



KEMENTERIAN PERDAGANGAN DALAM NEGERI  
DAN KOS SARA HIDUP



SURUHANJAYA SYARIKAT MALAYSIA  
COMPANIES COMMISSION OF MALAYSIA

# CORPORATE CODE OF ETHICS

COMPANIES COMMISSION OF MALAYSIA

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

At SSM, we recognise that our mission to ensure compliance with business registration and corporate legislation, as well as our commitment to fostering positive developments in the corporate and business sectors, can only be achieved through responsible, transparent and ethical conduct.



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# CHIEF EXECUTIVE OFFICER'S MESSAGE



**In the heart of this publication lies the acknowledgment that integrity and ethics must be at the forefront of our work at SSM.**

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Assalamualaikum dan Salam Sejahtera.

As the Chief Executive Officer of the Companies Commission of Malaysia (SSM), I am honoured to introduce SSM's Corporate Code of Ethics. In the pages that follow, you will discover a framework that underlines our commitment to the highest standards of integrity, ethics and anti-corruption practices.

At SSM, we recognise that our mission to ensure compliance with business registration and corporate legislation, as well as our commitment to fostering positive developments in the corporate and business sectors, can only be achieved through responsible, transparent and ethical conduct. This publication represents our collective pledge to uphold these values.

The chapters within this handbook articulate our core values and principles, provide definitions for key terms and outline our robust Anti-Corruption Plan for 2019-2023. It dives deep into the SSM Anti-Bribery Management System, elucidating the responsibilities and



obligations of our Commission Members, SSM Management, SSM Officers, SSM Club, SSM Cooperatives and Stakeholders.

Our journey continues with a commitment to compliance with laws and regulations, addressing conflict of interest, the prohibition of external support and influence and a clear stance against accepting gifts, no matter how well-intentioned they might be. We also emphasise the importance of our Internal Policy, which encourages a culture of transparency and accountability.

In the heart of this publication lies the acknowledgment that integrity and ethics must be at the forefront of our work at SSM. It is our collective responsibility to protect our organisation from corruption and unethical practices. By adhering to the principles outlined in this handbook, we maintain our commitment to being an exemplary corporate citizen.

I would like to express my gratitude to everyone who has been involved in the development and implementation of these policies. Your dedication reflects

the spirit of our organisation and your contributions are invaluable.

May this handbook serve as a guide and a source of inspiration as we collectively endeavour to nurture a corporate culture founded on integrity, ethics and a commitment to upholding the highest standards of governance. Together, we can continue to build an environment where transparency and ethical conduct prevail, benefitting not only our organisation but society at large.

Thank you for your unwavering commitment to SSM and for being a vital part of this journey.

Sincerely,

**YBHG. DATUK NOR AZIMAH BINTI**

**ABDUL AZIZ**

**Chief Executive Officer**

**Companies Commission of Malaysia**

# INTRODUCTION AND PURPOSE

**At its core, this Corporate Code of Ethics is more than just a document; it is a pledge to uphold the highest standards of conduct, an acknowledgment of the responsibilities that come with serving the public and a testament to our unwavering dedication to transparency and accountability.**

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In a world marked by constant change and complexity, the role of government agencies is pivotal. These organisations are entrusted with a wide array of responsibilities, ranging from regulatory oversight to public service delivery. Within the intricate tapestry of government bodies, Companies Commission of Malaysia (SSM) stands as a distinguished entity. As the regulatory body for companies, limited liability partnership and businesses in Malaysia, SSM plays a crucial role in shaping the nation's corporate landscape.

As part of its mission to ensure the highest standards of corporate governance and ethical behaviour, SSM is pleased to introduce this Corporate Code of Ethics. This comprehensive document is designed to serve as a guiding light for all stakeholders engaged with SSM, encompassing Commission Members, SSM Cooperatives, suppliers and every individual and organisation that interacts with us.

The inception of the SSM's Corporate Code of Ethics marks a milestone in our journey towards enhanced transparency,

accountability and integrity. It lays the foundation for a common understanding of the values and principles that underpin our operations and interactions, reinforcing our commitment to good governance and ethical conduct.

In the pages that follow, we will delve into the objectives and significance of this publication, explore the vital role of ethical conduct within SSM and discuss the responsibilities of different stakeholders.

At its core, this Corporate Code of Ethics is more than just a document; it is a pledge to uphold the highest standards of conduct, an acknowledgment of the responsibilities that come with serving the public and a testament to our unwavering dedication to transparency and accountability.

Together, we will embark on a journey that strengthens the trust our stakeholders place in us, fosters a culture of ethical excellence and ensures that SSM continues to be a beacon of integrity in the realm of corporate governance.

Welcome to the SSM Corporate Code of Ethics, where principles meet practice and ethics shape our legacy.



# COMPLIANCE WITH SSM'S CORPORATE CODE OF ETHICS

**Compliance is the embodiment of SSM's devotion to ethical behaviour and the cornerstone upon which trust is nurtured within the organisation and among stakeholders.**

---

Compliance with a Corporate Code of Ethics is not a mere formality. It is a fundamental commitment to ethical behaviour that underpins the essence of an organisation. It is through adherence to this code that an organisation truly exemplifies its dedication to the values that uphold its reputation, build trust among stakeholders and secure its long-term success. The following sections elucidate the imperatives of compliance, responsibilities and the far-reaching impact that adherence to this code can have.

## **Upholding Ethical Culture: The Ethical Imperative**

This Corporate Code of Ethics serves as a compass for all engaged with SSM, pointing them toward a collective ethical north. It is a manifestation of SSM's unwavering commitment to uphold the highest ethical standards, fostering a culture where integrity, transparency and respect become ingrained in every facet of the organisation.

Compliance with this code transcends mere rules. It is the embodiment of SSM's devotion to ethical behaviour and the cornerstone upon which trust is nurtured within the organisation and among stakeholders.

## **The Mandate of Compliance**

All Commission Members, SSM Management, SSM Officers, SSM Club, SSM Cooperatives and Stakeholders must not merely acknowledge the principles and requirements contained within this Corporate Code of Ethics but also diligently adhere to them. Furthermore, they are expected to take reasonable steps to ensure that other individuals or groups conducting business on behalf of SSM, including suppliers, vendor representatives, contractors, agents, consultants and other business partners, also comply with these principles.

This mandate of compliance is integral to the fundamental mission of SSM to serve as a paragon of corporate governance. Compliance is not a passive acknowledgment but an active commitment to ethical conduct

and the principles enshrined in this code.

## **Legal and Regulatory Adherence: Navigating the Ethical Landscape**

Adhering to this Corporate Code of Ethics is inextricably linked with compliance with all relevant laws, regulations and industry standards. It is a clarion call to navigate the intricate labyrinth of corporate governance with unwavering integrity. This publication is designed to provide clear guidance on how to reconcile the often-complex web of legal obligations and ethical responsibilities, ensuring that the path taken is not only lawful but also ethically sound.

## **Reporting Mechanisms: A Pillar of Accountability**

Transparency and accountability are the cornerstones of an ethical organisation. Considering this, SSM is committed to providing clear and accessible reporting mechanisms for potential violations of the Corporate Code of Ethics. Whistleblower channels, incident reporting procedures and

ethical conduct reporting avenues are established to encourage individuals to come forward when they encounter potential breaches of this code. These mechanisms are not just safeguards; they are manifestations of SSM's commitment to accountability, transparency and ethical responsibility.

In summary, this Corporate Code of Ethics is not a mere bureaucratic document. It is a strategic tool that can fundamentally transform SSM's culture and conduct. By fostering a culture of ethics and ensuring unwavering compliance with this code, SSM, can reap numerous benefits. These advantages span from the internal domain of workplace culture to

the external realm of stakeholder relationships and the overarching goals of a responsible and sustainable business environment.

**By fostering a culture of ethics and ensuring unwavering compliance with this code, SSM, can reap numerous benefits.**

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## OUR CORE VALUES

**These values, rooted in collaboration, customer-centricity, continuous learning, a culture of excellence and unwavering integrity, collectively illuminate the path for us.**

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In the ever-shifting landscape of the business world, governmental agencies play a pivotal role in maintaining order and integrity. SSM aspires to set a benchmark for good corporate governance and integrity in the Malaysian business environment.

In its capacity as the corporate registrar, SSM bears the essential duties of upholding compliance with the legal requirements that fall under its purview and protecting the interests of a wide spectrum of stakeholders.

This Corporate Code of Ethics doesn't merely exist on paper; it embodies the very essence of SSM's identity and serves as the foundation on which the organisation is built.

As we embark on a journey through the core values of SSM, we delve into the heart of this esteemed organisation. These values, rooted in collaboration, customer-centricity, continuous

learning, a culture of excellence and unwavering integrity, collectively illuminate the path for us. They guide our pursuit of providing outstanding services, driving innovation and ensuring ethical conduct. These values reflect not just what SSM does but who we are.

## Collaboration

At the core of SSM's identity lies a deep commitment to collaboration. We recognise that our strength multiplies when we work together with our partners. By fostering trust and credibility through meaningful collaborations, we empower one another to deliver value that extends far beyond the confines of our organisation. Together, we serve our stakeholders better and uphold the principles of integrity that define us.

## Customer Centric

As advocates of good corporate governance, we are firmly committed to prioritizing the needs of our customers. We acknowledge that our customers,

be they business entities or individuals, are at the heart of our mission. With respect as our guiding principle, we aim to provide them with the highest quality of service. We view their success as intertwined with ours and we strive to enhance their experience through our actions and advice.

## Continuous Knowledge and Skill Enhancement

As an organisation, we wholeheartedly encourage the continuous growth of our employees. The world is in perpetual motion and we understand the importance of adaptability and innovation.

Therefore, we empower our workforce to enhance their competencies, skills and knowledge. Emphasizing the pursuit of continuous learning, we promote creativity and quality, always striving for improvement.



## Culture of Excellence

In our quest for excellence, we set our standards high and commit ourselves to exceed them. We are relentless in our pursuit of enhancing the quality, efficiency and productivity within our organisation. Excellence is not just a goal; it is a way of life at SSM. We recognise and reward superior results, fostering an environment where dedication and achievement are celebrated.

## Integrity

One of our most fundamental and unwavering values is integrity. We commit to upholding superior work ethics, a commitment that resonates harmoniously with SSM's code of ethics. In every facet of our duties, we embrace the essence of integrity, ensuring that we act professionally, responsibly and ethically.

We do so because integrity is the bedrock upon which trust is built and trust is the currency of our relationships with all our stakeholders.

As we conclude our exploration of SSM's corporate values, we are reminded of the significance of these guiding principles. These values go beyond words; they define our identity and our aspirations. Our commitment to collaboration, customer focus, continuous learning, excellence and unwavering integrity is what distinguishes us.

# Our Core Values

These values, rooted in collaboration, customer-centricity, continuous learning, a culture of excellence and unwavering integrity, collectively illuminate the path for us. They guide our pursuit of providing outstanding services, driving innovation and ensuring ethical conduct. These values reflect not just what SSM does but who we are.

1

**Collaboration**



2

**Customer Centric**



3

**Continuous Knowledge  
and Skill Enhancement**



4

**Culture of Excellence**



5

**Integrity**



## CHAPTER 4

# DEFINITIONS

**These definitions serve as the foundation upon which our corporate code of ethics is built, providing guidance to all commission members, SSM Management, SSM Officer, SSM Club, SSM Cooperatives, suppliers and stakeholders of SSM.**

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In the pursuit of maintaining the highest standards of integrity, transparency and ethical conduct within SSM, it is crucial to establish a clear understanding of key terminologies and roles. These definitions serve as the foundation upon which our corporate code of ethics is built, providing guidance to all commission members, SSM Management, SSM Officer, SSM Club, SSM Cooperatives, suppliers and stakeholders of SSM.



**Commission**

Refers to the Companies Commission of Malaysia (SSM) established under Section 3 of the Companies Commission of Malaysia Act 2001 (Act 614).

**Chairman**

Refers to the Chairman appointed by the Minister under Section 6 of the Companies Commission of Malaysia Act 2001 (Act 614).

**Commission Member**

Member refers to Commission Members, including the Chairman of SSM.

**Family Member**

Means the interpretation referred to in Section 15 (5) (a) of the Companies Commission of Malaysia Act 2001 (Act 614), includes the interpretation of 'sibling' under section 3 of the Malaysian Anti-Corruption Commission Act 2009 (Act 694).

**Associate**

Means the interpretation referred to in Section 15 (5) (b) of the Companies Commission of Malaysia Act 2001 (Act 614), includes the interpretation of 'partner' under section 3 of the Malaysian Anti-Corruption Commission Act 2009 (Act 694).

**Head of Department**

Means the Chief Executive Officer, Deputy Chief Executive Officers, Divisional Directors for the divisions in the SSM Headquarters, State Directors for SSM States and Branch Managers for SSM Branches, Senior Managers or any other person authorised in writing to act on their behalf.

**SSM Management**

Refers to the Chief Executive Officer, Deputy Chief Executive Officers, Divisional Directors, Senior Manager of Internal Audit Section, Senior Manager of Enterprise Architect Management Section, Senior Manager of Risk Management Section, Senior Manager of State Office Operations Section, Senior Manager of Integrity and Discipline Section and Senior Manager of Commission Secretary Office.

**SSM Officer**

Refers to an individual who is permanently, contractually, temporarily, or on loan to SSM and is remunerated by SSM, including an individual who is seconded to any other statutory body or any Federal Government Ministry, Department, or Agency, or any State Government Department or Agency, or any company in which the Federal Government or any State Government has an interest.

**Stakeholder**

Refers to third parties, including business associates such as vendors, contractors, subcontractors, consultants, suppliers, agents, corporations, associations, bodies, groups, or any other parties directly or indirectly related to SSM.

# SSM'S ANTI-CORRUPTION PLAN 2019 - 2023

SSM has responded to the government's call by developing the Companies Commission of Malaysia Anti-Corruption Plan 2019-2023 (SSM OACP), as outlined in the National Anti-Corruption Plan (NACP) 2019-2023. The SSM OACP was launched on 17 December 2019, with advisory support from the Malaysian Institute of Integrity (INTEGRITI) and the Malaysian Anti-Corruption Commission (MACC). Through the SSM OACP, a total of 106 initiatives were approved by SSM's management for implementation from 2019 to 2023.

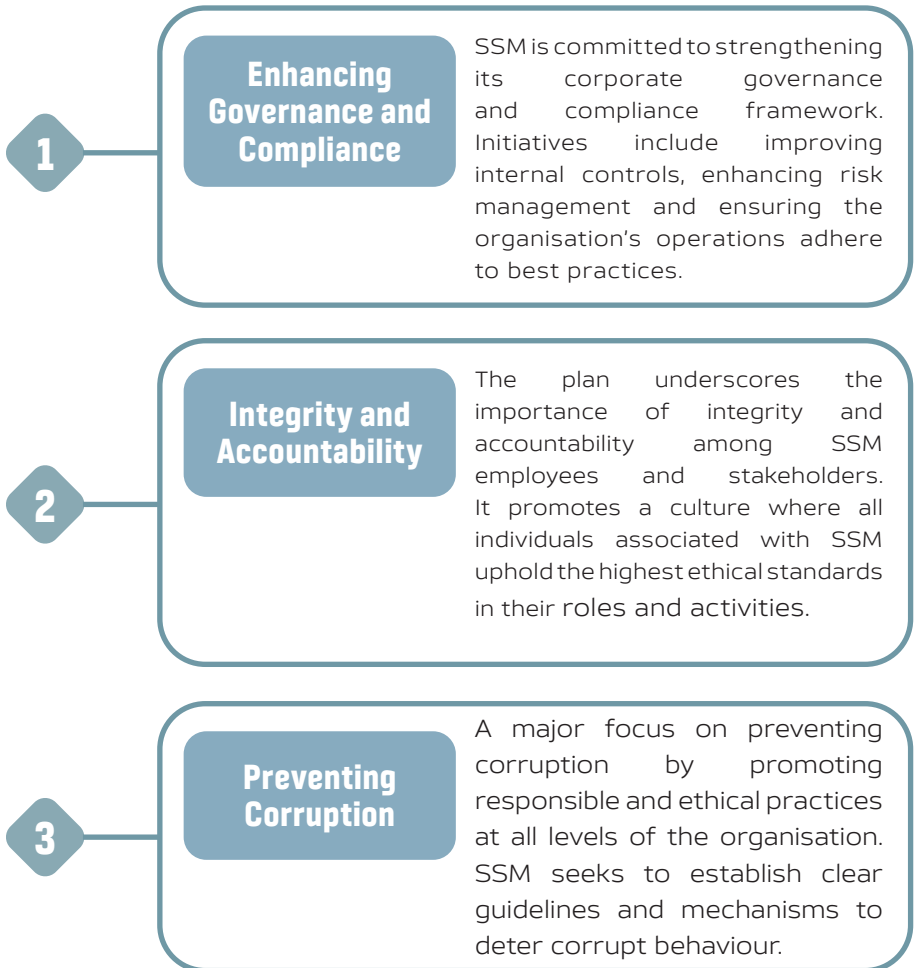
The SSM OACP is a comprehensive and holistic strategic plan for implementing anti-corruption policies within SSM. It serves as a commitment statement to support the government's NACP, which outlines comprehensive and integrated measures to combat corruption. The strategic plan, policy framework and identified initiatives are intended to enhance SSM's image and service quality for its employees, customers, stakeholders and the nation as a whole.

Incorporating the principles of transparency, integrity and accountability, the SSM OACP reflects SSM's unwavering dedication to eradicating corruption in its operations and promoting ethical behaviour throughout the organisation. This plan is a testament to SSM's commitment to good governance and its mission to play a vital role to set a benchmark for good corporate governance and integrity in the Malaysian business environment.

The SSM OACP's core objectives are aligned with the principles of the NACP, which seeks to instil a strong anti-corruption culture and promote transparency and accountability across government agencies. Through this plan, SSM aims to foster a corruption-free environment that upholds the highest ethical standards.

## Key Objectives and Initiatives of SSM OACP

The SSM OACP comprises a wide array of key objectives and initiatives aimed at instilling a culture of integrity, transparency and anti-corruption within the organisation. These objectives include:



4

### **Whistleblower Protection**

The SSM OACP ensures that there are mechanisms in place to protect whistleblowers who report corruption within the organisation. This is essential for creating a safe and transparent reporting environment.

5

### **Capacity Building**

Developing the skills and knowledge of SSM employees is a priority. This includes training programmes and continuous education to equip the workforce with the tools to combat corruption effectively.

6

### **Stakeholder Engagement**

Engaging with stakeholders, including the business community and the public, is integral to the plan. SSM aims to raise awareness about the importance of anti-corruption measures and to involve stakeholders in the fight against corruption.

7

### **Performance Evaluation**

The plan includes monitoring and evaluating the performance of anti-corruption measures within SSM. Regular assessments are conducted to ensure that the initiatives are achieving their intended outcomes.



## Collaborative Efforts

The SSM OACP was developed in collaboration with experts from the Malaysian Institute of Integrity (INTEGRITI) and the Malaysian Anti-Corruption Commission (MACC). Their guidance and expertise were instrumental in shaping the plan, ensuring it aligns with national anti-corruption efforts and best practices.

This collaboration reflects SSM's commitment to working closely with relevant authorities and organisations to create a robust framework for combating corruption. By leveraging the knowledge and experience of these partners, SSM strengthens its capacity to address corruption effectively.

## The Path Ahead

As the SSM OACP unfolds over the course of 2019-2023, SSM remains dedicated to its mission of providing efficient and trustworthy services to its employees, customers and stakeholders. By implementing the initiatives outlined in this plan, SSM seeks to create a workplace and business environment

characterised by transparency, integrity and ethical conduct.

The success of the SSM OACP relies on the collective efforts of all those involved, both within and outside the organisation. The business community, in particular, plays a vital role in upholding ethical standards and fostering a culture of integrity. SSM encourages active participation and support from the business community to achieve the plan's objectives.

By promoting transparency and ethical practices, the SSM OACP contributes to a clean and accountable business environment in Malaysia. It serves as a beacon of hope for a future where corruption is eradicated and businesses can thrive with the assurance of fairness and integrity. Together, with the collective commitment of all stakeholders, we can make Malaysia a shining example of integrity and transparency in the corporate world.

## CHAPTER 6

# MS ISO 37001:2016 ANTI-BRIBERY MANAGEMENT SYSTEM

**The integration of ABMS stands as a strategic move by SSM to fortify its operational framework, actively safeguarding against the risks of corruption and unethical practices.**

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SSM is deeply committed to maintaining the highest standards of ethics, integrity and governance. In this pursuit, we have developed the Anti-Bribery Management System, known as ABMS, as a comprehensive tool to prevent, detect and address corrupt practices. ABMS is a testament to our unwavering dedication to upholding anti-corruption laws.

Key to ABMS is our certification under MS ISO 37001:2016 Anti-Bribery Management Systems. This certification is a clear demonstration of SSM's strong commitment to ethical behaviour, integrity and responsible governance.

## Advantages of MS ISO 37001:2016 Anti-Bribery Management Systems

The integration of ABMS stands as a strategic move by SSM to fortify its operational framework, actively safeguarding against the risks of corruption and unethical practices. Let's delve into the specific advantages that ABMS brings to fortify SSM's anti-corruption endeavours.

### 1. Risk Assessment

ABMS empowers SSM to identify and assess corruption risks within the organisation, helping us recognise potential vulnerabilities.

### 2. Nurturing Anti-Corruption Culture

We are committed to fostering an environment of anti-corruption and integrity among our employees, promoting ethical conduct throughout our organisation.

### 3. Process Enhancement

With ABMS, we can conduct thorough reviews, monitor activities and make process improvements that strengthen our anti-corruption endeavours.

SSM's ABMS guides us in combating all forms of corrupt practices, abuse of power and misconduct within SSM. It applies to Commission Members, SSM Management, SSM Officers, SSM Club, SSM Cooperatives, suppliers, stakeholders and third parties engaging with or representing SSM.

By implementing the MS ISO 37001:2016 ABMS, SSM aligns itself with global best practices in anti-corruption measures. This underscores our commitment to promoting integrity and upholding the highest ethical standards within our organisation.

The MS ISO 37001:2016 ABMS is not only essential for SSM but also a significant step in the collective endeavour to combat corruption and promote ethical behaviour. It contributes to creating a clean and accountable business environment in Malaysia. This is a reflection of our ambition to be a

shining example of integrity and transparency in the corporate sphere, setting the standard for ethical and responsible business practices in Malaysia.

Our adoption of this system reaffirms our unwavering commitment to the highest standards of ethics, transparency and accountability. Our pledge extends to all stakeholders, particularly the business community, which plays a crucial role in nurturing a culture of integrity and ethical behaviour in the corporate landscape. With the collective dedication of all stakeholders, Malaysia can work towards a future where corruption is eliminated and businesses can flourish in a fair and transparent environment.

## **The Journey of Implementing ABMS at SSM**

The Ministry of Domestic Trade and Cost of Living (KPDN), along with SSM, was among the institutions selected for the Implementation of ABMS Certification, underscoring the government's commitment

to combating corruption. KPDN achieved ABMS Certification in June 2019, setting a significant precedent for organisations dedicated to ethical practices.

Following this achievement, SSM decided to embark on a journey to develop and implement ABMS within its organisation. The process began in 2019 and involved several key activities:

### **1. Formation of the ABMS Implementation Committee**

At SSM's Head Office, a dedicated committee was established to oversee the implementation of ABMS, ensuring that it aligns with the organisation's objectives.

## 2. Appointment of Internal Auditors

Competent internal auditors were appointed to assess and ensure the compliance of ABMS within SSM. Their role was crucial in maintaining the system's effectiveness.

## 3. Bribery Risk Assessment

SSM initiated the development of a comprehensive Bribery Risk Assessment process across all sections at the Head Office. This step was vital in identifying potential vulnerabilities to corrupt practices.

## 4. Training and Consultancy

SSM collaborated with SIRIM, an organisation with expertise in standards and quality, to provide training and consultancy services to the ABMS Implementation Committee and Internal Auditors. This support ensured that SSM's team was well-

equipped to handle ABMS effectively.

## 5. Development of ABMS-Related Policies

To support the implementation of ABMS and prevent corrupt activities, a set of policies were developed. These policies include the SSM Anti-Corruption Policy, the SSM No Gifts Policy, the SSM Conflict of Interest Policy, the SSM Internal Whistleblower Policy and the SSM Prohibition of External Support and Influence Policy.

## 6. Awareness Briefings

SSM conducted awareness briefings across the organisation to educate employees and stakeholders about ABMS, emphasising the importance of anti-corruption measures and ethical conduct.

## 7. Reporting and Audit

SSM implemented a reporting mechanism to track ABMS implementation and reported progress to the management and Commission Members. The entire process was subject to rigorous ABMS Certification Audits conducted by SIRIM QAS International Sdn. Bhd.

Through these concerted efforts, SSM has laid the foundation for a robust ABMS, reflecting its commitment to preventing corruption, promoting ethical conduct and ensuring good governance.

### Development of Policies Related to ABMS

In the quest to foster ethical practices and combat corrupt practices, SSM developed a series of policies designed to guide employees and stakeholders in upholding the highest standards of integrity. These policies include:

#### 1. SSM Anti-Corruption Policy

SSM's Anti-Corruption Policy, which took effect on 4th February 2021, underscores SSM's steadfast dedication to addressing corrupt practices, instances of power abuse and misconduct in all its forms. It establishes the groundwork for upholding a transparent and responsible organisation.

#### 2. SSM No Gifts Policy

SSM understands the importance of abstaining from gifts that could compromise ethical standards. This policy, commencing on 4th February 2021, strongly discourages the acceptance of gifts to ensure that our decisions and actions remain untainted by external influences. It serves as a protective shield against potential conflicts of interest and upholds our commitment to ethical conduct.

### 3. SSM Conflict of Interest Policy

In our commitment to transparency and impartiality, SSM has instituted the Conflict-of-Interest Policy, which became effective on the 4th of February 2021. This policy provides clear guidance to employees and stakeholders on recognising, disclosing and resolving situations in which personal interests may clash with their organisational duties.

### 4. SSM Prohibition of External Support and Influence Policy

This policy, effective from 4th August 2022, underlines SSM's steadfast commitment to independence and impartiality. It emphasises the utmost importance of refraining from any external support or influence that could potentially undermine the organisation's integrity.

### 5. SSM Internal Whistleblower Policy

This policy was updated in 2023 which provides an official channel for Commission Members, SSM Employees and Third Parties to disclose Improper Conduct committed by individuals and/ or a group of individuals within SSM.

These policies serve as the cornerstones of SSM's commitment to ethical practices and anti-corruption measures. They guide employees and stakeholders in maintaining the highest standards of integrity and contribute to a culture of transparency and accountability within the organisation.

# Development of Policies Related to ABMS

- 1

SSM Anti-Corruption Policy


- 2

SSM No Gifts Policy


- 3

SSM Conflict of Interest Policy


- 4

SSM Prohibition of External Support and Influence Policy


- 5

SSM Internal Whistleblower Policy





## Achievements of SSM's ABMS

### Phase One - Head Office

In the initial phase of ABMS implementation at SSM's head office, a significant achievement was reached. On the 5th of October 2021, SSM obtained the Malaysian Standard (MS) ISO 37001:2016 Anti-Bribery Management System (ABMS) Certification. This accomplishment encompassed the three fundamental pillars operating at the Head Office: corporate services, enforcement and registration services. The certification, spanning from the 5th October 2021, is valid for a three-year period.

### Phase Two

Commencing in the year 2022, SSM embarked on a next phase aimed at expanding the ABMS Certification to encompass all state offices and branches. To facilitate this extensive expansion, SSM took the strategic step of appointing Implementation Committees and Internal Auditors from various divisions. This meticulous expansion process adhered to established guidelines and underwent rigorous auditing conducted by SIRIM QAS.

On the 29th of September 2023, SSM achieved a significant milestone by securing certification for the expanded scope at the Head Office as well as for the extension to include all state offices and branches.

## The Future of ABMS

Looking ahead, SSM's ABMS certification is slated to expire on the 4th October 2024. During the 14th Anti-Corruption Committee Meeting of SSM, convened on the 2nd October 2023, a unanimous decision was made to continue with ABMS certification for the

subsequent three years. This strategic move positions SSM on a path toward recertification in 2024, ensuring the organisation's unwavering commitment to maintaining the highest anti-bribery standards.

# RESPONSIBILITIES AND OBLIGATIONS

**Each group holds a unique position within the organisation and it is the synergy of their commitments that fortifies our pursuit of excellence.**

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In this chapter, we delve deep into the essential roles and responsibilities that each stakeholder within SSM must embrace. SSM, as a prominent government agency and corporate registrar, plays a critical role in fostering the corporate and business sectors in Malaysia. It is our collective commitment to upholding the highest standards of integrity and ethical conduct that will ensure SSM's unwavering adherence to the principles of good corporate governance.



This commitment reflects our dedication to maintaining trust, preserving our reputation and sustaining our positive impact on the business community and the nation at large.

In this chapter, we will explore the key roles and responsibilities of Commission Members, SSM Management, SSM Officers, SSM

Club, SSM Cooperatives, suppliers and stakeholders dealing with SSM. Each group holds a unique position within the organisation and it is the synergy of their commitments that fortifies our pursuit of excellence. Together, we aim for a Malaysia where integrity, professionalism and ethical conduct are at the forefront of our endeavours.

## Responsibilities and Obligations of SSM Commission Members

Commission Members bear distinct responsibilities and expectations, guided by the provisions of the Companies Commission of Malaysia Act 2001. Their obligations encompass:

1

Carrying out their roles and responsibilities in strict accordance with the provisions of the Companies Commission of Malaysia Act 2001 (Act 614).

2

Considering the government's interests when making decisions pertaining to the agencies they represent, particularly for Commission Members appointed from the Public Service or government personnel.

3

Transparently declaring conflicts of interest and abstaining from voting or participating in decisions when such conflicts arise.

4

Unreservedly declaring any personal interests, refraining from involvement in matters where conflicts may compromise integrity and potentially lead to abuses of power.

5

During their tenure, it is incumbent upon Commission Members to promptly report any discrepancies uncovered during Security and Integrity Screening, with immediate resignation if required.

6

Attending courses and briefing sessions as stipulated by the Ministry to remain updated and well-informed about their roles and responsibilities.

Commission Members of SSM are bound by a commitment to adhere to the SSM Corporate Code of Ethics, ensuring they operate with the highest standards of professionalism, integrity and ethical conduct.

## Responsibilities and Obligations of SSM Management and Officers

SSM Management and Officers are instrumental to the organisation's prosperity and are entrusted with a set of responsibilities that include:

**1**

Aspiring to achieve an high standard of professionalism in every facet of their duties.

**2**

Demonstrating unwavering loyalty and steadfast compliance with SSM at all times and in all matters.

**3**

Serving with unwavering honesty, integrity, courtesy and an eager willingness to contribute.

**4**

Cultivating group cohesion founded on shared objectives and a genuine concern for each other's well-being.

**5**

Executing their duties diligently to protect SSM's interests and safeguard its reputation.

**6**

Exhibiting discipline, cooperation and an unwavering commitment to excellence in task execution.

**7**

Consistently acting in a manner that preserves SSM's trust and confidence in their capabilities.

**8**

Being obligated to adhere to the SSM Corporate Code of Ethics, which stands as a guiding beacon for their professional conduct.

## Responsibilities and Obligations of SSM Stakeholders

### Suppliers

For Suppliers, adhering to the principles of good corporate governance is a paramount requirement when supplying goods, services, or executing work for SSM. These principles, including the upholding of integrity and ethics, are to be consistently demonstrated, ensuring:

1. Upright conduct and ethical interactions in all dealings with SSM;
2. Commitment to the "Integrity Pact," thereby pledging to refrain from any corrupt practices; and
3. Full compliance with all the stipulations outlined in the SSM Corporate Code of Ethics.

### Stakeholders Dealing with SSM

Similarly, all stakeholders engaging with SSM are obligated to embrace the SSM Corporate Code of Ethics. The standard to be upheld encompasses the highest levels of integrity and ethical behaviour in their interactions with SSM.

The joint commitment of Commission Members, SSM Management, SSM Officers, SSM Club, SSM Cooperatives, suppliers and stakeholders to these responsibilities acts as a cornerstone for the unwavering integrity, professionalism and steadfast adherence to the highest standards of good corporate governance within SSM. This collective commitment forms a solid foundation for the enduring success and positive influence of SSM in fulfilling its mission to

support and regulate the corporate and business sectors in Malaysia.

In conclusion, the relentless pursuit of integrity, professionalism and ethical behaviour within SSM is a collective commitment. Commission Members, SSM Management, SSM Officers, SSM Club, SSM Cooperatives, suppliers and stakeholders are the pillars of our organisation and their dedication to their roles and responsibilities is the bedrock upon which our mission thrives.

**This policy underscores our dedication to promoting ethical practices, emphasizing that no one is above the law, regardless of their rank or position within the organisation.**

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The Anti-Corruption Policy, an essential cornerstone of SSM, underscores our unwavering commitment to fostering a culture of integrity, transparency and ethical governance. SSM stands as the vanguard in ensuring that all aspects of its services and operations are executed with the utmost professionalism, adhering to the highest ethical standards, legal regulations and best practices. This policy serves as a beacon, illuminating the path towards achieving a corruption-free environment within the organisation.

As we delve into the intricacies of this policy, we will explore the multifaceted strategies and principles put in place by SSM to combat corruption, misconduct and the abuse of power. It outlines our collective responsibility to uphold these principles, encompassing Commission Members, SSM Management, SSM Officers, SSM Club, SSM Cooperatives and the broad spectrum of suppliers and stakeholders associated with SSM. Our dedication to this cause reflects SSM's commitment to promoting good governance and ethical conduct at every level.

1. SSM is committed to ensuring that all matters related to SSM's services and operations are conducted ethically, professionally and in accordance with the law and regulations to instil high ethical standards, integrity and best governance practices. SSM's commitment to making integrity a guiding principle and culture is outlined through its Corporate Values, namely Collaboration, Customer-Centric, Knowledge and Skill Enhancement, Excellence and Integrity.
2. This policy aims to provide a clear direction to SSM in its efforts to combat corruption, misconduct and abuse of power.

3. SSM is committed to:

(a) Eradicating all forms of corruption, misconduct and abuse of power among Commission Members, SSM Officers, SSM Club, SSM Cooperatives, suppliers and stakeholders dealing with SSM while adhering to all relevant regulations, laws, acts, or directives related to corruption offenses, especially the Malaysian Anti-Corruption Commission Act 2009 (Act 694);

(b) Establishing and implementing internal control systems and activities to effectively detect, prevent, handle, enforce, assess and improve anti-corruption management measures;



(c) Encouraging Commission Members, SSM Management, SSM Officers, SSM Club, SSM Cooperatives, suppliers and stakeholders to perform their duties with transparency and integrity, reporting any incidents of corruption through the provision of a whistleblower channel and informant protection;

(d) Ensuring that a regular, secure and effective whistleblower channel and informant protection procedures are established by SSM for Commission Members, SSM Management, SSM Officers, SSM Club, SSM Cooperatives, suppliers and stakeholders dealing with SSM;

(e) Establishing the Integrity and Discipline Section of SSM as the Anti-Corruption Compliance Function with the authority and independence to monitor compliance with the Anti-Bribery Management System comprehensively and reporting to SSM Management and Commission Members;

(f) Ensuring that all actions, whether in the form of disciplinary measures or under the law, are carried out fairly, impartially and transparently, regardless of rank and position; and

(g) Taking legal action as appropriate against any party who does not comply with the provisions of the law applied in the SSM Anti-Corruption Policy.

4. This policy is applicable to Commission Members, SSM Management, SSM Officers, SSM Club, SSM Cooperatives, suppliers and stakeholders dealing with or on behalf of SSM.

The SSM Anti-Corruption Policy embodies our resolute stance against corrupt practices. It is a testament to our commitment to maintaining the highest standards of integrity and ethics in all our dealings. By adhering to this policy, we strengthen the foundation upon which SSM operates, cultivating an environment that is free from undue influence and favouritism, thus fostering

fairness, transparency and impartiality in every interaction.

This policy underscores our dedication to promoting ethical practices, emphasising that no one is above the law, regardless of their rank or position within the organisation. It is a comprehensive approach to eradicating corruption, ensuring compliance with the law and upholding the principles of transparency, accountability and integrity.

As we move forward, we stand united in our commitment to a corruption-free SSM, one that not only achieves the highest standards of corporate governance but also serves as an exemplar for ethical conduct. The Anti-Corruption Policy is not merely a document; it is a living testament to our unwavering commitment to integrity, guiding us in our pursuit of excellence.

**This chapter reinforces our commitment to maintaining the highest standards of ethical conduct and serving with transparency, ultimately strengthening trust in our organisation.**

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The No Gift Policy, an integral part of SSM, embodies our unyielding dedication to the utmost standards of integrity and transparency. At the core of our mission to provide equitable services to individuals and organisations engaged with SSM lies the firm commitment to safeguard fairness and impartiality. In this chapter, we delve into the principles and regulations that govern the giving and receiving of gifts by Commission Members, SSM Management, SSM Officers, SSM Club, SSM Cooperatives, suppliers and stakeholders. This policy reflects our unwavering pledge to uphold the highest ethical standards and eliminate any potential for undue influence or favouritism in all our interactions.

1. The No Gift Policy of SSM is a commitment to achieving the highest level of integrity in providing equitable services to individuals and organisations dealing with SSM;
2. Stakeholders are prohibited from giving any form of gifts to Commission Members, SSM Management, SSM Officers, SSM Club, SSM Cooperatives,

suppliers and likewise, Commission Members, SSM Management, SSM Officers, SSM Club, SSM Cooperatives, suppliers and stakeholders are not allowed to accept gifts; and

3. This policy applies to Commission Members, SSM Management, SSM Officers, SSM Club, SSM Cooperatives and encompasses suppliers and stakeholders dealing with or on behalf of SSM.

The No Gift Policy reflects SSM's unwavering commitment to maintaining the highest standards of integrity in its service delivery to all individuals and organisations interacting with the organisation. It ensures that no undue influence or favouritism arises from the exchange of gifts, promoting fairness, transparency and impartiality in all interactions.

The No Gift Policy encapsulates the very essence of SSM. It is more than a set of regulations; it is a testament to our unwavering commitment to integrity, transparency and equity. By prohibiting stakeholders from offering gifts and Commission

Members, SSM Management, SSM Officers, SSM Club, SSM Cooperatives from accepting them, we ensure that our service delivery remains impartial, unbiased and rooted in ethical principles.

Our promise is clear: every interaction with SSM is governed by fairness and integrity. This chapter reinforces our commitment to maintaining the highest standards of ethical conduct and serving with transparency, ultimately strengthening trust in our organisation.

## CONFLICT OF INTEREST POLICY

**The Conflict of Interest Policy is not just a document; it is a living testament to our commitment to integrity, guiding us toward the highest standards of excellence.**

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The Conflict of Interest Policy, a pivotal component of SSM, exemplifies our commitment to achieving the highest standards to prevent conflicts of interest within the realm of SSM's functions and powers.

This policy serves as our unwavering pledge to mitigate any personal conflicts of interest involving Commission Members, SSM Management, SSM Officers, SSM Club, SSM Cooperatives, suppliers and stakeholders in all matters related to SSM's services and operations. Such conflicts have the potential to lead to corrupt practices, abuse of power and misconduct, as well as cast a negative shadow on transparency and accountability among Commission Members, SSM Management and SSM Officers.

1. SSM aspires to attain the highest standards to avoid conflicts of interest in every aspect related to SSM's functions and authority.
2. The Conflict of Interest Policy represents SSM's commitment to avert any personal conflicts of interest involving

Commission Members, SSM Management, SSM Officers, SSM Club, SSM Cooperatives, suppliers and stakeholders in all matters related to SSM's services and operations that could lead to corrupt practices, abuse of power, misconduct and tarnish the perception of transparency and accountability.

3. SSM is committed to:

(a) Ensuring that Commission Members, SSM Management and SSM Officers declare any personal relationships or conflicts of interest within SSM or in any meetings, committees, or dealings involving SSM. Declarations are made in writing, recorded and maintained by the respective meeting or committee secretariat;

(b) Ensuring that Commission Members, SSM Management and SSM Employees do not employ their powers, positions and official capacities in SSM for personal gain, financial benefit, family members, or associates;

(c) Ensuring that Commission Members, SSM Management and SSM Officers execute their duties consistently and transparently in accordance with the Companies Commission of Malaysia Act 2001 (Act 614), appointment terms, SSM Service Circulars and relevant laws. They should not yield to any influence, directives and/ or pressures from any other party;

(d) Ensuring that Commission Members, SSM Management and SSM Officers have no personal/ financial interests with stakeholders and do not channel any confidential, classified, or restricted information related to SSM that would allow stakeholders to gain advantages in any official SSM transactions;

(e) Ensuring that Commission Members, SSM Management and SSM Officers neither give nor receive any form of personal gifts, gratuities, or inducements from any parties with business interest and dealings with SSM; and

(f) Taking appropriate legal action against any parties who fail to comply with the provisions of the law applied in the SSM Conflict of Interest Policy.

4. This policy applies to Commission Members, SSM Management and SSM Officers, SSM Club, SSM Cooperatives and includes suppliers and stakeholders dealing with or on behalf of SSM.

The Conflict of Interest Policy serves as the bedrock upon which SSM maintains the highest standards of integrity, transparency and ethical conduct.

Our commitment to mitigating conflicts of interest is unwavering and integral to our vision and strategic core. This policy embodies the principles of good governance and it emphasises the accountability and integrity of all parties interacting with SSM. By adhering to this policy, we cultivate an environment free from corrupt practices, favouritism and unethical behaviour, ensuring the highest degree of transparency and trust in all our endeavours.

As we continue to uphold the tenets of this policy, we stand united in our dedication to the promotion of ethical conduct and the safeguarding of SSM's reputation as a paragon of transparency and accountability. The Conflict of Interest Policy is not just a document; it is a living testament to our commitment to integrity, guiding us toward the highest standards of excellence.

## PROHIBITION OF EXTERNAL SUPPORT AND INFLUENCE POLICY

**This policy is aimed at ensuring that all assessments and decisions made by SSM, whether they concern Commission Members, SSM Management, SSM Officers, SSM Club, SSM Cooperatives, suppliers and stakeholders are transparent, unbiased and fair.**

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SSM is dedicated to maintaining the highest standards of governance, integrity and anti-corruption practices. SSM recognises that these principles are vital for ensuring that every facet of its functions, services, enforcement efforts, operations, activities and programmes remains untainted by corrupt practices, abuse of power, or misconduct.

The Policy on Prohibition of External Support and Influence underscores SSM's unwavering commitment to upholding the values of transparency, integrity and ethical conduct. This policy is designed to establish clear guidelines and expectations for all stakeholders engaging with SSM. It serves as a critical component of our broader framework for maintaining good governance and ensuring the organisation's reputation for ethical conduct remains untarnished.



This policy is aimed at ensuring that all assessments and decisions made by SSM, whether they concern Commission Members, SSM Management, SSM Officers, SSM Club, SSM Cooperatives, suppliers and stakeholders are transparent, unbiased and fair. It reinforces our commitment to creating a level playing field for all stakeholders, where ethical values are paramount.

Commission Members, SSM Management, SSM Officers, SSM Club and SSM Cooperatives are subject to the following prohibitions:

1. They are prohibited from seeking or attempting to obtain external influence or support from any government leader or influential individual to endorse any application or influence the consideration of any decision within SSM;
2. They must not use external support or influence as the basis for making decisions or receiving directives from government leaders or Influential Individuals; and

3. Commission Members, SSM Management and SSM Officers are not allowed to bring or attempt to bring any form of external influence or pressure to support or advance any claims related to SSM, whether those claims are their own or the claims of any other SSM Officer.

This policy applies to a wide range of individuals and groups that interact with SSM, including Commission Members, SSM Management, SSM Officers, SSM Club, SSM Cooperatives, suppliers and stakeholders who deal with or on behalf of SSM. It is our belief that every party associated with SSM should uphold the same high ethical standards and integrity principles to maintain the organisation's reputation and the trust of the Malaysian public.

# INTERNAL WHISTLEBLOWER POLICY

1. The Internal Whistleblower Policy has been designed to serve as a guide for Commission Members, SSM Management, SSM Officers and third parties in disclosing any unlawful conduct conducted by individuals and/ or groups within SSM. It also serves as an assurance that informants and the information related to the disclosure of unlawful conduct will be protected.

2. This policy aims to encourage SSM employees and external parties to report any misconduct or inappropriate behaviour by Commission Members, SSM Management, SSM Officers, SSM Club, SSM Cooperatives and Stakeholders. Additionally, subject to specific conditions, this policy ensures the confidentiality of the informant's identity.

3. Inappropriate behaviour includes, but is not limited to, the following:

(a) Misappropriation, corruption, or bribery;

(b) Breach of trust;

(c) Fraud or forgery;

(d) Misuse of SSM assets or funds;

(e) Unauthorised abuse of power;

(f) Receiving or requesting high-value services or goods from parties dealing with SSM, such as contractors or suppliers;

(g) Any harmful act that jeopardizes the safety or health of SSM Officers;

(h) Destruction, defacement, alteration, or concealment of documents or objects related to any investigation;

(i) Any wrongdoing where the nature of the conduct is contrary to SSM's interests;

(j) Unethical or indecent behaviour;

(k) Actions that violate the law; or

(l) Violation of SSM policies, procedures and regulations.

4. All documents with regards to information and the identity of the informant will be categorised as 'CONFIDENTIAL' documents. Anyone found disclosing the identity of the informant or the information may be subject to action under the Statutory Bodies (Discipline and Surcharge) Act 2000 (Act 605).
5. The identity of the informant and the information provided are kept confidential and not disclosed, including during court proceedings.
6. For SSM Officers, the Informant is appropriately protected from any adverse actions resulting from the disclosure, such as work-related disturbances, discrimination, service termination, demotion, suspension, unfavourable conditions, termination, or ill-treatment related to employment, or disciplinary actions, contract termination and withholding of payments that should be duly made.
7. Disclosure of Improper Conduct by an individual and/ or a group of individuals within SSM must be made by completing the SSM Internal Whistleblower Form. SSM's Internal Whistleblower Policy and Form also can be downloaded via SSM's Internal Portal link:
 

**www.ssm.com.my**

↓

**Whistleblower**

↓

**SSM Internal Whistleblower Form**

or click the link:

**<https://www.ssm.com.my/Documents/Whistleblower/BORANG-PEMBERI-MAKLUMAT-DALAMAN-SSM.pdf>**
8. The completed SSM Internal Whistleblower Form must be submitted either through:
 

**handover to Integrity and Discipline Section Senior Manager who is an Authorised Officer (PYDK);**

or e-mail to:

**whistleblower@ssm.com.my**

# CONCLUSION

The culmination of our journey through this comprehensive publication, SSM's Corporate Code of Ethics, reaffirms SSM's unwavering commitment to upholding the highest standards of integrity, ethics and transparency. Each chapter we've explored embodies our resolute dedication to fostering a corporate culture that is not just based on compliance with laws and regulations but, more importantly, one that is founded on the principles of responsibility, accountability and ethical conduct.

We commenced this publication with a heartfelt message from SSM's Chief Executive Officer, setting the tone for our unwavering dedication to ethical practices in all our operations and interactions. The Introduction and Purpose of this handbook underscored the necessity of such a guiding document, providing our stakeholders with a clear path to align with our Corporate Code of Ethics.

Our Core Values and Principles exemplify the foundation upon which SSM operates, promoting transparency, professionalism, accountability and integrity in all

our endeavours. The Definitions provided serve as a compass, ensuring that everyone within the SSM family understands and embodies the terminology central to our commitment to anti-corruption measures.

The SSM's Anti-Corruption Plan 2019-2023 is a testament to our forward-looking strategies and actions aimed at eliminating corruption and promoting good governance, within our organisation and beyond.

Subsequent chapters comprehensively detail our MS ISO 37001:2016 Anti-Bribery Management System, elucidating the responsibilities and obligations of SSM Commission Members, SSM Management, SSM Officers, SSM Club, SSM Cooperatives, suppliers and stakeholders. We believe that the shared commitment to these principles is pivotal in creating and maintaining a transparent, ethical and responsible working environment.

At the heart of our commitment to ethical standards is Compliance with Laws and Regulations. Furthermore, our Conflict-of-Interest Policy, No Gifts Policy,

Anti-Corruption Policy and Prohibition of External Support and Influence Policy ensure that our organisation remains untainted by unethical practices.

Our Internal Whistleblower Policy reinforces our dedication to transparency and safeguards individuals who choose to speak up against unlawful practices. It is a clear demonstration of our commitment to creating a secure platform for reporting unethical conduct within SSM.

This publication symbolises our pledge to uphold and promote the values and principles of integrity, ethics and good governance. We acknowledge the dedication

and collective effort of all those who have contributed to shaping these policies and we extend our gratitude to every member of the SSM family for embracing these principles in our collective mission to nurture a corporate culture that is free from corruption.

May this handbook continue to serve as a guiding light for all of us as we journey together towards a future where integrity and ethics reign supreme. Together, we can build a brighter, more transparent and corruption-free environment that benefits not only our organisation but the broader society we serve.

# ACKNOWLEDGEMENT

The development of this handbook, SSM's Corporate Code of Ethics, has been a collective effort that reflects the dedication and commitment of many individuals within SSM. As we come to the end of this journey, we would like to express our heartfelt gratitude to those who have played a crucial role in bringing this project to fruition.

Our sincere thanks go to our Chief Executive Officer, YBhg. Datuk Nor Azimah Binti Abdul Aziz for providing the leadership and vision necessary to drive the creation of this handbook. Your unwavering commitment to fostering a culture of integrity and ethics within our organisation has been the guiding force behind this endeavour.

We also extend our appreciation to the SSM Commission Members, SSM Management, SSM Officers and all employees who have dedicated their time, expertise and valuable insights to the development and implementation of these policies. Your active participation and commitment to upholding the highest standards of governance have been instrumental in the successful crafting of this handbook.

A special acknowledgment is reserved for those who have contributed directly to the writing, review and editing of the handbook. Your meticulous attention to detail and commitment to clarity and accuracy have greatly enriched the content of this document.

Furthermore, we would like to express our gratitude to all stakeholders, including suppliers and business partners, for their continuous support and understanding as we implement these policies. We look forward to your ongoing collaboration in upholding the principles of integrity and ethics.

Last but not least, we appreciate the dedication and tireless efforts of the SSM's Integrity and Discipline Section in the establishment of the MS ISO 37001:2016 Anti-Bribery Management System, which serves as the foundation for our commitment to ethical conduct and anti-corruption practices.

The collective spirit and commitment of all those mentioned above represent the core of SSM's journey towards a more ethical, transparent and accountable organisation. As we navigate the path of integrity,

we do so together, each of us contributing to a culture of excellence.

Thank you for your unwavering support and dedication to upholding the highest standards of integrity and ethics within SSM.





## Appendix A: Anti-Corruption Policy



### **POLISI ANTIRASUAH**

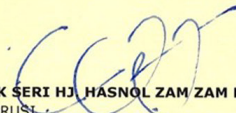
Suruhanjaya Syarikat Malaysia (SSM) komited untuk memastikan segala urusan berkaitan perkhidmatan dan operasi SSM dilaksanakan secara beretika, profesional dan berlandaskan undang-undang serta peraturan demi menginstitusikan standard etika, integriti tinggi dan governans terbaik seiring Visi dan Teras Strategik SSM. Komitmen SSM menjadikan integriti sebagai satu prinsip dan budaya telah digariskan melalui Nilai-Nilai Korporat iaitu KUNCI (Kolaborasi, Utamakan Pelanggan, Nobatkan Ilmu, Cemerlang dan **INTEGRITI**).

Polisi ini bertujuan untuk membentuk satu hala tuju yang jelas kepada SSM dalam usaha membanteras amalan rasuah, penyelewengan dan salah guna kuasa.

SSM komited untuk:

- a) Membanteras segala amalan rasuah, penyelewengan dan salah guna kuasa daripada berlaku di kalangan Anggota Suruhanjaya, Pegawai SSM dan Pihak Ketiga yang berurusan dengan SSM serta mematuhi segala peraturan, perundangan, akta atau arahan yang berkaitan dengan kesalahan rasuah, terutamanya Akta Suruhanjaya Pencegahan Rasuah Malaysia 2009 (Akta 694);
- b) Mewujudkan dan melaksanakan sistem kawalan dalaman dan aktiviti bagi mengesan, mencegah, mengendalikannya, menguatkuasa, menilai serta menambah baik langkah pengurusan antirasuah secara berkesan;
- c) Menggalakkan Anggota Suruhanjaya dan Pegawai SSM melaksanakan tugas secara telus dan berintegriti; dan melapor sebarang kesalahan rasuah yang berlaku dengan menyediakan saluran aduan dan perlindungan pemberi maklumat;
- d) Memastikan saluran aduan dan tatacara perlindungan pemberi maklumat yang teratur, selamat dan efektif diwujudkan oleh SSM kepada Anggota Suruhanjaya, Pegawai SSM dan Pihak Ketiga yang berurusan dengan SSM;
- e) Seksyen Integriti dan Disiplin SSM selaku Fungsi Pematuhan Antirasuah yang mempunyai kuasa dan bebas diwujudkan untuk memantau pematuhan kepada Sistem Pengurusan Antirasuah (SPAR) secara menyeluruh dan melaporkan kepada Pihak Pengurusan SSM dan Anggota Suruhanjaya;
- f) Memastikan segala tindakan sama ada berbentuk tatatertib atau di bawah undang-undang yang berkenaan dilaksanakan secara adil, saksama dan telus tanpa mengira pangkat dan jawatan; dan
- g) Melaksanakan tindakan undang-undang yang sewajarnya ke atas mana-mana pihak yang tidak mematuhi peruntukan undang-undang yang digunapakai di dalam Polisi Antirasuah SSM.

Polisi Antirasuah SSM ini hendaklah dibaca bersama dengan Garis Panduan Antirasuah SSM.

  
**DATUK SERI HJ. HASNOL ZAM ZAM BIN HJ. AHMAD**  
PENGURUS  
SURUHANJAYA SYARIKAT MALAYSIA

4 FEBRUARI 2021





### **POLISI TIADA HADIAH**

Polisi Tiada Hadiah Suruhanjaya Syarikat Malaysia (SSM) adalah satu komitmen SSM untuk mencapai piawaian integriti tertinggi dalam memberikan layanan sama rata kepada individu dan organisasi yang berurusan dengan SSM.

Pihak Ketiga tidak dibenarkan untuk memberi hadiah dalam apa jua bentuk kepada Anggota Suruhanjaya atau Pegawai SSM manakala Anggota Suruhanjaya atau Pegawai SSM tidak dibenarkan menerimanya.

Polisi Tiada Hadiah SSM ini hendaklah dibaca bersama dengan Garis Panduan Tiada Hadiah SSM.

  
**DATUK SERI HJ. HASNOL ZAM ZAM BIN HJ. AHMAD**  
PENERUSI  
SURUHANJAYA SYARIKAT MALAYSIA

4 FEBRUARI 2021

## Appendix C: Conflict of Interest Policy



### **POLISI PERCANGGAHAN KEPENTINGAN**

Suruhanjaya Syarikat Malaysia (SSM) berniat untuk mencapai tahap piawaian tertinggi bagi mengelakkan percanggahan kepentingan di dalam setiap urusan berkaitan fungsi dan kuasa SSM.

Polisi Percanggahan Kepentingan adalah satu komitmen SSM untuk mengelakkan sebarang percanggahan kepentingan peribadi melibatkan Anggota Suruhanjaya, Pegawai SSM dan Pihak Ketiga dalam sebarang urusan berkaitan perkhidmatan dan operasi SSM yang boleh menjurus ke arah amalan rasuah, salah guna kuasa dan penyelewengan serta menimbulkan persepsi buruk terhadap ketelusan dan tanggungjawab Anggota Suruhanjaya dan Pegawai SSM.

SSM komited untuk:

- a) Memastikan Anggota Suruhanjaya dan Pegawai SSM mengisytiharkan sebarang perhubungan peribadi atau percanggahan kepentingan di SSM, atau mana-mana mesyuarat, jawatankuasa atau urusan yang melibatkan SSM. Pengisytiharan dibuat secara bertulis dan direkod serta disimpan oleh urus setia mesyuarat atau jawatankuasa berkenaan;
- b) Memastikan Anggota Suruhanjaya dan Pegawai SSM tidak menggunakan kuasa atau jawatan serta kedudukan rasmi di SSM untuk kepentingan peribadi, kewangan, anggota keluarga atau sekutu;
- c) Memastikan Anggota Suruhanjaya dan Pegawai SSM melaksanakan amanah secara teratur dan telus berdasarkan kepada Akta Suruhanjaya Syarikat Malaysia 2001, syarat-syarat pelantikan, Pekeliling Perkhidmatan SSM dan undang-undang yang berkaitan; dan tidak akur kepada sebarang pengaruh, arahan dan/atau tekanan dari sebarang pihak lain;
- d) Memastikan Anggota Suruhanjaya dan Pegawai SSM tidak mempunyai kepentingan peribadi atau kewangan dengan Pihak Ketiga dan menyalurkan apa-apa maklumat rahsia, sulit dan terperingkat berkaitan SSM yang membolehkan Pihak Ketiga mendapat manfaat dalam apa-apa urusan rasmi di SSM;
- e) Memastikan Anggota Suruhanjaya dan Pegawai SSM tidak memberi atau menerima sebarang bentuk hadiah, keraian bersifat peribadi, imbuhan, suapan dengan mana-mana pihak yang mempunyai kepentingan perniagaan dan berurusan dengan SSM; dan
- f) Melaksanakan tindakan undang-undang yang sewajarnya ke atas mana-mana pihak yang tidak mematuhi peruntukan undang-undang yang digunapakai di dalam Polisi Percanggahan Kepentingan SSM.

Polisi Percanggahan Kepentingan SSM ini hendaklah dibaca bersama dengan Garis Panduan Percanggahan Kepentingan SSM.

  
**DATUK SRI HJ. HASNOL ZAM ZAM BIN HJ. AHMAD**  
PENGURUS  
SURUHANJAYA SYARIKAT MALAYSIA

4 FEBRUARI 2021



### **POLISI LARANGAN PENGGUNAAN SOKONGAN DAN PENGARUH LUAR SURUHANJAYA SYARIKAT MALAYSIA (SSM)**

Polisi Larangan Penggunaan Sokongan dan Pengaruh Luar Suruhanjaya Syarikat Malaysia (SSM) dibangunkan sebagai satu komitmen SSM untuk memantapkan tadbir urus (governance), integriti dan antirasuah agar setiap fungsi, perkhidmatan, penguatkuasaan operasi, aktiviti dan program SSM sentiasa bebas daripada amalan rasuah, salah guna kuasa dan penyelewengan selaras dengan hasrat SSM untuk mencapai tahap piawai integriti tertinggi dalam membuat penilaian dan keputusan secara telus dan adil kepada Anggota dan Pegawai SSM.

Anggota Suruhanjaya dan Pegawai SSM adalah dilarang untuk:

- (a) membawa atau cuba membawa pengaruh luar atau mengemukakan apa-apa sokongan daripada mana-mana Pemimpin Kerajaan atau Individu Berpengaruh bagi menyokong sesuatu permohonan atau mempengaruhi pertimbangan sesuatu keputusan;
- (b) menggunakan sokongan atau pengaruh luar sebagai asas pertimbangan atau arahan daripada Pemimpin Kerajaan atau Individu Berpengaruh dalam membuat sesuatu keputusan; dan
- (c) membawa atau cuba membawa apa-apa bentuk pengaruh atau tekanan luar untuk menyokong atau memajukan apa-apa tuntutan berhubung dengan atau terhadap SSM, sama ada tuntutan itu ialah tuntutannya sendiri atau tuntutan mana-mana Pegawai SSM lain.

Polisi Larangan Penggunaan Sokongan dan Pengaruh Luar SSM ini hendaklah dibaca bersama dengan Garis Panduan Larangan Penggunaan Sokongan dan Pengaruh Luar SSM.

**YBHG. DATUK AZMAN BIN MOHD YUSOF**  
PENERUSI  
SURUHANJAYA SYARIKAT MALAYSIA

4 OGOS 2022



KEMENTERIAN PERDAGANGAN DALAM NEGERI  
DAN KOS SARA HIDUP



SURUHANJAYA SYARIKAT MALAYSIA  
COMPANIES COMMISSION OF MALAYSIA

# POLISI PEMBERI MAKLUMAT DALAMAN SURUHANJAYA SYARIKAT MALAYSIA

## OBJEKTIF

- 1 Menyediakan saluran rasmi kepada Anggota Suruhanjaya, Pekerja SSM dan Pihak Ketiga untuk membuat pendedahan Kelakuan Tidak Wajar (KTW) yang dilakukan oleh individu dan/atau sekumpulan individu dalam SSM.

## KELAKUAN TIDAK WAJAR (KTW)

- 2 Apa-apa kelakuan yang jika terbukti, menjadi suatu kesalahan tatatertib atau kesalahan jenayah.

## KRITERIA PERLINDUNGAN

- 3 Pemberi Maklumat (PM) boleh diberikan perlindungan sekiranya memenuhi kriteria yang terkandung di dalam Polisi Pemberi Maklumat Dalaman 2013 (Pindaan 2023) SSM.

## JENIS PERLINDUNGAN

- 4
  - Maklumat Sulit PM adalah dirahsiakan dan tidak didedahkan; dan
  - Sekiranya PM merupakan Anggota Suruhanjaya atau Pekerja SSM, PM dilindungi daripada sebarang Tindakan Yang Memudaratkan akibat daripada pendedahan yang telah dibuat.

## PEMBATALAN PERLINDUNGAN

- 5
  - PM sendiri telah menyertai KTW yang didedahkan itu;
  - PM dengan sengaja memberi maklumat palsu atau tidak benar;
  - Pendedahan KTW itu adalah remeh atau menyusahkan;
  - Pendedahan KTW mempersoalkan merit dasar Kerajaan atau SSM;
  - Pendedahan dibuat dengan motif untuk mengelak daripada dibuang kerja atau tindakan tatatertib yang lain; atau
  - PM dalam perjalanan membuat pendedahan itu, atau memberikan maklumat lanjut, telah melakukan sesuatu kesalahan di bawah Polisi ini.

## KAEDAH PENDEDAHAN MAKLUMAT

- 6
  - Lengkapkan Borang Pemberi Maklumat Dalaman (boleh dicapai di Portal SSM); dan
  - Kemukakan Borang melalui serahan tangan kepada Pengurus Kanan SID atau e-mel ke alamat [whistleblower@ssm.com.my](mailto:whistleblower@ssm.com.my)



Ethics is knowing the difference  
between what you have a right to do  
and what is right to do.

- Potter Stewart -