



# ORGANISATIONAL ANTI-CORRUPTION PLAN

2023-2027

**PBLT**  
sdn.bhd

[www.pblt.com.my](http://www.pblt.com.my)



## MESSAGE FROM THE CHAIRMAN

Dear Warga PBLT, Business Partners and Stakeholders,

On behalf of the Board of Directors, I am pleased to present PBLT Organisational Anti-Corruption Plan (OACP). The OACP highlights our support towards the Government's effort in combating corruption through the National Anti-Corruption Plan. The development of this plan is to strengthen our governance, integrity and anti-corruption controls as proof of our commitments toward the high standard and transparent business practices.

PBLT as a whole are committed in ensuring the implementation of all the initiatives that have been planned and it is the responsibility of all parties to consistently display and adhere to a high standard of work ethics and professionalism with good behaviour and exemplary conduct to instil confidence and trust among our business partners and stakeholders.

Finally, I call on all PBLT staff, business partners and stakeholders to work together to ensure that the country is always free from corruption and misuse of power, and to serve with integrity.

Thank you.

**TAN SRI DATUK SERI (Dr) MAZLAN BIN LAZIM**  
Chairman  
PBLT SDN BHD





## COO'S STATEMENT

Dear Colleagues, Business Partners and Stakeholders,

We at PBLT firmly believe that conducting business with the highest ethical standards is not only a moral obligation but also essential for our long-term success.

It is our responsibility to ensure that every decision, transaction and interaction is conducted with integrity, transparency and accountability.

To uphold this commitment, we have developed the Organisational Anti-Corruption Plan (OACP). Series of workshop were held to ensure that the OACP accurately addresses PBLT's operating challenges. This plan outlines our strategies, policies and procedures designed to prevent, detect and address corrupt practices within our organisation. We are dedicated to creating a culture of compliance where every employee from the top leadership to the newest team member, understands and embraces their role in preventing corruption.

Corruption erodes trust, damages reputations and undermines the fundamental values that we hold dear. We view this plan as a crucial step in ensuring success and sustainability of our organisation.

I invite every member of PBLT family to actively participate in this collective effort against corruption. Let us stand united in upholding our values and creating a brighter, more ethical future for our organisation.

PBLT SDN BHD wishes to express its gratitude to the Board of Directors, Management, employees and those involved for their valuable support in the development of PBLT's OACP.

Thank you for your commitment and unwavering support.

**Sr NOR KHAIRIAH ABDUL HALIM**  
Chief Operating Officer

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# INTRODUCTION

CONTRACT

## Report Overview

This document outlines the PBLT Organisational Anti-Corruption Plan (“OACP”) for the period 2023-2027. It identifies the main corruption risks associated with PBLT’s operations and describes various initiatives and actions to mitigate these risks.

This OACP aims to meet the following objectives:



To make these actions as the basis for PBLT’s integrity and anti-corruption practice and inculcation of an ethical business culture within the organisation.



To assist PBLT in preventing, identifying and responding to corruption in a timely manner, compliance to the prevailing anti-corruption laws as well as implementation of best practices.



To assure PBLT’s management, employees, customers, partners and other stakeholders of its implementation of integrity vetting for high-risk activities and positions towards prevention of corruption in its operations.

The completed document provides a clear roadmap for PBLT’s anti-corruption initiatives over the 5-year period from 2023 to 2027, and will place PBLT on a stronger governance footing.

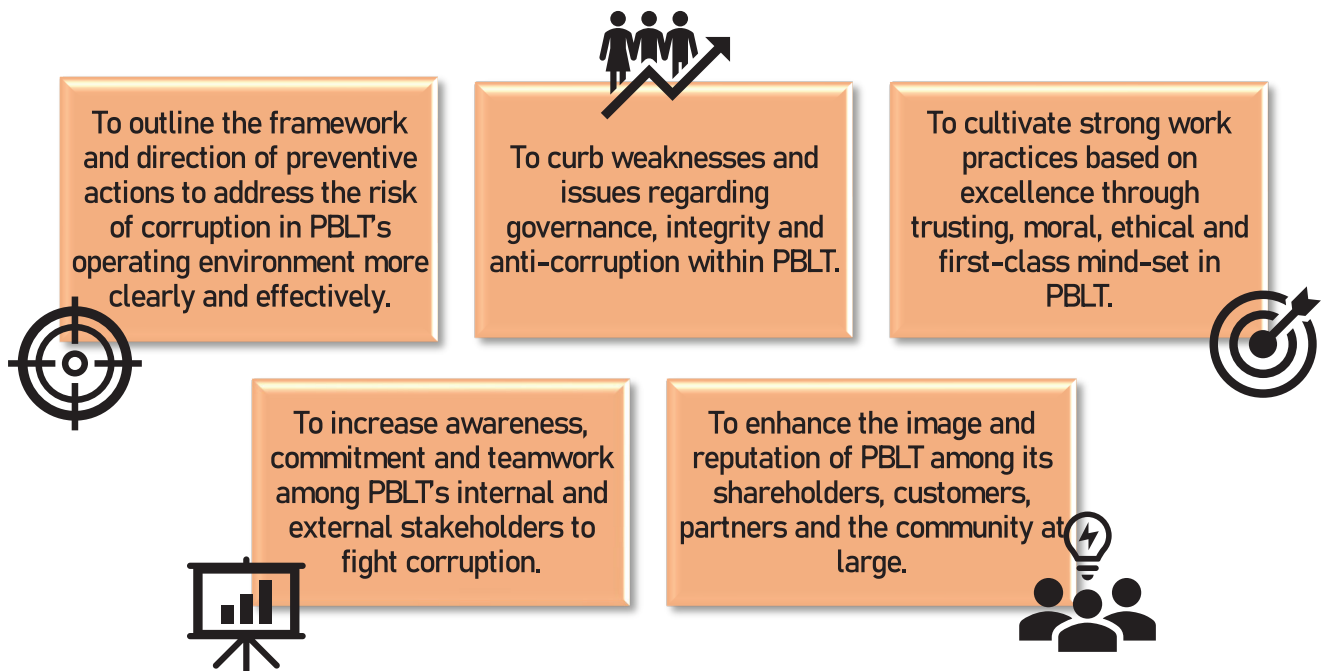
This OACP will be subject to a mid-term review to monitor the effectiveness of its deliverables and identify any possible area which may require improvements. This review will be undertaken by the Legal and Governance Department (“LGD”) in collaboration with related parties and completed during the second half of 2025.

## Executive Summary

PBLT was incorporated on 28 July 2005 as a company owned by Minister of Finance (Incorporated) to fast track the development of police quarters and facilities based on the findings and the Government's response to the 2004 Report of the Royal Commission to Enhance the Operation and Management of the Polis Di Raja Malaysia (PDRM).

From the inception until to date, PBLT has carried out development of PDRM quarters and facilities with a gross Development Cost of more than RM7.0 billion. PBLT is also actively involved in providing project management and facilities management services to PDRM, other Government agencies and Government linked companies.

As a responsible company, PBLT is committed to adopt a zero-tolerance approach against all forms of bribery and corruption in line with the National Anti-Corruption Plan. With this we developed PBLT Organisational Anti-Corruption Plan with the following main objectives:



PBLT aims to further promote human governance in its organisational practice to enhance integrity, transparency and accountability. This can only be achieved with the highest commitment and cooperation from all parties, from PBLT's Board of Directors, Management and Employees to its partners, clients and stakeholders. It is our aim that this plan will guide PBLT as we move forward towards being an organisation recognised not only for its quality, cost effective and timely completed projects but also for its strong business ethics, integrity and governance practices.



# DEVELOPMENT OF PBLT's OACP





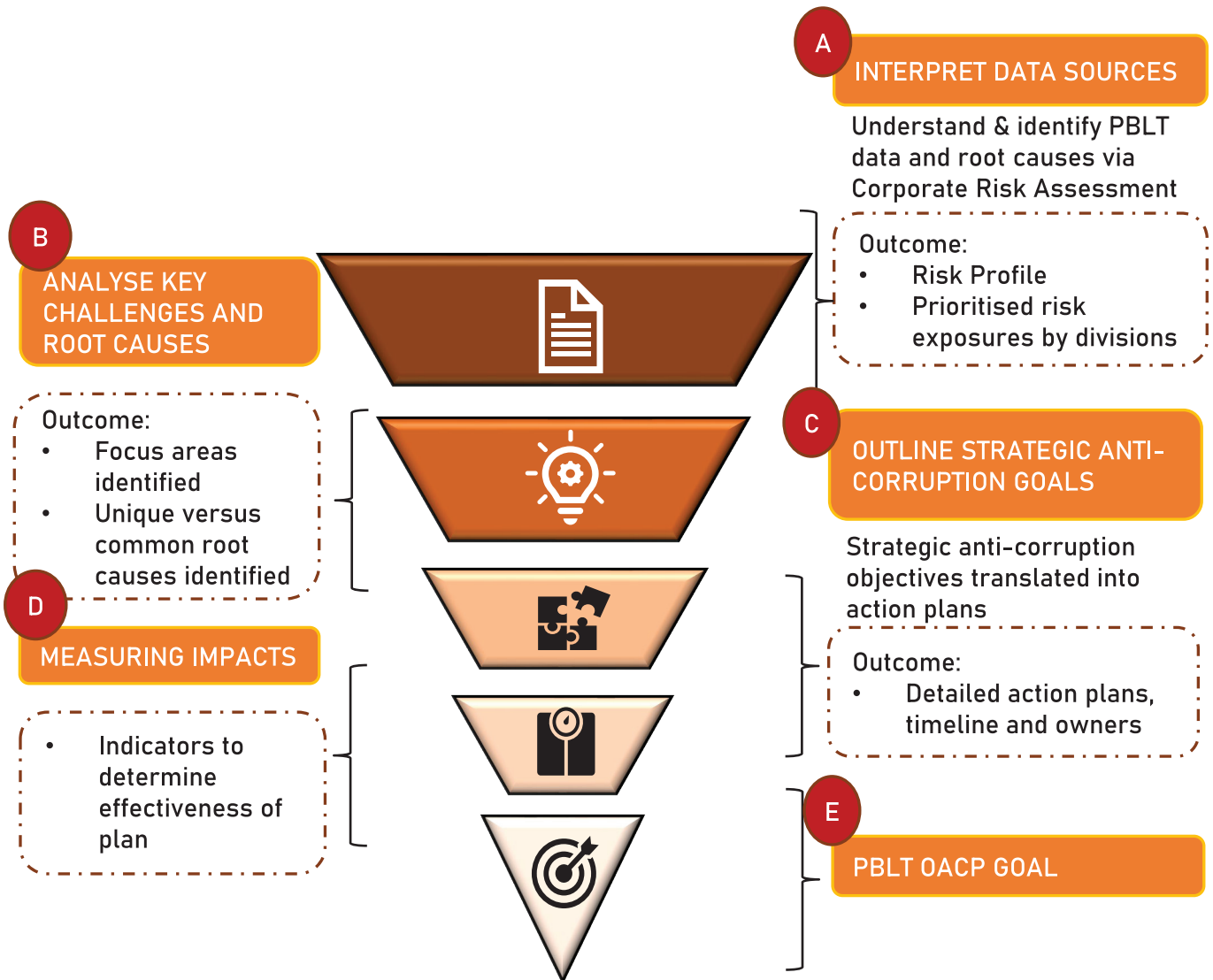
## OACP OBJECTIVES



## 7 STEP APPROACH



## KEY OACP ELEMENTS





# OACP FRAMEWORK

## PBLT OACP FRAMEWORK YEAR 2023-2027

It describes PBLT's vision and mission statements together with its strategic themes and results. This is followed by the 4 priority areas together with its associated anti-corruption goals. The critical link is between the strategic themes (representing PBLT's business model) and the priority areas (representing the OACP initiatives).

VISION	TRUSTED PARTNER IN REALISING YOUR GOALS				
MISSION	TO PROVIDE INNOVATIVE AND SUSTAINABLE INFRASTRUCTURAL SERVICES EMPLOYING THE BEST TECHNOLOGY				
CORE VALUES	QUALITY	INTEGRITY	PEOPLE	ACCOUNTABILITY	SAFETY
PRIORITY AREAS	Financial Management	Customer and Partner Management	Business Process	Organisation Culture	
STRATEGIC ANTI-CORRUPTION GOALS	Goal # 1 Improving Efficiency and Transparency in Financial Management	Goal # 2 Strengthening Accountability and Transparency in Managing Customers and Partners	Goal # 3 Strengthening Accountability and Integrity in Business Process	Goal # 4 Empowering Good Governance Practices in PBLT	
INITIATIVES	3	10	5	10	
TIMELINES					
In Progress	1	1	1	2	
Short Term (2024 – 2025)	2	4	4	6	
Long Term (2026-2027)	–	5	–	2	

# TIMELINE

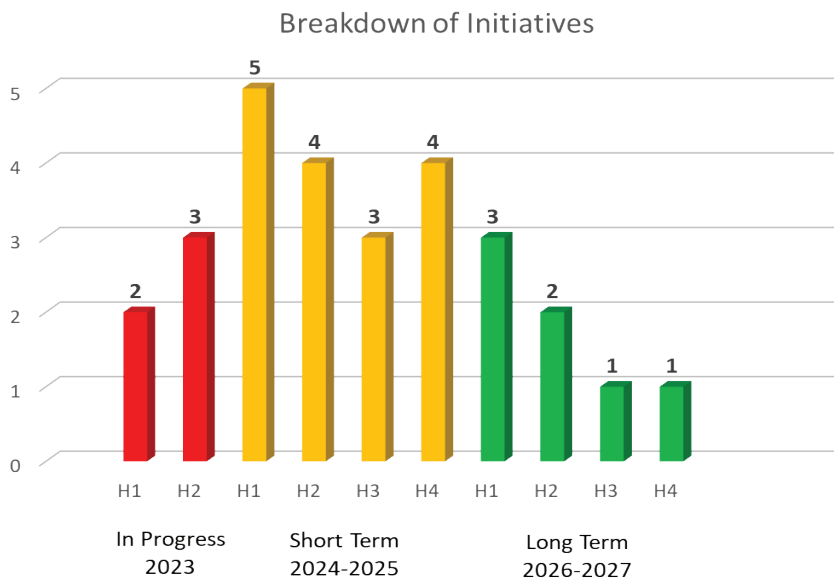
A breakdown of the 3 timelines with its related colour band is shown below:

Timeline	Implementation Period	Colour Band
In Progress	H1 2023 – H2 2023	Red
Short Term	H1 2024 – H4 2025	Orange
Long Term	H1 2026 – H4 2027	Green

These colour bands are used throughout this document to identify each timeline.

Tracking the OACP as a living document over time provides a better perspective of how the initiatives are spread over the 5-year period. As shown in table below, 16 of the 28 initiatives (57%) are Short Term, scheduled to be implemented between 2024-2025.

Timeline	In Progress	Short Term	Long Term	Total
Number of Initiatives	5	16	7	28
Overall Percentage	18%	57%	25%	100%







# IMPLEMENTATION, MONITORING & EVALUATION

## INDICATORS

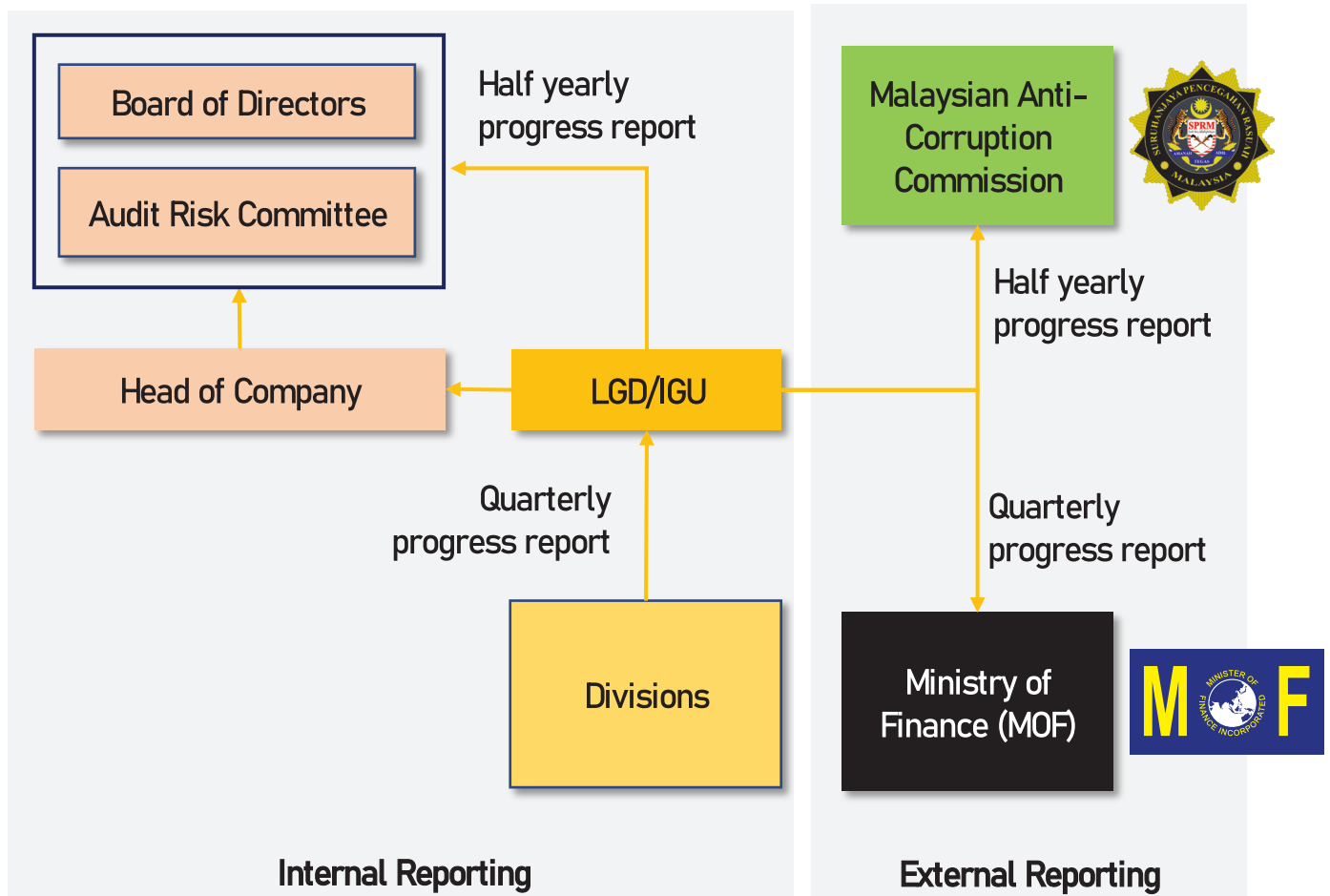
Measuring the impact of the OACP will give PBLT clear indicators as to its effectiveness. This is achieved by building in relevant indicators related to specific Anti-Corruption initiatives which can be tracked during the life cycle of the OACP. These measurements aim to show gradual and real improvements in the effectiveness and delivery of the OACP.

2 main criteria were used to identify suitable indicators:

- Measurable – it should be measurable over time, with the results subject to review for accuracy
- Related to the top 10 risks – it must address the main risks identified to show relevance and importance

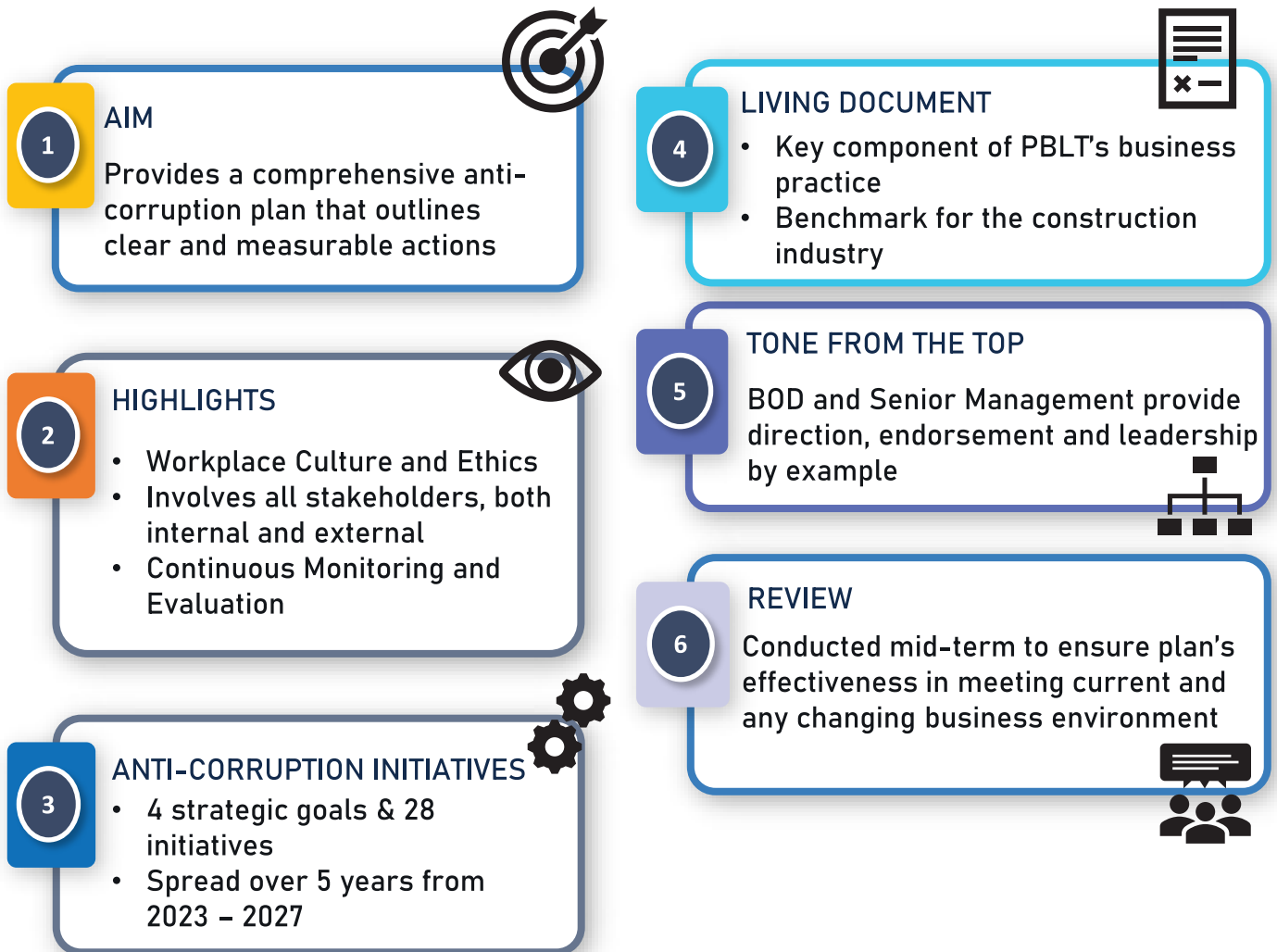
	FINANCIAL MANAGEMENT	CUSTOMER & STAKEHOLDER MANAGEMENT	BUSINESS PROCESS	ORGANISATION CULTURE
ANTI-CORRUPTION GOAL	Improving Efficiency and Transparency in Financial Management	Strengthen Accountability and Transparency in Managing Customers and Partners	Strengthening Accountability and Integrity in Business Process	Empowering Good Governance Practices in PBLT
OBJECTIVE	Eliminating corrupt practices to achieve “value-for-money” in financial management	Ensuring integrity in the service delivery process	Applying ethical values to comply with rules and regulations	Incorporating anti-corruption initiatives into the daily operations of PBLT
DESCRIPTION	<ul style="list-style-type: none"> <li>% of completion of review, enhancement, implementation and compliance of: <ul style="list-style-type: none"> <li>TOR &amp; SOP on issuance of Invoices &amp; Receipt of Payments</li> <li>SOP for Procurement &amp; Administration</li> <li>Valuation Procedures for Consultants Payment Recommendations</li> </ul> </li> <li>% of Declination of cases suspected with errors/ false claims/ overpayments</li> </ul>	<ul style="list-style-type: none"> <li>% of completion of anti-corruption education &amp; awareness programme for: <ul style="list-style-type: none"> <li>stakeholders</li> <li>Vendors/ contractors</li> <li>Consultants</li> </ul> </li> <li>Contractors &amp; Consultants - % completion of/ number of: <ul style="list-style-type: none"> <li>updating anti-bribery policy,</li> <li>anti-corruption contract clauses,</li> <li>requirements for ABMS,</li> <li>Due diligence procedures</li> <li>% number of enforcement over contractors who breach the anti-corruption clauses</li> </ul> </li> <li>Staff: <ul style="list-style-type: none"> <li>% completion of salary review</li> <li>% completion of hiring of Project Accountants and Site QS</li> <li>% of declination of cases of suspected bribery, false claims, fraud/ errors and loss documents</li> <li>% of declination of staff complaint cases / poor performance</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Corruption Risk Management <ul style="list-style-type: none"> <li>% completion of review &amp; update of CRM framework</li> <li>% completion of CRA exercise</li> <li>% of completion in updating anti-corruption policies and procedures to address corruption risks</li> </ul> </li> <li>% of completion in updating anti-corruption policies &amp; procedures: <ul style="list-style-type: none"> <li>Related to Internal Audit findings</li> <li>Gift policy – giving &amp; receiving</li> <li>Middleman &amp; support letters</li> </ul> </li> <li>Number of audits conducted to detect bribery and corruption red flags</li> </ul>	<ul style="list-style-type: none"> <li>Mid-Term Review OACP: <ul style="list-style-type: none"> <li>Status of OACP implementation (% of achievement)</li> <li>Assess Level of Integrity – maintain at Satisfactory level</li> </ul> </li> <li>Adequate Procedures Guidelines: <ul style="list-style-type: none"> <li>% of completion of adequate Procedures Guidelines</li> <li>Conduct Integrity Assessment over the overall corporate culture of PBLT – target to maintain at “Satisfactory” level</li> <li>% completion of updating whistle-blowing procedures</li> </ul> </li> <li>Employees: <ul style="list-style-type: none"> <li>Communication: <ul style="list-style-type: none"> <li>% number of reminders send to staff on code of conducts and integrity</li> </ul> </li> <li>Training: <ul style="list-style-type: none"> <li>% of staff completed mandatory anti-corruption training</li> <li>% of employees achieved the satisfactory level of understanding</li> <li>% number of staff attended financial planning course</li> </ul> </li> <li>Salary revision: <ul style="list-style-type: none"> <li>% of implementation of salary revision for certain staff levels</li> </ul> </li> <li>SOP on staff suspension: <ul style="list-style-type: none"> <li>% completion on updating SOP for temporarily staff replacement</li> </ul> </li> <li>Liaison Officer: <ul style="list-style-type: none"> <li>Appointed a Liaison Officer</li> <li>% of declination or reduced number of complains relating to Government officials</li> </ul> </li> <li>Stakeholders engagement: <ul style="list-style-type: none"> <li>% Completion of stakeholder engagement plan</li> <li>Appointment of an authorised spokesperson</li> <li>Tested stakeholder engagement plan and achieved the expected outcomes</li> </ul> </li> </ul> </li></ul>

## REPORTING STRATEGY





## SUMMARY



## JOURNEY OF ESTABLISHMENT OF OACP



## OUR APPRECIATION

1. PBLT BOARD OF DIRECTORS
2. PBLT MANAGEMENT
3. VISIONETHICS ADVISORY SERVICES SDN BHD

## PBLT OACP LAUNCHING COMMITTEE

1. MOHD HELMY MOHD YUSOFF
2. NAZIHAH MOHD RASHID
3. MUHAMMAD KHAIRUL ANWAR MANSOR
4. SITI NURSHAZWANI CHE MOHAMED HUSSEIN
5. MARLINA BAHAROM
6. HAILY AYOP
7. FAIZUL AZMAN ZAINAL ABIDIN
8. AZRINI MOHD MOHSIN
9. MOHD RASHDAN AB RASHID
10. NOOR ADILA MUHAMAD
11. ROHANI TALIB
12. MIRA EZWANY TUMINGAN
13. WAN SUZILAWATI WAN SAGAR

## PBLT OACP WORKING COMMITTEE

1. NOOR AZMAN EMBI
2. MOHD YUSOFF AWANG
3. SAHARUDIN SALIM
4. ZAIDI HARON
5. WAN SHARWANI WAN YAACOB
6. MOHD HELMY MOHD YUSOFF
7. NAZIHAH MOHD RASHID
8. NAZRI ABU SEMAN
9. WAN NORHANA WAN HAMZAH
10. BAYZULKAMA BAHAROM
11. MUHAMMAD KHAIRUL ANWAR MANSOR
12. SITI NURSHAZWANI CHE MOHAMED HUSSEIN
13. HAILY AYOP
14. FAIZUL AZMAN ZAINAL ABIDIN
15. MUHAMMAD BASHEK UMAR
16. BADRUL AMAN MOHAIDIN
17. NORAINI ABDUL RAHMAN
18. NOOR AZIRA ABDUL RAHMAN
19. SALFARINA ABDUL MALEK



OACP Launching | 23.08.2023