**INTEGRITY POLICY**

TNB Integrated Learning Solution, ILSAS does not tolerate bribery. Bribery means as an act of giving or receiving of any gratification corruptly with the intention of influencing the behavior of someone to obtain or retain a commercial advantage.

**ANTI-BRIBERY POLICY**

**OBJECTIVE**

To state TNB ILSAS’s position on bribery and related matters, and to establish key pillars in its structure to protect the company against the impact of bribery.

**SUMMARY**

Bribery in all its forms related to TNB ILSAS’s activities is prohibited. It is the responsibility of Personnel at all levels to act with integrity. TNB ILSAS’s holds a ‘No Gifts’ policy, although certain exceptions are allowed. Integrity Pledges must be signed by Personnel on a regular basis, as well as a Conflict of Interest declaration. Business Associates acting on behalf of the company must be managed carefully. Reporting of misconduct by Personnel or third parties is expected, with protection provided for all disclosers acting in good faith. The company is committed to enforcing its position, with the Anti-Bribery Compliance Function and Business Support Quality and Communication taking on this role. The Anti-Bribery Management System will be assessed and updated on a regular basis to ensure its effectiveness is maintained.

[***Click here for Anti-Bribery Policy***](2.%20Clause%205%20-%20Leadership/ILSAS%20Policy%20statement%20English%20A%5b105887%5d.pdf)

**CONFLICT OF INTEREST POLICY**

**OBJECTIVE**

To establish TNB Integrated Learning Solution, ILSAS’s position on Conflicts of Interest, the company’s expectation that Personnel at all levels should declare any conflicts as they arise, and state the sanctions for non-compliance.

**SUMMARY**

It is the policy of TNB ILSAS that the disclosure and management of Conflicts of Interest is the responsibility of its Personnel at all levels. All potential, perceived and actual conflicts are to be declared in a timely manner and managed using the mechanisms provided by the company. Primary responsibility for managing the declaration lies with the person’s own Manager, with support provided by Human Resource Unit (HRM) and the Anti-Bribery Compliance Function. Sanctions for non-compliance can be severe, depending on the nature of the declared conflict and its impact on the company.

[***Click here for declaration conflict of interest form***](4.%20Caluse%207%20-%20Support/ILSAS%20Conflict%20of%20Interest%20Disclosure%20Form.pdf)

[***Click here for Integrity Pack Form***](4.%20Caluse%207%20-%20Support/Integrity%20Pact%20Form.pdf)

[***Click here for Integrity Pledge Form***](4.%20Caluse%207%20-%20Support/ILSAS%20Integrity%20Pack%20and%20Commitee%20Integrity%20Pledges%20Form.pdf)

**WHISTLEBLOWING POLICY**

**OBJECTIVE**

To establish secure and confidential reporting channels, ensure whistleblower protection, and provide guidelines on managing reports to their conclusion in an effective and timely manner.

**SUMMARY**

TNB ILSAS expects Personnel at all levels to report concerns they may have on any behaviour they observe in relation to the company’s activities via the channels established for this purpose. External parties encountering misconduct as they work with TNB ILSAS Personnel are likewise expected to report their concerns through the designated channels. Protection will be provided to all parties acting in good faith.

[***Click here for whistle blowing policy***](5.%20Clause%208%20-%20Operation/8.9%20Whistleblowing%20Policy.pdf)

**REPORTING IN GOOD FAITH**

Under the Whistleblower Policy, TNB ILSAS provides an avenue for all employees and stakeholders of TNB ILSAS to disclose any wrongdoings or irregularities with regard to TNB ILSAS business operations.

TNB ILSAS expects all parties to act with integrity and have reasonable grounds when making a report. TNB ILSAS will not entertain any reports with malicious intent.

**PROTECTION FROM RETALIATION AND REPRISAL**

TNB ILSAS provides assurance to the whistleblower that he/she would be protected from retaliation or reprisal. All complaints reported to TNB ILSAS are treated in strict confidence. The whistleblower’s identity will not be revealed unless it is required by law.

**REPORTING CHANNEL**

The complaint is preferably in writing, submitted by hand, via post or email, to ensure that there is a clear understanding about the issues raised.  The report should be sealed in an envelope if sent via post with “Private and Confidential” indicated and addressed to **Integrity Officer via:**

* Call 019-2685295 (Integrity Officer) from Monday to Friday during office hours (8.00 am to 5.15 pm)
* Email to Nizam.mohamad@tnb.com.my
* In writing to Integrity officer, TNB Integrated Learning Solutions Sdn Bhd, KM7 Jalan Ikram-Uniten, 4300 Bandar Baru Bangi, Selangor
* Fill in the whistle blowing form

**Whistleblower Protection Act 2010**

In the event that there are discrepancies between this policy and the Whistleblower Protection Act 2010, the Act shall prevail.

**GIFTS, HOSPITALITY AND RELATED BENEFITS POLICY**

**OBJECTIVE**

To delineate the difference between a gift and a bribe, and provide guidance on the acceptable behaviour for company Personnel at all levels with respect to gifts, hospitality and related benefits. Expectations of external parties are also stated.

**SUMMARY**

TNB ILSAS holds a ‘No Gifts’ policy. However, there are some exceptions allowed, provided no Conflict of Interest arises and decision-making behaviour is not influenced. Likewise, normal business hospitality is permitted but must not be so frequent or extravagant that sense of obligation is created on the side of the receiver. Festive hampers are discouraged and are to be refused wherever possible. Discounts for staff by External Providers must be provided transparently as part of a general agreement between the Provider and TNB ILSAS. Facilitation payments must not be made. Charitable donations and sponsorships must be made transparently and for the general well-being of the company and the communities it serves. Political contributions are prohibited.

***[Click Here For Gift, Hospitality And Related Benefit Policy](5.%20Clause%208%20-%20Operation/8.7%20Gifts,%20Hosp%20&%20Related%20Benefits%20Policy.pdf)***