamsunazaruddin Shah Mohd Salleh
Rozaiffee Abu Zaharim
Zulhayati Yahya**

OACP Committee

**Azila Azhar
Hani Hurainie Saidi
Siti Farah Husna Adam Sani
Zubir Baharon
Che Wan Hasnawati Aiza Che Wan Ahmad**

OACP Secretariat

**Nurafifah Islahiyyah Mohd Fazil
Nor Aznira Abd Aziz
Muhamad Adham Gul Bin Khalib
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