



Pengurusan Aset Air

PAAB **ANTI-CORRUPTION** STRATEGY 2025-2027





Pengurusan Aset Air

PENGURUSAN ASET AIR BERHAD

19th Floor, Menara Felda,
Platinum Park, No.11 Persiaran KLCC,
50088 Kuala Lumpur

CHAIRMAN'S STATEMENT

Integrity is the foundation of our reputation and success. It involves doing the right thing even when no one is watching, being honest and transparent in all our dealings, both internally and externally. Integrity guides us to make decisions that are not only legally sound but also ethically strong. It's about being consistent and fair, and treating everyone with respect and dignity. As leaders and team members, we need to be role models of integrity, setting the tone for our entire organization.

Governance is the framework that supports our integrity. It encompasses the systems, processes, and principles that ensure we operate responsibly and ethically. Effective governance provides clarity and accountability, ensuring that we manage our resources wisely, comply with legal and regulatory requirements, and uphold the highest standards of ethical behaviour.

At PAAB, our commitment towards integrity and governance is reflected in our policies, culture, and our daily practices. We have implemented rigorous compliance programs, ethical training, and robust reporting mechanisms to support our values. Integrity and governance are dynamic concepts that continuously evolve over time. It adapts to the changing social, economic, and regulatory landscapes, reflecting the shifting values and expectations of stakeholders. As organizations strive to uphold ethical standards and effective governance practices, PAAB must remain vigilant and responsive to new challenges, ensuring our integrity practices align with current trends and best practices. Embracing this evolution is essential for fostering trust, accountability, and long-term sustainability within any organization.

The launching of National Anti-Corruption Strategy (NACS) 2024 - 2028 which replaces National Anti-Corruption Plan (NACP) 2019-2023, is a national anti-corruption strategy that reflects the people's high hopes for a corruption-free country, based on the principles of integrity, transparency, and accountability. As a Government-Linked Company, PAAB supports the MADANI Government aspiration to improve the Corruption Perception Index (CPI) by implementing strategies to further enhance internal control, application of information technologies in business operations and diversify corruption prevention programmes.

Thank you for your dedication, hard work and unwavering commitment to these fundamental principles. Together, we will continue to lead with integrity, govern with responsibility and pursue excellence in all our endeavours.

YBhg. Dato' Seri Ir. Jaseni Maidinsa
Chairman



STATEMENT OF COMMITMENT

PAAB Anti-Corruption Plan (PAAB ACP) was first developed in 2021 as a comprehensive plan integrating efforts to strengthen governance, integrity, and anti-corruption controls. PAAB ACP consists of 41 initiatives designed to both implement effective measures and prepare PAAB for Adequate Procedures. These initiatives were strategically developed to enhance our operational integrity, ensure compliance with regulatory standards, and promote a culture of transparency and accountability within the organization. By implementing these measures, PAAB aims to strengthen its commitment to preventing corruption and fostering ethical practices in all areas of its operations.

On 7 May 2024, our Prime Minister YAB Datuk Seri Anwar Ibrahim has launched the National Anti-Corruption Strategy (NACS) 2024-2028, which emphasises on the effectiveness of anti-corruption efforts to improve governance and integrity in public service administration. In conjunction with the launch of this NACS, PAAB took a proactive step by developing PAAB Anti-Corruption Strategy 2025-2027 (PAAB ACS) 2025-2027 to support the Government's efforts. PAAB ACS 2025-2027 outlines four (4) core strategies to strengthen governance in effort to prevent corrupt practices in the organisation, and is a continuation from the PAAB Anti-Corruption Plan (PAAB ACP 2021 – 2024). The implementation of these strategies will be closely monitored to ensure their effectiveness. This evaluation process will involve regular assessments and feedback mechanisms to track progress, identify challenges, and make informed adjustments as needed. Continuous monitoring is essential to guarantee that we achieve the intended objectives and uphold our commitment to excellence.

PAAB proudly supports the (NACS) and pledges to implement all necessary measures to prevent, detect, and address corruption within our operations. This includes but not limited to:

- Establishing and enforcing strict anti-corruption policies and practices.
- Promoting a culture of ethical behaviour and zero tolerance for corruption at all levels of our organization.
- Ensuring that our employees, partners, and stakeholders are aware of their roles and responsibilities in combating corruption.
- Cooperating fully with relevant authorities and stakeholders to support the national efforts against corruption.
- Providing regular training and resources to empower our teams to identify and report corrupt activities.

We believe that by committing to these strategies, we are not only safeguarding the reputation and sustainability of our business but also contributing to a more just and transparent society.



Ir. Zulkiflee Omar
Chief Executive Officer



Azila Azhar
Head of Integrity & Governance Department

PAAB'S VISION

Centre of Excellence

MISSION STATEMENT



PROVIDE CREATIVE SOLUTIONS AND NURTURE COST RECOVERY IN THE NATIONAL WATER SERVICES INDUSTRY

Recognising the challenges faced by the national water services industry, PAAB strives to provide tailored creative solutions to help nurture cost recovery in the national water services industry.

REVITALISE THE NATIONAL WATER SERVICES INDUSTRY THROUGH EFFICIENT DELIVERABLES

PAAB is committed towards provision of efficient deliverables to its stakeholders which in turn, helps revitalise the national water services industry.

CULTIVATE TALENT AND EXPERTISE TO MEET FUTURE INDUSTRY DEMAND

PAAB endeavours to attract, cultivate and retain the right talent, expertise and skillset in its drive towards fulfilling the prevalent aspiration of the national water services industry.

VALUE CREATION FOR STAKEHOLDERS THROUGH OPTIMUM OPERATION

In cognisance of the various challenges and limitations faced by PAAB, it is critical to ensure PAAB creates value for its stakeholders by allocating the right balance of resources.

EXECUTIVE SUMMARY

The PAAB Anti-Corruption Strategy 2025-2027 is a comprehensive initiative aimed at enhancing integrity, accountability, and transparency within PAAB's operations. This strategy underscores the organization's dedication to ethical governance and the eradication of corruption through a structured approach that builds public trust and strengthens organizational credibility. By focusing on robust governance, compliance enhancements, and stringent oversight mechanisms, PAAB seeks to establish a culture of zero tolerance for corruption across all levels.

The strategy focuses on four (4) core strategies: Cost efficient to eliminate corruption opportunities through streamlined processes, Digitalization for improved transparency and data-driven monitoring, Strengthened Internal Controls to ensure compliance and deter misconduct, and Stakeholder management to meet their expectation.

To ensure accountability and measure progress, the strategy incorporates robust monitoring, evaluation, and reporting mechanisms, enabling ongoing assessment and continuous improvement. With this proactive strategies, PAAB aims to reduce corruption incidents, build stakeholder trust, and align with global anti-corruption standards, positioning itself as a leader in ethical governance.



PAAB operate at the highest level of ethical behaviour governed by the PAAB Code of Conduct & Business Ethics (COBE)

ABBREVIATION

AD	Account Department
AMD	Asset Management Department
ADMIN	Administration Department
CCD	Corporate Communications Department
CD	Contract Department
CEO's OFFICE	Chief Executive Officer's Office
COO's OFFICE	Chief Operating Officer's Office
COMD	Commercial Division
DMT	Design Management & Technical Department
FPM	Financial Project Management Department
HR	Human Resource
HSSE	Health Safety Security Environment Department
ICC	Integrity & Compliance Committee
IGD	Integrity & Governance Department
ITD	Information Technology Department
LD	Legal Department
LMD	Land Management Department
PD	Planning Department
PPD	Project Delivery Division
PROC	Procurement
QADM	Quality Assurance & Document Management Department
RM	Risk Management
RMD	Revenue Management Department
STO	Strategy and Transformation Office
SPD	Special Project Department
TED	Tender Evaluation Department
TCF	Treasury & Corporate Finance Department
TSD	Tender Secretariat Department
T&ED	Technology & Engineering Division
T&I	Technology & Innovation Department



TABLE OF CONTENTS

01

Chairman's Statement	i-vi
Statement of Commitment by CEO & HIGD	
Our Vision & Mission	
Executive Summary	
Abbreviation	

02

Chapter 1 - Introduction	1-9
Background of PAAB Anti-Corruption Strategy (ACS 2025-2027)	
Key Highlight PAAB Anti-Corruption Strategy (ACS 2025-2027)	
PAAB's Journey in Fostering a Culture of Integrity	

03

Chapter 2 - Approach in developing PAAB ACS	10-15
Approach	
Risk Assessment Process	
Internal Stakeholder Engagement - PAAB ACS Workshop 2024	
PAAB ACS Framework	

04

Chapter 3 - Key Strategies	16-21
PAAB Anti-Corruption Strategy 2024-2027	

05

Chapter 4 - Implementing, Monitoring & Evaluation Mechanism	22-25
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06

Chapter 5 - Conclusion & Appreciation	26-30
--	--------------

07

Q&A	31
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Pengurusan Aset Air



CHAPTER 1

INTRODUCTION



BACKGROUND OF PAAB ANTI-CORRUPTION STRATEGY

The establishment of NACS is an important component of Malaysia's reform agenda, as it outlines the overall core strategies for preventing corruption in Malaysia. The strategy aims to address the root causes of corruption, improve governance, and enhance the effectiveness of anti-corruption efforts. The NACS is founded on five (5) key pillars: Education, Public Accountability, Voice, Enforcement, and Incentive. The strategies outlined in NACS focuses on the effectiveness of corruption prevention efforts, in addition to improving governance and integrity in the administration of public services and government-related companies. The launch of this NACS is a continuation and enhancement of National Anti-Corruption Plan (NACP) which began in 2019.

MALAYSIA'S SCORE

YEAR	SCORE ¹
2019	53
2020	51
2021	48
2022	47
2023	50

Note: 1. 100 (very clean) to 0 (highly corrupt)



The decrease in Malaysia's Corruption Perception Index (CPI) score from 53 in 2019 to 50 in 2023 highlights a growing concern about corruption at the national level. For organizations like Pengurusan Aset Air Berhad (PAAB), we recognize that effort to combat corruption require cooperation from all parties. Hence, there is a critical need for intensified anti-corruption efforts and a strong emphasis on ethical service delivery. PAAB can focus on implementing robust anti-corruption policies, promoting transparency, enhancing accountability, and cultivating a culture of integrity among employees and stakeholders. By taking a proactive stance, PAAB can help improve public confidence, enhance institutional integrity, and contribute to Malaysia's broader efforts to combat corruption.

The establishment of the PAAB Anti-Corruption Strategy reflects the company's commitment to promoting integrity, transparency, and good governance within its operations. As a key player in Malaysia's water industry, PAAB oversees significant financial and operational responsibilities, which makes it essential to address corruption risks and deter unethical practices.

The core goals of the PAAB Anti-Corruption Strategy include:

01

Fostering a Culture of Integrity

Ensuring that employees, management, Board of Directors and business associates adhere to ethical principles.

Strengthening Internal Controls

Developing robust mechanisms to identify, monitor, and mitigate corruption risks.

02

03

Collaboration with Stakeholders

Engaging with government authorities, contractors, business associates and the public to ensure fair and transparency in all business operation.

Compliance with Laws and Regulation

Align the strategy with national regulations, including the Malaysian Anti-Corruption Commission Act 2009 (MACC Act).

04



By pursuing these goals, PAAB aims to create a sustainable framework that ensures ethical governance, promotes culture of integrity, minimizes corruption risks, and supports Malaysia's national anti-corruption objectives.



“**NACS 2024-2028 dilancarkan,** beri fokus terhadap keberkesanan usaha pencegahan rasuah selain **meningkatkan tatakelola dan integriti** dalam pentadbiran perkhidmatan awam serta GLC”

YAB DATO' SERI ANWAR IBRAHIM
Perdana Menteri

KEY HIGHLIGHT

PAAB ANTI-CORRUPTION STRATEGY

PAAB's anti-corruption agenda



PAAB Anti Corruption Plan
2021-2024



PAAB Integrity Kit
2022



PAAB Anti Corruption Plan
Mid-Term Review
2023

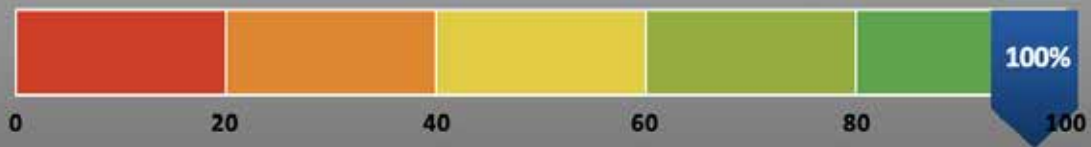
PAAB Anti-Corruption Plan (PAAB ACP 2021-2024) is a document created in response to the initiative in the National Anti-Corruption Plan (NACP), and its implementation began in August 2021. A total of 41 initiatives was registered in PAAB ACP in effort to reduce and manage risk related to governance, integrity, and anti-corruption. As part of the PAAB ACP implementation control mechanism, monitoring and reporting was conducted on a quarterly basis.

PAAB ACP 2021-2024 Achievement

Overall Analysis of Initiatives Progress for Year 2021 – 2024 (Until 30 September 2024)

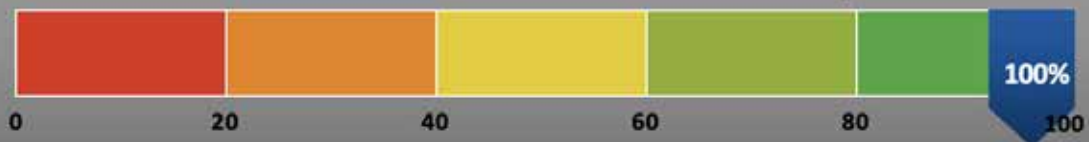
Short-Term Initiatives (6 months - 1 year)

3 out of 3 Short-Term Initiatives have been completed



Medium-Term Initiatives (1-2 years)

29 out of 29 Mid-Term Initiatives have been completed

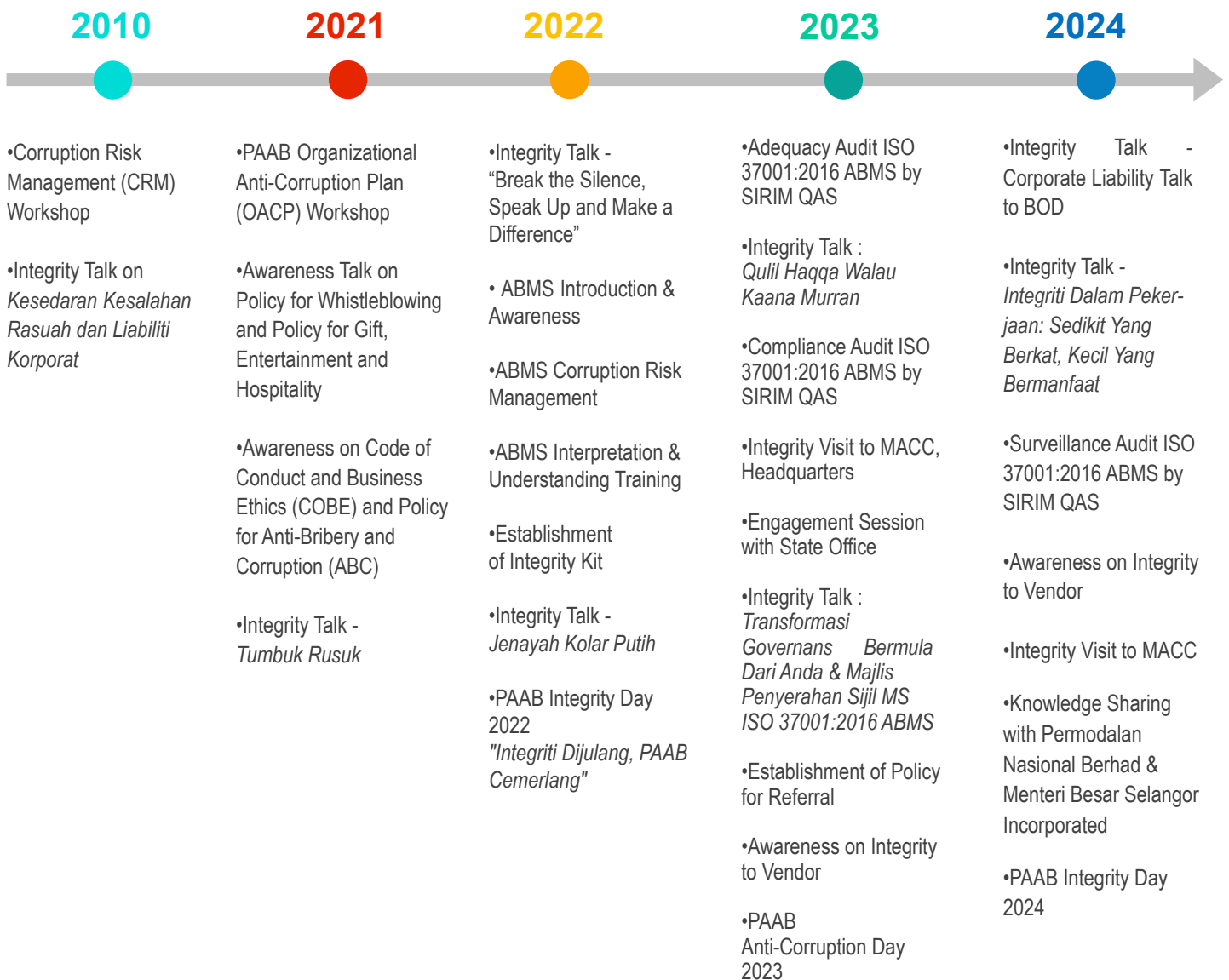
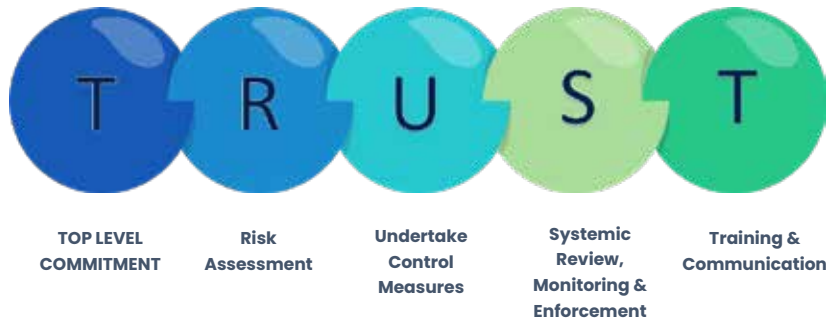


Long-Term Initiatives (2-3 years)

7 out of 9 Long-Term Initiatives have been completed



PAAB'S JOURNEY IN FOSTERING A CULTURE OF INTEGRITY





CHAPTER 2



APPROACH IN DEVELOPING PAAB ACS

APPROACH

PAAB adopted similar approach to development of the National Anti-Corruption Strategy, by analyzing and interpreting data from multiple sources internally and externally, defining and analyzing risks related to integrity, governance, and corruption. Process owners were engaged in thorough discussion to understand the root causes of risks identified, followed by assessment of it's potential impact and formulation of action plan. This approach is based on the PAAB Corruption Risk Management (CRM) framework which is aligned with the ISO 37001:2016 Anti-Bribery Management System (ABMS).

The scope included all PAAB business area which was categories under five (5) key business functions, namely Operations, Commercial, Finance, Corporate Services and Governance & Human Resource. The result of corruption risk assessment was further analyzed to concentrate on risk rated as moderate or high risks.

Developing an organization anti-corruption strategy involves implementing a comprehensive, multi-faceted approach tailored to the specific needs, risks, and context of the organization. Following pages describe the key approaches undertaken in developing strategies:

RISK ASSESSMENT PROCESS

A

RISK IDENTIFICATION

- Risk identification is a systematic process used to identify, analyse, evaluate, and treat risks that could potentially affect an organization's objectives and operations.
- Identify risks related to integrity, governance, and corruption at all business process.
- Internal and external risks: Review both operational procedures and interactions with internal and external stakeholders.
- Identify gap in internal control and formulate action plan.

B

RISK ANALYSIS

- The identified risks are analysed in more details to understand their nature, sources, and potential impacts. The purpose is to gain deeper insights into the risks and determine the level of threat each risk poses.
- Challenges in Risk Analysis are:
 - Data Limitations: Limited or inaccurate data may lead to flawed assessments.
 - Biases: Subjective judgments may lead to biases in qualitative analyses.

C

RISK EVALUATION

- The results of the risk analysis are compared against pre-defined risk criteria to prioritize and decide whether a risk is acceptable or whether further action is needed.
- It involves evaluating factors that might influence the risk's occurrence. Probabilities can be expressed qualitatively (e.g., significant, major, moderate, low).
- Decisions Made Here:
 - Accept the risk and establish an appropriate risk-financing plan.
 - Reduce the likelihood or the consequences or both
 - Avoid the risk by either deciding not to proceed with the activity that contains the intolerable risk, choosing an alternative of more acceptable activity
 - Transfer the risk, in full or in part, to another party.

D

ACTION PLAN

- Clearly defined steps that need to be taken to treat each risk.
- Assigning ownership to specific individuals or teams to carry out the tasks and setting deadlines to ensure timely implementation.
- Establishing mechanisms to track the effectiveness of the treatment, make adjustments if necessary, and ensure that risks remain within acceptable levels.

INTERNAL STAKEHOLDER ENGAGEMENT

PAAB ACS WORKSHOP 2024

PAAB ACS Workshop 2024, held on 24-25 September 2024 at Pavilion Hotel Kuala Lumpur, was a collaborative session involving personnels from key business process within PAAB including Operations, Commercial, Finance, Corporate Services, Governance and Human Resource.

PAAB ACS Workshop activities include an introduction to NACS, a briefing on data analysis, risk assessment, action plan, monitoring and reviewing mechanism, followed with presentation sessions.

The finalization of strategies and sub-strategies through collaboration between the HIGD, HODivs, HODept and C-suite executives ensures that PAAB's direction is both strategically sound and aligned with the highest standards of governance, integrity, and operational excellence.

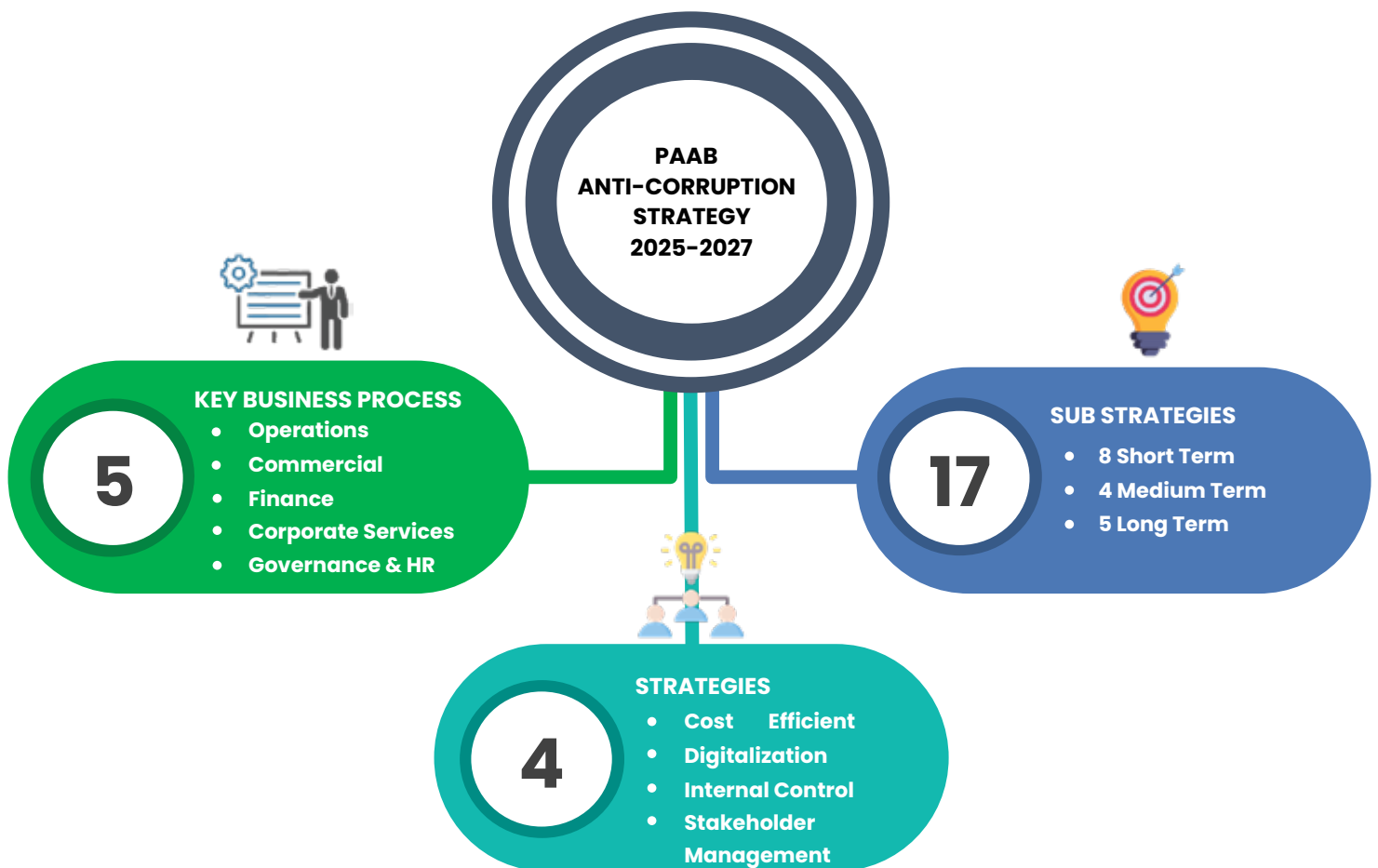


PAAB

ACS FRAMEWORK

PAAB Anti-Corruption Strategy Framework integrates best practices in governance ensuring that every level of the organization is committed to mitigating corruption risks. This is supported by 17 sub strategies to elevate the integrity and governance standards from 2025 to 2027. By integrating these sub strategies, PAAB's commitment to delivering its mandate ethically, building trust and practicing good governance demonstrates its strong support for national anti-corruption objectives. By fostering transparency, accountability, and integrity in its operations, PAAB aligns with national strategies to combat corruption, ensuring fair processes and reducing corruption risks for societal benefit.

By combining 4 core strategies which is Cost Efficient, Digitalization, Internal Control and Stakeholder Management, PAAB is targeting critical areas to ensure optimal resource utilization and accountability. This integrated approach supports transparency, minimizes risks, and ensures that ethical standards are maintained throughout operations, setting a strong foundation for organizational integrity and trustworthiness.





Pengurusan Aset Air



CHAPTER 3

KEY STRATEGIES



SUB-STRATEGIES TIMELINE



STRATEGY 1 – COST EFFICIENT

Optimize Procurement Spending to Boost Operational Effectiveness and Efficiency

NO	SUB STRATEGY	DEPT.	TIMELINE	RESPONSIBILITY	
				LEAD DEPARTMENT	SUPPORTING DEPARTMENT
1.1	Enhance Due-Diligence Process and Cost Optimization in Procurement Activities (OPEX)	Procurement Department	Short Term (1 Jan 2025 - 31 Dec 2025)	HOD PD	HOD IGD

STRATEGY 2 – DIGITALIZATION

Elevate Data Integrity and Drive Productivity through Strategic Digitalization Initiatives

NO	SUB STRATEGY	DEPT.	TIMELINE	RESPONSIBILITY	
				LEAD DEPARTMENT	SUPPORTING DEPARTMENT
2.1	Developing New E-Procurement System	Procurement Department	Long Term (1 Jan 2025 - 31 Dec 2027)	HOD PD	HOD TSD, HOD TED, HOD ITD
2.2	Implementation of Treasury Module in SAP	Information Technology Department	Short Term (2 Jan 2025 - 31 Dec 2025)	HOD ITD	HOD TCF
2.3	Establish New EDMS System	Quality Assurance & Document Management	Long Term (1 Mar 2025 - 31 Dec 2027)	HOD QADM	HOD ITD

STRATEGY 3 – INTERNAL CONTROL

Reinforce Internal Controls to Safeguard Compliance and Prevent Misconduct

NO	SUB STRATEGY	DEPT.	TIMELINE	RESPONSIBILITY	
				LEAD DEPARTMENT	SUPPORTING DEPARTMENT
3.1	Establish HSSE Audit/ Inspection Process Procedure	Health Safety Security Environment Department	Short Term (1 Jan 2025 - 31 Dec 2025)	HOD HSSE	HOD QADM
3.2	Conduct PRMS Internal Audit	Chief Executive Officer's Office	Short Term (1 Jan 2025 - 31 Dec 2025)	HOD IAD	CEO'S OFFICE, COO'S OFFICE, HODiv CSD, HOD QADM
3.3	Enhance RFQ TOR by Incorporating Clause on Collusion/Bid-rigging	Procurement Department	Short Term (1 Jan 2025 - 30 June 2025)	HOD PD	HOD IGD
3.4	Targeted Familiarization on Procurement Process During Staff Engagement	Procurement Department	Short Term (1 Jan 2025 - 31 Dec 2025)	HODiv COMD	HOD PD, HOD TSD, HOD CD, HOD TED, HOD HRA, HOD IGD
3.5	Enhance SOP for Lease Rental Charging Mechanism	Revenue Management Department	Short Term (1 Jan 2025 - 30 Jun 2025)	HOD RMD	HOD QADM
3.6	Develop E-Learning Module on Integrity and Anti-Corruption	Integrity & Governance Department	Medium Term (1 Sept 2025 - 31 Dec 2026)	HOD IGD	Training Manager
3.7	To Enhance Due-Diligence in Corporate Communication Activities and Stakeholder Engagement Procedure	Corporate Communications Department	Short Term (1 Jan 2025 - 30 Jun 2025)	HOD CCD	HOD QADM
3.8	To Develop Succession Planning Programme	Human Resource	Medium Term (1 Jan 2025 - 31 Dec 2026)	Training Manager	Training Manager

STRATEGY 4 – STAKEHOLDER MANAGEMENT

Empower Internal and External Stakeholders Towards Strengthened Good Governance Practices

NO	SUB STRATEGY	DEPT.	TIMELINE	RESPONSIBILITY	
				LEAD DEPARTMENT	SUPPORTING DEPARTMENT
4.1	Encourage Vendor to Obtain Anti-Bribery Management System Certification	Integrity & Governance Department	Medium Term (1 Jan2025 - 31 Dec2026)	HOD IGD	HOD STO
4.2	Planning and Organizing Training and Awareness on ISO Occupational Health and Safety Management System (OSHMS) and Environmental Management System (EMS)	Quality Assurance & Document Management Health Safety Security Environment Department	Long Term (1 Mar 2025 - 31 Dec 2027)	HOD QADM	HOD ITD
4.3	Readiness for Certification of Occupational Health and Safety Management System (OSHMS) and Environmental Management System (EMS)	Quality Assurance & Document Management Health Safety Security Environment Department	Long Term (2 Mar 2025 - 31 Dec 2027)	HOD QADM	HOD HSSE
4.4	Implementation of a Competency Assessment Within the Organization	Human Resource	Long Term (1 Jan 2025 - 31 Dec 2027)	Training Manager	HOD ITD
4.5	Expansion of Anti-Bribery Management System Scope	Integrity & Governance Department	Medium Term (1 Jan 2025 - 30 Sept 2026)	HOD IGD	COO's Office



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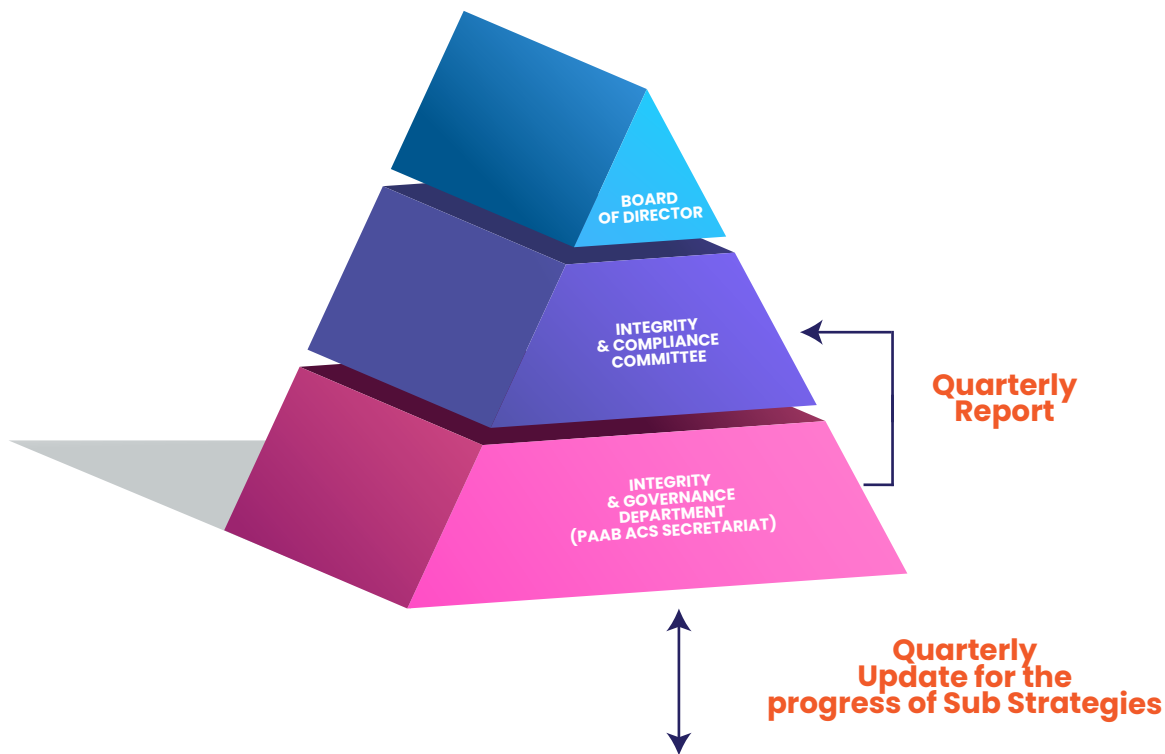


CHAPTER 4



IMPLEMENTING, MONITORING & EVALUATION MECHANISM

GOVERNANCE STRUCTURE



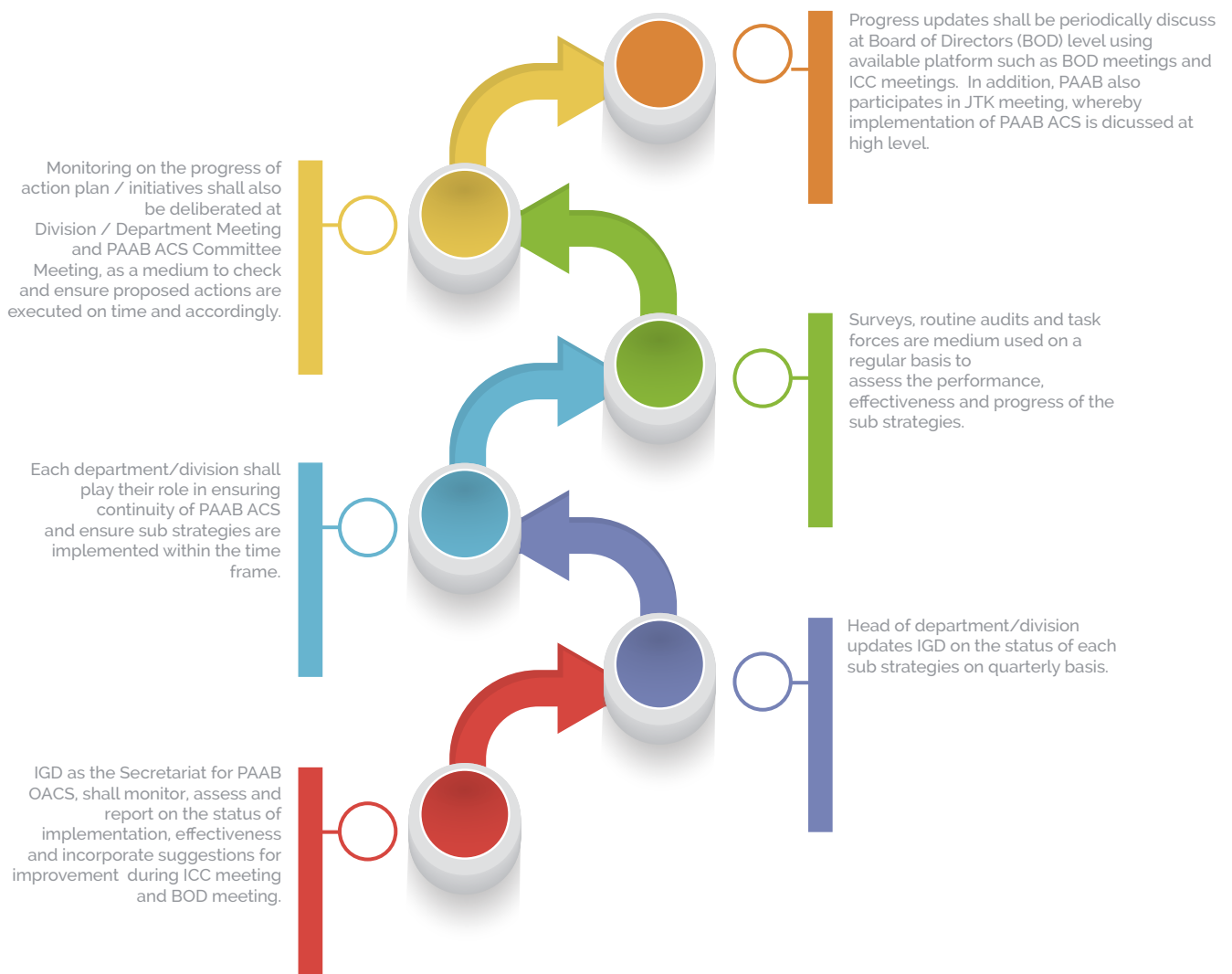
All Divisions/Departments involved in the implementation of PAAB OACS

- Operations (COO's Office, Health Safety Security Environment, Asset & Land Management Division, Technical & Engineering Division, Project Delivery Division, Special Project Division)
- Commercial (Tender Secretariat, Tender Evaluation, Contract, Procurement)
- Corporate Services (Corporate Communication, Legal, Quality Assurance & Document Management Department, Information Technology)
- Finance (Financial Project Management, Accounts, Treasury & Corporate Finance, Revenue Management)
- Governance & HR (Strategy & Transformation Office, Internal Audit, Integrity & Governance Department, Human Resource & Administration)

MONITORING MECHANISM

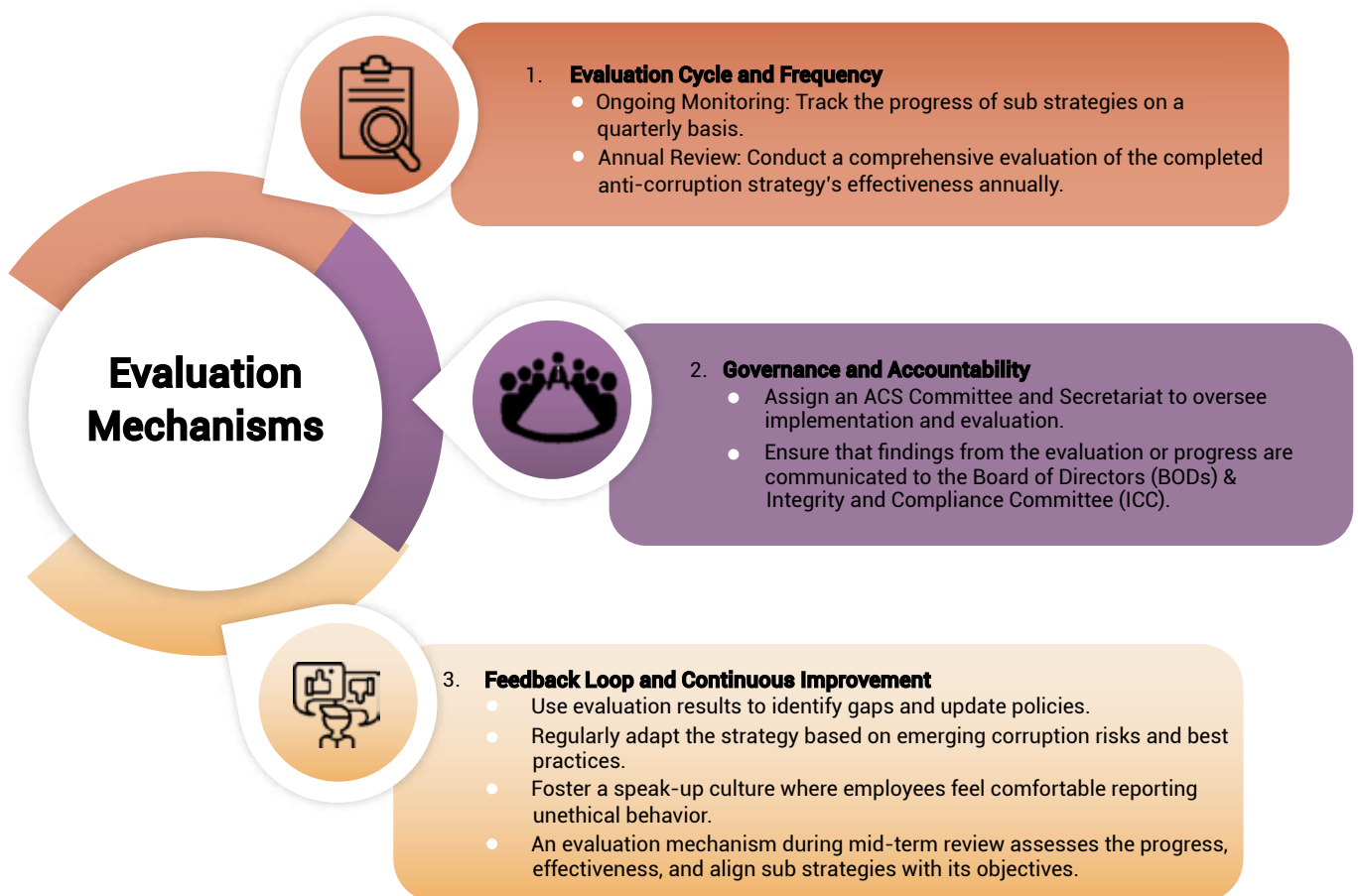
These monitoring mechanisms ensure the effective implementation of our sub strategies.

- All changes and amendments to the initiatives will be reviewed and approved annually by the PAAB's Board of Directors (BOD).
- HIGD is responsible for updating and tabulating progress of PAAB ACS sub strategies to PAAB Board of Directors (BOD) & Integrity & Compliance Committee (ICC) on a quarterly basis
- The overall implementation of PAAB ACS is updated on periodically during Jawatankuasa Tatakelola (JTK) Meeting at Ministry level.



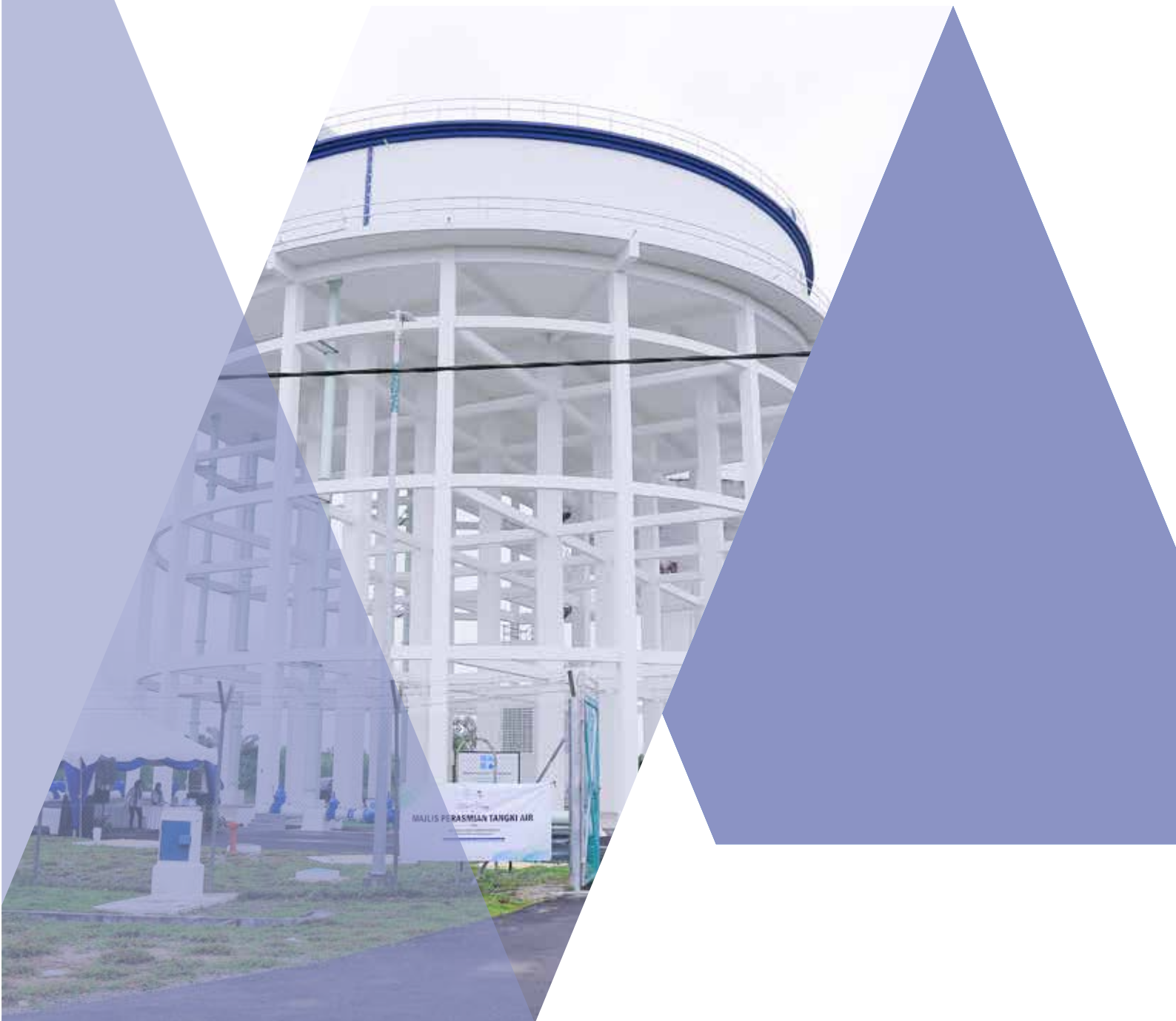
EVALUATION MECHANISMS

An evaluation mechanism for PAAB ACS ensures that efforts to prevent, detect and respond to integrity and governance are effective and aligned with best practices. Assessment on the sub strategies shall be perform using the following mechanisms:



CHAPTER 5

CONCLUSION



CONCLUSION

The success of PAAB ACS depends on continuous monitoring and evaluation, with Key Performance Indicators, audits, and feedback mechanisms providing insights into areas of improvement. It is also crucial to maintain accountability at every level of the organization, ensuring that anti-corruption efforts are not merely symbolic but result in real behavioral and operational changes.

We believe that through the commitment of leadership, the vigilance of employees, and the support of partners, we can create a work environment where ethical behavior is the norm, and corruption has no place. Our aspiration is for these efforts to not only mitigate risks but also serve as a model of responsible business conduct within our industry.

The 17 sub strategies outlined in this ACS is not just based on a compliance requirement, but a long-term investment in our reputation, sustainability, and the well-being of all those we serve. PAAB's anti-corruption strategies focus on optimizing resource use through Cost Efficient, enhancing transparency via Digitalization, safeguarding against fraud with strong Internal Control and Stakeholder Management to ensure accountability and reduce opportunities for corruption.

Together, through continuous improvement and collaboration, we hope to create lasting positive change and ensure that the values of honesty and fairness guide every decision we make.



Integrity & Governance Department would like to express our heartiest appreciation and special thanks to those who have contributed in the development of the PAAB ACS 2025 - 2027

OUR APPRECIATION

PAAB Board of Directors

Integrity and Compliance Committee

PAAB Leadership Team

- **Ir. Zulkiflee Omar – Chief Executive Officer**
- **Zaleha Abdul Hamid – Chief Financial Officer**
- **Ir. Abdul Samad Sulaiman – Chief Operating Officer**
- **Mohamad Mohamad Nor – Head of Commercial Division**
- **Rozaifee Abu Zaharim – Head of Corporate Services Division**
- **Ir. Zainal Nagin – Head of Asset & Land Management Division**
- **Zulhayati Yahya – Head of Human Resource & Administration Division**
- **Mohd Fauzi Omar – Head of Technical & Engineering Division**
- **Ir. Shamsunazaruddin Shah Mohd Salleh – Head of Project Delivery Division**
- **Johari Sinal @ Zainal – Head of Special Projects Division**

PAAB ACS Committee

- **Azila Azhar – Integrity and Governance Department**
- **Hani Hurainie Saidi – Financial Project Management Department**
- **Che Wan Hasnawati Aiza Che Wan Ahmad – Procurement Department**
- **Siti Farah Husna Adam Sani – Legal Department**
- **Hafsah Hairudin – Land Management Department**

PAAB ACS Secretariat (Integrity and Governance Department)

- **Nurafifah Islahiyyah Mohd Fazil**
- **Muhamad Adham Gul Bin Khalib**
- **Afzal Alamin Azmi**
- **Siti Shahirah Abd Hamid**
- **Muhammad Firdaus Ahmad Zamri**

PAAB ACS Workshop Participants

Key Business Process : Governance & Human Resource

- **Noor Ajmahin Jamiah Jalil, Chairman Office**
- **Abdullah Azzam bin Mohd Norman, Strategy and Transformation Office**
- **Muhammad Syahmi Zakaria, Internal Audit**
- **Muhammad Mahendra, Internal Audit**
- **Norasyikin Abu Bakar, Company secretary**
- **Azila Azhar, Integrity and Governance**
- **Nurafifah Islahiyyah Mohd Fazil, Integrity and Governance**
- **Muhamad Adham Gul Khalib, Integrity and Governance**
- **Afzal Alamin Azmi, Integrity and Governance**
- **Siti Shahirah Abd Hamid, Integrity and Governance**
- **Muhammad Firdaus Ahmad Zamri, Integrity and Governance**
- **Muhamad Harith Naim Ishak, Human Resource – Compensation and Benefits**
- **Mohd Azlee Abdullah, Human Resource – Recruitment & Employee**
- **Mohd Hanafi Jamiat, Human Resource – Training & Development**
- **Rosdin Roslee, Administration**

Key Business Process : Operations

- **Muhammad Iqram Bin Zulkifli, Chief Operating Officer Office**
- **Huzir Rizal bin Mokhtar, Health, Safety, Security & Environment**
- **Muamar Shakir Shafuridin, Asset Management**
- **Hafsah Hairudin, Land Management**
- **Ir. Shamsunazaruddin Shah Mohd Salleh, Project Delivery**
- **Zubir Baharon, Project Delivery**
- **Wan Norhafizah Wan Hasnan, Planning**
- **Anwar Asyhraff Rosli, Planning**
- **Mohd Amirul Rashid Bin Mohd, Technology & Innovation**
- **Wong Soon Pol, Design, Management & Technical**
- **Ts. Abdul Halim bin Abd Latif, Design, Management & Technical**
- **Nurul Nadia binti Shamshuddin, Design, Management & Technical**
- **Norakashah Saharil, Special Projects**
- **Nur Ain Mohd Saat, Special Projects**

Key Business Process : Procurement

- **Nur Safawati Md Salleh, Tender Secretariat**
- **Shaiful Azhar Abu Bakar, Tender Evaluation**
- **Muhamad Azlan Osman, Contract**
- **Muhamad Adib Azman, Contract**
- **Che Wan Hasnawati Aiza Che Wan Ahmad, Procurement**
- **Syahrul Nizam Jamaludin, Procurement**

Key Business Process : Corporate Services

- **Siti Farah Husna Adam Sani, Legal**
- **Abdul Zaeffri bin Abd Rahim, Legal**
- **Harvinderjit Kaur Sandhu A/P Sukhdev Singh, Quality Assurance & Document Management**
- **Syazwani Mohd Shukor, Quality Assurance & Document Management**
- **Maizah Khairuddin, Information Technology**
- **Adibah Ahmad Fuad, Information Technology**

Key Business Process : Finance

- **Hani Hurainie Saidi, Financial Project Management**
- **Norhidayah binti Adnan, Treasury & Corporate Finance**
- **Norman bin Mohd Said, Accounts**
- **Mohd Azim bin Rahmat, Revenue Management**
- **Nur Azfeera Izzaty Mohd Nizam, Revenue Management**
- **Nur Yumna Bazilah Malek, Risk Management**

Q&A

ARE WE OBLIGATED TO DEVELOP PAAB ACS?

According to NACS document, participation from private sector companies and non-governmental organizations is crucial for ensuring the successful implementation of the strategies.



HOW DO WE ESTABLISH OUR STRATEGY AND SUB STRATEGIES FOR THE DEVELOPMENT OF PAAB ACS?

We focus on high-risk areas as defined by the established risk parameters.



WHAT IS THE TIMELINE FOR COMPLETING ALL SUB STRATEGIES IN THE PAAB ACS?

To align the PAAB Anti-Corruption Strategy (PAAB ACS) framework with the three-year plan for 2025-2027, the framework will require a phased structure that balances the complexity of activities while ensuring timely completion.



WHAT MEASURES CAN WE TAKE TO ENSURE THE SUCCESSFUL IMPLEMENTATION OF ALL SUB STRATEGIES WITHIN THE PAAB ACS?

To ensure the effective implementation of all sub strategies, a structured monitoring and periodic reviews oversight by key bodies such as the Integrity and Governance Department (IGD), the Integrity & Compliance Committee (ICC), and the Board of Directors (BOD)

