

## Pioneering Integrity: Thumbprints' Commitment to Anti-Corruption and Ethical Business Practices

Company Name:  
**Thumbprints Utd. Sdn Bhd**

Industry:  
**Printing Solutions**

### Company Description

**Thumbprints Utd. Sdn Bhd (Thumbprints)** is a company based in Malaysia, with its head office in Rawang. It has established itself as a pioneer in the Malaysian printing industry. Since its inception, the company has consistently pushed the envelope, integrating advanced printing technologies and eco-friendly practices into its operations. Their comprehensive range of services includes commercial printing, packaging solutions, and publishing services, each tailored to meet the unique needs of their diverse clientele. With state-of-the-art facilities, Thumbprints ensures that every product, whether a marketing brochure, an intricate packaging design, or a published book, meets the highest standards of quality and environmental responsibility.

The company's modern machinery and energy-efficient processes underscore their dedication to reducing environmental impact, setting them apart as leaders in sustainable business practices. Thumbprints' forward-thinking approach is evident in its continuous investment in research and development, exploring new materials, techniques, and technologies to stay ahead in the competitive market. Moreover, Thumbprints' engagement with the community through various environmental and social initiatives reflects its broader mission of creating a positive societal impact. As they continue to evolve and expand their offerings, Thumbprints remains a beacon of innovation and sustainability, setting new benchmarks in the printing industry and demonstrating that business success and environmental stewardship can go hand in hand.



**THUMBPRINTS®**

## Key Takeaways

The founders and CEO of Thumbprints understood the crucial role of integrity in maintaining ethical business practices. Over two decades ago, Thumbprints proactively identified and addressed various unethical issues. The company worked diligently to strengthen its governance and prevent unethical practices among its employees and business associates. Thumbprints sought guidance from Transparency International-Malaysia (TI-M) to kick-start its anti-corruption efforts. Today, Thumbprints is proud to have achieved anti-corruption compliance with **ISO 37001 standards**, drawing valuable insights from internal audits and external consultants.

The company faced significant challenges in its initial shift to transparent business practices, encountering numerous obstacles and rejections from its stakeholders. Despite losing clients in the initial stage, Thumbprints remained committed to its goal of fostering a strong culture of **honesty and integrity**. This dedication is strongly supported and upheld by top-level management, demonstrated through their active involvement in the **Zero Corruption Committee (ZCC)** and their unwavering support for Thumbprints' adherence to anti-corruption standards. This commitment underscores Thumbprints' dedication to maintaining a robust anti-corruption and strong business integrity culture.

Moreover, regular risk assessments are conducted to identify and mitigate potential corruption risks at Thumbprints. The company regularly evaluates its operations and interactions with external parties, such as suppliers and contractors, which help

pinpoint areas susceptible to corrupt practices. The risk assessment involves reviewing financial transactions, procurement procedures, and third-party engagements to ensure transparency and accountability. The ZCC conducts risk assessment reviews at least **twice annually** to ensure they remain current and relevant. Stringent enforcement measures have been implemented to address misconduct, which encompasses terminating employees who engage in such behaviour.

Furthermore, comprehensive **training programs** were implemented to educate employees, particularly the Heads of Departments, on adhering to the anti-corruption policies and procedures. Thumbprints diligently educated and communicated the importance of anti-corruption policies to their suppliers and business associates, urging them to sign the **integrity pledge**.

Thumbprints sets an example and promotes ethical leadership by establishing a high standard for business integrity and responsibility in the industry. The company has fostered increased trust and confidence in its business practices by adopting anti-corruption principles and practices, resulting in no new reported corruption cases. Furthermore, Thumbprints communicates with suppliers and agents regarding the company's strict stance on anti-bribery. Suppliers are encouraged to sign an integrity pledge. Additionally, **over 90% of suppliers** have signed the **integrity pledge**, and the company intends to maintain this rate in the near future.

“ We won't pay any bribe or facilitation payment in our business... this is not only the right thing to do as an individual, but also as an organisation; we must lead by example and protect our business. ”

Mr Lim Chee Yoong, Managing Director



## Framework Overview

Honesty and Integrity have been Thumbprints' guiding principles since 1997. Over the years, Thumbprints has developed a robust and comprehensive anti-corruption framework to promote ethical business practices and ensure strict compliance with relevant laws. This framework is meticulously aligned with both local and international anti-corruption legislation, including the Malaysian Anti-Corruption Commission Act and principle-based approaches such as the United Nations Global Compact principles.

At the core of Thumbprints' framework is a firm commitment to the values of **honesty, integrity, and transparency** in all its operations. The company has instituted a **zero-tolerance policy** towards bribery and corruption, making it clear that any form of corrupt behaviour is unacceptable and will be dealt with decisively.

## Adequate Procedures Based on TRUST Principles

### T

#### Top-Level Commitment



Top Level Commitment is important in establishing a strong **anti-corruption culture** within the organisation. Thumbprints' Chairman takes personal responsibility for implementing anti-corruption policies. The Zero Corruption Committee (ZCC) is responsible for implementing an anti-bribery management system across all employees, including management and clients, suppliers, and business partners. Thumbprints demonstrate an unwavering **top-level commitment** to anti-corruption through the active involvement of senior management in the ZCC. The committee oversees the implementation of anti-corruption policies, ensuring that ethical standards are upheld across all levels of the organisation.

The management's dedication is evident in their ongoing efforts to educate employees about the importance of integrity and compliance. Thumbprints has set four anti-bribery targets, which top management is committed to achieving, include attaining **zero incidences of bribery and corruption**, achieving **zero incidences of fraud**, ensuring that 90% of suppliers, vendors, and contractors sign the **Supplier Corporate Integrity Commitment Form**, and achieving 80% **employee awareness** of the whistleblowing program.

## CASE STUDY 4

**Anti-Corruption:**  
Implementing TRUST Principles  
for Business Integrity Competence

### R

#### Risk Assessment



Regular risk assessments are conducted to identify and mitigate potential corruption risks. Thumbprints evaluates its operations and interactions with external parties, such as suppliers and contractors, to pinpoint areas susceptible to corrupt practices. The risk assessment process involves reviewing financial transactions, procurement procedures, and third-party engagements to ensure transparency and accountability. The ZCC carries out the review twice annually to ensure that risk assessments system remains consistently up to date.

### U

#### Undertake Control Measures



Thumbprints has long been a trailblazer in ethical business practices, particularly in the area of anti-corruption. In 2020, Thumbprints became the **first printer** in Malaysia to be **certified** by SIRIM Bhd for ISO 37001 Anti-Bribery Management Systems, underscoring their commitment to combating bribery and maintaining high standards of corporate governance. This prestigious certification reflects the robust anti-corruption measures and rigorous compliance frameworks that Thumbprints has implemented, setting a **benchmark** for the industry.

This includes political contributions and facilitation payments, which are prohibited entirely, while charitable donations and sponsorships must be approved by management. Gifts, entertainment, and hospitality are allowed in the context of promoting good business relations, and Thumbprints enforces a **'No Gift Policy'** where employees cannot accept gifts besides corporate gifts. The ZCC also details what payments fall into each category and when certain payments are permissible. For example, extortion payments are allowed if health and safety are at risk. This detailed procedure reduces possible confusion around whether an action is considered bribery.

In addition, Thumbprint **centralised** its connection with external parties for procurement, outsourcing, and contractual agreements instead of allowing various departments to deal with contractors or third parties. This allows better control over anti-corruption policies and procedures. This long-standing commitment to ethical conduct has fortified their corporate reputation and instilled a strong sense of trust among stakeholders, including customers, suppliers, and regulatory bodies, highlighting their leadership in promoting ethical business operations and setting higher standards within the industry.

## CASE STUDY 4

**Anti-Corruption:**  
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### S

#### Systematic Review, Monitoring, and Enforcement (S)



The ZCC **reviews the system twice a year** to ensure its is up to date and relevant. This allows for procedures to be continuously revised as needed. Quarterly meetings are also held, and the Board of Directors is made aware of the meeting reports. The ZCC ensures that the anti-bribery management system conforms to requirements and reports its performance to top management and relevant authorities. Their anti-corruption policy is enforced with internal investigations, where employees found guilty of misconduct are terminated. Thumbprints has established a mechanism by which individuals can report their corruption concerns.

Their **whistleblowing policy** allows employees to report wrongdoings in good faith without fear of reprisals. Reports can be made through letter, electronic mail, mobile phone, or directly to the Malaysia Anti-Corruption Commission or the Company Chairman, making this mechanism accessible. The policy also states that the whistleblower will be informed of the conclusion of the investigation, if possible, which encourages potential whistleblowers as they can feel assured their reports are being investigated.

In alignment with the core principles of **Honesty and Integrity**, Thumbprints have successfully achieved all four governance targets to cultivate a trust and reliability culture. In 2023, the company has met its objectives with **zero reported bribery**, corruption, and fraud cases, showcasing its steadfast commitment to ethical practices. This dedication to integrity enhances its corporate reputation and reinforces the trust of its stakeholders, including customers, suppliers, and regulatory bodies.

Furthermore, Thumbprints **surpassed** its goal of having 90% of suppliers, vendors, and contractors sign the **Supplier Corporate Integrity Commitment Form**, achieving a commendable 91% compliance rate. Additionally, Thumbprints exceeded their target of 80% employee awareness of the whistleblowing program, with 96% of Thumbprints employees being well-informed about this crucial initiative. These accomplishments reflect Thumbprints proactive approach to fostering a **transparent and accountable** organisational culture, ensuring long-term success and reliability.

### T

#### Training and Communication



Thumbprints' ZCC regularly conducts anti-corruption training for staff to ensure they can act ethically. For example, in December 2023, they held an **Anti-Corruption Day** dedicated to informing employees about the company's policy towards gifts, entertainment, and hospitality. An anti-bribery and corruption document is available to employees, detailing Thumbprints' policies towards acting with good ethics in business dealings. This allows employees to understand better the proper course of action towards sponsorships, donations, and other such matters. Employees are also tested on their knowledge of the anti-corruption policies after briefings so that the company can assess how effective their training is.



### Perceived Benefits

The adoption of anti-corruption practices has several benefits, including enhanced **corporate reputation**, reduced risk of legal penalties, and fostering a culture of integrity within the organisation. By adhering to stringent anti-corruption measures, the company can **build trust** with stakeholders, including customers, suppliers, and regulatory bodies, which is essential for long-term success. These practices demonstrate the company's commitment to ethical business conduct, making it a preferred partner and bolstering its **competitive advantage** in the market. Thumbprints' dedication to business integrity has not gone unnoticed; the company is regularly invited to speak at industry events and engagements, sharing its expertise and experiences in maintaining ethical standards and promoting transparency.

This recognition extends beyond just invitations to speak; Thumbprints is also acknowledged as a **leader** in corporate integrity initiatives. They hosted the second edition of **TI-M's Corporate Integrity System Best Practice** Session at their facilities, showcasing their role as a benchmark for best practices in the industry. Additionally, Thumbprints has been honoured with the **UNGCMYB Anti-Corruption Award**, further solidifying its status as a leading advocate for anti-corruption measures in the business community. This prestigious award highlights their unwavering commitment to upholding the highest standards of integrity and transparency. By facilitating such sessions and earning accolades, Thumbprints highlights its commitment to anti-corruption measures and actively contributes to the broader industry dialogue on the importance of maintaining high ethical standards. This proactive approach to promoting integrity and transparency further solidifies its standing as a trusted and responsible entity in the business community.

