ABAC, AML & Human Rights for Business

With Section 17A & T.R.U.S.T. Aligned Compliance Awareness

Course Duration: 1 Day (9:00 AM – 5:00 PM)

Level: Awareness & Prevention

Target Audience: General Staff, New Hires, Sales, Procurement, and Operations Teams.

Course Overview

This intensive 1-day program provides the essential "legal shield" for your organization. It translates complex regulatory requirements into practical, daily actions to prevent bribery, money laundering, and human rights violations. Participants will move from "general awareness" to a formal, documented commitment to corporate integrity. It is specifically designed to align with the **Malaysian Guidelines on Adequate Procedures (T.R.U.S.T. Principles) pursuant to Section 17A(5) of the MACC Act 2009.**

Learning Outcomes

By the end of this 1-day programme, participants will be able to:

- **Operationalise the T.R.U.S.T. framework** by translating each principle into daily business actions.
- **Identify** red flags and exposure points in daily operations to support organizational **Risk Assessment (R)**.
- **Apply** preventive internal controls and due diligence measures in alignment with **Undertake Control Measures (U)**.
- **Explain** how leadership behavior and an ethical culture drive **Top Level Commitment (T)**.
- **Analyse** ethical dilemmas using ESG lenses to protect the organization's reputation and mitigate corporate liability.
- **Formally Commit** to the organization’s Code of Conduct through a structured **Integrity Pledge** session.

Training Methodology

- Scenario-based learning using real business situations.
- Interactive quizzes and group challenges.
- **NO heavy technical workshop** – focus on practical application and awareness.

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Course Outline and Schedule

DAY 1 — Awareness & Preventive Measures

("Stop the problem before it becomes scandal")

9.00 am – 10.30 am

Module 1: Governance, Ethics & ESG Linkage

- Why compliance failures destroy companies (real cases)
- ABAC + AML → Governance (G)
- Human Rights → Social (S) + DEI
- Malaysian context:
    - MACC Act Section 17A (corporate liability)
    - AMLA fundamentals

· Introduction to **T.R.U.S.T Principles** and translate each principle into real business action instead of theory

Activity: *"Approve or Reject?"* (ethical decision challenge)

10.30 am – 12.30 pm

Module 2: ABAC Risks in Daily Operations

- What actually counts as bribery (not just envelopes of cash)
- Grey areas:
    - Gifts & hospitality
    - Sponsorships
    - Facilitation payments
- High-risk zones:
    - Procurement
    - Vendor Onboarding
    - Contract approvals

· Link to:

- Top Level Commitment (T) – Leadership behaviour
- Risk Assessment (R) - Identifying exposure points

Activity: *Red Flag Mapping (Procurement Scenario)*

12.30 pm – 1.30 pm

Lunch Break

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1.30 pm – 2.30 pm

Module 3: AML Awareness for Non-Bankers

- The 3 stages:
  - Placement
  - Layering
  - Integration
- How businesses unknowingly become part of laundering
- Link to:
  - Corruption → laundering
  - Risk Assessment (R) – Identifying suspicious patterns

Activity: *"Follow the Money" mini simulation*

2.30 pm – 3.30 pm

Module 4: Human Rights as Business Risk (ESG/DEI Lens)

This is where you differentiate yourself

- Human rights = NOT CSR, but **operational risk + ESG exposure**
- Workplace and supply chain exposure
- Reputation and investor pressure
- Key risks:
  - Forced labour / modern slavery
  - Workplace discrimination
  - Harassment & toxic culture
  - Supplier exploitation
  - Privacy & dignity
- Link to:
  - ESG reporting
  - DEI practices
  - Employer branding & talent risk
  - Top Level Commitment (T) – Ethical culture
  - Undertake Control Measures – Policies, supplier standards

Activity: *Case: "Profitable but unethical — continue or stop?"*

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3.30 pm – 5.00 pm

Module 5: Preventive Controls & Safeguards

- Code of Conduct Vs Policy vs SOP (clear distinction)
- Internal controls:
    - Segregation of duties
    - Approval thresholds
    - Audit trails
- Third-party due diligence
- Strong alignment with:
    - Undertake Control Measures (U)

The key message: **If your control only exists on paper, it doesn't exist.**
Activity: *Design Your Department Controls*

Day 1 Value Add: The "Integrity Pledge" Commitment

This programme goes beyond awareness by incorporating a structured **Integrity Pledge Signing Session** at the end of Day 1.

Unlike typical training programmes that end with discussion, this session requires participants to:

- **Formally commit** to ethical conduct and compliance standards
- Acknowledge their responsibilities under:
    - Anti-Bribery & Anti-Corruption (ABAC)
    - Anti-Money Laundering (AML)
    - Human Rights & ESG principles
- Reinforce alignment with the organisation's **Code of Conduct and T.R.U.S.T framework**

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