



ORGANISATIONAL
ANTI-CORRUPTION
PLAN (OACP)
2023-2027

MALAYSIA DIGITAL ECONOMY CORPORATION

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**YB Tuan Syed Ibrahim
Syed Noh**
Chairman of MDEC

Assalamualaikum Warahmatullahi Wabarakatuh and Greetings Everyone,

On behalf of the Board of Directors, I am honoured to present the Malaysia Digital Economy Corporation (“**MDEC**”) Organisational Anti-Corruption Plan (“**OACP**”) 2023-2027 which demonstrates our commitment in combating corruption in the organisation.

At MDEC, our stand against corruption is clear. Corruption diminishes the reputation of an organisation, thus lead to burning the bridges between stakeholders and the entity. Corruption is unacceptable and it is something that we have zero-tolerance for.

Since its establishment in 1996, MDEC, a government agency under the purview of the Ministry of Communications and Digital, has been practicing high integrity and governance in every aspect. In other words, we are dependable, honest and trustworthy.

Upholding these values on top of our daily commitments should be our main priority and we will not jeopardise what we already have and future that we are aiming for.

MDEC's commitment is to avoid any wrongdoings, whether it is internally or externally, that would tarnish MDEC's reputation, and stay consistent with it. On behalf of the top levels of MDEC, we affirm that the organisation is and will continuously operating in compliance with its policies and any applicable regulatory requirement.

MDEC fully support the OACP 2023-2027 as it will assist us in strengthening the implementation of strategic governance, integrity, and anti-corruption initiatives.

With this stringent anti-corruption plan and awareness in place, I believe we will build a more solid relationship with the Rakyat (people), entrepreneurs, and investors. We strive to boost Malaysia's status as the preferred digital hub of ASEAN.

FOREWORD BY CHAIRMAN OF BOARD INTEGRITY AND GOVERNANCE COMMITTEE (BIGC) OF MDEC, YBHG. DATIN PADUKA ROSLINAH MD JANI

Assalamualaikum
Warahmatullahi
Wabarakatuh and
Salam Integriti,



YBHG. Datin Paduka Roslinah Md Jani

Chairman of Board Integrity and Governance Committee (“**BIGC**”) of MDEC

MDEC OACP elaborates on principles of corruption and other malpractices that may arise in the course of business especially in this current digital era.

As you may recall, the National Anti-Corruption Plan (“**NACP**”) 2019-2023 highlighted that the development of the OACP aims to address corruption, governance, and integrity issues within the organisation.

I truly understand that we cannot run away from the current technological advancements as we are living in the digital era. We are exposed to challenges and risks but with a strong foundation, we always go back to our main objective – to achieve the digital transformation, making Malaysia as the preferred digital hub of ASEAN with high standard of integrity and governance. We aim to achieve this objective through catalytic high-impact initiatives, strategic and sustainable investments as well as inclusive policies implemented upon a solid foundation of integrity, transparency and good governance.

As the Chairman of Board Integrity and Governance Committee of MDEC, I am honoured to uphold the agency’s commitment to fight against corruption in business and strongly support for good governance practice in the agency.

The development of OACP is intended as a systematic procedure to our employees, as well as to the public, to adhere to integrity and to commit in combating corruption and bribery related issues. Therefore, the OACP should not be taken lightly.

This is the basis of further initiatives towards greater governance, risk assessment, disciplinary, endorsed budget, and strategic plannings. This is, among others, the guideline that MDEC must uphold to strengthen the agency’s vision, mission, and value.

Corruption destroys everything. Hence, we do not tolerate such wrongdoing that will tarnish our image and destroy stakeholders’ confident. Let’s walk this journey together and fight against not only corruption but also other integrity related offences. Say no to corruption and keep practicing good governance.

CEO TS. MAHADHIR AZIZ’S COMMITMENT MESSAGE TOWARDS MDEC OACP

Dear stakeholders
and MDECrew,



Ts. Mahadhir Aziz

Chief Executive Officer of MDEC

The ever-evolving landscape of digital and technology has very much impacted our lives, from government to businesses and individuals. Often, we let the new technological advancements blind us to what truly matters, and we are susceptible to challenges that would jeopardise our integrity.

Bribery, corruption, abuse of power, mismanagement of assets, privacy breaches, abuse of procedures, malpractice, and many of those are the main problems affecting the economic and social development of nations.

Before I begin our pledge towards anti-corruption, let us always remember that MDEC aspires to bolster Malaysia’s status as the digital hub of ASEAN, opening new doors and driving shared prosperity for all Malaysians. In the race towards a thriving digital economy, teamwork is of the essence, and everyone in MDEC plays a crucial role.

While on the ground, keeping the engines running and the wheels turning, let’s not forget our main purpose – to uphold our values in serving the nation, responsibly and ethically.

At MDEC, we pride ourselves for acting professionally, ethically, honestly, and fairly. The agency’s reputation is built on our core value – the people – the value that our stakeholders and partners expect of us in the agency.

We are committed to uphold and develop the national initiatives to fight against corruption – the OACP 2023 -2027 – to help us achieve clear and efficient organisational Vision, Mission and Key Performance Indicators (“**KPIs**”).

The OACP 2023-2027 serves as a platform to encourage us to improve our reputation and performance from any criticism or adverse effect, and to safeguard commercial organisations from being disputed under Malaysian Anti-Corruption Commission (“**MACC**”) Act 2009.

I believe by maintaining our values with ethics, integrity, good governance and professionalism, we will build a strong foundation that keeps us growing and stay competitive in the digital age and corruption free.

Together, let’s fight corruption and practice a morally working environment.

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ACRONYMS	FULL TERM		
ABMS	Anti-Bribery Management System	IDD	Digital Industry Development Division
BIGC	Board Integrity and Governance Committee	IGD	Integrity and Governance Department
BOD / Board	Board of Directors	KKD	Ministry of Communications and Digital
BSD	Business Services Division	MACC	Malaysia Anti-Corruption Commission
CAD	Corporate Affairs Division	MACC Act 2009	Malaysian Anti-Corruption Commission Act 2009
CCIG	Critical Corruption Integrity & Governance	MD	Malaysia Digital
CeIO	Certified Integrity Officer	MDEC	Malaysia Digital Economy Corporation Sdn Bhd
CEO	Chief Executive Officer	MOF Inc.	Minister of Finance (Incorporated)
CRA	Corruption Risk Assessment	MRCC	Management Risk and Compliance Committee
CSD	Corporate Services Division	MSC	Multimedia Super Corridor
DEN	Digital Enablers Division	NACP	National Anti-Corruption Plan
DEX	Digital Export Division	OACP	Organisational Anti-Corruption Plan
DID	Digital Investment Division	PAM	Privilege Access Management
EXCO	Executive Committee	PEMANGKIN	Malaysia Digital Catalytic Programmes
GDP	Gross Domestic Product	SOP	Standard Operating Procedures
GLC	Government Linked Companies	SPD	Strategy & Policy Division
GMD	Grant Management Department		
HRA	Human Resource & Administration		



Chapter

ABOUT MDEC

This chapter provides an in-depth exploration of MDEC; from the foundational background, core values, overarching vision, and mission. Additionally, it sheds light on the MDEC Integrity and Governance Department, enlightening the role and significance within the organisation. A critical focus is placed on the pivotal aspects of the MDEC OACP, underlining its substantial importance in MDEC's operations and commitment to combatting corruption.

1.1 ABOUT MDEC

1.1.1. MDEC, founded in 1996 under the Ministry of Communications and Digital, spearheads Malaysia's digital economy. Initiated by Malaysia's government to implement the MSC Malaysia initiative, we drive nationwide digital transformation and growth. Through incentives and strategic governance, we aim to elevate Malaysia as ASEAN's digital hub.

1.2 LOGO AND TAGLINE

1.2.1. Logo



1.2.2. Tagline

Leading Malaysia's Digital Economy

MDEC works towards Malaysia's digital advancement by creating opportunities for everyone to thrive in a future-proof economy.

1.3 VISION AND MISSION

For Malaysia to be the preferred hub for world-class digital businesses and talents.



Drive the digital economy through catalytic high-impact initiatives, strategic and sustainable investments, and inclusive policies.

1.4 PEOPLE AND VALUES

1.4.1. Meet the MDECrew

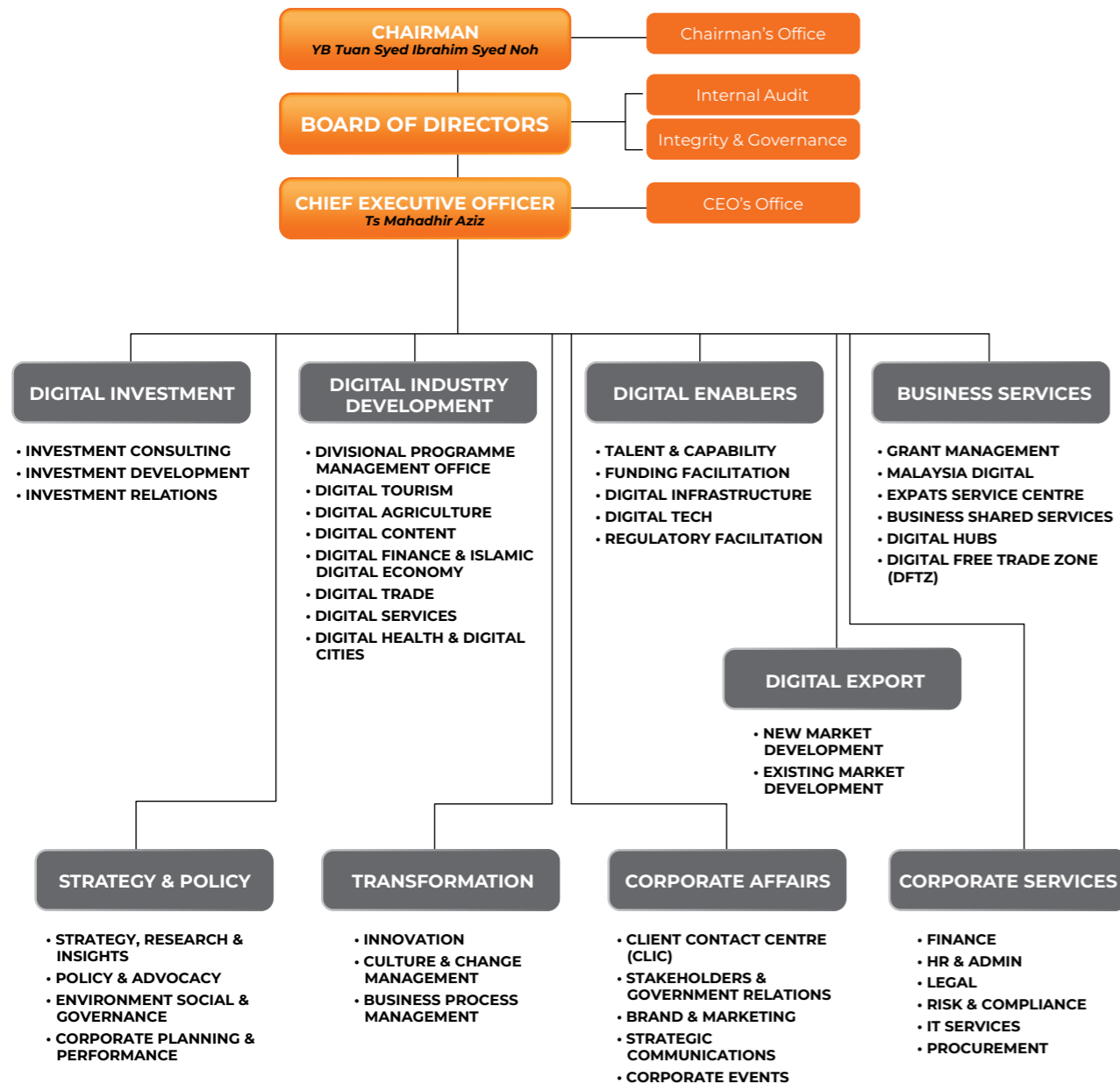
Teamwork is paramount at MDEC. Like a Formula One race crew, we have a team principal leading, directors coordinating for peak performance, and our ground team ensuring smooth operations. Together, as the MDECrew, we drive Malaysia's digital economy with expertise, passion, and seamless collaboration.

1.4.2. The core values of MDECrew 2023:



1.5 GOVERNANCE AND OPERATION STRUCTURE OF MDEC

1.5.1. MDEC is owned by Minister of Finance (Incorporated) (“**MOF Inc.**”) and the functional reporting to the Ministry of Communications and Digital. MDEC strategic functional structure 2023 as follows:



Note: This is strategic functional structure approved for 2023 and may subject to changes

1.6 MALAYSIA DIGITAL

1.6.1. Since 1996, MDEC have driven Malaysia’s digital transformation. MDEC remains committed to advancing Malaysia’s digital economy by:

a

Crafting policies and coordinating stakeholder collaboration for a dynamic digital ecosystem.

b

Nurturing local entrepreneurs and fostering global champions to boost the digital economy's Gross Domestic Product (“**GDP**”).

c

Optimising digital investment for economic benefit.

1.6.2. The rapidly changing digital landscape demands a new strategy for sustained relevance, resilience, and fuelling the country’s economic growth.

1.6.3. Malaysia Digital (“**MD**”) is a government-backed initiative to draw in companies, talents, and investments, empowering Malaysian businesses and *rakyat* to lead in the global digital revolution and economy.

1.6.4. The mission:

a

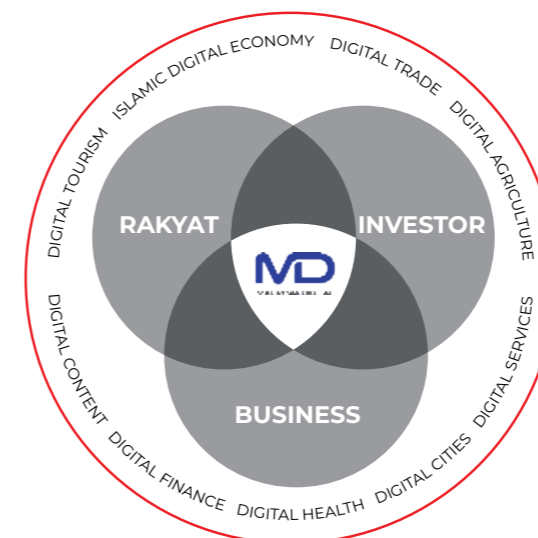
Promote digital adoption among young entrepreneurs, businesses, and *rakyat*.

b

Assist local tech companies in becoming successful international players and “Malaysian champions”.

c

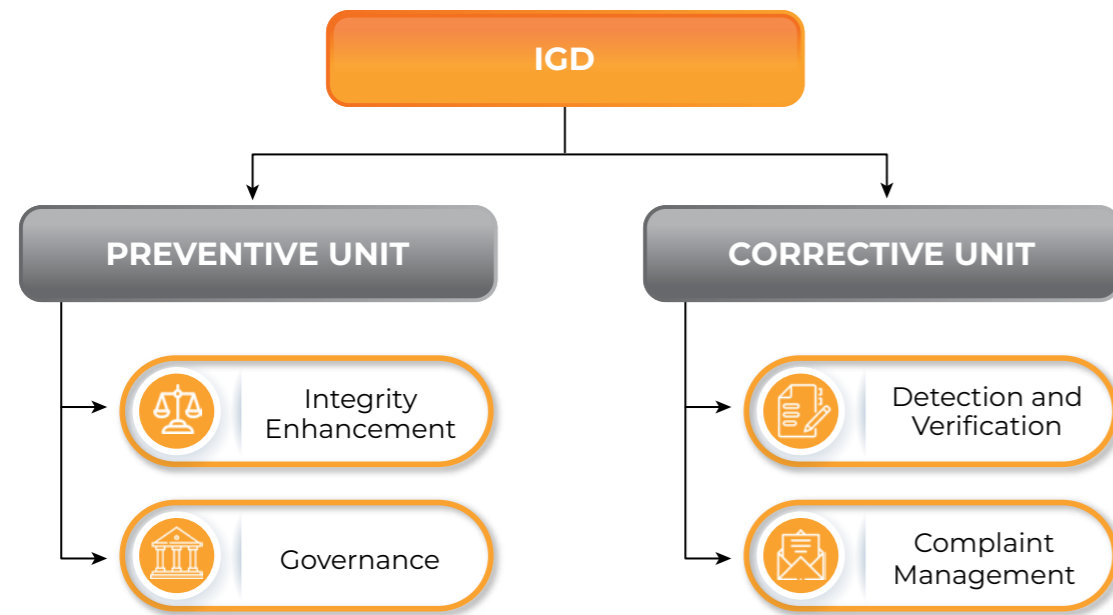
Attract high-value digital investments.



Malaysia Digital (MD) fuels sector growth **via digital adoption and programmes like PEMANGKIN**

1.7 INTEGRITY AND GOVERNANCE DEPARTMENT OF MDEC

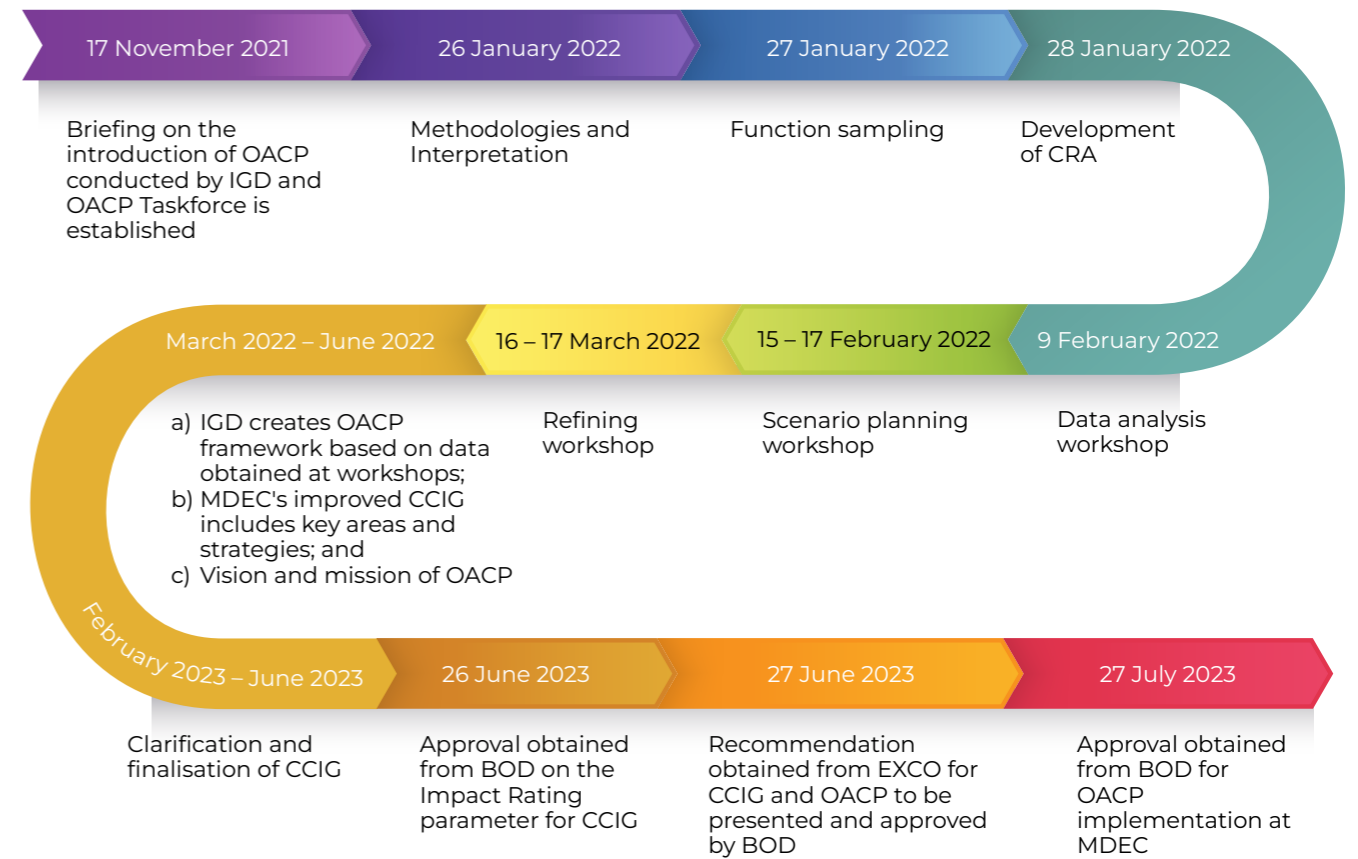
- 1.7.1. Established in alignment with NACP 2019-2023, the IGD at MDEC was approved on 13th May 2020 to promote a culture of excellence, ethics, and anti-corruption measures.
- 1.7.2. The IGD aligns with Prime Minister's Directive No. 1/2018 to prevent corruption within MDEC and acts as a defence under Section 17A of MACC Act 2009.
- 1.7.3. There are two (2) units under the IGD serving four (4) main functions as follows:



Chapter 2 MDEC OACP JOURNEY

In this chapter, we explore into the priority areas and focal points of MDEC concerning governance, integrity, and combating corruption. It provides an insightful narrative on the comprehensive developmental journey of the MDEC OACP, outlining its growth, evolution, and strategic milestones over time.

- 2.1 The OACP is a crucial anti-corruption document, focusing on governance, integrity, and corruption. It aligns with NACP 2019-2023, requiring implementation across entities like statutory bodies and private sector enterprises.
- 2.2 MDEC OACP is guided by Corruption Risk Assessment ("CRA") and Critical Corruption Integrity and Governance ("CCIG") data from workshops and taskforce engagements.
- 2.3 The table below illustrates MDEC OACP's developmental journey:

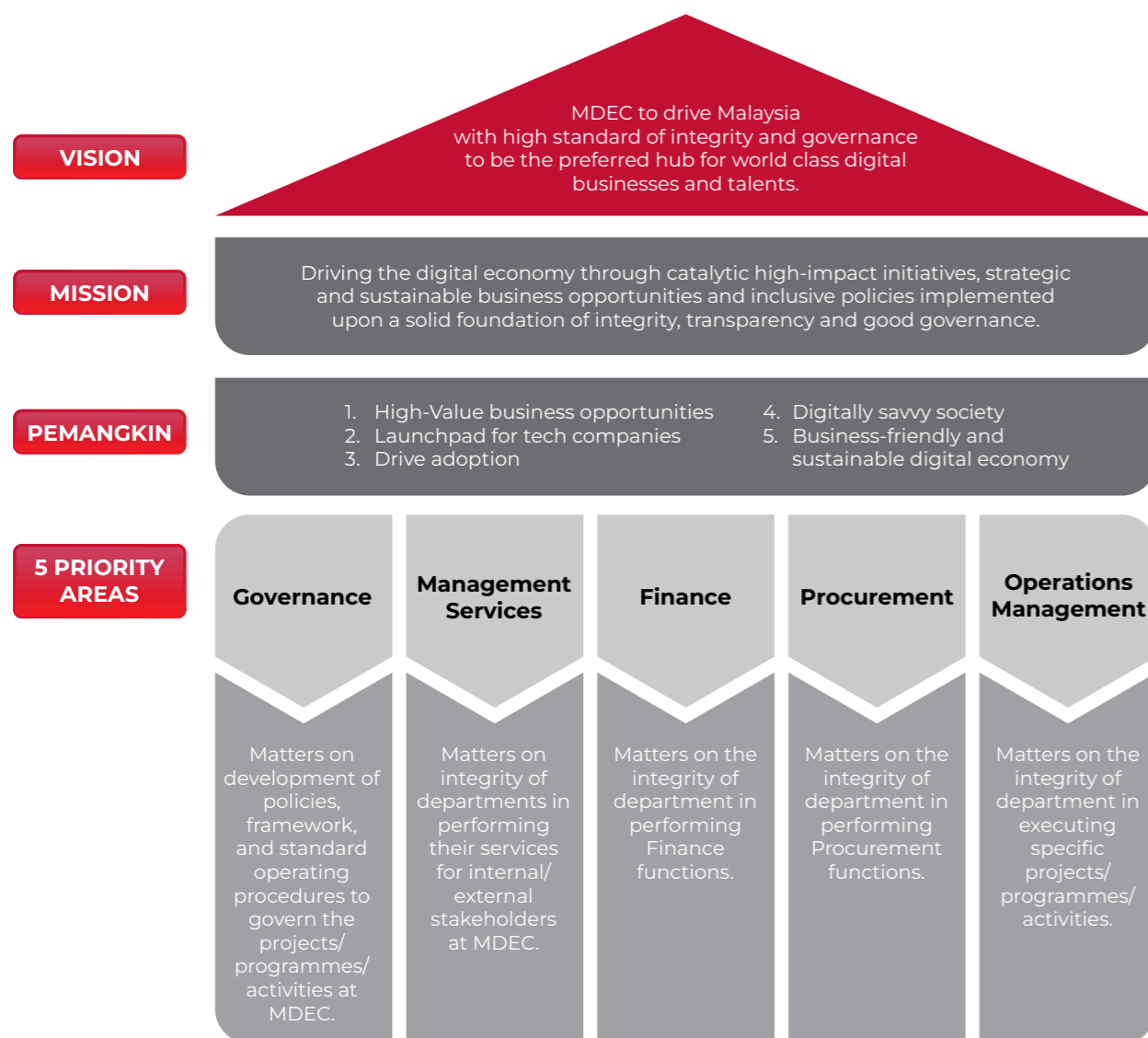


Chapter

MDEC OACP FRAMEWORK

In this chapter, we explore into the MDEC OACP Framework and its development in alignment with established guidelines. This chapter illustrates the priority areas that underpin the MDEC OACP. It offers detailed insights into the OACP's focal points and its areas of focus. Furthermore, it expounds on the Priority Areas, Strategies, and Strategic Objectives that constitute the core of the MDEC OACP.

3.1 MDEC OACP framework is developed in line with the Guidelines on Adequate Procedures (pursuant to Subsection (5) of Section 17A of the MACC Act 2009) issued by the Prime Minister's Department. The following depicts vision, mission, PEMANGKIN and priorities areas for MDEC OACP:



3.2 The implementation of OACP focuses on **five (5) priority areas** namely **(1) Governance, (2) Management Services, (3) Finance, (4) Procurement and (5) Operations Management**.

Diagram below shows the proposed priority areas, strategies, and the strategic objectives of MDEC OACP.

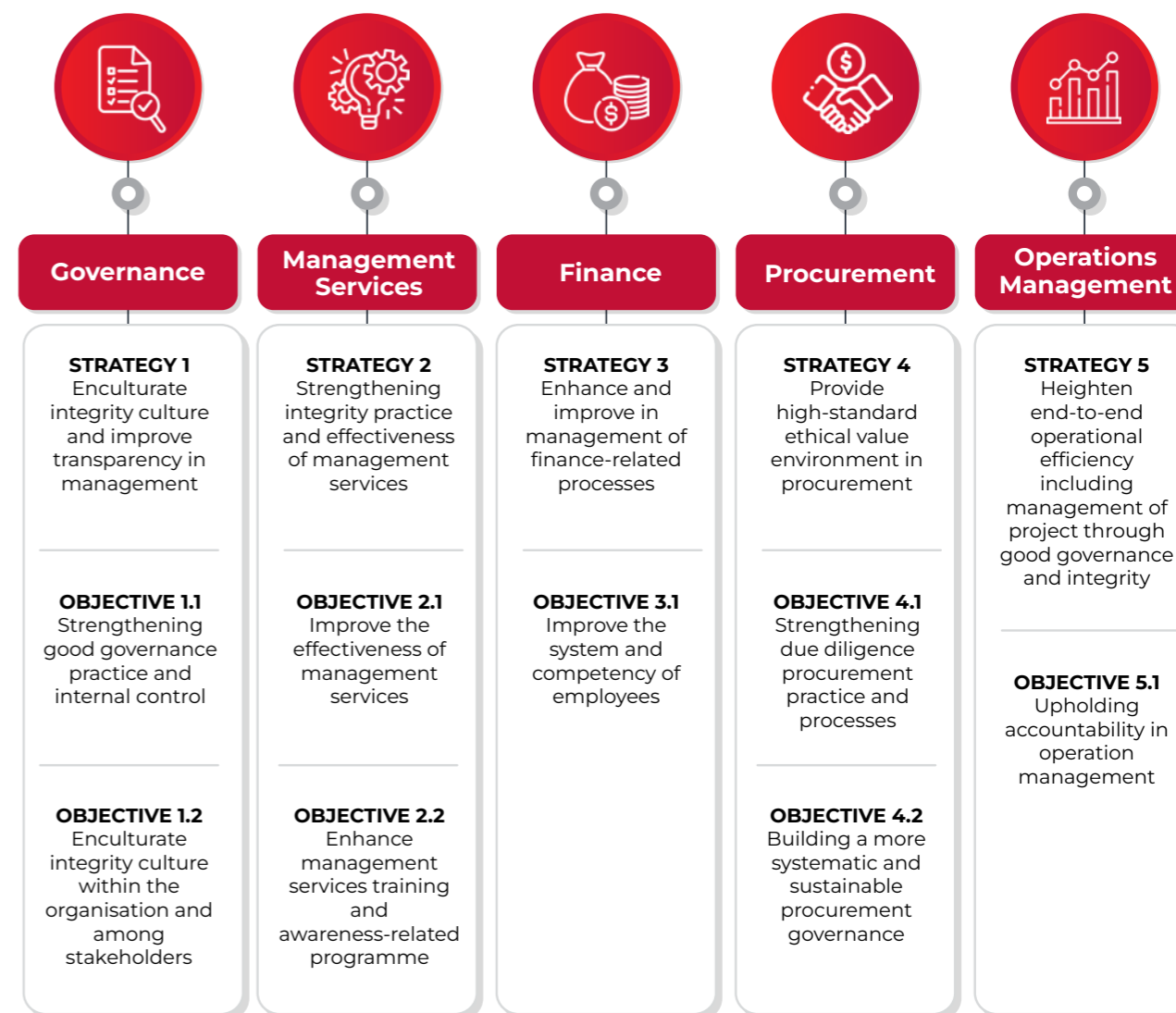


Table 3.2: Priority Areas, Strategies and Strategic Objectives of MDEC OACP

3.3 Priority areas are align with MDEC functions.

3.4 Governance covers the development on policy, framework and standard operating procedures.

3.5 Integrity risks in the performance of departments' functions are categorised under Management Services, Finance, Procurement, or Operations Management.

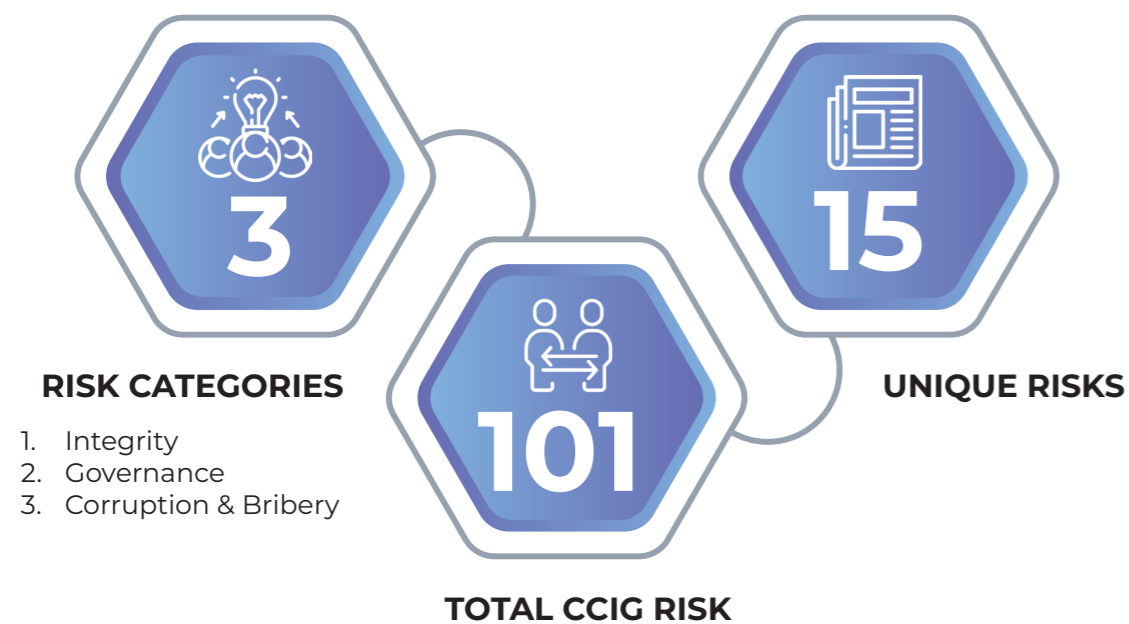
3.6 OACP framework serves as a strategic reference for ethical practices, enhancing MDEC's impact on deliverables and services.

Chapter 4

CRITICAL CORRUPTION INTEGRITY AND GOVERNANCE RISK REGISTER

In this chapter, the outcomes of a comprehensive risk assessment conducted based on the Critical Corruption Integrity and Governance (“**CCIG**”) framework are presented, accompanied by a suitable timeline.

4.1 MDEC has conducted corruption risk assessment based on CCIG risk register and the findings are as follows:



4.2 Based on OACP workshops, the OACP Taskforce plans actions with **short-term (2 years) or long-term (5 years)** timelines.

4.3 Following the above, IGD has identified a total of 77 action plans and grouped the similar action plans into several common initiatives resulting in **23 MDEC OACP initiatives**.

Chapter 5

MDEC OACP INITIATIVES (2023 – 2027)

In this chapter, a thorough breakdown of short-term and long-term MDEC OACP initiatives for the upcoming years is presented.

MDEC OACP’s key priority areas are supported by **five (5) strategies, eight (8) strategic objectives** and **twenty-three (23) initiatives**.





GOVERNANCE

Strategy 1: Enculturate integrity culture and improve transparency in management

Strategic Objective 1.1: Strengthening good governance practice and internal control

NO.	MDEC OACP INITIATIVES	ACTION PLAN	OWNER	TIMELINE
1.	Initiative 1.1.1	To periodically revise/monitor policies: Employee Code of Conduct, Whistleblowing Policy, Fit & Proper Policy, Integrity Pact, and implement Anti-Bribery Management System (“ ABMS ”)	IGD	Long Term (2023 – 2027)
2.	Initiative 1.1.2	To obtain Certified Integrity Officer (“ CeIO ”) certificate	IGD	Short Term (2023 – 2024)
3.	Initiative 1.1.3	To periodically revise/develop policies/SOPs/guidelines for continuous improvement.	MDEC	Long Term (2023 – 2027)
4.	Initiative 1.1.4	To consider restructuring departments that are exposed to potential of conflict of interest and/or inability to provide total independent oversight on the decision making process.	CEO’s Office, Human Resource & Administration (“ HRA ”) & Board	Short Term (2023 – 2024)

Strategic Objective 1.2: Enculturate integrity culture within the organisation and among stakeholders

NO.	MDEC OACP INITIATIVES	ACTION PLAN	OWNER	TIMELINE
5.	Initiative 1.2.1	To continuously brief and communicate IGD policies/SOPs/guidelines, including updates on MACC Act 2009, OACP, and MS ISO 37001 ABMS, collaborating with relevant bodies/agencies/organisations as needed.	IGD	Long Term (2023 – 2027)



MANAGEMENT SERVICES

Strategy 2: Strengthening integrity practice and effectiveness of management services

Strategic Objective 2.1: Improve the effectiveness of management services

NO.	MDEC OACP INITIATIVES	ACTION PLAN	OWNER	TIMELINE
6.	Initiative 2.1.1	To develop an Electronic Document Management System for enhanced document distribution and access based on classification	Transformation (Document Control)	Long Term (2023 – 2027)
7.	Initiative 2.1.2	To prepare a more comprehensive agreement detailing deliverables and milestones	HRA	Long Term (2023 – 2027)
8.	Initiative 2.1.3	To establish yearly virtual asset sighting i.e. online asset review and confirmation	IT Services	Long Term (2023 – 2027)
9.	Initiative 2.1.4	To set up yearly online asset reporting dashboard for End User Computing	IT Services	Short Term (2023 – 2024)
10.	Initiative 2.1.5	To initiate yearly asset reports for other IT assets	IT Services	Short Term (2023 – 2024)
11.	Initiative 2.1.6	To implement the Privilege Access Management (“ PAM ”) solution to further review, refine and manage privilege access to all assets	Transformation (Innovation)	Short Term (2023 – 2024)
12.	Initiative 2.1.7	To continuously enhance system audit capabilities: detailed logs, screen recording, key stroke logging, and rollback ability	Transformation (Innovation)	Short Term (2023 – 2024)
13.	Initiative 2.1.8	To establish mechanism for project prioritisation and process tailored to support ad hoc and urgent requirements	Transformation (Innovation)	Short Term (2023 – 2024)
14.	Initiative 2.1.9	To develop and implement Grant Management System	Grant Management Department (“ GMD ”)	Long Term (2023 – 2027)

Strategic Objective 2.2: Enhance management services training and awareness-related programme

NO.	MDEC OACP INITIATIVES	ACTION PLAN	OWNER	TIMELINE
15.	Initiative 2.2.1	To continuously conduct HR awareness sessions: performance management, manpower planning, and claim process for MDEC employees	HRA	Long Term (2023 – 2027)
16.	Initiative 2.2.2	To continuously conduct awareness on Personal Data Protection standard operating procedures	Legal	Long Term (2023 – 2027)



FINANCE

Strategy 3: Enhance and improve in management of finance-related processes

Strategic Objective 3.1: Improve the system and competency of employees

NO.	MDEC OACP INITIATIVES	ACTION PLAN	OWNER	TIMELINE
17.	Initiative 3.1.1	To improve expertise and competency of employees through training and awareness sessions	Finance	Long Term (2023 – 2027)



PROCUREMENT

Strategy 4: Provide high-standard ethical value environment in procurement

Strategic Objective 4.1: Strengthening due diligence procurement practice and processes

NO.	MDEC OACP INITIATIVES	ACTION PLAN	OWNER	TIMELINE
18.	Initiative 4.1.1	To continuously monitor, review, and enhance vendor performance process and evaluation criteria for consultants, vendors, and suppliers	Procurement	Long Term (2023 – 2027)
19.	Initiative 4.1.2	To continuously review the effectiveness of the implementation of procurement centralisation	Procurement	Long Term (2023 – 2027)

Strategic Objective 4.2: Building a more systematic and sustainable procurement governance

NO.	MDEC OACP INITIATIVES	ACTION PLAN	OWNER	TIMELINE
20.	Initiative 4.2.1	To continuously improve procurement system in the aspects of people, technology and processes	Procurement	Long Term (2023 – 2027)
21.	Initiative 4.2.2	To continuously improve expertise and competency of employees through training and awareness sessions	Procurement	Long Term (2023 – 2027)



OPERATIONS MANAGEMENT

Strategy 5: Heighten end-to-end operational efficiency including management of project through good governance and integrity

Strategic Objective 5.1: Upholding accountability in operation management

NO.	MDEC OACP INITIATIVES	ACTION PLAN	OWNER	TIMELINE
22.	Initiative 5.1.1	To perform due diligence and enforce compliance to policies/standard operating procedures/guidelines/frameworks including cross check with MDEC's database e.g. Blacklist Register	MDEC	Long Term (2023 – 2027)
23.	Initiative 5.1.2	To establish an online platform i.e. Business Connection Programme for transparency with criteria and scoring features	Digital Content Development	Short Term (2023 – 2024)

Chapter

IMPLEMENTATION FOR MONITORING AND EVALUATION

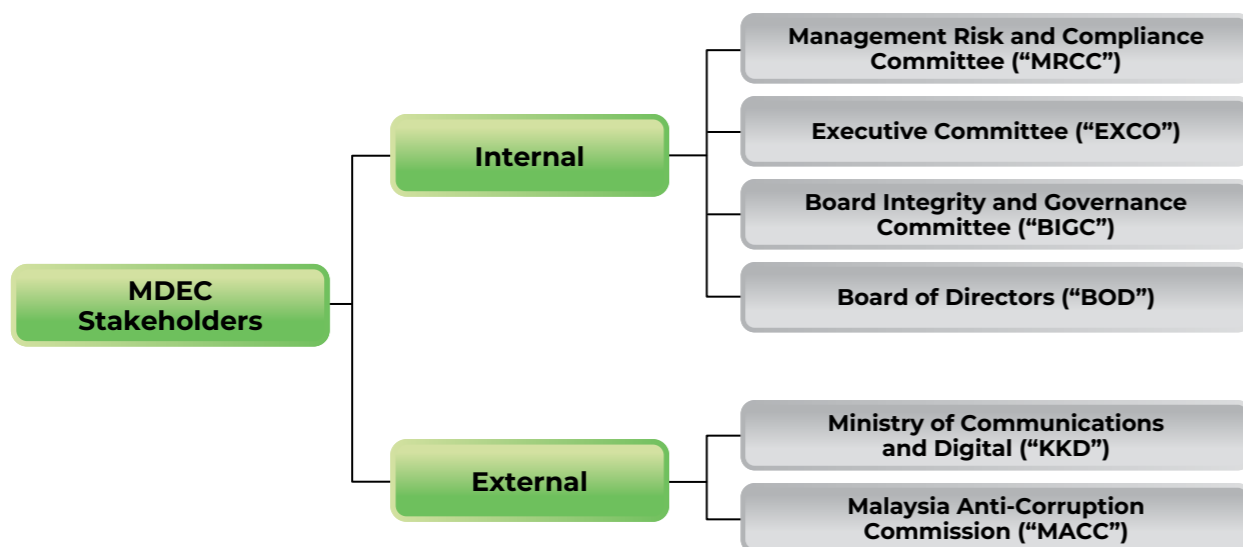
This chapter provides insight into the monitoring and evaluation of MDEC's OACP, highlighting importance and the involvement of key stakeholders for alignment and transparency. Additionally, it outlines action plan reporting and evaluation mechanism, crucial for maintaining a corruption-free environment.

6.1 THE MONITORING AND EVALUATION

- 6.1.1. Robust systems are vital to uphold integrity and combat unethical practices. Effective monitoring and evaluation at MDEC allow proactive risk identification, measure prevention effectiveness, and drive continual anti-corruption enhancement.
- 6.1.2. Crucial involvement and cooperation of top management, MDEC employees, customers, and stakeholders ensure alignment of MDEC OACP with the Government of Malaysia's NACP.
- 6.1.3. The OACP action plans will be reported to internal and external stakeholders.

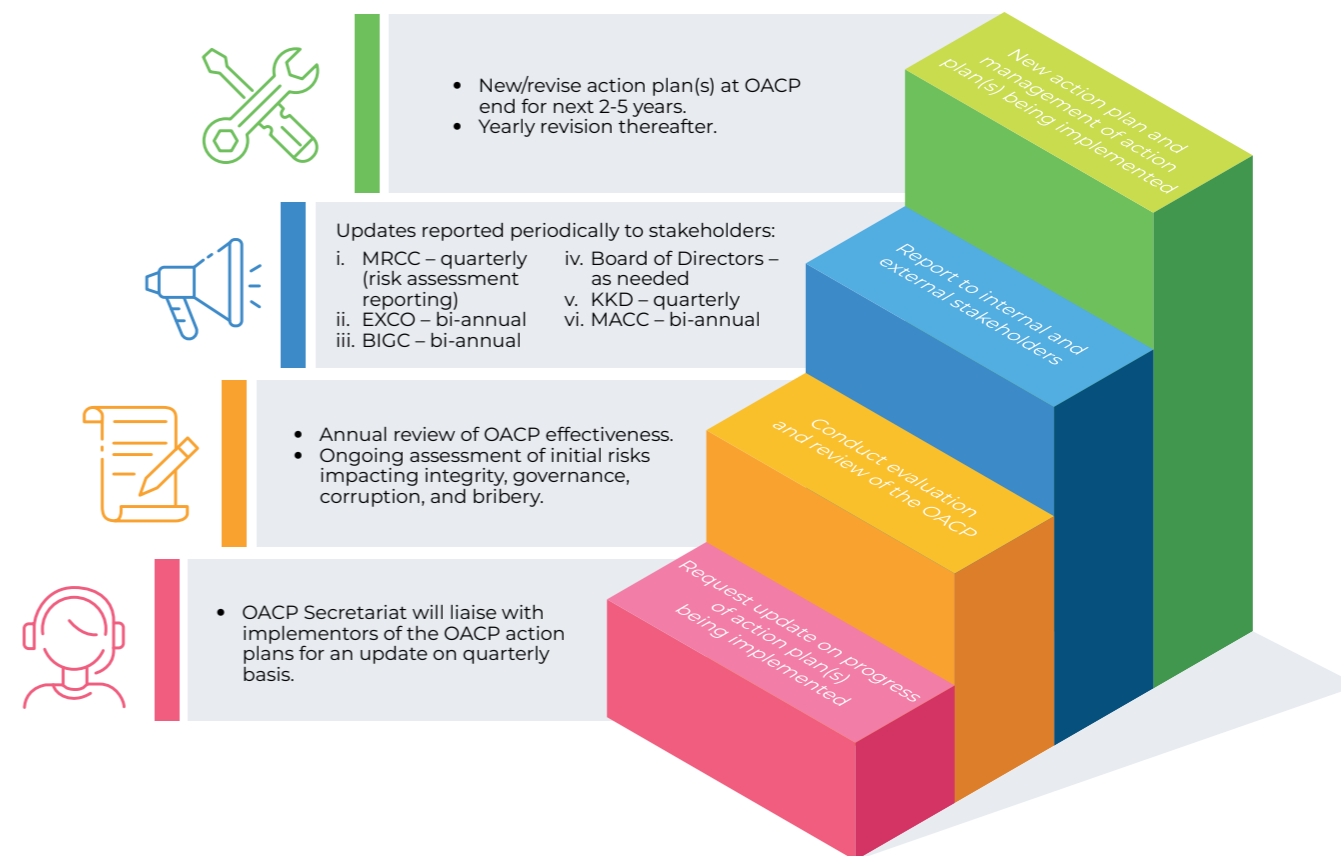
6.2 STAKEHOLDERS

- 6.2.1. During OACP development, MDEC involved internal and external stakeholders for comprehensive evaluation to foster transparency, accountability, and continuous improvement in anti-corruption efforts.
- 6.2.2. The stakeholders are illustrated as below:



6.3 EVALUATION MECHANISM

6.3.1. To ensure OACP's effective implementation at MDEC, a structured approach for gathering, analysing, and communicating progress has been devised. Here is an overview of the evaluation mechanism for MDEC's OACP:



- 6.3.2. MDEC's OACP is instrumental in fighting corruption and enhancing transparency within the organisation. The monitoring process provided valuable insights into the plan's effectiveness, progress of implementation, and areas for improvement.
- 6.3.3. The monitoring and evaluation showcased the organisation's leadership commitment to combat corruption effectively. MDEC's active leadership involvement in plan implementation and promoting a zero-tolerance approach significantly contributed to its success.
- 6.3.4. In conclusion, evaluating MDEC's OACP combats corruption and upholds integrity. Monitoring and improvements sustain its efficacy. A strong commitment to transparency, accountability, and ongoing improvement is vital for a corruption-free environment within MDEC.

7 Chapter

APPRECIATION & ACKNOWLEDGEMENT

Our sincere gratitude to the Board of Directors, CEO, Executive Committee, Division and Department Heads, task force, and all MDECrew involved, directly or indirectly, in developing and executing MDEC's Organisational Anti-Corruption Plan 2023 – 2027.



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