



Cradle

— Creating. Leading. Startups. —

ORGANISATIONAL ANTI-CORRUPTION PLAN (OACP) 2023 – 2025





Organisational Anti-Corruption Plan (OACP) 2023 - 2025

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Message from *Chairman*

Fighting corruption is imperative for all corporations and institutions, as bribery can undermine trust and accountability, and reduce their lifespan's sustainability.

Datuk Yvonne Chia

*Chairman, Cradle Fund Sdn Bhd
(2020 - 2023)*

I laud Management for their initiative to start the Organisation Anti-Corruption Plan (OACP), a three-year journey to reflect and commit to Cradle's zero tolerance towards corruption. Corruption can take many forms, including bribery, patronage, and influence peddling.

This inaugural issue will mark the beginning of documenting a comprehensive guide that will capture, provide formal documentation, and promote an ethics and compliance culture throughout the Cradle group of companies. It will encompass activities and learning materials aimed at simplifying the understanding of both visible and invisible forms of corruption.

Trust, honesty, integrity, and transparency are the fundamental values for the Cradle group of companies, and this will also address potential areas of conflict of interest and educate the appropriate approach and actions.

Actioning via a clear framework, i.e., the code of conduct which applies to all employees irrespective of their level of responsibility, including the Board of Directors, our vendors, and partners, will provide clear principles to guide the appropriate processes and actions when faced with potential risks of corruption or conflict of interest.

It is everybody's duty and responsibility to understand the values and ethics guiding our approach to our organisational goals and for us to communicate to all employees, including our partners and vendors, the values and principles concerning our business ethics.

We will have to act, align with our values, and do the right thing to protect and sustain our organisation. Our collective actions and living up to the values we espoused will have Cradle stand tall in the ecosystem.

I commend Management, who have contributed to this OACP initiative to embed the ethics and conduct into Cradle's culture and values.

Malaysia MADANI.

“

Trust, honesty, integrity, and transparency are the fundamental values for the Cradle group of companies, and this will also address potential areas of conflict of interest and educate the appropriate approach and actions.

Foreword by GCEO

It is with immense gratitude and a sense of accomplishment that we have completed our inaugural Organisational Anti-Corruption Plan 2023 – 2025 (OACP). This significant milestone represents our commitment to the principles of transparency, integrity, and good governance in Cradle as the focal point for Malaysian startup ecosystem.

Norman Matthieu Vanhaecke

*Group Chief Executive Officer
Cradle Fund Sdn Bhd*



“ It is my personal goal to drive not just adherence, but a complete embodiment of transparency, integrity and good governance in all activities and behaviours across all levels in Cradle.

We find ourselves in an era where the global fight against corruption has become not just a priority but a collective responsibility. In this journey, we are also grateful for the unwavering dedication of our Government in its tireless efforts to combat corruption. The National Anti-Corruption Plan (NACP) serves as a testament to our nation’s resolute pursuit of a corruption-free society, and we are proud to align our efforts with this noble cause.

At Cradle, we firmly believe that a foundation built on transparency and integrity is essential for our success. Our commitment to these principles is not just a matter of policy, but a core value that guides our every action. This OACP reflects our dedication to uphold the highest standards of ethical conduct in all our operations.

It is my personal goal to drive not just adherence, but a complete embodiment of transparency, integrity and good governance in all activities and behaviours across all levels in Cradle. By identifying areas prone to corruption risks, developing a strategic framework

and implementing initiatives to prevent and combat these risks, we aim to set a benchmark for ethical practices within our industry and beyond.

I would like to extend my heartfelt gratitude to our Integrity & Governance Unit (IGU) for spearheading this pivotal project. Their commitment, expertise and efforts have been instrumental in bringing the OACP to fruition. I would also like to acknowledge and thank the entire Cradle team for their invaluable support and contributions. It is through the collective dedication of everyone that we are able to achieve this significant milestone.

As we move forward, let us remember that our commitment to combat corruption is not just a requirement, but a moral imperative. Let the completion of our OACP be a testament to our dedication and support to creating a better future, where transparency, integrity, and good governance prevail.

Malaysia MADANI.

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Cradle is committed to conduct its business with integrity and in compliance with all applicable laws and regulations in Malaysia. We have zero-tolerance towards any form of bribery and corruption, and uphold firmly to our:

- Anti-Bribery and Corruption Policy
- Conflict of Interest Management Policy
- Whistleblowing Policy
- Code of Business Conduct
- Integrity and Governance
- Malaysian Anti-Corruption Commission (MACC) Act 2009

PART 1:

Introduction



What is the Organisational Anti-Corruption Plan (OACP) all about?

The OACP is a fundamental anti-corruption document that puts forth the organisation's commitment to fight corruption, identify and rectify weaknesses and issues relating to governance and integrity within the organisation.

The Organisational Anti-Corruption Plan (OACP) is a fundamental anti-corruption document and comprehensive instrument designed particularly at the organisational level to address and rectify vulnerabilities, weaknesses, and issues related to governance, integrity, and corruption within an organisation.

The OACP is not a one-size-fits-all solution, it is a living document that is tailored to the specific needs and challenges faced by each organisation. It is aimed not only to identify areas where corruption risks may be prevalent but also to outline a strategic framework for preventing and combating these risks effectively. Typically, it involves risk assessments, employee training and awareness programmes, reporting mechanisms for suspected corruption, and clear actions in the case of any wrongdoing.

In accordance with the National Anti-Corruption Plan (NACP) for the period 2019-2023, the OACP has gained a reputation for itself as a critical tool in the fight against corruption. Under Initiative 2.1.5, the public sector is mandated to develop and implement OACPs, ensuring the highest standards of integrity and accountability. Additionally, Initiative 6.2.1 extends this obligation to various entities, including Statutory Bodies, State-Owned Enterprises (SOEs), Company Limited by Guarantee (CLBG), and private sector organisations regulated by relevant authorities. Thus, the OACP becomes a crucial instrument for ensuring that various types of entities adhere to high standards of ethical conduct and actively contribute to the broader anti-corruption efforts.

Organisation Background

Cradle Fund Sdn. Bhd. (Cradle) is incorporated under the Ministry of Finance Malaysia (MOF) in 2003 with a mandate to fund potential and high-calibre tech startups through its CIP Programmes. Cradle is presently administered by the Ministry of Science, Technology and Innovation (MOSTI).

Throughout its history, Cradle has helped fund over 1,000 Malaysian tech startups and holds the highest commercialisation rate among government grants in the country. Having two decades of experience in the nation's grant funding scene, Cradle further expanded its role from grant provider to an investor through the establishment of its venture arm, Cradle Seed Ventures, in 2015. Following its portfolio expansion to equity investment in early 2017, Cradle offered both funding and investment assistance.

Currently, two new grants are available for the startup ecosystem, namely CIP SPARK and CIP SPRINT. Allocated under the Twelfth Malaysia Plan (12MP), CIP SPARK is a funding programme targeting technology startups for the development of ideas and Minimum Viable Product (MVP) as well as other pre-commercialisation activities, and CIP SPRINT is for the commercialisation of innovative technology products and services, aimed at assisting technology startups at an early stage to develop and commercialise their products in the market.

Following the announcement of the Malaysia Startup Ecosystem Roadmap 2021-2030 (SUPER) in 2021, Cradle has been appointed as the focal point agency for Malaysia's startup ecosystem and mandated to ensure the successful running of a holistic ecosystem to enable and encourage growth among startups. Cradle also spearheads the MYStartup initiative - one of the interventions identified under five Ecosystem Drivers in SUPER - where it contributes directly to efforts in increasing the number of innovative and quality startups.

Furthermore, Cradle administers the Angel Tax Incentive, designed for angel investors to be accorded a tax deduction of up to RM500,000 to stimulate and encourage angel investments from the private sector into technology-based startup companies in Malaysia.

Cradle's product offerings are not only restricted to monetary aid, but also include commercialisation support, coaching and various value-added services to cater to today's entrepreneurs' diversified needs.

Focus Area and Activities

The three focus areas identified based on the main activities in Cradle that are vulnerable to corruption and weakness of governance are as follows:



Fundings

Cradle's main mandate of providing funds to early-stage startups include grants and investment.



Programmes

Other programmes that are managed by Cradle such as Angel Tax Incentive and MYStartup.



Support Services

Other supporting services that enable Cradle to function as an organisation as a whole.

Integrity and Governance

The Integrity and Governance Unit (IGU) within Government Linked Companies (GLCs) plays a crucial role in promoting transparency, ethical conduct and good governance in an organisation. Cradle's IGU was established in August 2020 in accordance with regulatory requirements that are related to:

- The Prime Minister's Directive Series 1 No. 1 of 2018
- The Malaysian Anti-Corruption Act 2009
- Guidelines on Adequate Procedures issued by the Prime Minister's Department in December 2018
- Guideline for the Management of Integrity & Governance Unit 2019



Complaints Management

Complaints Management involves management of complaints, whistleblowing and information on misconduct of corruption, abuse of power, malpractice, violation of organisation's code of conduct and ethics to ensure that action is taken on every information/complaint.



Detection & Verification

Responsible for detecting and verifying information or complaints on criminal misconduct as well as violation of code of conduct and ethics, following which appropriate action is taken.

IGU CORE FUNCTIONS



Integrity Enhancement

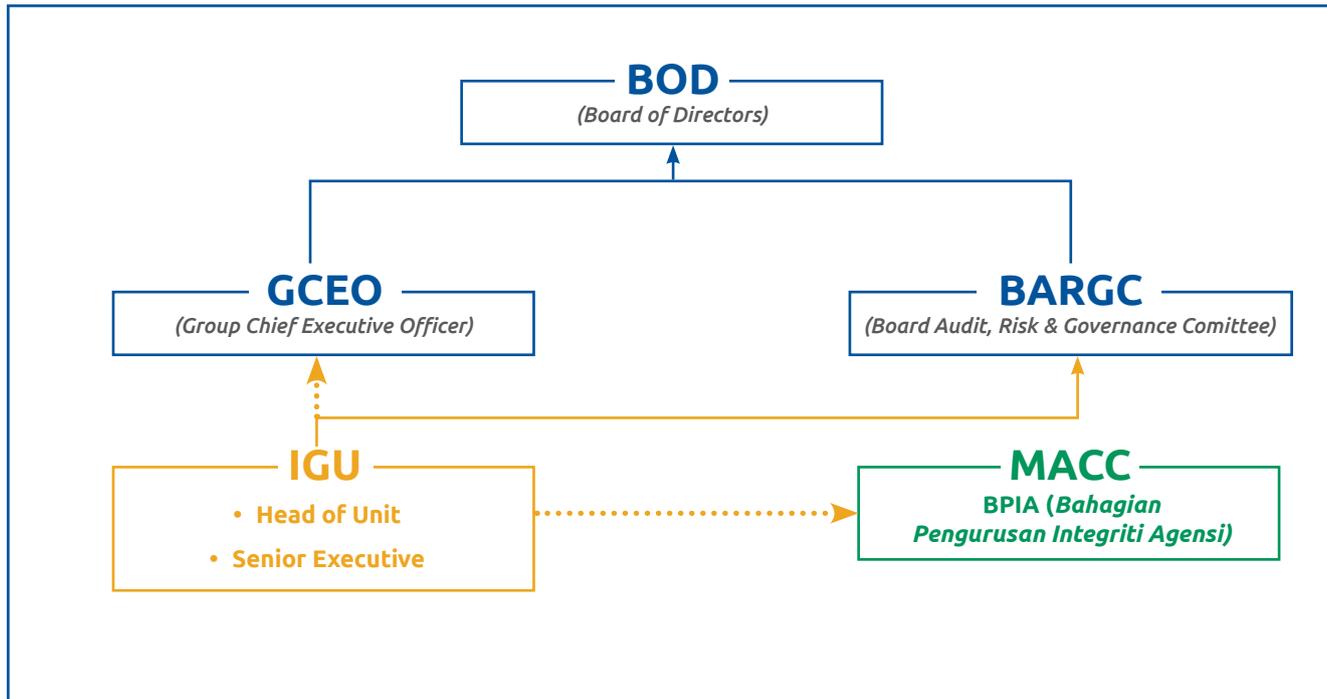
Integrity Enhancement is an important function to ensure the implementation of integrity culture can be achieved through awareness, training, education programmes, among staff within the organisation.



Governance

To ensure good governance is practised in the effort to strengthen integrity, particularly dealing with issues of corruption, malpractice and abuse of power.

IGU'S REPORTING STRUCTURE



BARGC: Overseeing any complaints or cases progress, activities and plan

BOD: Overseeing the overall implementation and function of IGU

GCEO: Overseeing day-to-day administrative matters

MACC (BPIA): Monitoring and reporting of IGU function, activities and progress, every six (6) months

PART 2: *Fighting Bribery and Corruption*



What are the main issues and challenges in fighting bribery and corruption at an organisation level?

The main issues and challenges include:

- Ensuring stringent processes and procedures.
- Raising awareness among employees about their role in the organisation.
- Promoting awareness of the importance of integrity and ethical choices.

Cradle is committed to conducting its business with integrity and in compliance with all applicable laws and regulations in Malaysia. We will always ensure that our business transactions, dealings and relations are conducted with utmost transparency, professionalism and fairness.

We have zero tolerance towards any form of bribery and corruption, and will firmly uphold our Anti-Bribery and Corruption Policy.

Issues and Challenges

Corruption is a complex and pervasive issue that plagues societies worldwide, undermining economic development, eroding public trust, and hindering social progress. Malaysia, like many other nations, grapples with the formidable challenge of combating corruption. Despite ongoing efforts, corruption remains a significant concern in the country.

This is apparent in Malaysia's declining trend in recent years in the Transparency International (TI) Corruption Perception Index (CPI), the most used global corruption ranking.

Malaysia's CPI score slightly improved from 47 in 2018 to 53 in 2019. However, the CPI scores showed a progressive decline since 2019 until 2022.

A nation's CPI score reflects the perceived extent of corruption within its public sector, within a scale of 0 to 100. A score of 0 indicates a high degree of corruption, while a score of 100 signifies a state of notably high integrity and transparency.

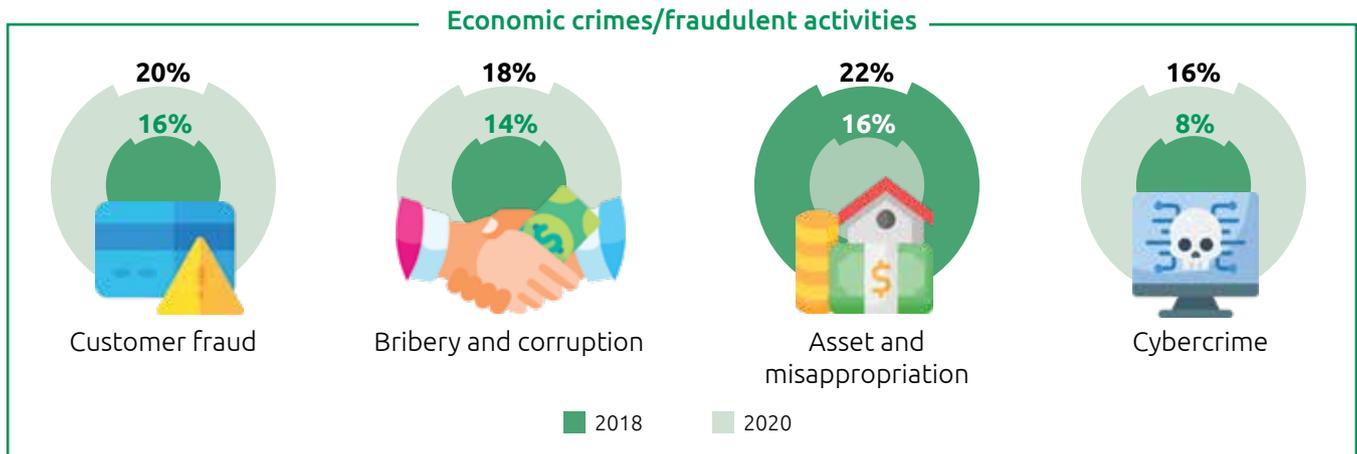
Table 2.1: Corruption Perception Index Score & Rank of Malaysia (2018-2022)

Year	Score	Ranking
2018	47	61
2019	53	51
2020	51	57
2021	48	62
2022	47	61

(Source: Transparency International)

As reported by PricewaterhouseCoopers (PwC) in the Global Economic Crime and Fraud Survey 2020, the four most disruptive fraudulent activities experienced by Malaysian organisations were customer fraud, bribery and corruption, asset misappropriation, and cybercrime. These forms of misconduct collectively constituted a substantial 70% of the total instances of economic crimes in Malaysia.

The top four most disruptive fraudulent activities in Malaysia



(Source: PwC's Global Economic Crime and Fraud Survey)

Additionally, low income levels are not the primary motivator for the involvement of individuals in corrupt practices. According to research carried out by the Malaysian Anti-Corruption Commission regarding the factors contributing to corruption among public service officers, the principal factors driving public service officers to engage in corruption offences are:

- 1 Adopting a lifestyle beyond their means.
- 2 Embracing a greedy attitude.
- 3 Availability of conducive opportunities for engaging in corruption.
- 4 The low values of integrity among the officers.

Key Challenges in Fighting Corruption in Malaysia

Political Interference

The Malaysian Anti-Corruption Commission (MACC) has determined that the primary contributors to corruption in the nation are the procurement and enforcement sectors, along with prominent figures with personal agendas. In addition, procurement-related corruption is often linked to individuals with vested interests, as they hold the authority to grant project approvals.

Moreover, political motivations persist in filling board and chairman positions, thereby complicating the task of distinguishing between political and business interests.

Lack of Political Will

The lack of political will to combat the root cause of corruption is evident from the slow implementation of the NACP 2019-2023, as well as limitations to MACC's independence and autonomy as an anti-corruption institution.

Several institutional reforms have been stalled, such as the development of the Political Funding law, Government Acquisition law and amendments to the Whistleblowers Protection Act 2010.

Whistleblower Protection

Becoming a whistleblower is a challenging path to tread, as individuals are not offered sufficient protection under the Whistleblower Protection Act 2010. Its weak legal infrastructure has created a low-trust environment where individuals are fearful of retaliation and revocation of protection.

The two prevalent issues for a whistleblower to disclose misconduct are:

- I. The Act obliges the individual to report wrongdoing only to enforcement agencies, which are generally perceived as corrupt. The whistleblower protection would be revoked if one reported the wrongdoings to another individual or party, such as a lawyer or the media.
- II. The Act also requires the disclosure of wrongdoing not under the purview of any written law, such as the Malaysia Official Secrets Act 1972, Income Tax Act 1967, and Banking and Financial Institutions Act 1989, regardless of whether the misconduct is detrimental to society.

Low Public Support

The lack of transparency and accountability in ensuring procedures and processes comply with existing legal requirements has undermined public confidence in the Government's ability to enforce and punish corruption offenders.

Towards a Corruption-Free Organisation

At Cradle, we are committed to fostering a corruption-free organisational culture. We strive to lead by example, setting the highest standards of integrity, transparency, and accountability in all our operations. We firmly believe that eradicating corruption is not just a legal or ethical obligation; it is the foundation of our sustainable growth, reputation, and the betterment of society.



We maintain zero tolerance towards bribery and corruption in any form, and everyone in our organisation, including senior management, resonates with this commitment. Employees and members of the public are encouraged to report any suspicion of breach of policies, bribery, corruption, misconduct and more through our safe and confidential Whistleblowing channels provided. With our Whistleblowers Policy, whistleblowers are protected from retaliation, and their valid concerns will be thoroughly investigated.

We promote transparency, ethical conduct and accountability in all our dealings, work procedures and conduct, together with ongoing anti-corruption training and awareness programmes for our team. We believe that knowledge and awareness are key tools in preventing corrupt practices.

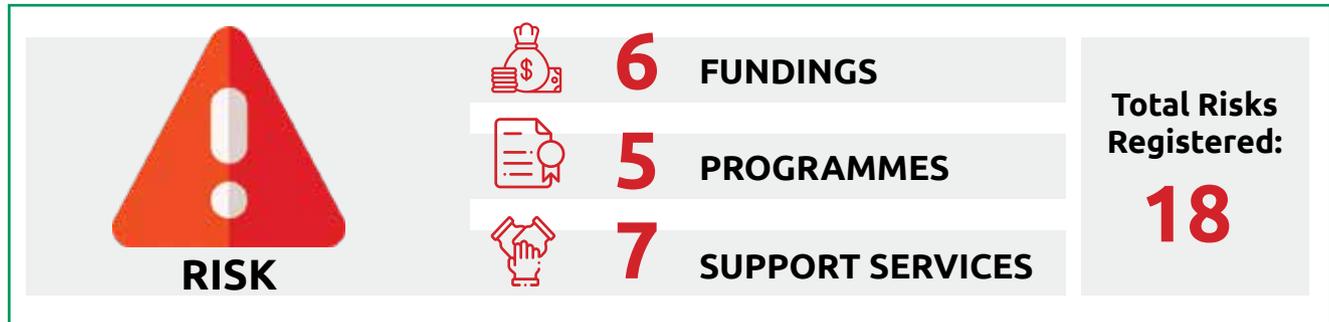
We rigorously adhere to all anti-corruption laws and regulations in Malaysia, which include, but are not limited to, the Malaysian Penal Code (revised 1977) and its amendments, the Malaysian Anti-Corruption Commission Act 2009 and its amendments, the Companies Act 2016, and the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act (AMLATFAPUA) 2001.

We aspire to be the role model in our industry of how an organisation can thrive and prosper while upholding the highest standards of ethics and integrity. This commitment reflects our strong dedication to creating an organisational culture committed to fighting corruption and promoting the highest ethical standards.

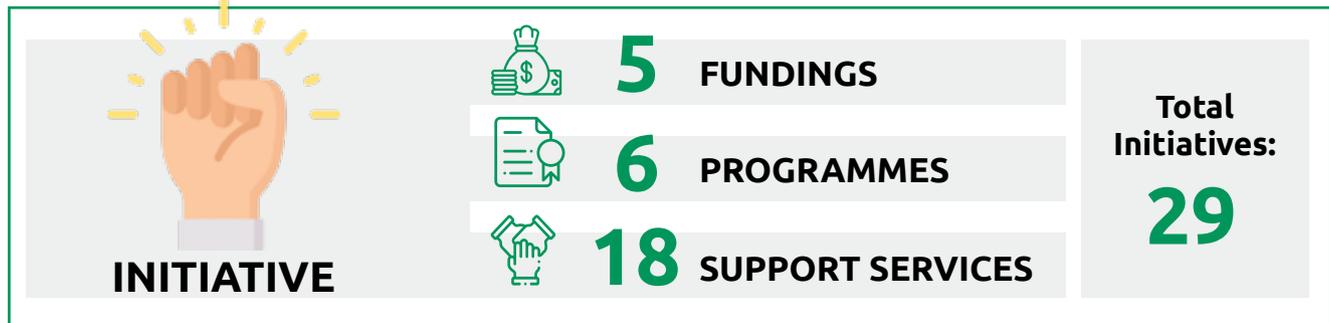
Risk and Data Analysis

Through Cradle's risk exercise, data collection, and data analysis, we have been able to identify a total of 18 Risks and concluded 29 Initiatives to mitigate these potential risks.

OACP: RISK REGISTER SUMMARY



OACP: INITIATIVE SUMMARY



OACP Development

Developing an Organisational Anti-Corruption Plan (OACP) is a structured process that involves several key stages aimed at identifying, preventing, and addressing corruption within an organisation. The key steps, as outlined in the OACP module, include:

Data Analysis

Conduct a thorough assessment to identify potential corruption risks within the organisation, involving both internal and external factors. Data analysis is collected through internal reports, literature reviews, and evaluations of existing policies, procedures, as well as past incidents of corruption.

Corruption Risk Management

Corruption Risk Assessment aims to recognise the risk of past, current, and potential corruption within the organisation. All the organisation's activities, along with their risks, are recognised, and the establishment of current management control is examined. The next necessary action is determining the residual risk and developing effective extra controls while deciding the targeted risk for each area.

Scenario Planning

Set up scenario planning to develop risk metrics, initiatives, and mitigation plans. Planning potential scenarios helps in making informed decisions to prevent corruption incidents. All internal and external activities need to be identified to outline logical scenarios that might occur in the future, based on data analysis. The consequences of each decision and alternative must be considered when reviewing this mitigation plan.

Action Planning

Implement specific control measures to mitigate identified corruption risks. This includes strategic objectives, strategies, and initiatives in the prioritised and potential risk areas. The departments, units or individuals in charge of the risk area must be included in this action plan, and they must acknowledge the strategies and initiatives taken to minimise the risk of corruption. This action plan must include the targeted durations to achieve its target within the expected timeline.

Monitoring and Evaluation

A report on the OACP's implementation progress will be presented during MOSTI's Anti-Corruption Committee meeting. An effective OACP is not a one-time task but an ongoing commitment to combating corruption within the organisation. It is important to adapt and respond to new challenges and vulnerabilities as they arise. Hence, the OACP needs to be continuously evaluated and reviewed for its effectiveness throughout the implementation period and renewed based on the current report and findings.

Vision

Towards a trusted, integrity and corruption-free organisation

Mission

To foster a work culture of integrity, transparency and accountability

Purpose

- Enhancing and strengthening integrity among employees.
- Prioritising transparency and accountability in all aspects of work.
- Supporting all efforts to combat corruption, abuse of power and malpractice.

Main Sectors

Fundings



Programmes



Support Services

Strategy

Fundings

Strengthening fund and investment management for work efficiency and transparency



Programmes

Enhancing programme management to improve programme delivery



Support Services

Strengthening the role and functions of support services

ACTIVITIES OF FOCUS AREA



Fundings

Grant

- **Evaluation** unit that manages application and approval of entrepreneurs
- **Portfolio management** unit that oversees recipients' milestones and reimbursement of project claims

Investment

Portfolio unit that monitors investee companies and exit.



Programmes

These programmes were initiated to contribute and provide a large impact to the startup ecosystem.

- Angel Tax Incentive
- MYStartup



Support Services

Human Resource

Managing recruitment, salary payout, bonus, staff benefits, work performance monitoring, and training. Oversees the adherence to the code of conduct.

Procurement

Manages procurement, tender, purchasing, vendor list and terms of contract.

Strategic Communication

Manages internal and external communications for the organisation.

Finance & Risk

Managing the organisation's accounts and financial activities and organisation risk.

Monitoring

- Integrity & Governance Unit
- Internal Audit Unit
- Legal Affairs

PART 3:

Initiatives

and Action Plan



Focus Area 1: Funding



Focus Area 2: Programme



Focus Area 3: Support Services

As an employee, how can I support these initiatives?

You can support and fulfill your role by checking the corresponding initiative for your unit or department and ensuring that it is achieved or completed within the planned duration.

FOCUS AREA 1: FUNDINGS



Grant

- Evaluation
- Portfolio Management



Investment

Strategy 1

Strengthening fund and investment management for work efficiency and transparency

Objective 1

Streamlining the work process, procedures and guideline for funding management

No.	Initiative Reference No.	Initiative(s)	Lead Department/Unit	Duration
1	1.1.1.1	Enhance segregation of tasks within team members	Evaluation Unit	3 Years
2	1.1.1.2	Include checking Conflict of Interest (COI) in the Evaluation Process	Evaluation Unit	6 Months
3	1.1.2.1	Awareness on document safekeeping to ensure availability of documents for claim submission	Portfolio Management Unit	3 Years
4	1.1.2.2	Enhance existing process with extra layers of verification (i.e. SSM Checks, third party verification)	Portfolio Management Unit	6 Months
5	1.2.1	Enhance competency training for the Investment Team	Investment	3 Years

FOCUS AREA 2: PROGRAMMES



Angel Tax Incentive



Ecosystem Development

Strategy 2

Enhancing programme management to improve programme delivery

Objective 2

Streamline work processes and procedures to increase the efficiency of programme management

No.	Initiative Reference No.	Initiative(s)	Lead Department/Unit	Duration
6	2.1.1	Briefing/Training on the guidelines and contract including on membership fee collection	Angel Tax Incentive Office (ATIO)	3 Months
7	2.1.2	Add on the existing SOP about membership fee collection	Angel Tax Incentive Office (ATIO)	3 Months
8	2.1.3	Create a membership database with checklist and status	Angel Tax Incentive Office (ATIO)	6 Months
9	2.2.1	Awareness of data security & governance	Ecosystem Development	3 Years
10	2.2.2	Enhance the workflow process by adding tracking of data request	Ecosystem Development	1 Year
11	2.2.3	Conduct penetration test	Ecosystem Development	1 Year

FOCUS AREA 3: SUPPORT SERVICES

- | | | |
|--|---|--|
| <ul style="list-style-type: none"> • Procurement • Strategic Communication | <ul style="list-style-type: none"> • Legal Affairs • Finance & Risk • Human Resource | <ul style="list-style-type: none"> • Internal Audit Unit • Integrity & Governance Unit |
|--|---|--|

Strategy 3 Strengthening the role and functions of support services

Objective 3 Enhance work efficiency through integrity, credibility and accountability of employees

No.	Initiative Reference No.	Initiative(s)	Lead Department/Unit	Duration
12	3.1.1	Enforce communication via official procurement email	Procurement	3 Months
13	3.1.2	Develop an end-to-end procurement system (Automated process)	Procurement	2 Years
14	3.1.3	Extra layer of background checking on vendors	Procurement	3 Years
15	3.2.1	Enhancing the current SOP on material approval, channel of communication and response timeline	Strategic Communication	1 Year
16	3.2.2	Improve information gatekeeping to avoid miscommunication & misuse of intellectual property.	Strategic Communication	1 Year
17	3.2.3	Create periodic awareness among internal staff regarding communication etiquette	Strategic Communication	3 Years

No.	Initiative Reference No.	Initiative(s)	Lead Department/Unit	Duration
18	3.3.1	Conduct briefing and knowledge-sharing sessions to startups and/or Cradle staff to spread awareness and equip both with basic legal knowledge on proper governance to avoid fraud/misrepresentation and other unlawful activities.	Legal Affairs	3 Years
19	3.4.1	Enhance SOP on payment process: <ul style="list-style-type: none"> • Payment Term • Implement Service Confirmation Form 	Finance & Risk	1 Year
20	3.4.2	Create awareness on updated payment process and cycle to employees	Finance & Risk	1 Year
21	3.5.1	Awareness on code of conduct and ethics	Human Resource	3 Years
22	3.5.2	Punitive action on misuse & abuse of power in the workplace	Human Resource	3 Years
23	3.5.3	Update and create awareness of the Scheme of Services (SOS)	Human Resource	3 Years
24	3.5.4	Introduce a fixed allowance basis	Human Resource	1 Year
25	3.5.5	Enhance existing attendance system to include monitoring option	Human Resource	3 Years

No.	Initiative Reference No.	Initiative(s)	Lead Department/Unit	Duration
26	3.6.1	Special review by Internal Audit from time to time	Internal Audit	3 Years
27	3.7.1	Awareness on bribery, corruption and penalties for offences	Integrity & Governance Unit	3 Years
28	3.7.2	Training and awareness on work integrity, honesty and good governance	Integrity & Governance Unit	3 Years
29	3.7.3	Review and update policies – Whistleblower Policy, Anti-Bribery and Corruption Policy, Conflict of Interest Policy and more	Integrity & Governance Unit	3 Years

PART 4:

Monitoring and Evaluation



How long is the monitoring period for the OACP?

The monitoring period for the OACP is three (3) years, covering the cycle from 2023 to 2025. The subsequent period will span from 2026 to 2028.

The Integrity & Governance Unit (IGU) is the designated secretariat to monitor and evaluate the mechanism that will be implemented in the administrative structure and consists of two (2) levels, which are Operating and Strategic Level.

Operating Level

IGU and all units and departments in Cradle

Strategic Level

Board of Directors, Board Committee and Senior Management of Cradle

Mechanism and Reporting

The mechanism for monitoring and evaluating an Organisational Anti-Corruption Plan (OACP) involves several key steps and components.

Progress Report

- Units and departments to submit reports on the implementation status of the initiatives outlined in the OACP on a quarterly basis (two weeks before the meeting).
- Quarterly meeting to discuss the implementation status, issues or challenges and action plan.
- Full report of progress to be presented to Board of Directors quarterly.

Implementation Achievement

- To submit the implementation achievement report during the Anti-Corruption Committee meeting (JAR).

Review and Assessment

- Secretariat to monitor the effectiveness of the overall plan and conduct improvement to address weaknesses and emerging risks.
- Monitor the effectiveness of training and awareness programmes on the OACP initiatives.
- Identify areas to improve and plan for the OACP renewal.

Renewal Plan



OACP Renewal Plan

The Organisational Anti-Corruption Plan (OACP) renewal process involves reviewing, updating, and potentially revising the plan to ensure its continued effectiveness in addressing corruption risks and weaknesses, and aligning with any changes and updates within the organisation's operations, policies, and best practices.

Incomplete initiatives, as well as emerging risks and challenges must be weighed and included in the renewal plan.

Cradle's OACP renewal plan will be implemented at the end of the current OACP period (2023 – 2025) and issued for the following year period 2026 - 2028.

PART 5: *Conclusion*



The primary objective behind the development and formulation of the OACP is to establish a specific, practical, and strategic roadmap for combating malpractice and corruption within Cradle. Additionally, the OACP is tasked with establishing achievable goals based on the initiatives to be undertaken by Cradle.

Aligned with the concerted efforts to realise the Government’s vision towards a country free of corruption, the OACP plays a pivotal role in shaping the policies and direction of governance, integrity, and anti-corruption efforts in Cradle. It also aims to enhance the quality and conduct a thorough analysis using corruption risk assessment methods that enable the identification of critical areas that require serious attention.

From time to time, the OACP will undergo evaluation and continuous improvement, adapting to the current situation. All departments and units in Cradle are expected to fulfil their respective roles in realising the objectives and initiatives outlined in the OACP. The commitment and dedication of both management and staff are crucial in enabling the implementation success of the OACP.

Ultimately, the OACP seeks to cultivate an organisational culture characterised by strong ethical values, integrity and good governance. The implementation aims to instil and maintain the highest level of integrity among the people in the organisation while fostering excellence and unwavering commitment to serving stakeholders.

Appreciation

Our special thanks to everyone involved for their contribution and unwavering support:

- 1 Board of Directors
- 2 GCEO and Senior Management
- 3 Malaysian Anti-Corruption Commission (MACC)
- 4 Malaysian Anti-Corruption Academy (MACA)
- 5 Unit Integriti (UI), MOSTI
- 6 All the departments and units in Cradle involved in the development of the OACP.

And everyone else who were involved directly and indirectly in the completion of this OACP.

Abbreviation

Abbreviation	Term
12MP	Twelfth Malaysia Plan
ATIO	Angel Tax Incentive
BARGC	Board Audit, Risk & Governance Committee
BOD	Board of Directors
CEO	Chief Executive Officer
CIP	Cradle Investment Programme
CLBG	Company Limited by Guarantee
COI	Conflict of Interest
CPI	Corruption Perception Index
GLC	Government Linked Company
IGU	Integrity & Governance Unit
JAR	<i>Jawatankuasa Anti-Rasuah</i> (Anti-Corruption Committee)
MACC	Malaysian Anti-Corruption Commission
MOF	Ministry of Finance Malaysia
MOSTI	Ministry of Science, Technology and Innovation
MVP	Minimum Viable Product
NACP	National Anti-Corruption Plan
OACP	Organisational Anti-Corruption Plan
PwC	PricewaterhouseCoopers
SOE	State-Owned Enterprise
SOS	Scheme of Services
SSM	Suruhanjaya Syarikat Malaysia
SUPER	Malaysia Startup Ecosystem Roadmap
TI	Transparency International







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