



THE CENTER TO COMBAT
CORRUPTION AND CRONYISM

Annual Report 2024

The Center to Combat Corruption & Cronyism





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Unit A707, Pusat Dagangan Phileo Damansara 1,
No. 9, Jalan 16/11, Off Jalan Damansara,
46350 Petaling Jaya, Selangor, Malaysia.
www.c4center.org
Email: contact@c4center.org
Telephone: +603-7660 5140

From *the Board of Directors*

The year 2024 has been another challenging and disappointing period for anti-corruption efforts in Malaysia. Despite frequent rhetoric from the Prime Minister on combating corruption, the lack of substantial reforms aimed at addressing systemic and grand corruption continues to undermine the nation's progress. The government's "business as usual" approach has allowed corruption to persist, draining the country's resources and eroding public trust.

While the Malaysian Anti-Corruption Commission (MACC) has increased its activities, these efforts have largely focused on petty corruption, leaving major systemic issues unaddressed. High-profile investigations targeting former Prime Ministers and opposition-linked individuals have raised serious concerns about the MACC's credibility and independence. The perception of selective prosecution has only been heightened by the commutation of Najib Razak's 10-year sentence, especially given his ties to UMNO, which is part of the unity government.

Public confidence in the criminal justice system has also been severely undermined. The perception of deliberate incompetence in the prosecution's handling of cases involving high-profile individuals like Najib Razak and Irwan Serigar Abdullah raises troubling questions about impartiality. The reappointment of Azam Baki as Chief Commissioner of the MACC further signals the government's reluctance to implement meaningful reforms. Notably, the National Anti-Corruption Plan (NACP), which ended in 2023, had proposed reforms to the appointment process of the Chief Commissioner—a missed opportunity for substantial change this year.

Continued...

“The need for genuine commitment to reform and action against corruption has never been greater.”

2024 also witnessed allegations of conflict of interest involving the Minister of Youth and Sports and her husband in the Asia Mobility saga. This incident once again highlighted the persistent issue of conflict of interest, which often escalates into grand corruption. The awarding of a pilot project to a family member within the same political coalition has drawn attention to the lack of transparency in the government's procurement processes.

Public procurement remains a critical area in need of reform, yet the promised Public Procurement Act remains absent. This legislative gap continues to enable abuse, wastage, and corruption in government expenditure, as highlighted year after year in the National Audit Report. Moreover, scandals and corruption in the recruitment of foreign workers have drawn global criticism, with allegations of profiteering and abuse raising serious concerns. The lack of transparency and consistent enforcement of the law only deepens the perception of elite capture and selective accountability.

In June 2024, the unveiling of the National Anti-Corruption Strategy was expected to renew momentum for reform. However, the initiative

fell short of addressing critical issues. Key reforms, such as separating the Public Prosecutor's Office from the Attorney General's Chambers and limiting the Prime Minister's term to prevent entrenchment of power, were conspicuously absent from the strategy. It was also disappointing that amendments to the Whistleblower Protection Act of 2010 have yet to be presented, especially since this reform, which is relatively straightforward to implement, could have a significant impact in the fight against corruption.

The need for genuine commitment to reform and action against corruption has never been greater. Moving forward, we urge the government to prioritise meaningful systemic changes to restore public confidence and ensure accountability at all levels.

We, the members of the board would also like to express our gratitude to the team at C4 Center for their commitment, passion and drive and wish them a great year in 2025.

OUR BOARD OF DIRECTORS



PROFESSOR EMERITUS DR. EDMUND TERENCE GOMEZ
Chairman

Edmund Terence Gomez was Professor of Political Economy at the Faculty of Economics & Administration, University of Malaya. He specializes in state-market relations and the linkages between politics, policies, and capital development. He has also held appointments at the University of Leeds (UK) and Murdoch University (Australia) and served as Visiting Professor at Kobe University, Japan and at the University of Michigan, Ann Arbor. Between 2005 and 2008, he served as Research Coordinator at the United Nations Research Institute for Social Development (UNRISD), in Geneva, Switzerland. Other academic appointments include Visiting Fellowships at the Australian National University, Canberra and at the Nordic Institute of Asian Studies, Denmark. He has written and published several books on politics, economics, and Government-Linked Corporations (GLCs).



CYNTHIA GABRIEL

Founding Director

Cynthia Gabriel, is easily recognized as a key advocate of human rights and good governance in Malaysia and on the global platform. She was the recipient of the Anti-Corruption Champions Award 2022, a prestigious award conferred by the US Department of State. In June 2021, at a rare and exceptional invitation by the President of the United Nations General Assembly. Cynthia addressed the plenary of member states at their special session against corruption. Cynthia was appointed into the prestigious Global Future Councils of the World Economic Forum (WEF), on economic and anti-corruption issues for the term 2019-2020, an advisory body to the World Economic Forum, which meets every year in Davos, Switzerland. In 2020, Cynthia received a meritorious award by the King of Malaysia, for her outstanding efforts in fighting corruption and courage in advancing democratic freedoms in Malaysia and the region. Academically well-rounded, she has degrees in both the science and legal fraternities.



DATUK SUTINAH BINTI SUTAN

Director

Dato' Hj. Sutinah binti Sutan started her career in the Malaysia Anti-Corruption Commission (MACC) on June 1980. Throughout her decades of service, she quickly moved up the ranks as she dedicated her life to preventing corruption. She was formerly the Deputy Chief Commissioner (Prevention) of the MACC from 2010 until her retirement. She is involved in numerous local and international taskforces and committees that promote integrity including the National Integrity Committee on Public Governance as Chief Secretariat, Integrity Committee on Policy, System and Procedure, the National Integrity Plan, the MACC Oversight Group, the South-East Asian Anti-Corruption Pact (SEAPAC), ADB-OECD Anti-Corruption Initiatives for Asia and the Pacific, and the International Association of Anti-Corruption Authorities. Dato' Hj. Sutinah binti Sutan holds a Bachelor Degree in Humanities from the University of Science Malaysia.



AZRUL BIN MOHD KHALIB

Director

A firebrand social activist who has dedicated his life to fighting for human rights and public health. He now heads a social policy thinktank called the “Galen Centre”. His previous positions include being a senior manager with the Institute for Democracy and Economic Affairs (IDEAS) as well various positions in humanitarian organisations such as the International Planned Parenthood Federation (IPPF), the International Committee of the Red Cross (ICRC), and the United Nations Development Programme (UNDP). As a writer, Azrul is a frequent columnist for the Malay Mail and China Press.

*“Youth and innovation —
drivers of change.”*



CEO's Message

- PUSHPAN MURUGIAH -

As I enter my second year as CEO, I am proud to present our 2024 Annual Report. The past year has been a remarkable journey filled with dynamic activities and engagements, both locally and internationally. Our focus remains steadfast on institutional reforms, including calling for the establishment of an Ombudsman's office, ensuring the independence of the Malaysian Anti-Corruption Commission (MACC), and advocating for critical legal changes such as amendments to the Whistleblower Protection Act 2010, public procurement laws, and Right to Information legislation.

Additionally, we continued to address issues surrounding corruption in migrant worker recruitment while contributing narratives and commentary on pressing anti-corruption topics, including Malaysia's Corruption Perception Index (CPI) ranking, the controversial pardon of Najib Razak, and associated reforms. Recognizing the importance of a comprehensive framework to address conflicts of interest (COI), as COI remains a significant contributor to grand corruption in Malaysia, we've also amplified our call for an asset declaration act and Political Financing Act.

Environmental governance has also been a major focus, particularly in addressing plastic and waste management issues. We have actively explored corruption risks in the burgeoning carbon capture and carbon markets industries, emphasizing the need for robust governance in these spaces.

Report Launches

In 2024, we successfully launched two critical reports:

1. "Structuring the Malaysian Ombudsman Office"

Released in March, this report makes a compelling case for establishing an Ombudsman office to combat maladministration and enhance accountability among civil servants. The launch featured a keynote address by Sweden's Deputy Chief of Mission, Mr. Robert Lejon, and included a thought-provoking discussion with global experts.

2. "Ending Waste Colonialism: Governing Plastic Solutions"

This report, building on our earlier work on plastic governance, examines Japan's role as an exporter of plastic waste to Malaysia and explores the associated governance and corruption challenges.

In December, we also conducted a soft launch of our National Anti-Corruption Strategy (NACS) Report, which analyses the current NACS 2024-2028 framework compared to its predecessor, the National Anti-Corruption Plan (NACP) 2019-2023. This event coincided with International Anti-Corruption Day. A copy of the report was handed to representatives from MACC and the United Nations Office on Drugs and Crime (UNODC).

Private & Public Sector Engagement

The private sector plays a critical role in economic growth, yet systemic corruption often hinders fair competition. To address this, we've engaged with private entities to identify practical solutions for anti-corruption reforms.

Highlights include:

- Speaking at Top Glove Corporation's conference, "Emerging Trends Shaping Business Sustainability & Humanity".
- Addressing the Association of Development Finance Institutions of Malaysia (ADFIM) on global crises worsened by corruption.
- Presenting to the Institute of Internal Auditors Malaysia (IIA Malaysia) on the role of internal auditors in implementing beneficial ownership policies effectively.

Workshops and Events

This year, in collaboration with the International Labor Organization (ILO) and UNODC, we conducted a workshop on migrant smuggling. This tripartite project brought together stakeholders from the diplomatic corps, enforcement agencies, business communities, and government departments to address recruitment process challenges. We were also honoured to partner with the International Republican Institute (IRI) for a discussion on Malaysia's Position on Beneficial Ownership in Kuala Lumpur.

Government Engagement & Working Trips

C4 actively participated in key engagements, including:

- A study tour to Australia with the Legal Affairs Division and Deputy Law Minister, focusing on Ombudsman reforms.
- A study tour to Australia on the Right to Information Bill, with the Legal Affairs Division and members of parliament
- Invitations for stakeholder engagements on the Climate Change Bill, and Carbon Capture initiatives by the respective ministries.
- Membership in several government task forces and committees, including the Climate Change Consultative Panel, the Ombudsman Steering & Working Committees, and the research commit-

tees on amending the Trustees (Incorporation) Act 1952 and feasibility of a Charities Act and a Charities Commission.

Additionally, we were invited to present to the Special Senate Committee on Integrity and Anti-Corruption, emphasizing ways to improve Malaysia's CPI scores.

Regional and International Engagement

On the regional front, C4 is a member of the Southeast Asia Anti-Corruption Network (SEA-ACN) and attended several key conferences, such as the International Anti-Corruption Conference in Bangkok, where I spoke on corruption in the foreign workers' industry and cross-border crimes, and the Parliamentary Good Practices Workshop in Thailand hosted by PCAsia.

Internationally, we co-hosted a session with UNODC on scam centres at the International Anti-Corruption Conference (IACC) in Lithuania and observed the Fifth Session of the Intergovernmental Negotiating Committee to develop an international legally binding instrument on plastic pollution (INC-5). We also collaborated with UNODC to produce videos spotlighting youth and environmental corruption issues featuring members of C4 Center.

Looking Ahead to 2025

2025 poses significant challenges for the anti-corruption landscape in Malaysia, with inconsistencies in government reforms raising concerns about the commitment to meaningful change. As civil society, we must intensify our advocacy efforts and ensure the government upholds the principles of the United Nations Convention Against Corruption (UNCAC). At C4, we are committed to fostering diversity, equity, and inclusion (DEI) while empowering youth to lead transformative reforms. By combining the wisdom of experienced leaders with the creativity and passion of the younger generation, we can drive meaningful progress.

Acknowledgments

I extend my deepest gratitude to our board members, supporters, and partners for their unwavering commitment. A heartfelt thank you to my dedicated team for their tireless efforts, youthful energy, and camaraderie that make our work both impactful and fulfilling. Together, let us continue to strive for a better, more transparent, and accountable Malaysia.

OUR RESEARCH TEAM





ARIEF HAMIZAN
Head of Research & Policy Advocacy

Arief leads research and advocacy on a broad range of reform issues, including whistleblower protection, freedom of information, political financing, and environmental governance. He holds an MSc Comparative Public Policy from the University of Edinburgh, graduating with distinction as a Chevening Scholar. His dissertation investigated the relationship between colonial land regimes and the construction of indigenous identity in Peninsular Malaysia and Singapore, and its impact upon policymaking following independence. Arief also holds an LLB from the International Islamic University Malaysia and completed his pupillage at a major Malaysian law firm, where he worked in corporate litigation with a focus on anti-corruption issues and government abuses of power.



NABILA ZULKEFLEE
Environmental Governance Research Officer

Nabila advocates for the reform of Malaysia's environmental governance framework, with particular focus on its connection to corruption. She has contributed to several major research projects with the organisation, including a reevaluation of Malaysia's Environmental Impact Assessment (EIA) framework, the mismanagement and corruption scandals associated with Government-Linked Companies (GLCs), and international plastic waste trade issues.



BRYAN CHEAH
Research Officer

Bryan is a law graduate from the University of London external programme, and has had prior experience working for a human rights organisation as well as for a university research centre, focusing on drug policy and prison reform amidst COVID-19. Bryan's current areas of research in C4 Center cover COVID-19 pandemic and governance issues related to the transparency of public procurement of healthcare services.



PRISHANTH LINGGARAJ
Policy & Legal Research Officer

Prishanth advocates for legal reform through an intersectional lens, identifying gaps which allow for the perpetration and perpetuation of corruption as well as measures to uphold good governance. His focus areas include ombudsman institutions, whistleblower protection, right to information, and the autonomy of domestic oversight institutions. He has a particular interest in the intersection between human rights, international law and corruption, leading C4 Center's involvement with the Universal Periodic Review (UPR).



SANGEETHA NISCINTA NANDINI
Research Officer

Sangeetha is a Research Officer at C4 Center. Her primary focus area is the business-politics nexus, identifying issues of corruption, abuses of power, and cronyism. Currently, she researches governance and transparency issues within the administration of Federal Lands. Beyond this, Sangeetha also leads C4 Center's community outreach initiative through the organisation's 'Build My-Town' card game. In her free time, she enjoys arts event and listening to music.



BENJAMIN TIONG
Research & Communications Officer

Through his role as Research and Communications Officer at C4 Center, Benjamin combines his background in media studies with his keen interest in current affairs to contribute to the organisation's advocacy and investigative works. His work sees him scrutinise the government's commitment to their anti-corruption pledges and wider reform policies, primarily via the National Anti-Corruption Strategy 2024-2028 (NACS). Previously, Benjamin co-authored a report titled, "Navigating Reform: Challenges and Opportunities in the National Anti-Corruption Strategy 2024-2028" which evaluated the effectiveness of the NACS as an anti-corruption policy. A first class graduate from UCSI University with a degree in Mass Communication, where he majored in journalism, Benjamin is determined to uncover unseen instances of corruption that have served to widen social inequality in the country.

OUR ADMIN TEAM





FARHANA BAHARIN
Finance & Administrative Officer

Farhana is the Finance and Administrative Officer who has dedicated several years to supporting programs, financial management, and administrative tasks at C4 Center. She completed three years of studies in Accounting and has worked in the corporate sector for nine years before joining the organization. Farhana also handles the admin works at C4 Center. She is a mother who, during her free time, enjoys outdoor activities such as camping and hiking with her boys.



WONG SI PENG
Events & Projects Officer

Si Peng has been a professional event manager for over 20 years overseeing corporate events in various industries ranging from IT, pharmaceutical to automobile organizing product launches, international and regional conferences, award ceremonies and sport events such as marathons and fun runs. She is also a qualified scuba diving instructor with the aim of training safe new divers with appreciation towards marine conservation. In her free time, she organises beach clean-ups, volunteers for coral surveys monitoring the health of Malaysia's coral reefs and shark conservation awareness programmes.



INTAN FAUZI
Administrative and Finance Clerk

Intan completed her studies in Secretarial Science which involve a range of administrative support task to ensure smooth operation within the organization. She is passionate about providing essential support in any work environment, from managing schedules and correspondence. She loves cats.



ASYRAF ABDUL SAMAD
Social Media & Campaigns Officer

Asyraf graduated with honours from Limkokwing University with a degree in Broadcasting and Journalism, and has worked for several news organisations in Malaysia, including the New Straits Times and The Star. He previously co-directed a documentary film about the struggles of government hospital cleaners in Malaysia, which was screened at the Freedom Film Festival in 2019.







#LawanKorupsi: Forum on Najib Razak's Pardon

Held in Kuala Lumpur on the 4th of February 2024

Following the reduction of Najib Razak's jail sentence, the Malaysian United Democratic Alliance (MUDA) held a forum on the 4 February to discuss this issue. Joining MUDA was a team of panellists brought on to discuss corruption at large.

During the forum, C4 Center publicly decried the decision to commute the sentence of the former Prime Minister, noting its distinct lack of fairness. Following in the same note, Pushpan emphasised the need to carry out institutional reforms in order to prevent unjust instances such as this again.



Meeting with JKPK TIA on the Corruption Perception Index 2023 (CPI) at the Dewan Negara

Held in Kuala Lumpur on the 25th of March 2024

On 25 March, C4 Center's CEO Pushpan Murugiah and Head of Research and Policy Advocacy Arief Hamizan were invited to the Jawatankuasa Pilihan Khas Tata Kelola, Integriti dan Antirasuah Dewan Negara (JKPK TIA) at the Dewan Negara to share our views regarding the Corruption Perception Index 2023.

During the meeting, ways to improve and maintain the improvement of Malaysia's CPI Index were discussed, while we warned them of a potential derailment of the country's progress due to recent events. Among the events brought up were:

- The discharge not amounting to an acquittal (DNAA) for Zahid Hamidi in the Yayasan Akalbudi prosecution.
- The reduction of Najib Razak sentence for his conviction in the SRC International trial.
- Regressive laws.
- Lack of real reforms in fighting corruption.

We also stressed the point that looking at CPI scores alone is not sufficient in fighting the biggest cancer that Malaysia has, which is grand corruption. In doing so, the importance of implementing institutional reforms was heavily stressed.



Sharing Session with the National Water Services Commission (SPAN)

Held in Cyberjaya on 13th of May 2024

C4 Center CEO Pushpan Murugiah was invited to a Taklimat and Sharing session hosted by the National Water Services Commission or Suruhanjaya Perkhidmatan Air Negara (SPAN) where he provided some insight on the concept of Conflict of Interest (COI) and what its implications are. Conflict of interest may differ from various industries, cultures, & countries, and so clarifying the boundaries of COI according to different situations is of unique necessity. There is no one size fits all solution. Addressing conflict of interest issues require effort from multiple angles; from setting up robust internal whistle blower mechanism, good governance policies that applies to top management & board members as well as staff & employees, and transparency in service procurement processes. There are many policies of international standards that can be customised and adapted to local contexts. Conflict of interest is only the tip of the iceberg in the large ecosystem of corruption. An ecosystem so broad and complex, the provisions of the MACC Act are not equipped to address. Therefore, it becomes even more important for organisations to go beyond what is expected in order to curb corrupt practices.



Parliamentary Good Governance Workshop

Held in Bangkok, Thailand in June 2024

Pushpan Murugiah, CEO of C4 Center, participated in a workshop on Parliamentary Good Governance practices organized by The Secretariat of the Senate of the Kingdom of Thailand and the Parliamentary Centre of Asia (PCAsia). Across many ASEAN nations, there is a lack of comprehensive codes of conduct for parliamentary governance. Thailand, however, serves as a valuable reference with its

well-established codes. Notably, France demonstrates best practices by maintaining highly comprehensive conduct guidelines, and the European Union Parliament also adheres to a robust set of codes.

In light of this, Malaysia has an opportunity to lead by establishing a comprehensive code of good governance conduct within its own parliament. Such a code would address critical issues related

to conflicts of interest, cronyism, and nepotism among politicians. By providing a legal framework, it could effectively regulate these matters, particularly in the context of combating grand corruption in Malaysia.

FORUM KHAS



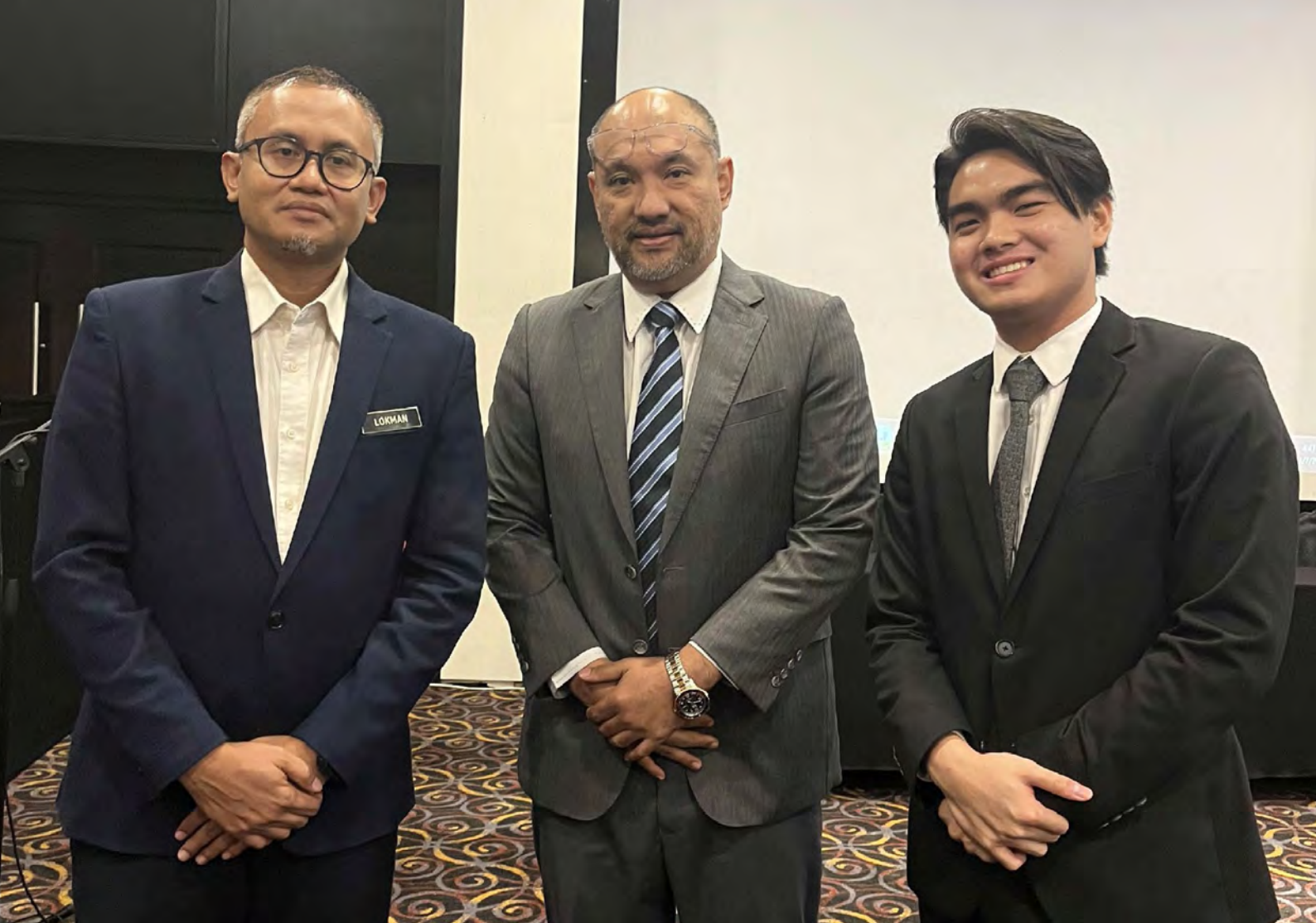
Forum Khas: Reformasi SPRM, Apa Yang Perlu?

Held in Shah Alam on 18th of July 2024

In a televised forum on 18th July 2024, organised by Sinar Harian and Rasuah Busters, the panel discussed reforms needed to make the Malaysian Anti Corruption Commission (MACC) independent. They also discussed how Malaysia can increase its annual Corruption Perception Index (CPI) rating in which Malaysia received 50 points for the year 2023.

Pushpan Murugiah represented C4 Center in the forum together with Bersih Chairman Muhammad Faisal Abdul Aziz, as well as Senator Datuk Dr. Arman Azha Abu Hanifah who is Chairman for the Special Select Committee on Governance, Integrity and Anti-Corruption of the Dewan Negara.

The discussion covered how the MACC can be reformed through legislation and constitutional amendments for it to be placed under an independent body free from influence of the executives. Pushpan further elaborated that this is part of a larger reform agenda needed if Malaysia aims to reach top 25 on the CPI ranking. He also explained that relying on ranking alone is insufficient in dealing with the type of corruption that Malaysia is exposed to, which includes grand corruption. Reforms that are pivotal in combating grand corruption in the Malaysian context include the comprehensive overhaul of MACC, the reframing of offences to include enablers of corruption, the separation of the Attorney General and the Public Prosecutor's offices, and the tabling of a political financing legislation.



NACS Strategy Workshop and Engagement Session

Held in Cyberjaya on 24th of July 2024

On 24 July 2024, C4 Center's CEO Pushpan Murugiah and Research and Communications Officer Benjamin Tiong were invited by the Malaysian Anti-Corruption Commission's (MACC) National Governance Planning Division (NGPD) to attend a stakeholder engagement meeting concerning the National Anti-Corruption Strategy (NACS). Other non-governmental organisations (NGOs) joined us including Transparency International Malaysia (TI-M), Rasuah Busters, and the Malaysian Corruption Watch. This meeting was organised by the government to share in detail about each strategy that the NACS intends on executing, providing timelines and rationale for implementation. Participants were also briefed on the government's plan to create a "NACS Dashboard" on the MACC website which would allow for specific reforms to be tracked by the wider public, a move that would greatly enhance transparency and access to information on this matter.

C4 Center raised questions and provided insight concerning the development of the NACS, particularly in relation to the involvement of NGOs or civil society organisations (CSOs) within the development of the NACS in the future.



Panel Discussion: “Reforming the Pardons Board Process in Malaysia”

Held in Petaling Jaya on the 25th of July 2024

On 25th July 2024, C4 Center CEO Pushpan Murugiah was invited by CSO Platform for Reform as a speaker on a forum titled “Reforming the Pardons Board Process in Malaysia”. There he shared C4 Center’s position on the Pardon Boards’ decision in reducing former Prime Minister Najib Razak’s sentence for his role in the 1MDB corruption scandal. He explained how this decision impacts anti-corruption efforts and global collaboration among the international community to expose the inter- national scandal. He also spoke on how the legal fraternity, civil societies, and members of the public should advocate for Pardons Board reform including placing limitations on pardons on certain offences, as well as having a minimum waiting period for any pardon application with exceptions for those who are terminally ill or suffering from old age.

The forum saw a lively debate on the constitutionality of the pardons board decision. Well known constitutional expert Emeritus Professor Datuk Dr Haji Shad Saleem Faruqi and former President of the Malaysian Bar shared their insights during the debate. All the speakers agree that more has to be done to ensure a transparent decision-making process in granting pardons to convicts.



Beneficial Ownership Transparency and Malaysia's Progress organised by the International Republican Institute

Held in Kuala Lumpur on 7th and 8th of August 2024

On 7-8 August 2024, C4 Center CEO Pushpan Murugiah was invited as a panellist to share on the progress of Beneficial Ownership (BO) Transparency in Malaysia, as Malaysia amended its Company Act 2016 to make beneficial ownership reporting mandatory in 2023. This was necessary for the country to comply with the requirements of the Financial Action Task Force's recommendation 25 on having BO Transparency to combat money laundering, terrorism financing, and illicit money flow.

Apart from a well-managed registry, strict compliance, and a robust verification process, we need to ensure that any registry of Beneficial Ownership be made accessible not only to

enforcement agencies but also accessible to the public. This is particularly necessary in spaces where regulators are not independent and subject to executive control or influence.

There is also a need to ensure that the agency tasked with this responsibility must be empowered and given adequate resources to carry out its function effectively. We must also ensure that there is a mechanism and framework for mutual legal assistance and international cooperation for enforcement agencies in identifying beneficial owners registered in other jurisdictions or countries.



CSO Platform for Reform Strategic Planning Meeting and National Symposium 2024

Held in Petaling Jaya on 12th and 13th of November 2024

CEO Pushpan Murugiah attended the CSO Platform for Reform Strategic Planning Meeting held at Menara PKNS, Petaling Jaya on the 12th and 13th of November. This event brought together representatives from various CSOs working on different thematic areas to pool resources, share expertise, and conceptualise joint solutions and positions to pressing issues affecting Malaysia today. The meeting covered issues like communication strategy, complexities of institutional reform in Sabah and Sarawak, and present gaps in institutional reform. C4 Center actively contributed to the proceedings, and emphasised issues such as constituency development funds (CDF) being a gateway to patronage politics.

On the 14th of November, Policy and Legal Research Officer Prishanth Linggaraj attended the National Symposium held at the same venue. With the theme “2 Years into MADANI Government: Institutional Reforms on Track”, this symposium included panel discussions with the Deputy Minister in the Prime Minister’s Department (Law and Institutional Reform) M. Kulasegaran and former MPs Mujahid Yusof Rawa, Charles Santiago, Sivarasa Rasiah, and Kasthuriraani Patto.



Appointment to the Research Committees on Amendments to the Trustees (Incorporation) Act 1952 (JKPA) and Feasibility of Enacting a Charities Act and Establishing a Charities Commission (JKAK)

In connection with Cabinet's efforts to improve and reform Malaysian trust law, the Legal Affairs Division of the Prime Minister's Department (BHEUU) decided to establish three research committees comprising academics and civil society representatives to study the Trustee Act 1949, the Trustees (Incorporation) Act 1952, and the feasibility of the proposal to enact a Charities Act and establish a Charities Commission. On 3 May 2024, C4 Center representatives Prishanth Linggaraj and Arief Hamizan were appointed to sit on the committees on the Trustees (Incorporation) Act 1952 (Jawatankuasa Kajian Pindaan Akta Pemegang Amanah (Pemerbadanan) 1952, or JKPA) and the proposed Charities Act and Charities Commission (Jawatankuasa Kajian Kewajaran Penggubalan Akta Khairat dan Penubuhan Suruhanjaya Khairat, or JKAK) respectively. This was an incredible opportunity for C4 Center to have a seat at the table and be directly involved in the development of legal reform.



the bodies corporate, introducing additional powers for the regulator to supervise these bodies, and potentially introducing sanctions for non-compliance. According to BHEUU, there has been an increasing trend of applica-

Over the course of July to September 2024, the research committees met to brainstorm and discuss existing gaps in the legislative and regulatory frameworks of the respective trust regimes. JKPA focused on the limitations faced by BHEUU as the regulator of trustees incorporated under the Trustees (Incorporation) Act 1952, such as streamlining statutory definitions, elaborating upon the reporting requirements placed on

tions for the incorporation of trustees and the creation of foundations since 2015, with applicants ranging from the Federal and State Governments, local authorities, companies, societies, international bodies and private individuals. Unlike the statutory frameworks established for companies or societies, the regulatory framework under the Trustees (Incorporation) Act 1952 is archaic and does not contemplate the realities of financial reporting and corporate governance in the modern age. Therefore, this exercise aims to update the Act to ensure that regulators can adequately monitor the operation of this specific type of body corporate.

JKAK on the other hand took a broader approach in evaluating the need for a Charities Act to consolidate the regulatory framework for the various types of “charitable organisations” which exist in Malaysia. Presently, non-profit entities that work towards the public good or for “charitable” purposes may be referred to using a range of different terms – “non-governmental organisation” (NGO), “non-profit organisation” (NPO), “civil society organisation” (CSO), “community-based organisation” (CBO), “charities” or “foundations”/“yayasan”. None of these terms have a strictly delineated legal definition, and are often used interchangeably. “Non-profit” may even refer to profit-making entities that do not provide dividends or profitability to shareholders. Some of these entities might perform advocacy and campaigning while others may focus on service provision, and many may accept public donations to support their respective causes.

An NPO in Malaysia may exist as any of the following legal entities:

1. A society registered under the Societies Act 1966;
2. A company incorporated under the Companies Act 2016 (could either be a company limited by shares or by guarantee);
3. A trust incorporated under the Trustees (Incor-





poration) Act 1952 in Peninsular Malaysia, the Trustees (Incorporation) Ordinance (Sabah Cap. 148) in Sabah, or the Charitable Trusts Ordinance 1994 in Sarawak; or

4. Other forms of charitable institutions such as wakafs under the respective state enactments on the administration of Islamic law, or Hindu endowments.

This lack of uniformity in the regulation of NPOs creates gaps in the system which allow for abuse by bad faith actors. For instance, foundations have been very commonly used as vehicles to facilitate corruption and money laundering e.g. Yayasan Akalbudi and Yayasan Wilayah

Persekutuan. Another prominent recent example is Aman Palestin Berhad, a charity registered as a company established to channel monetary support to the people of Palestine. However, several high-ranking officers within the institution have been charged with criminal breach of trust, cheating, and money laundering, for allegedly misappropriating the money collected from donations.

However, NPO regulation has also been used as a cudgel by certain governments to restrict and suppress the operation of civil society within their jurisdictions. For instance, the Financial Action Task Force (FATF) has acknowledged that its Recommen-

dation 8 (on combating terrorist financing abuse of non-profit organisations) has been misapplied and misinterpreted in a manner which has led countries to apply disproportionate measures which have impeded their ability to operate and pursue their missions effectively, access resources, or even to continue legitimate operations. Therefore, it was critical that any recommendations made during this preliminary study addressed the risk of abuse by a government acting in bad faith.

Among the Research Committee activities C4 Center conducted and participated in for the purposes of the Charities Act and Commission were:



1. Roundtable Discussion with Non-Governmental/Civil Society Organisations (NGOs/CSOs) on 24 July 2024

Aimed at providing a platform to consult with a wide range of NGOs and CSOs operating in Malaysia, C4 Center organised a roundtable discussion to enable the voices of civil society to be incorporated into the research project. The attendees worked on various areas of advocacy (e.g. gender, environment, religious, governance, and civil liberties) and included registered societies, companies, statutory bodies, and informal community-based groups. The discussion aimed to foster open dialogue and collaboration among stakeholders on the abuse of trusts and charities, outdated administration of trusts and other potential forms of corruption that arise from Malaysia's current regulatory framework, and identify workable solutions to improve regulations, prevent possible corruption, and address mismanagement of funds.

2. BHEUU Joint Consultation with Trust Regulatory Bodies of Sarawak, Sabah and Labuan - Visit to Sarawak on 29 and 30 July 2024



The Ninth Schedule of the Federal Constitution establishes the Legislative Lists, which distinguish the subject matter upon which the Federal and State Legislatures may make laws respectively. The Federal List includes charities, charitable institutions, charitable trusts and trustees excluding wakafs. However, the Supplement to Concurrent List for the States of Sabah and Sarawak (which confers concurrent legislative competence upon the Sabah and Sarawak Legislatures) also includes “charities and charitable trusts and institutions in the State...and their trustees, including the incorpo-

ration thereof and the regulation and winding up of incorporated charities and charitable institutions in the State.” Thus, Sabah and Sarawak have independent regulatory schemes for charitable trusts created in

Sarawak Islamic Council, which are jointly responsible for the administration of the 1994 Ordinance for non-Muslim and Muslim charitable trusts respectively. The discussions with these bodies focused

on the advisory and supervisory role they play, as well as the limitations faced in regulating charitable trusts. The delegation also had the opportunity to speak to the Sarawak State Mosque Welfare Trust Board - a char-

itable trust incorporated under the Ordinance - to learn about the governance structures and policies established by the Board over and above the basic statutory requirements.

C4 Center joined the visit to Sarawak to meet with regulatory bodies to learn about the administration of the Charitable Trusts Ordinance 1994, which is the relevant legislation governing charitable trusts in Sarawak. The delegation was accompanied throughout the series of engagements by a representative of the State Attorney General's Chambers, who provided general input on legal matters. The delegation had official visits to the offices of the Ministry of Women, Early Childhood and Community Wellbeing Development and the

itable trust incorporated under the Ordinance - to learn about the governance structures and policies established by the Board over and above the basic statutory requirements.

3. Virtual Meeting with the Australian Charities and Not-for-Profits Commission on 23 August 2024

On 23 August 2024, C4 Center participated in a meeting with the Australian Charities and Not-for-Profits Commission (ACNC) to learn more about the development of regulatory frameworks, governance structures, and compliance



measures within the charitable and not for-profit sectors in Australia. The ACNC shared insights on maintaining transparency, accountability, and ethical practices in charitable organizations, highlighting the importance of fostering public trust and adherence to legal standards. Discussions revolved around challenges and solutions in the sector, including strategies for promoting financial integrity and combating fraud or misuse of funds within non-profits.

4. BHEUU Consultation with Charity Regulators in Singapore 28-30 August 2024

From 28-30 August 2024, C4 Center joined a delegation comprising members of both commit-

tees for a working study trip to Singapore. There, the delegation had the opportunity to engage with those directly involved in developing the charities sector, including the Commissioner of Charities (Ministry of Culture, Community and Youth), Majlis Ugama Islam Singapura, as well as the team from the Yong Pung How School of Law and the Lien Centre for Social Innovation (Singapore Management University).

The meetings were extremely valuable for providing context on the development of charity regulation within the region. While there are several similarities between the two countries, Malaysia's charity landscape appears far more complex and fragmented, especially when considering the jurisdiction of each individual state to regulate

Islamic affairs, which includes religious charity.

5. Stakeholder Consultations on the Amendments to the Trustees Act 1949 on 28 August and 11 September 2024

In addition to C4 Center's involvement on the core research teams in pursuance of the legal reform goals as stated above, C4 Center was also consulted by BHEUU for our input into amending the Trustees Act 1949, specifically with regards to the regulation of the express private trusts and the possibility of a public reporting requirement for beneficiaries of such trusts. The government's impetus in pursuing these amendments is due to growing concerns around the use of the express private trusts as a means of money laundering but also due to Malaysia's participation in the Financial Action Task Force (FATF), an inter-governmental organisation established to develop policies to combat money laundering. The FATF conducts reviews of its member countries' policies on their degree of adherence to a list of FATF Recommendations — these amendments are in the interests of improving Malaysia's rating in accordance with R.25, "Transparency and beneficial ownership of legal arrangements". Malaysia was rated as "Partially Compliant" (PC) to R.25 during the 2018 Follow-up Report, and

hence the government aims to achieve the status of "Compliant" (C) during the next review cycle through amendments to the Trustees Act 1949.

C4 Center was invited to the first roundtable consultation session on this at the Asian International Arbitration Centre on 28 August 2024, and was attended by a variety of major stakeholders such as the Attorney-General's Chambers, the Malaysian Bar Council, Bank Negara representatives, the Inland Revenue Board, and private legal practitioners as well, amongst others. This first consultation

6. Presentation of the Research Findings to the Deputy Minister on 25 September 2024



The final outcome reports of the research projects were submitted to Deputy Minister YB M. Kulasegaran on 25 September 2024, which were positively received. C4 Center is appreciative to BHEUU for its consistent, transparent, and people-centric approach to developing reform agendas, and we hope to continue working closely with the government on other areas of legal and policy reform.







Report launch of "Structuring the Malaysian Ombudsman Office"

Held in Petaling Jaya on 7th March 2024

In 2023, Minister in the Prime Minister's Department (Law and Institutional Reform) Dato' Sri Azalina Othman Said announced that the government was considering the possibility of establishing an Ombudsman's office as an independent statutory body tasked with addressing and resolving public complaints against government departments and agencies. This body aims to improve the current system of managing public complaints helmed by the Public Complaints Bureau (PCB), which presently lies under the authority of the Prime Minister's Office and draws its authority from administrative circulars.

This lack of structural independence carries the inherent risk of executive interference in the functions of the PCB. Therefore, it is imperative that the Ombudsman – which is meant to enhance oversight upon the public services – is conferred sufficient power, authority, and autonomy to fulfil its intended purpose.

As part of the drafting process of the Ombudsman Bill, several consultations were held with various stakeholders – including a session with civil society organisations on 8 May. Since that consultation session, C4 Center has conducted an in-depth comparative analysis of Ombudsman in-



stitutions across the world through extensive desk research and stakeholder consultations over a 10 month period – culminating in a research report titled “Structuring the Malaysian Ombudsman Office”.

The report contains various recommendations on the structure, functions, and powers which should be afforded to a proposed Ombudsman office in Malaysia, taking into account domestic complexities when adopting and adapting best practices from a range of international jurisdictions.

The report was launched on 7 March at the Hotel Eastin, Petaling Jaya. The event included two panel discussions to stimulate debate and discussion on a relatively foreign concept for Malaysia:

Panel Discussion 1 on “Fundamental Issues with Public Service Delivery Today”

- Steven Thiru (Managing Partner of Steven Thiru & Sudhar Partnership, former President of the Malaysian Bar)
- Fiqah Roslan (Tiada.Guru Campaign representative, co-founder of Borneo Speaks)
- Dato’ Sutinah Sutan (Board of Directors of C4 Center, former Deputy Commissioner of the MACC)

The panellists discussed the his-

torical context of the Malaysian public service and the development of the current system of integrity and oversight applicable to public servants. This discussion aimed to identify existing gaps in the oversight mechanisms for the public service i.e. the problems which are sought to be addressed by introducing the Ombudsman.

Panel Discussion 2 on “Ombudsman Institution Practice”

- Iain Anderson (Commonwealth Ombudsman, Australia)



- Luka Glušac (Assistant Director & Research Fellow, Institute for Philosophy and Social Theory, University of Belgrade)
- Isolina Kinyua (Chief Legal Officer, Office of the Ombudsman/Commission on Administrative Justice, Kenya)

Panellists from various other jurisdictions were invited to explain the tangible benefits which have resulted from the introduction of Ombudsman institutions in their respective nations/states to the improvement of public service delivery, government accountability, and transparency. This discussion aimed to illustrate best practices which should be considered by Malaysia in establishing the Ombudsman, and to show the importance of this particular institutional reform towards upholding good governance in Malaysia.

Attendees of the report launch event included government representatives from the Legal Affairs Division of the Prime Minister’s Department (BHEUU) and the Ministry of Foreign Affairs, diplomatic officials from various embassies and high commissions, members of the media, and other civil society representatives. C4 Center is grateful in particular for the attendance of BHEUU’s Principal Assistant Director of the Policy and Research Section Pn. Nurbani Shuhada, who graciously received a copy of our report at the event; as well as First Secretary and Deputy Head of Mission of the Embassy of Sweden, Mr Robert Lejon who gave the keynote speech tracing the evolution of the concept of the Ombudsman in Sweden to the modern day.

C4 Center hopes that the proposal set out in this report will provide useful guidance for Malaysian lawmakers in the establishment of this new office, and we look forward to continued engagement with relevant stakeholders in this reform area.



Meeting with EAIC About the Creation of an Ombudsman Office in Malaysia

Held in Putrajaya on 25th of March 2024

As part of the advocacy surrounding the establishment of a Malaysian Ombudsman office, C4 Center paid a courtesy call to the Enforcement Agency Integrity Commission (EAIC) at their office in Putrajaya on 25 March to present and discuss the findings of our research report, “Structuring the Malaysian Ombudsman Office”.

The functions of the EAIC as stipulated under the EAIC Act 2009 largely mirror the roles played by Ombudsman institutions worldwide, but on a smaller scale – only overseeing enforcement agencies listed under the Schedule to the Act. Therefore, C4 Center strongly believes that the institutional knowledge and expertise of the Commission could be a vital part of the Ombudsman reform agenda by potentially assigning the functions of the Ombudsman office to the EAIC along with a proportionate increase in its budget and staffing.

It is also of note that the EAIC Chairman Tan Sri Dr Ismail Hj Bakar has been reported as stating that the EAIC would be willing to spearhead the establishment of the Ombudsman if the government decides to consolidate the functions of the office under its ambit.

C4 Center is grateful to the members of the EAIC who joined this presentation and discussion, and who were very receptive to the ideas presented to them. As we continue towards the development of a progressive and comprehensive Ombudsman Bill, we look forward to continued collaboration and discussions with various relevant government bodies and other stakeholders.

Appointment to Steering and Working Committees on Holistic Consultation to Determine the Mechanism of Establishing the Malaysian Ombudsman



Following C4 Center's release of our research report "Structuring the Malaysian Ombudsman Office" and our subsequent engagements with the Legal Affairs Division of the Prime Minister's Department (BHEUU), C4 Center's CEO Pushpan Murugiah and Policy and Legal Research Officer Prishanth Linggaraj were appointed to sit on the Steering and Working Committees on Holistic Consultation to Determine the Mechanism of Establishing the Malaysian Ombudsman respectively. The Working Committee - which includes BHEUU, the Enforcement Agency Integrity Commission (EAIC), the Public Complaints Bureau (PCB), and the Ombudsman of the University of Science Malaysia (USM) - was set up by the government to conduct a holistic consultation work plan to consult with stakeholders and analyse the implications of the establishment of an Ombudsman office with regard to financial considerations, human resources, and legal matters. At the end, a final outcome document shall be presented to the Steering Committee.

The first meeting of the Working Committee was held on the 29th of July 2024, where the letters of appointment were presented to committee members and a preliminary briefing was given on the timeline of activities over the coming months. The next convening of the Committee was for a Policy Setting Workshop on the 12th and 13th of August 2024, where the Committee evaluated and decided upon broad policy considerations regarding the structure, functions, powers, jurisdiction, and legal implications of the office. A general consensus was reached on several key issues during this pre-

liminary workshop, however many matters remained unsettled. During this workshop, C4 Center reiterated our findings from our research report in attempting to build consensus, particularly on the matter of the independence of the Ombudsperson appointment process.

It was also determined during the first Working Committee meeting that a series of Regional Consultations would also be held across the country to inform members of the state governments and local authorities about the proposal to introduce an Ombudsman office. This is important due to the unsettled matter of the Ombudsman's jurisdiction i.e. whether it would extend to the state governments, which may prove legally untenable due to the constitutional separation of legislative competence between the federal and state legislatures. Nevertheless, the PCB presently does assist with the co-ordination and monitoring of public complaints made against state government departments/agencies as well as the local authorities. Hence, there currently exists a grey area which must be resolved in creating the Ombudsman.





On the 23rd and 24th of September, the first Regional Consultation was held for the Northern Zone (the states of Perlis, Kedah, Penang, and Perak) in the Office of the Perak State Secretary in Ipoh. This two day session brought together about 200 representatives from various state government departments, agencies, and the local authorities for a series of presentations from the PCB, EAIC, and the USM Ombudsman on different aspects of public complaints management, processing, and resolution. C4 Center's Policy and Legal Research Officer Prishanth Linggaraj was a panellist on a forum titled "Ombudsman Malaysia: Are We Ready?". During his session, he emphasised the potential improvements which an independent and empowered Ombudsman office could bring not only for members of the public, but also the government itself - through identifying barriers and possible avenues for reform to improve service delivery and internal operations.



Subsequently, the second Regional Consultation was held in Kota Kinabalu, Sabah on the 28th and 29th of October. Representatives from Sabah state departments and agencies as well as Sabah state branches of federal agencies attended to hear a series of presentations from the PCB, EAIC, and the Sarawak Ombudsman on different aspects of public complaints management, processing, and resolution. Once again C4 Center's Policy and Legal Research Officer Prishanth Linggaraj was a panellist on a forum titled "Ombudsman Malaysia: Are We Ready?", during which he emphasised the same points as above.

C4 Center also assisted the Working Committee to arrange a virtual meeting with the Ombudsman New

Zealand on the 24th of October. The main reason we pushed for this meeting was the strengths of the New Zealand model – such as its system of appointment by Parliament and protected autonomy – that we believed would be valuable input for the Working Committee's consideration. From the New Zealand side, the meeting was attended by New Zealand Chief Ombudsman Peter Boshier, Senior Assistant Ombudsman Strategy and Development Emma Leach, Assistant Ombudsman Engagement Alex Schröder, and International Development and Engagement Advisor Grace Taylor.

During the discussions, Mr Boshier emphasised the importance of protecting the independence and autonomy of the Ombudsman. He was clear that placing an oversight body under the Prime Minister's Department is not ideal, and that financial independence is also a necessary consideration. Ms Leach also explained the process of complaint management, investigation, and resolution that the Ombudsman New Zealand undertakes. We believe that many of the opinions espoused by the representatives of the Ombudsman New Zealand were highly persuasive, and we hope these will have a positive impact on the development of the Ombudsman Act here. C4 Center also wishes to record our appreciation for the assistance of the New Zealand High Commission in Malaysia in coordinating this meeting.

A general consensus seems to be building with regards to how the Ombudsman should be structured, who it shall oversee, and what its powers shall be. We are glad to see that many of these aspects are aligned with international best practice, as C4 Center has advocated strongly for and shall continue to do so in the coming months, as the Bill is developed.



Rasuah Busters Coalition Consultation with Deputy Minister M. Kula Segaran

Held in Putrajaya on 25th of April 2024

On April 25th C4 Center, along with the members of the Rasuah Busters coalition, attended a consultation session with the Deputy Minister in the Prime Minister's Department (Law and Institutional Reform) YB Tuan M. Kula Segaran and various officers of the Legal Affairs Division (BHEUU) on the proposal to establish the Malaysian Ombudsman office.

This session was an opportunity for civil society organisations to share our baseline expectations on the development of the Ombudsman Bill. Important points of emphasis included measures to safeguard the body's autonomy, sufficient resourcing and budgeting, and constitutional issues. We also presented a brief summary of C4 Center's report "Structuring the Malaysian Ombudsman Office", to give the Deputy

Minister and BHEUU officers a clearer picture of the key considerations that they must take into account in order to create a viable and progressive Ombudsman office. Ancillary topics were also raised during our discussions, such as the amendments to the Whistleblower Protection Act 2010 and the contours of the proposed Parliamentary Services Act.

C4 Center is grateful that BHEUU continues to show significant interest in engaging civil society when developing their reform proposals. Our discussions gave us some details on the present status of the Bill's development, and we are excited to continue working closely with BHEUU to advance this reform agenda to completion.



Ombudsman Working Trip to Australia

Held in Sydney and Canberra, Australia on the 7th to 11th of November 2024

From 7 to 11 November, C4 Center joined a working study trip to Sydney and Canberra to learn about the operation and impact of Ombudsman offices in Australia, as well as their framework for public sector governance. The delegation was led by YB M. Kulasegaran, Deputy Minister in the Prime Minister's Department (Law and Institutional Reform), and included Dr Nur Faiza Ishak, Principal Assistant Director of the Legal Affairs Division. The trip was organised with the support of the Australian High Commission.

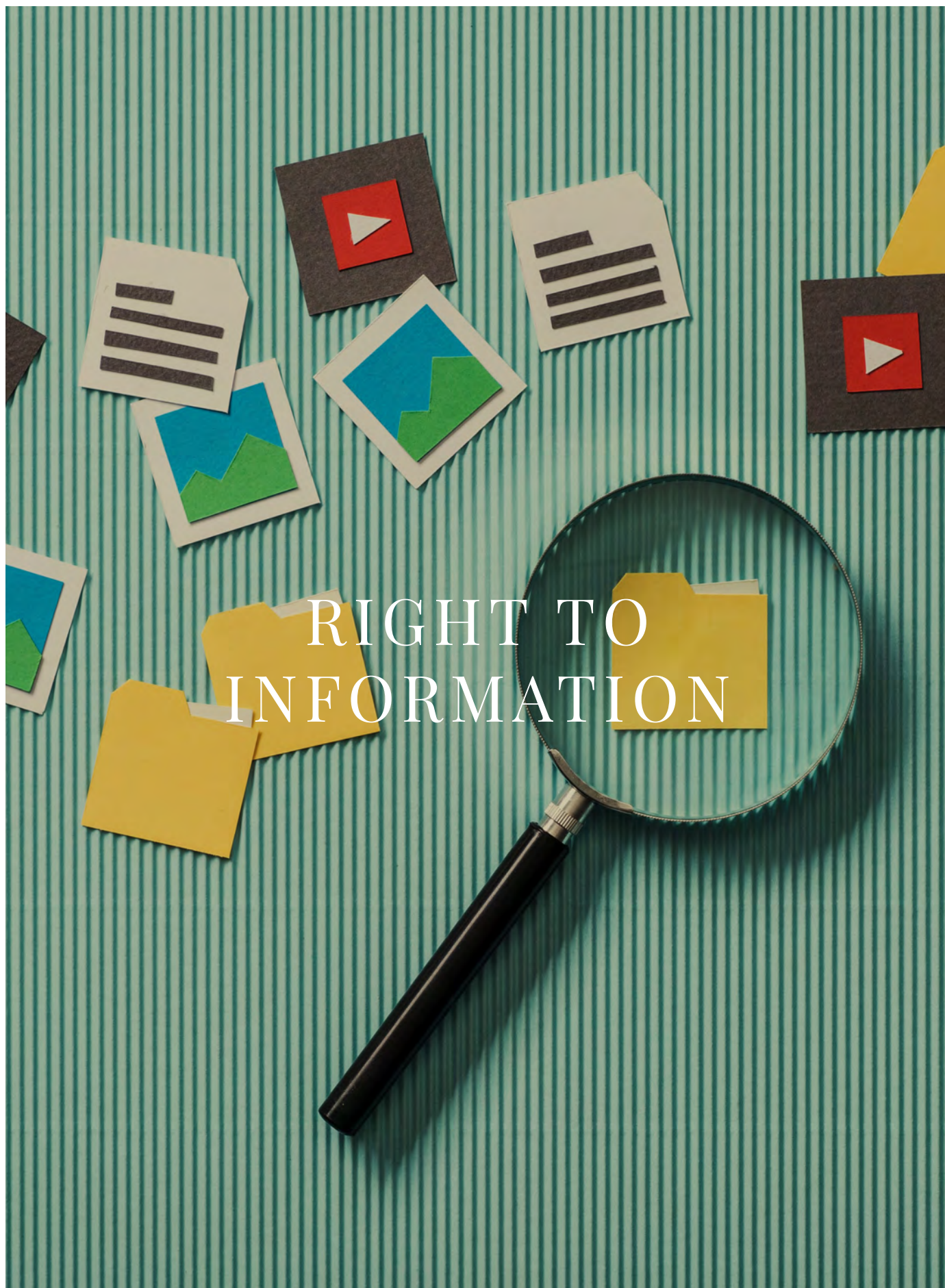
Over the course of the trip, the delegation met with key institutions including the Office of the Commonwealth Ombudsman, the New South Wales Ombudsman, the Department of Finance, the Attorney General's Department, the Administrative Appeals Tribunal, and the Australian Human Rights Commission. In addition, the group had the benefit of learning from ombudsman expert John McMillan, who previously held the role at both Federal and State levels.

Two key learnings emerged from the visit. Firstly, that the independence of the ombudsman office is fundamental to its success. In Australia, the ombudsman serves as a watchdog, ensuring that government agencies are held accountable for their actions and

that citizens have a trustworthy avenue for redress when they feel they have been treated unjustly by public authorities. This independence allows the ombudsman to operate without fear or favour, making its recommendations credible and authoritative.

Secondly, the ombudsman office will face resistance as the culture of the civil service is transformed. The early days of the Australian system were not smooth, as the ombudsman posed a threat to authority and established practices. Managing this resistance in the initial transition period is crucial to the office's success. By fostering a collaborative approach and emphasising that the ombudsman is not a punitive force, but a partner in improving governance and service delivery, we can gradually transform the mindset within the civil service.

The lessons learned from Australia will directly influence the design of Malaysia's own ombudsman office, helping Malaysia establish an institution that not only resolves individual complaints but also overcomes systemic issues in governance. This is a critical step in ensuring that the public has greater access to justice and in building a civil service that is accountable and fair in all its dealings.





Roundtable Discussion with Minister in Prime Minister's Department (Law & Institutional Reform) Azalina Othman on the Right to Information Bill

Held in Kuala Lumpur on 23rd of January 2024

On the 23 January 2024, C4 Center was invited to attend a meeting with Minister in the Prime Minister's Department (Law & Institutional Reform) Azalina Othman Said and the Legal Affairs Division of the Prime Minister's Department. The meeting, which was attended by C4 Center Founding Director Cynthia Gabriel, CEO Pushpan Murugiah, and Head of Research and Policy Advocacy Arief Hamizan, aimed to create space for discussion on the Right to Information (RTI) bill. This discussion allowed for C4 Center to contribute and participate in the drafting of the Right to Information bill. We eagerly anticipate our ongoing collaboration with all relevant stakeholders in our collective endeavour to draft a comprehensive and effective RTI bill.



Right to Information Bill Working Study Trip to Australia

26th of February to 1st of March 2024

From 26 February to 1 March, C4 Center was selected as one of two civil society representatives alongside the Centre for Independent Journalism (CIJ) to join a working study trip to Sydney and Canberra, Australia to learn about the details of the Commonwealth Freedom of Information (FOI) framework from various government departments and bodies, such as the Office of the Australian Information Commissioner, the Administrative Appeals Tribunal, the Departments of Defence, Home Affairs, and Foreign Affairs & Trade, and the Attorney General's Chambers.

Aside from the civil society representatives, the diverse delegation consisted of representatives from several government departments (including the Legal Affairs Division, Attorney General's Chambers, and Personal Data Protection Department), two Members of Parliament from the Parliamentary Special Select Committee on Human Rights, Elections, and Institutional Reform.

This trip provided valuable insight into the real-world application of fundamental Right to Information (RTI) principles: the challenges which must be addressed as well as the tangible benefits which arise therefrom. Our in-depth discussions covered a wide variety of topics, such as federal-state relations, the intersection of national security with public interest considerations, and the process of managing appeals from dissatisfied applicants. The lessons learned from this trip shall aid the development of the domestic RTI framework greatly. There is a lot to gain from international best practice, as long as these ideas are adapted to fit the domestic context without losing their 'teeth' in doing

so. C4 Center is sincerely grateful to the wonderful officers at the Legal Affairs Division for their continued collaboration with civil society in the institutional reform process. It is clear that the government now recognises the importance of engaging civil society as a key stakeholder in this process, which is a pattern we hope to see persist moving forward. We would also like to thank the Australian Department of Foreign Affairs and Trade for their strong and continued support of Malaysian legal and institutional reform, in line with the new Australia-Malaysia Institutional Strengthening Program which aims to facilitate institutional exchange, capacity building, and advancing government integrity and transparency.

C4 Center is excited to continue engaging with the Legal Affairs Division and other key government stakeholders in the development of the Malaysian RTI framework over the coming months, in the hopes of bringing greater accountability, transparency, and public scrutiny for the Malaysian government. Additionally, we are currently working closely with CIJ and other CSO members of the Freedom of Expression (FOE) cluster to produce a CSO Model RTI Bill, which shall hopefully provide important guidance for the drafters of the federal legislation.





Press Conference on Right to Information at Parliament

Held in Kuala Lumpur on 18th of March 2024

In connection with the working study trip to Australia, C4 Center was invited by Kota Melaka MP Khoo Poay Tiong and the Parliamentary Special Select Committee on Human Rights, Election, and Institutional Reform to join a press conference at Parliament on 18 March.

CEO Pushpan Murugiah was given the opportunity to say a few words on our hopes for the enactment of the Right to Information (RTI) Act in Malaysia. In his comments, Pushpan emphasised the importance of transparency and freedom of information in tackling corruption, highlighting the need for this act to do just that.



RTI Coalition Meeting with the Parliamentary Special Select Committee on Human Rights, Election and Institutional Reform

Held in Kuala Lumpur on the 1st of October 2024

C4 Center along with the other members of the CSO coalition working on the Model Right to Information (RTI) Bill – the Centre for Independent Journalism, Article 19 Malaysia, and Sinar Project – were invited to a meeting with the Parliamentary Special Select Committee on Human Rights, Election and Institutional Reform (PSSC) on the 1st of October 2024 at Parliament. Chairman Tuan William Leong Jee Keen and Member Tuan Khoo Poay Tiong attended the meeting, along with representatives from the Legal Affairs Division of the Prime Minister’s Department, the Human Rights Commission of Malaysia, and the Attorney-General’s Chambers.

This meeting was an opportunity for the CSO coalition to present a brief summary of the Model RTI Bill we were developing, with particular emphasis on what we agreed were “non-negotiable factors” in order to implement a viable information access regime. These factors include that information is generally held by the government on behalf of the public, and should therefore be open to public access by default unless non-disclosure can be justified based on a set of limited exceptions. The presentation also covered ancillary laws which need to be amended for the right to information to be operationalised, such as the Official Secrets Act 1972, the Whistleblower Protection Act 2010, and the Personal Data Protection Act 2010.

The Members of Parliament were receptive to our recommendations and agreed that the inclusion of these non-negotiable factors in the final Act was important. They also asked the CSO coalition about our plans to drum up public support for this reform proposal, and pledged to work together with civil society to eventually enact the RTI Act. This meeting was encouraging, and C4 Center shall continue working closely with partners and stakeholders to create a right to access public information in Malaysia.

Government Engagements and Development of the Civil Society Model Right to Information (RTI) Bill

Throughout 2024, the Legal Affairs Division of the Prime Minister's Department (BHEUU) has been conducting a series of regional consultations across the country to raise awareness of the proposed Freedom of Information (FOI) Act among members of the state government departments and agencies. On the 29th and 30th of August 2024, the final regional consultation was held in the Central Zone (Selangor and the Federal Territories of Kuala Lumpur and Putrajaya) at the Putrajaya International Convention Centre.

This event brought together rep-



resentatives from the federal and state governments, non-governmental organisations (NGOs), civil society organisations (CSOs), the Bar Council of Malaysia, and academics, and aimed to collect input on the development of a freedom of information regime from the various stakeholders.

Further, the event was attended by international experts from Australia and Canada and representatives of Freedom of Information/ Right to Information Commissions from Australia, Indonesia, South Africa and Sri Lanka - who provided extensive explanations about their national perspectives and history of administering right to information regimes.

C4 Center representatives attended this consultation to provide our recommended policy positions, based on the fundamental principle that information held by the government is done so in the capacity of a custodian, and rightfully belongs to the public. Therefore, we emphasised the importance of information being open by default, that members of the public cannot be required to provide reasons for any applications under this FOI Act, and that any exemptions to justify non-disclosure must strictly comply with the internationally recognised harm test. Together with our fellow CSO comrades, we presented our proposals to the audience as a snapshot of what the public hopes to see in this Bill.

Parallel to the government's steady progress towards enacting the FOI Act, CSOs have also continued our tireless efforts to draft a





CSO Model RTI Bill. Despite the government's use of the term "freedom of information" (FOI), we have maintained use of "right to information" (RTI) to stress that this is a fundamental human right to which the public is entitled, and not a privilege afforded to the pub-

lic under the government's discretion. On the 28th of August 2024, C4 Center along with several other CSOs met with Toby Mendel, Executive Director of the Centre for Law and Democracy - a Canada-based international NGO that works to promote and protect fundamental human rights pertaining to democracy, including the right to information and freedom of expression. Mendel provided his comments on our draft Bill, as well as his opinions on the best ways forward for our advocacy campaigns.

C4 Center also attended discussions with other organisations primarily working on the Model RTI Bill - the Centre

for Independent Journalism (CIJ), Article 19 Malaysia, and Sinar Project - to refine the Bill and come to a consensus on the remaining contentious aspects therein, as well as to design an impactful campaign strategy premised upon the Bill over the coming months. We also spoke with other CSOs and NGOs which work broadly on issues of freedom of speech and expression to ensure that a holistic range of input goes into the final outcome document.

As the development of the Bill by the government moves towards the creation of the final Bill, C4 Center shall continue alongside aligned partners to campaign and advocate for a progressive and viable RTI regime which aligns with international best practice and ensures that a culture of transparency and accountability can be upheld.



ENVIRONMENTAL GOVERNANCE



Interview with Jabatan Pengurusan Sisa Pepejal Negara (JPSPN) for Japan Plastic Waste Trade Project

Held in Putrajaya on 21st of February 2024

As a part of the Japan Plastic Waste Trade Project, C4 Center's environmental team managed to conduct an interview with the Jabatan Pengurusan Sisa Pepejal Negara (JPSPN) team under the Ministry of Housing and Local Government (KPKT).

The main objective of this interview was to understand the role of JPSPN as the spearheading agency that provides licenses to the imported plastic waste businesses and their challenges in enforcement to tackle this massive issue.

This fruitful engagement with JPSPN helped us to gain more insights on the existing issues in plastic waste management, and we have established our interest in participating in any future discussions with KPKT and JPSPN to enhance the plastic waste management in Malaysia.



Sahabat Alam Malaysia and Third World Network's Forum on Climate Justice

Held in Kuala Lumpur on 29th of February 2024

On 29 February, C4 Center attended a forum on Climate Justice, organized by Sahabat Alam Malaysia (SAM) and Third World Network (TWN). The forum aimed to focus on the inequality between the Global South and Global North in dealing with the exacerbating climate change.

The developed countries in the Global North are responsible for around half of all the emissions since the Industrial Revolution, whereas developing countries with lesser capabilities in handling climate change have to deal with the burden of the continued emissions, in addition with the carbon tax that was initiated by the Global North. SAM's president, Meenakshi Raman highlighted that equity and distribution are the key elements that we need to focus on to address this existing climate injustice.

In addition, Hillary Kung, senior researcher for SAM and TWN presented critical assessments of the carbon pricing and carbon offset policies that

are currently being explored in Malaysia, especially in Sabah and Sarawak. Some of the unresolved conceptual issues in this matter mentioned were:

- i) The injustice in climate debt of developed countries.
- ii) How trading in the carbon market must not be equated to the provisions of climate finance by developed countries to developing countries.
- iii) How carbon markets and the "net zero" concept present a false solution to the climate crisis.

C4 Center fully concurs with the SAM's stance on the carbon market as a false solution to combat climate change. It is imperative that Malaysia, as a developing country, take a step back and reconsider the carbon market implications. Feasibility studies must be done in a holistic way before we implement such policies and regulations related to the carbon market.

Launching of C4 Center's Report

Ending Waste Colonialism, Governing Plastic Pollution:

Japan's Opportunity to Lead Asia out of the Plastic Crisis

This research shed light on the discrepancies between each country's domestic and regional governance capacities on the movement and management of plastic waste, raising serious questions on transparency, traceability, and accountability of the plastic waste trade framework.

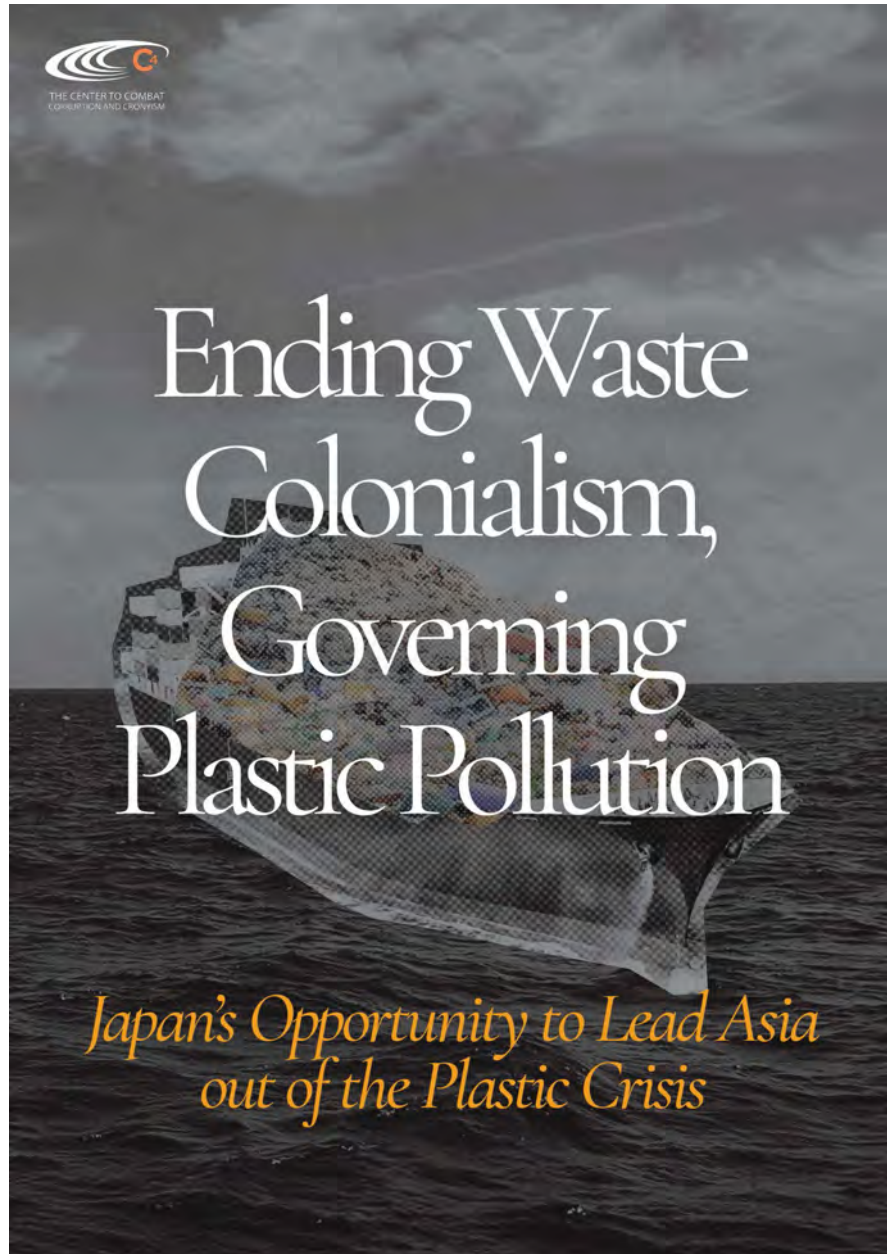
On 4 April 2024, the Center to Combat Corruption and Cronyism (C4 Center) launched report titled “Ending Waste Colonialism, Governing Plastic Pollution: Japan’s Opportunity to Lead Asia out of the Plastic Crisis”, highlighting waste colonialism in Malaysia caused by massive imports of Japan’s plastic waste. Since China banned solid waste imports in 2018, Malaysia has emerged as a global hub for plastic waste exports, with Japan being the leading nation exporting plastic waste to Malaysia. In November 2023, Japan exported 21.7 million kg in that month to Malaysia alone, more than the respective total amounts exported by other OECD countries to all non-OECD countries.

This research shed light on the discrepancies between each country’s domestic and regional governance capacities on the movement and management of plastic waste, raising serious questions on transparency, traceability, and accountability of the plastic waste trade framework. The report noted several major challenges for Malaysian waste management, which include illicit waste management practices such as open burning and illegal dumping, a lack of enforcement and monitoring from authorities, as well as a lack of transparency and public access to investigate regulatory compliance in importing plastic waste.

The report launch included sever-

al notable panel presentations and discussions. Jim Puckett, Executive Director and Founder of Basel Action Network (BAN) elaborated on the issue of lack of transparency and monitoring of waste trade, noting that only 10 PIC (Prior Informed Consent) applications were made in 2023 for permission to export contaminated mixed plastic waste to Malaysia. Lauren Weir, Senior Campaigner at the Environmental Investigation Agency (EIA), presented on the recently passed EU Waste Shipment Regulation amendments, where all plastic waste exports to non-OECD countries are to be banned 2.5 years after adoption. She put forth that this was a possible step that Japan could emulate to lead Asia out of the plastic pollution crisis. Anthropologist Dr. Shiori Shakuto shed light on the global economic, historical, racial, and gender imbalances that have brought about the current plastic pollution crisis - echoing the report’s argument that governing the waste trade is not merely an issue of economics or the environment.





Waste colonialism does not only impact Malaysia, as other Southeast Asia countries are similarly impacted. Therefore, from the research report, C4 Center strongly calls for the Japanese government to phase out plastic waste exports to Malaysia and other non-OECD countries as a means of combating waste colonialism. In addition, on the Malaysian governance side, it is imperative for the government to ensure transparency and public access to data to support local community efforts which address plastic waste trade issues, strengthen enforcement in moni-

toring waste shipments, and phase out plastic waste imports and focus on expanding the capacity and infrastructure in domestic waste collection and sorting.

As ways forwards for this research report, C4 Center will continue to amplify the key findings to both Japan and Malaysia counterparts, especially the key players in the government sector who can facilitate and continue addressing the plastic waste issues during the Intergovernmental Negotiating Committee (INC) discussion to develop an effective Global Plastic Treaty (GPT) to combat the plastic crisis.



Meeting with the Bahagian Pengurusan Alam Sekitar (BPAS) on Transboundary Haze

Held in Putrajaya on 30th of April 2024

On 30 April 2024, C4 Center was invited to join a focus group meeting involving CSOs and government agencies working under the Ministry of Natural Resources, Environment and Sustainability (NRES) in dealing with transboundary haze issues in Malaysia. The meeting was chaired by the Bahagian Pengurusan Alam Sekitar (BPAS) and the objective of the meeting was to address the transboundary haze issues, particularly in strategising the efforts to address peatland burning in Malaysia and also from the neighbouring countries, which have been a major contributor to this prevalent transboundary haze. Following this meeting, C4 Center has proposed a project proposal to the Ministry which focuses on the issue domestically by investigating the cooperation mechanism between the federal and state governments of Malaysia with regard to their collaborative efforts to curb transboundary haze and air pollution. The expected outcome from this project is to publish a policy advocacy document with key recommendations to influence the Malaysian government in enhancing the harmonisation between the state and federal governments in terms of safeguarding the environment.



CSO Insights on Just Energy Transition (JET) Using the Business and Human Rights (BHR) Lens

Held in Petaling Jaya on 15th of May 2024

On 15 May 2024, C4 Center was invited by Klima Action Malaysia (KAMY), a climate justice and feminist organisation, to join a focus group discussion with other CSOs and provide insights from CSO's perspective on just energy transition (JET) in Peninsular Malaysia. This focus group interview and discussion is one of the methodologies used by KAMY as a data collection for their research report with the aim to understand the current challenges and anticipate future issues to ensure a well-managed just energy transition by using business and human rights (BHR).



The thematic areas discussed were Rights, Economy, Climate Justice, Labour, and Social Dialogue and Tripartism, all of which are crucial for an equitable and just energy transition.

C4 Center emphasised the importance of transparency, accountability, and meaningful public participation in every energy transition project. This is to mitigate corruption risks in the form of abuse of power, conflicts of interest, and cronyism, and to ensure good governance in a just energy transition.

From C4 purview, we emphasised the importance of including transparency of the project details, accountability, and a meaningful public participation in every energy transition project to prevent corruption risks such as abuse of power, conflict of interest, cronyism, and others to happen during the project development and to ensure good governance in a just energy transition. The research report is expected to be completed by the end of the year.





Dialogue Session Between CSOs and Ministry of Economy on Implementation of CCUS Act

Held in Putrajaya on 13th of June 2024

On 13 June 2024, C4 Center, together with environmental CSOs such as Sahabat Alam Malaysia (SAM), Klima Action Malaysia (KAMY), Rimba Watch and others were invited to have a dialogue session with the government on ways forward with the CCUS Act implementation. The Ministry of Economy is spearheading the drafting of the Carbon Capture Utilisation and Storage (CCUS) Act, slated to be tabled in the Parliament at the end of this year.

However, the implementation of this Act raises many questions and concerns from the civil society and these concerns were addressed during the dialogue session. During the meeting, C4 Center has raised a few of the main issues lacking in the draft and plan on the CCUS implementation. Some of the concerns encompassed that there is no environmental consideration mentioned in the Act, no long-term safety of any CCUS projects, lack transparency on the project details, and the raising issue of carbon colonialism from CCUS projects to Malaysia.

Therefore, C4 Center recommends that the Ministry of Economy to reconsider the implementation of this Act as they are not feasible and the government was unable to prove the viability of CCUS with concrete data baseline and research studies.



Climate Change Bill Consultation with NRES

Held in Kuala Lumpur on 30th of July 2024

The Ministry of Natural Resources and Environmental Sustainability (NRES) convened the very first roundtable meeting with the Climate Change Advisory Panel, which includes C4 Center and various CSOs, community and youth groups, and concerned individuals. The roundtable meeting that was held on 30 July 2024 aimed to consolidate inputs from the advisory panel on Climate Change, as NRES bill on Climate Change is slated to be tabled by Parliament in 2025. In addition, the meeting agenda was followed by a discussion on preparation for COP 29 that will take place in Baku, Azerbaijan in November this year.

There are several important issues that C4 Center addressed during the consultation, namely the Carbon Capture Utilisation and Storage (CCUS) legislation issue, specifically the

fast-paced implementation of CCUS Act raising serious major environmental concerns. Hence, we urged NRES to lead the draft bill, to advise the Ministry of Economy and provide prompt guidance and take on the responsibility of reassessing every environmental impact of carbon capture projects. Secondly, we shared how the Environmental Quality Act (EQA) 1974 is outdated and needs amendments to address emerging environmental issues. Thus, NRES should amend the EQA 1974 to enhance the environmental protection.

From the meeting, we hope that NRES takes the considerations from the consultation as a significant step to be proactive in preserving the environment and C4 Center looks forward to participating in the next discussion on drafting the Climate Change Bill.



Zero Waste Workshop

Held in Subang Jaya on 3rd of July 2024

On 3rd July 2024, C4 Center had the opportunity to be a part of the Zero Waste “What to ask in Waste?” workshop. The workshop was organised by Zero Waste Malaysia (ZMW), coordinated together with C4 Center and Sahabat Alam Malaysia (SAM) which aims to equip and empower media journalists with zero waste and local waste management knowledge, and to amplify the advocacy of the existing serious issues pertaining to plastic waste to the public through the media. The workshop was attended by various Malaysian journalists representing 12 media groups from Bernama, BFM, Sin Chew and others.

The topics covered during the first session were on the Global Plastic Treaty (GPT) and Waste Trade, Misconception in Waste and Local Waste Management policies, and the False Solution in Waste Management. As C4 Center

emphasises the importance of improved environmental governance to address the ongoing waste management issues in Malaysia, Wong Si Peng has diligently delivered a sharing session on the existing policies and other relevant Malaysian legislation concerning local waste management. In addition, C4 Center also had the chance to share the findings from our research report, “Ending Waste Colonialism, Governing Plastic Pollution: Japan’s Opportunity to Lead Asia out of the Plastic Crisis”.

Following that, there was an engaging hands-on session on a local Map of Power to implement zero waste nationwide. The workshop participants agreed that it is imperative for the media to assist CSOs in amplifying our advocacy to the public. Hence, C4 Center looks forward to having more engagement with the media practitioners.



NRES 2025 Budget Consultation

Held in Kuala Lumpur on the 1st of August 2024

On 1st August 2024, C4 Center had the opportunity to join the Sesi Libat Urus Dialog Belanjawan 2025 organised by NRES, focusing on the budget allocation for environment areas across ministries. The event was attended by various stakeholders including government agencies, GLCs, CSOs and NGOs. NRES is focusing on low carbon development, biodiversity & environment protection, and mining including critical minerals. Feedback and concerns were raised by CSOs, including the push for more recognition of gender issues in climate crisis, mineral resource issues, and data collection & accessibility.

Among the issues raised during the consultation was plastic pollution. C4 Center brought several recommendations during the dialogue session, such as the importance of the Continuous Emission Monitoring System (CEMS) to hold companies accountable and amplify data transparency. In order for NRES to address plastic pollution at the state level, we called on NRES to create an incentive mechanism similar to the Ecological Fiscal Transfer on single-use plastic reduction to encourage each state to minimise its use and hence will reduce their plastic use. Besides that, NRES should be working collaboratively with other agencies to assess budget implementation and provide a detailed comprehensive budget, implementation report, and guarantees that the report is publicly available for check and balance mechanisms.



Stakeholder Consultation for Global Plastic Treaty IWG

Held in Putrajaya on 7th of August 2024

The consultation was organised by Environmental Management Division of the Ministry of Natural Resources and Environmental Sustainability (NRES) with representatives from industry, government agencies including technical experts appointed by the ministry to attend the intersessional technical working group meetings in Bangkok with CSO and NGO representatives. During the meeting, the technical experts shared summaries of the online meetings and written replies to the questions for EG1 (Expert Group 1 on Financing) and EG2 (Expert Group 2 on Chemicals, Product Designs and Problematic Plastics).

The discussion was primarily focused on EG2 questions. Industry representatives indicated that the plastics industry is currently well regulated and there were concerns of duplicating the provisions of existing MEAs (Multilateral Environmental Agreements) on chemicals and waste ie Stockholm, Rotterdam and Basel Conventions. There was acknowledgement from the ministry that Malaysia has yet to ratify the Stockholm Convention and the ministry

requires input from academics, industry as well as CSOs.

A representative from Consumers' Association of Penang, Mageswari Sangaralingam, shared the paper from IPEN providing clarification on criteria vs non-criteria based approaches for the consideration of the experts and the ministry.

Chemical industry representatives gave suggestions to the ministry to consider following procedures used in the Stockholm Convention. This includes the listing of chemicals to be done only after full assessments are conducted. Socio-economic aspects must be considered as creating a list using hazard based approaches in the GPT may affect the economies of countries like Malaysia. Plastic industry representatives gave recommendations to experts to recommend mono-layered plastic products. The use of terms such as "problematic, unnecessary, avoidable" was suggested to be defined. All stakeholders were invited to submit written replies for the IWG questions to the ministry.



Environmental Reporting Workshop

Held in Petaling Jaya on the 24th of August 2024

On 24 August, C4 Center had a great opportunity to attend an insightful workshop on environmental reporting that was conducted by Law Yao Hua from Macaranga, a journalism media that covers the environment and sustainability in Malaysia. The workshop, organised by the Agora Society and B.E.A.CC.H. aimed to teach attendees to investigate an environmental issue strategically and effectively by identifying the key issues and the tools to kickstart and assist the data collection of the investigation. Furthermore, the workshop also includes how to use satellite imagery by using Sentinel Hub and Google Earth Pro, specifically to identify forest degradation area by comparing the vegetation area over a certain time. The workshop was attended by various environmental CSOs and concerned individuals who are keen to investigate ongoing environmental issues and for C4 Center, we believe that this workshop has been insightful as it would help us effectively structure an environmental case study and identify the land use area through satellite image.



JPSPN Report Handover

Held in Putrajaya on 28th of August 2024

C4 Center is sincerely grateful for the invitation extended by the Ministry of Housing and Local Government (KPKT) to present our plastic waste trade report titled “Ending Waste Colonialism: Governing Plastic Pollution” to the Deputy Director General of JPSPN, YBr Encik Ahmad Zuhairi bin Muzakir, and his supportive team. The research findings have been extensively shared by the co-authors of the report, Wong Pui Yi, Wong Si Peng, and Nabila Zulkeflee, who have also emphasised the significance of KPKT in addressing the plastic issue in Malaysia.

In addition, the C4 Center would like to express our appreciation to the JPSPN team for their ongoing support, as they provided their insights during the initial process of this research. We anticipate further collaboration with JPSPN to combat plastic pollution, and improve waste management in Malaysia, particularly with the implementation of the recently published Circular Economy Blueprint for Solid Waste in Malaysia (2025-2035).



Interagency Workshop with NRES

Held in Putrajaya on 10th and 11th of September 2024

C4 Center, along with other environmental NGOs including Basel Action Network, Sahabat Alam Malaysia, Persatuan Tindakan Alam Sekitar Kuala Langat (PTASKL), and Greenpeace has successfully coordinated an interagency workshop with the Ministry of Natural Resources and Environmental Sustainability of Malaysia (NRES) in Putrajaya. This 2-day workshop has established a forum for dialogue amongst authorities relating to waste trade, with the objective of emphasising the issues of governance in the process of waste trade and exploring ways forwards to overcome these challenges. Among authorities involved were the Department of Environment (DOE), National Solid Waste Management Department (JSPN), the Royal Malaysian Customs Department (JKDM), SIRIM, local councils in Selangor, and others.

The specific areas of waste trade that were discussed during the workshop were on plastic, electronic waste (e- waste), scrap metals, and paper. Various significant issues were raised during this workshop as the stakeholders pin-pointed the loopholes at the certain process in waste trade that they specifically faced in their daily jobs. In addition, insightful discussions between NGOs and these authorities were conducted in order to overcome these challenges which the overarching objective is to have a better governance in waste trade to combat waste colonialism and mitigate the pollution of waste imports which have hindered Malaysia's waste management.



BFFP Asia Pacific Advisory Council (APAC) Meeting

Held in Bangkok, Thailand on 11th to 15th of September 2024

C4 Center officer Wong Si Peng had the honour of being invited to join the BFFP Asia Pacific Advisory Council (APAC) for a two-year term from 2024 until 2026. The other illustrious APAC council members are Froilan Grate from GAIA Asia Pacific, Lubna Anantakrishnan from Kashtakari Panchayat (India), Tiza Mafira from Dietplastik (Indonesia), Hemantha Withanage from Friends of the Earth International (Sri Lanka), Haimei Jin from BFFP China, Rufino Varea from Pacific Island Climate Action Network (Fiji) and Aileen Lucero from EcoWaste Coalition (Philippines). Following the on-boarding call in May, the council members met in person on 11-15 September in Bangkok to clarify the role of the council, review the mandate & nomination process for future council members, and identify top line work plan for the next 12 – 18 months.



Climate Change Forum 2024: *Path to COP29 Baku*

Held in Putrajaya on the 30th of September 2024

On 30 September, C4 Center was invited by the Ministry of National Resources and Environmental Sustainability (NRES) to attend the Climate Change Forum 2024: Path to COP29 Baku with involved the launching of the National Climate Change Policy (NCCP) 2.0 and discussion on Malaysia's path on climate change and its priorities during the upcoming United Nations Framework Convention on Climate Change (UNFCCC) negotiation during the 29th Conference of Parties (COP29) in Baku, Azerbaijan from 11-12 November.

During the launching of NCCP 2.0, NRES Minister Nik Nazmi stated that this new policy reflects further understanding on climate change and serves as the backbone for the Climate Change Act which is slated to be completed next year. NCCP introduces a new framework towards low carbon economy and some of the pathways emphasised in the policy are the Nationally Determined Contributions (NDC), Long-Term Low Emission Development Strategies (LT-LEDS), climate financing, and climate adaptation. The policy aims to establish a pro-

ductive partnership with other national policies, including the National Energy Transition Roadmap (NETR).

Following the launch of the NCCP, several insightful panel discussions were conducted including discussions on the way forward for NCCP implementation, COP Presidencies & the roadmap mission to achieve the 1.5°C benchmark, and innovative approaches to climate adaptation.

Following this forum, C4 Center looks forward to the implementation of the NCCP. We hope this ensures the achievement of our NDC and LT-LEDS target, with a process that is equitable, transparent, and includes meaningful public participation. We also emphasise that greenwashing elements in the net zero mechanism - such as carbon offset and Carbon Capture Utilisation and Storage projects - need to be avoided in the climate change adaptation. Thus, C4 Center will continue to monitor the progress of our climate initiatives and be actively engaged in the development of the Climate Change Act.



Rally Himpunan Tolak Insinerator

Held in Selayang on the 1st of October 2024

C4 Center has been invited by Malaysian anti incinerator movement, Gabungan Anti Insinerator Kebangsaan (GAIK) to join a rally in Selayang in front of the Majlis Perbandaran Selayang to protest the development of Batu Arang incinerator that is currently being proposed. The rally conducted on October 1st participated by over 120 people including organisations such as the Rawang Tolak Insinerator (RTI), Greenpeace, political party Parti Socialist Malaysia (PSM), and concerned communities living in Rawang.

C4 Center questions the governance, environmental consideration, and the waste management efficiency of developing this incinerator, also known to be a Waste-to-Energy (WTE) technology proposed by the Selangor state government. Worryingly, the proposed project is located less than 1km from the residency area, showing that there is no concern that the emissions from the incinerator will affect the health and livelihood of nearby residents. In addition, the Environmental Impact Assessment (EIA) report has not been concluded for public review and consultation since the project plan has been announced.

Furthermore, C4 Centre is appalled with the Selangor state government being unresponsive after protests have been made for this development, showing that there is no meaningful pub-

lic participation on the government's decision to develop an area even though strong objections have been made by the public.

Hence, C4 Center urges the Selangor state government to consider the public's concern on the impacts from WTE in Batu Arang and reevaluate this project, and the federal government to cohesively conduct cost benefit and feasibility studies of WTE effectiveness to manage waste management and how to mitigate environmental risks from this technology. To ensure a good governance is practiced in order to safeguard the environment and the livelihood of the public, C4 Center also recommends the state government and the stakeholders to:

1. Provide a comprehensive and credible EIA report for the project and ensure it is publicly accessible to ensure meaningful public participation upon publication.
2. Conduct a meaningful discussion between the stakeholders, including communities, competent academicians, and CSOs prior any project developments.
3. To mitigate the existing waste mismanagement focused on state level, the state government must collaborate with the Ministry of Housing and Local Government to effectively implement the Circular Economy Blueprint for Solid Waste.



Roundtable Discussion on Developing Climate Change Framework

Held in Petaling Jaya on the 7th of October 2024

On October 7th, C4 Center joined a roundtable discussion (RTD) on developing the Climate Change framework organised by the CSO Platform for Reform in collaboration with B.E.ACC.H. and Environment Protection Society Malaysia (EPSM). The RTD aimed to gather insights, expertise, and perspectives from a broad spectrum of CSOs. The RTD's primary goal is to ensure the forthcoming Climate Change Bill genuinely reflects national aspirations and addresses the multifaceted challenges posed by climate change. One of the main discussions during the RTD is the reflections on the recently published National Climate Policy 2.0 (NCCP 2.0) which ties all the climate initiatives and provides a blueprint towards a low carbon economy. In addition, NRES has published a consultation paper on the proposed Rancangan Undang-Undang Perubahan Iklim Negara (RUUPIN), thus one of the sessions focused on dissecting the paper, its loopholes, and recommendations to enhance the paper.

The RTD created a platform for dialogue and deliberation on key priority areas and provisions that should be included in the Climate Change bill. A coalition was formed from the RTD and a task force of representatives from 21 CSOs including C4 Center aims to produce collaborative feedback in response to the proposed RUUPIN and monitor the development of RUUPIN and other climate-relevant legislations.



Expert Interview by KAMY on Just Energy Transition and Business and Human Rights

Held in Petaling Jaya on the 8th of October 2024

On the 8th of October 2024, Policy and Legal Research Officer Prishanth Linggaraj had an expert interview with Programme Director Ili Nadiah Dzulfakar and Research Associate Aznita Pharmy from Klima Action Malaysia (KAMY). This interview formed part of KAMY's stakeholder consultation series in developing their framework for a Just Energy Transition (JET) using a Business and Human Rights (BHR) lens in Peninsula Malaysia. KAMY sought C4 Center's input primarily on the proposed Malaysian Ombudsman and the role it might play in a just energy transition, based on our publication of the report Structuring the Malaysian Ombudsman Office and subsequent collaboration with the Legal Affairs Division of the Prime Minister's Department on the Working Committee developing the Ombudsman Act.

During the 2 hour interview, we covered themes such as access to remedy for members of the public against government and the private sector, transparency and public participa-

tion, how an Ombudsman might protect Free, Prior, and Informed Consent (FPIC) procedures, and the right to information under the planned Right to Information Act. The conversations were stimulating and allowed for exchange of expertise and experience between both organisation's thematic areas.

We are grateful for the opportunity to provide insight in KAMY's work, as we are acutely aware of the need for more progressive and effective action in combating the imminent threats posed by climate change. This exchange was a great example of CSOs working beyond our silos to bridge the gaps between us, thereby strengthening our collective efforts to effect change in Malaysia. C4 Center hopes to continue collaborating with other CSOs on similar cross-cutting concerns, and we shall persist in advocating for progressive reforms.



COP29 Masterclass

Held in Kuala Lumpur on the 9th of October 2024

On 9 October 2024, C4 Centre was invited to join the 29th Conference of Parties (COP29) Masterclass hosted by the Institute of Strategic & International Studies (ISIS) Malaysia in collaboration with Third World Network. As a precursor to the COP29 which is scheduled to take place on 11–22 November in Baku, Azerbaijan, the programme brought together various national stakeholders, emphasising on learning through sharing by experts. The objectives of the program include:

- i. To understand Malaysia's national priorities in fulfilling climate goals as well as the dynamics of climate negotiations at the international level;
- ii. To explore key agendas

at COP29 and relate them to national contexts, including outcomes of the first Global Stocktake, Mitigation Work Programme (MWP), Global Goal on Adaptation (GGA) and National Adaptation Plan (MyNAP), as well as the new collective quantified goal (NCQG) on climate finance; and,

- iii. To provide a neutral and alternative platform for national stakeholders to exchange perspectives on Malaysia's climate ambitions, in advocating for and achieving equitable progress at the global negotiations level.

The discussions from the program focused on the understanding of the negotiation process and highlighting Malaysia's general priorities

at COP which should include equitable transition financing, access to loss and damage funds, strengthening collaboration and finding common interest with the G77 coalition, and capacity building. In addition, it is imperative for the stakeholders including C4 Centre to oversee the development from the COP29 discussions and its impacts in the implementation of the response measures at national level which will be circling over the formulation of the Climate Change Bill and the National Adaptation Plan (MyNAP).



The Journey to End Plastic Pollution

Held in Bukit Jalil on 18th to 20th of October 2024

C4 Center, a core member of the Malaysia Stop Waste Trade Coalition together with Consumers' Association of Penang, Greenpeace Malaysia and Sahabat Alam Malaysia jointly

organised the 3-day public engagement event using art, film and stories to illuminate the stark realities of our dependence on plastic, ahead of the fifth Intergovernmental

Negotiating Committee (INC-5) for an international legally binding instrument to end plastic pollution, informally known as the Global Plastic Treaty.

The collaboration with several artist and Sunway University's School of Arts and Centre for Planetary Health enabled visitors to see the dark side of plastic through creative in-

stallations such as Co2_karbondioksida's Junk Food series made from plastic waste collected within the Muar community in Johor and Noktah 2.0, a transformative group exhibition that delves into the critical theme of planetary health. Each artist in Noktah correlates their projection mapping with a UN Sustainable Development Goal (SDG), which guides the artists towards themes like climate action, biodiversity conservation, responsible consumption, and health.

The exhibition also featured solutions to plastic waste reduction. Visitors were able to fill up their existing containers with laundry detergent from ReadyCare and were also rewarded with complimentary coffee vouchers when they brought their own tumblers to the exhibition. Visitors were also invited to complimentary screening of the ground-breaking feature

documentary "Plastic People" highlighting our addiction to plastic and the growing threat of microplastic on human health.

On the final day of the exhibition, the Minister of Natural Resources and Environment Sustainability, YB Nik Nazmi Nik Ahmad was invited as a panellist, together with Edmund Bon, AICHR representative and Mageswari Sangaralingam, Chief Executive of Consumers' Association of Penang (CAP) on the topic "People vs Plastic". YB Nik Nazmi also toured the exhibition after the panel session. C4 Center had the opportunity to present our recommended provisions for a strong Global Plastic Treaty to the minister.





Forests and Finance Workshop - Banking on Biodiversity Collapse: Malaysian Edition by Sahabat Alam Malaysia

Held in Kuala Lumpur on the 21st of October 2024

On October 21st, Sahabat Alam Malaysia (SAM) organised the Forests and Finance Workshop - Banking on Biodiversity Collapse: Malaysian Edition which focused on the sustainable financing linked to the environmental damage happening in Malaysia. The workshop, attended by various local environmental CSOs and NGOs aimed to build a better understanding on sustainable finance, especially with the Environment, Social, Governance (ESG), No Deforestation, No Peat and No Exploitation (NDPE), and sustainable finance dominating the sustainability discourse. In addition, the participants have collectively looked at the gaps in the financial regulation for the protection of forests and social safeguards in Malaysia at various angles, with C4 Center concernedly highlighting the needs to mandate data transparency and public participation in the regulations so that the community will have the rights to object any proposed projects through a strict financial sustainability policy, and hold corporations accountable for any non-compliance that will negatively impact the environment and the livelihood of marginalised communities.





Towards a Circular Economy: Tackling Plastic Pollution and Waste Management Event by EUDEL and Embassy of Finland

Held in Kuala Lumpur on the 18th of November 2024

C4 Center had a great opportunity to collaborate with the Delegation of the European Union to Malaysia (EUDEL) to participate in the Circular Economy (CE) event as panelist and moderator for the forum session. C4 Centre joined a handful of CE experts including Mr Michael Bucki from EUDEL in Thailand, Kian Seah from Heng Hiap Industries, and Ms Adlina from UNODC. We took this opportunity to present the key problems in our published Plastic Waste Trade report and highlighted Malaysia's waste management and showed the linkage between corruption risks and environmental issues via the secrecy in the existing waste trade process chain. The event, "Towards a Circular Economy: Tackling Plastic Pollution and Waste Management", which was jointly organised by the EUDEL and the Embassy of Finland in Kuala Lumpur continued with a moderated session which had collected insightful discussions among Circular Economy experts, including H.E. Anne Vasara from the Embassy of Finland, Ahmad Zuhairi Muzakir from the Ministry of Housing and Local Government, CE specialist Jacqueline Chang, and academician Dr S.Sri Umeswara. The discussions highlighted the needs of Malaysia to effectively implement the CE approach holistically through the well developed CE policies that have been published this year, namely the Circular Economy Policy Framework for the Manufacturing Sector and Circular Economy Blueprint for Solid Waste in Malaysia (2025-2035).



The Fifth Session of the Intergovernmental Negotiating Committee to Develop an International Legally Binding Instrument on Plastic Pollution, Including in the Marine Environment (INC-5)

Held in Busan, South Korea from 21st of November to 2nd of December 2024

Through our research in the “Ending Waste Colonialism: Governing Plastic Pollution” report, we have been following the development of the international legally binding instrument (ILBI) to end plastic pollution, including in the marine environment. Currently, our government’s effort on controlling plastic pollution is guided by 2 national roadmaps; Roadmap Towards Zero Single-Use Plastics 2018 – 2030 and Malaysia Plastics Sustainability Roadmap 2021 – 2030. With little updates on the progress of implementation of both the roadmaps, there is little to show except some states implementing a fee or ban of plastic bags and a short-lived no straws campaign. Plastic in its many forms, from product, to packaging, to electronics, to synthetic textiles is transboundary in nature, will

require a comprehensive approach beyond national measures to manage its pollution impacts from production to end-of-life.

Thus with a mini-grant from Global Greengrant Funds, our officer travelled to Busan together with 576 civil society organisations, scientist coalitions, rights holder organisations, with great expectations that with enough political will from the member states governments, we could walk out with a historic environmental treaty that will address plastic pollution across its entire life-cycle. But in the early hours of 2 December, the fifth meeting of the Intergovernmental Negotiating Committee (INC-5) concluded without an agreement, leaving countries with an extended deadline and a proposal by the Chair to resume talks at an extra session

(INC 5.2) to resolve outstanding disagreements. Countries will use the latest Chair’s text for the resumed session as the basis for the continued negotiations.

While the additional session is welcomed, civil society observers are concerned that the process remains at risk as the bracketed rules of procedure and the need for consensus allows the lowest denominator to hold ambition hostage. Observers were allowed into contact groups for 4 days, but from mid-week onwards, all discussions were closed door informal discussions. Despite the barriers to participation, civil society organisations, including Indigenous Peoples, waste pickers, fenceline and frontline communities, women, global citizens, and scientists stood united in their ambition and joined Rwanda’s



(representing 85 countries) call at the closing plenary to stand up for ambition.

In addition to attending the negotiations held at Busan Exhibition and Convention Centre (BEXCO), our officer participated in the 1123 Busan Plastic March held on 23 Nov before the start of INC-5 and met many inspirational activists including Indigenous Peoples, frontline communities

and production.

With Busan behind us, we continue working with Malaysia's delegation to the INC to ensure that critical provisions which complements our national efforts to control plastic pollution will be included in the treaty:

- phased production reduction
- criteria for the elimination of the most harm-

ful plastic products and chemicals of concern including harmonised and transparent labelling

- setting up of an adequate financing mechanism to support effective implementation of the treaty for developing countries
- Enhancement of waste trade controls through mandatory PIC (prior informed consent) for all plastic waste
- transparent reporting and monitoring of treaty obligations

Malaysia as a primary plastic polymer producer and plastic manufacturer has the opportunity to stand at the right side of history by negotiating for a treaty that will enable a just transition to a safe and toxic free circular economy.





Sahabat Alam Malaysia - SAM Conference on Deforestation, Climate Change and Community Rights & EIA Workshop

Held in Tanjung Bungah, Penang on 10th to 13th of December 2024

In December, C4 Center was invited to attend two conferences organised by Sahabat Alam Malaysia (SAM) which was held in Tanjung Bungah, Penang. These conferences have gathered various CSOs and grassroots communities including the Orang Asli communities. The first conference focuses on deforestation, climate change, and community rights was held for the first 3 days and the first conference have deliberately increased the understanding amongst the participants on the new forms of threats against forests and indigenous customary territories in Malaysia in particular within the context of climate change, including monoculture plantations, the mining of rare earth elements (REE) and carbon offsetting projects. In addition, SAM have shared the top down process of the inter-governmental conventions and agreements on climate change, forests and biodiversity, such as the United Nations Framework Convention on Climate Change (UNFCCC) and the Convention on Biological Diversity (CBD) affecting the country's policies on climate change, forests, community land rights and just energy transition at national measures. The participants

were more critical on the evaluation of the latest developments of false climate solutions such as carbon and biodiversity offsets and net zero. In this regard, C4 Center was given the opportunity to present the corruption risks in the Carbon Market which is imperative for the communities to understand the needs of public participation, data accessibility, and accountability to address the corruption risks in the whole process as these so called sustainable projects pose more harm to the environment and livelihood of the marginalised communities.

The conference was followed by a 1 day workshop to understand the whole process of Environmental Impact Assessment (EIA) to increase critical understanding amongst the local and national CSOs on the strengths and weaknesses of the various EIA processes in Malaysia. This is to also encourage greater public participation in the EIA process to ensure that the public can be the check and balances for the sustainable development, and the participants have the opportunity to discuss the ways in which the EIA process can be improved in the country, including through policy and governance reforms.



KUASA Workshop - Sustainable Development Goals (SDG) Workshop with the Orang Asli in Selangor

Held in Kuala Lumpur on the 14th of December 2024

On 14th December, C4 Center was invited to be one of the speakers for a workshop organized by grassroots-based NGO, Persatuan Aktivis Sahabat Alam (KUASA). The workshop was held at KIP Hotel, Kuala Lumpur focused on providing training for the Orang Asli communities in Selangor to understand their rights to public participation and data accessibility in a case when a project development is conducted and affecting their livelihoods. C4 Center had the greatest opportunity to present topics of Freedom of Information (FOI), Politics, Corruption, Abuse of Power in Environmental Management. The presentation mainly talked about the corruption cases linked to environmental degradation and

shared possible corruption risks in the project development process pertaining to the emerging carbon market projects. We highlighted the needs of the public to push for reforms including FOI, Political Financing, Climate Change Act, and other related reforms to ensure that these corruption risks will be addressed by calling out more public participation, transparency, and accountability in any development process.





Meeting with the International Labour Organisation (ILO)

Held in Kuala Lumpur on the 16th of February 2024

C4 Center was invited to meet the International Labour Organization (ILO) on the 16 February. During this meeting, we discussed the issues faced by migrant workers in Malaysia, while discovering where we aligned on related migrant issues.

Overall, we agreed that future engagements with ILO and other relevant stakeholders would be highly beneficial. With this, we hope to create a fair, safe and corruption-free labour market for migrants in our country.



UNODC Regional Platform in Southeast Asia for UNCAC Implementatoin

Held in Bangkok, Thailand on 27th to 29th of February 2024

C4 Center CEO Pushpan Murugiah was invited as a panellist in the UNODC regional platform in Southeast Asia to fast track the implementation of the United Nations Convention Against Corruption (UNCAC) held in Bangkok.

In his capacity as a panellist, Pushpan spoke on the intersection between corruption and human rights and the impact it has on gender issues and the role of civil society. C4 Center is immensely grateful to UNODC for the opportunity.

Joint Workshop on Migrant Smuggling with the International Labour Organisation (ILO) and UNODC

Held in Kuala Lumpur on the 9th of May 2024

The Tripartite-plus Workshop on Labour Migration, Smuggling of Migrants was held on 9 May 2024 at Intercontinental Hotel, Kuala Lumpur. This event is part of a larger research project into the movement of migrant labour into Malaysia, the relevant legal framework of migration, and the allegations of corruption in the recruitment process, and was jointly organised by C4 Center as well as the International Labour Organisation (ILO).

Currently, a large portion of Malaysia's workforce — especially in occupations considered dirty, dangerous, demeaning (3D) — is comprised of migrant labour, and demand for migrant labour continues to grow. As a result of this, networks of corruption and cross-border crime have erupted in order to facilitate the movement of migrant labour into Malaysia outside of legal channels, ranging from job scams to human smuggling and trafficking operations. Hence, the overall research programme here aims to examine recruitment and admission practices on migrant worker management, and identifying gaps in the processes that enable rent-seeking activities and labour exploitation, and that

leave migrant workers vulnerable to irregular migration, forced labour, smuggling and trafficking. This workshop in particular aimed to present C4 Center's initial re-

port on corruption and governance issues within migrant labour recruitment to a wide variety of stakeholders and to receive their feedback. It also aimed to collect more perspectives from these groups in what their specific challenges were in terms of confronting and dealing with the issues, to collectively seek solutions and steps forward from different perspectives.

Subject matter experts within the labour and migration space were invited to speak at



this event. The opening remarks were presented by Rebecca Miller, Regional Coordinator, Human Trafficking & Migrant Smuggling, UNODC Regional Office for Southeast Asia and the Pacific (ROSEAP); Nilim Baruah, Senior Migration Specialist, DWT, ILO Regional Office for



Smuggling of Migrants”, and “Preventing rent-seeking activities and promoting transparency”. Since the groups were separated according to sector and industry, they were allowed to speak freely and openly, as well as bounce talking points off of each other. In total, the workshop was attended by over 40 participants across the different sectors. The findings from these focus group discussions will be instrumental in furthering the research into migrant labour corruption, and will be incorporated into a larger report on this subject.

Asia and the Pacific (ROAP); Pushpan Murugiah, Chief Executive Officer, C4 Center. The panel discussion, “Labour Migration Challenges and Opportunities” featured the panel-

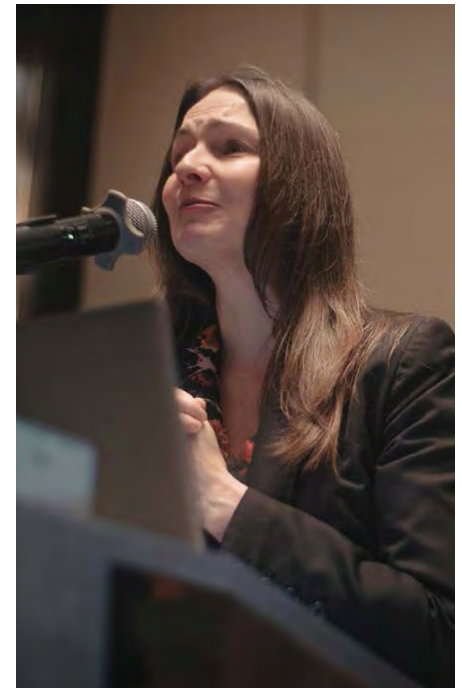
lists Engrit Liaw, Malaysian Trade Unions Congress representative; Dr Andika Wahab, Universiti Kebangsaan Malaysia; Adrian Pereira, North-South Initiative; Vinothaa Selvatoray, Malaysiakini. The event was attended by members of government and enforcement agencies, diplomatic corps, members of civil society organisations, and private sector representatives who are familiar with migrant labour recruitment processes. These

groups engaged in breakout room discussions separately, with moderators leading the discussions according to predetermined questions and issues to focus on. The topics of the three discussions were “Improving recruitment and migrant worker management practices”, “Upholding Labour Rights and combating Forced Labour, Trafficking in Persons, and

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International Anti-Corruption Conference 2024 (Vilnius, Lithuania)

Held in Vilnius, Lithuania in June 2024

In June, C4 Center CEO Pushpan Murugiah flew to Vilnius, Lithuania to take part in the International Anti Corruption Conference 2024. There, C4 Center ran a joint session with the UNODC. The subject of discussion was “Sovereignty for Sale: Special Economic Zones, Scam Operations, Casinos, and Human Trafficking.” It was an informative discussion where new ideas were mooted. It was an honour to be amongst so many anti-corruption experts and practitioners. It was also great to know that, our friends from the Phillipines Center for Investigative Journalism (PCIJ) also had a fruitful and interesting session titled “Watching the watchtower, harnessing the power of collective action, discussing the role that the fourth estate has on fighting corruption and abuse of power.”



International Conference on Anti-Corruption (Bangkok, Thailand)

Held in Bangkok, Thailand on 7th of June 2024

C4 Center CEO Pushpan Murugiah had the opportunity to attend and speak at the 2nd, International Conference on Anti Corruption Innovations in Southeast Asia held in Bangkok early this month. There he presented the linkages between corruption, migrant smuggling and cross border crime between Malaysia and the region. He also spoke on how political influence and corruption plays a vital role in driving demand for illegal recruitment (false demands).

The session featured an impressive lineup of speakers; Ms. Carmela from PCIJ, John Wojcik from UNODC - United Nations Office on Drugs and Crime, and Tuan Reemos Khan from MACC, moderated by Annika Wythes.



Southeast Asian Anti-Corruption Network (SEA-ACN) Roundtable Discussion

Held in Bangkok, Thailand on 8th of June 2024

The ASEAN Anti-Corruption Network (SEA-ACN), a coalition of anti-corruption civil society organizations in ASEAN, convened a meeting on June 8th in Bangkok during the 2nd International Conference on Anti-Corruption in Southeast Asia. The discussion focused on critical corruption-related topics, including public procurement, whistleblower protection, data transparency, and business integrity. Recognizing that corruption transcends national boundaries, global cooperation is essential to combat this issue effectively.



Waste Crime and Anti-Corruption Technical Seminar (Bangkok, Thailand)

Held in Bangkok, Thailand on 25th and 26th of June 2024

The 2-day technical seminar on 25 & 26 of June in Bangkok, Thailand, was attended by over 50 participants from various enforcement agencies in the SEA region. Enforcement agencies included officers from Customs, anti-corruption agencies, police, and representatives from the Ministry of Environment/Department of Environment from Indonesia, Malaysia, Thailand, Vietnam and Philippines. Participation from civil society organisations was limited to only 3 organisations, 2 from Malaysia and 1 from Indonesia. The informative seminar had speakers and panellists who shared case studies and experiences linking corruption in waste management and illegal waste trafficking crimes. The inclusion of prosecution officers at the seminar was also key as the conviction rate for waste trafficking crimes in the region remains low. It was beneficial to be able to have dialogues with various enforcement agencies involved in waste trafficking and to hear their experiences, learnings and suggestions.



Advancing Anti-Corruption Efforts in Southeast Asia Through Beneficial Ownership Transparency Organised by the United Nations Office on Drugs and Crime (UNODC)

Held in Jakarta, Indonesia on the 12th and 13th of August 2024

C4 Center CEO Pushpan Murugiah was invited to attend the forum organised by UNODC in Jakarta on the 12th and 13th of August. The forum was designed to bring together regional, enforcement agencies, regulators and civil societies in understanding the concept of Beneficial Ownership (BO) and its current progress in member states. Malaysia is among the few that has amended its Company Act 2016 to make beneficial ownership reporting mandatory. The amendments were passed in 2023 last year and take effect this year. All companies in Malaysia now are required to submit their list of beneficial owners to the Companies Commission of Malaysia (CCM) which acts as the regulator for beneficial ownership reporting. Some of the discussions that were raised was the use of AI and open data to promote effective reporting

and better transparency in addressing money laundering, terrorism financial, and illicit money flows. The context of each national agenda was also touched upon where some jurisdictions promote an open BO registry while others do not favour an open registry.

C4 Center has always maintained that for better oversight and transparency it would be better to make these registries accessible to the public, similar to the United Kingdom's open BO registry. In the case of Malaysia, the fact that our regulators are not truly independent and is often subject to government intervention and influence, it is critical that these registries are made publicly accessible to minimise those in power from weaponizing these information for their political benefit.

Regional Forum on Good Governance Initiatives and Advocacy Strategies

Held in Kuala Lumpur on the 23rd and 24th of September 2024

Acknowledging the pressing need to promote the development and implementation of effective CSO-Parliament mechanisms for engagement across Southeast Asia, C4 Center organised the “Regional Forum on Good Governance Initiatives and Advocacy Strategies” in September 2024. The two day summit brought together a diverse set of representatives from

civil society organisations (CSOs) all throughout Southeast Asia. As a whole, this event saw the participation of individuals from Malaysia, Philippines, Indonesia, Thailand, Cambodia, Brunei, Timor-Leste, and Myanmar. The coalescence of these individuals served to create a platform for information exchange and act as a prelude to potential cross-border alliances be-





tween the various CSOs. A number of esteemed speakers were invited to share and contextualise advocacy efforts within various national contexts:

- Political Systems in ASEAN by Prof. Wong Chin Huat, Political Scientist, UN Sustainable Development Solutions Network (SDSN) Asia Headquarters, Sunway University
- Malaysian CSO Experience in Advocacy with Parliamentarians by Cynthia Gabriel, Founding Director, C4 Center
- Using the APPGM Platform for Advocacy by YB Tuan Syed Ibrahim bin Syed Noh, Chairman of All Party Parliamentary Group Malaysia - Integrity, Governance and Anti-Corruption
- Advocacy Experiences in the US by Congressman Mike Bishop
- Advocacy Experiences in Indonesia by Dr. Rifqi Sjarief Assegaf, Program Director for Justice, Anti-Corruption and Human Rights, Kemitraan
- Advocacy Experiences in Thailand by Asst. Prof. Dr. Torplus Yomnak, Director of the Knowledge Hub for Regional Anti-Corruption and Good Governance Collaboration (KRAC)
- Using Media as an Advocacy Tool in Advancing Reform by Carmela Fonbuena, Executive Director, The Philippine Center for Investigative Journalism (PCIJ)



formed over the two days. This culminated in the “Solidarity Night” held at Kuala Lumpur Tower – the world’s seventh tallest tower. During this soirée, participants were given the freedom of KL Tower’s observation and sky decks – allowing them to soak in the wonders of Kuala Lumpur’s sprawling nighttime skyline from a unique vantage point. The highlight was the evening dinner which gave participants a chance to truly enjoy each other’s company. On top of all this, the dinner provided guests with a glimpse of Malaysia’s multicultural heritage, with awe-striking cultural

The sharing of these multifaceted advocacy experiences provided participants with a number of strategies that they could incorporate in their own works, and also shined a light upon the many nuances present within the advocacy spaces of the countries spoken on. Yet, as significant as these pointed presentations were, the beating heart of this event came in the form of a series of carefully crafted workshops. Through these workshops, a spirit of collaboration and understanding was engendered among the many representatives, as it provided them all with an opportunity to speak on the intricate details that line their individual national contexts. The workshops spanned four sessions, which addressed the challenges faced by these CSOs, shed light on their notable successes, illustrated tools to develop advocacy strategies, and brought together methods of future collaboration.

The discussions and interactions in these sessions facilitated a rich exchange of ideas and experiences that fostered mutual understanding on the legislative and organisational constraints of each country. These sessions, though, built up more than just organisational relations between regional CSOs, with a sense of fraternity and kinship also having been

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Overall, the rich successes of this forum were founded on the bonds forged by participants of diverse backgrounds, paving the way to future regional collaboration.

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dance performances bringing a touch of spectacle to the night.

Overall, the rich successes of this forum were founded on the bonds forged by participants of diverse backgrounds, paving the way to future regional collaboration. From the quality of the speakers, to the learnings in the workshops, the event as a whole served as a true platform for the creation of strategies in pursuing advocacy both locally and regionally. Though the forum may have ended, its impacts have left indelible impressions on each participant – reinvigorating their energies in advocating for change and good governance in the region.





UNODC Strengthening Corporate Integrity for Transparency and Accountability in Malaysia

Held in Kuala Lumpur on 9th of December 2024

As part of International Anti-Corruption Day 2024 (IACD) celebrations this year, C4 Center took part in the United Nations Office on Drugs and Crime (UNODC)'s "Strengthening Corporate Integrity for Transparency and Accountability in Malaysia" forum. Attended by a wide range of participants, including members of the public and private sectors as well as representatives from civil society, this event sought to expose participants to methods that strengthened organisational integrity through a greater culture of accountability and governance. Throughout this event, presentations were given by various anti-corruption experts, alongside a panel discussion session that involved the sharing of key insights from seasoned professionals from the anti-corruption field.

During the event, C4 Center CEO Pushpan Murugiah was given the opportunity to speak during an expert sharing session titled "The Case for an Independent Ombudsman and Public Access to Beneficial Ownership in Malaysia". In this session, Pushpan laid down the context of what an independent Ombudsman office would look like in Malaysia, with evidence and research provided from C4 Center's "Structuring the Malaysian Ombudsman Office" report. Here, Pushpan emphasised key principles that are fundamental in the establishment of any public complaints body in Malaysia such as:

- Providing Parliament with the ability to manage appointments, removals, instead of Executive discretion
- Structural safeguards in appointment, removal, staffing, and budgeting
- Broad investigative powers for complaint management
- Statutory standing to institute legal proceedings in exceptional cases
- No enforcement powers



These points were emphasised to advocate for an independent and capable public complaints body that not just reflects international best practices, but also competently navigates local contexts and complexities. However, in concluding his presentation on the Ombudsman office, Pushpan stressed how the Ombudsman must not be held as the

solution to all of Malaysia's systemic problems, but rather a catalyst for change within the public service.

Following on from this presentation, Pushpan would go on to talk about Beneficial Ownership reporting in Malaysia, in light of the recent amendments to the Companies Act 2016 last year. In it, he discussed the various shortcomings present within the newly-instituted reporting process. Namely, he elaborated on how the lack of a publicly available Beneficial Ownership registry in Malaysia will widen the existing public trust deficit, with there being few avenues for accountability from the public. Adding to this, Pushpan highlighted the importance of Beneficial Ownership transparency in Malaysia, placing emphasis on the corruption risks that are evident without adequate measures in place.

Subsequently, Pushpan would feature in

the event's panel session, "National Anti-Corruption Strategy (NACS) and the Future of Integrity in Malaysia", which looked at exploring the progress, challenges, and strategic direction of the country's national anti-corruption policy. During his session, Pushpan spoke on the numerous weaknesses that litter the NACS, including:

- The reduced scope of the NACS in comparison to its predecessor
- The lack of clarity in the NACS' targets
- The continuance of an inter-governmental affair in NACS implementation
- The lack of non-governmental oversight or evaluation
- The inefficiencies of the NACS evaluation mechanism

Directly following this panel session, C4 Center Research and Communications Officer Benjamin Tiong provided a brief introduction on C4 Center's latest research report, "Navigating Reform: Challenges and Opportunities in the National Anti-Corruption Strategy, 2024-2028". This presentation provided an overview of the research, acting as a "soft-launch" for this report, which outlined the aims, methodology, contents, findings, and recommendations of the report. As a whole, this presentation served to act as a call to action for the government in their implementation of the NACS, proposing ways forward that allow them to adopt tangible and actionable solutions in their anti-corruption efforts.

WORK WITH CSOs





Roundtable: Technology and Crime in Southeast Asia

Held in Kuala Lumpur on 31st of January 2024

C4 Center Head of Research and Policy Advocacy Arief Hamizan attended and took part in a roundtable discussion at the Australian High Commission on the 31 January. Organised by the Global Initiative Against Transnational Organized Crime, the meeting sought to collect insights on domestic challenges in combating cyber crime. C4 Center raised the following issues:

- i) The insufficiencies in Malaysia's legal framework on cybercrime.
- ii) Malaysia's lack of involvement in the Budapest Convention, an international treaty that provides a framework for cross-border cooperation against cybercrime.
- iii) Limited development on domestic cybercrime laws in Malaysia.
- iv) The use of cryptocurrencies for money laundering activities, which has created another layer of complexity for enforcement agencies.



Harmony in Democracy: Gathering Advocates for Local Council Elections in Malaysia

Held in Kuala Lumpur on the 17th of January 2024

On the 17 January 2024, C4 Center, along with other civil society organisations (CSOs) such as Bersih, SUARAM, CSO Platform for Reform, Pusat Komang and the SME Association of Malaysia gathered to discuss the implementation of local council elections in Malaysia.

C4 Center CEO Pushpan Murugiah and Head of Research and Policy Advocacy Arief Hamizan represented C4 Center in this meeting. During the gathering, a consensus was established as to the need of local council elections within the current political system.



Malaysia's 4th Cycle Universal Periodic Review and Media Briefings

Held in Petaling Jaya on 25th of January 2024

Malaysia underwent its 4th cycle of the Universal Periodic Review (UPR) on 25 January in Geneva, Switzerland, where 131 states gave their recommendations to Malaysia on improving the national human rights situation. C4 Center has been a long-standing member of the Coalition of Malaysian NGOs in the UPR Process (COMANGO), and in this cycle we have actively advocated for the inclusion of anti-corruption and good governance issues in the push for promoting and protecting human rights in Malaysia.

In the weeks leading up to the review in January, C4 Center joined a media briefing session on 18 January to sensitise the media and bring about cover-

age on the UPR process. For the UPR Pre-Sessions in Geneva, C4 Center created a factsheet summarising our recommendations both in the COMANGO joint submission and C4 Center's sole submission, for dissemination to the country representatives there.

During the review on 25 January, C4 Center attended the UPR Watch Party organised by SUARAM to watch the live-streamed session and provide live commentary to media personnel present. At the review itself, it was clear that our advocacy had been successful: Canada submitted a recommendation for the establishing permanent independent bodies such as Parliamentary Select Committees

to oversee appointments to all oversight institutions with sufficient resources and independence to perform their function – a recommendation taken directly from our resources.

Further, Kenya and Lesotho stressed the importance of establishing an autonomous and viable Ombudsman's Office, which is a key reform agenda that C4 Center is presently pushing for.

In the following months, C4 Center shall continue to work with other COMANGO members to push for the acceptance of these recommendations by the Malaysian government during the next UN Human Rights Council session in June 2024.



The Launch of BERSIH Reformasi 100 Peratus Campaign

Held in Petaling Jaya on 7th of February 2024

C4 Center's Head of Research and Policy Advocacy Arief Hamizan along with our Policy and Legal Research Officer Prishanth Linggaraj, were invited to attend the launch of Bersih's Reformasi 100 Peratus Campaign. During this event, C4 Center stated our position on the Madani's Government to the media, noting the contradictory actions taken by them despite a supposed commitment to anti-corruption efforts.

We decried the lack of progress and commitment shown by the government in implementing reforms foundational to fighting corruption in Malaysia. We also reiterated that the cost of Najib's pardon is not only monetary, but devalues the risks and sacrifices made by government servants, whistleblowers, and enforcement agents both in Malaysia and internationally who worked together to bring him to justice.



Meeting with BERSIH Chairperson Faisal Abdul Aziz

Held in Petaling Jaya on the 20th of February 2024

On 20 February, C4 Center CEO Pushpan Murugiah and Head of Research and Policy Advocacy Arief Hamizan attended a meeting with the Chairperson of Bersih Faisal Abdul Aziz. The meeting touched upon preparations that needed to be made by NGO groups for the upcoming Parliamentary session in late February.



Meeting with Members of Parti Sosialis Malaysia (PSM) and JPKK

Held in Petaling Jaya on 22nd of February 2024

As part of C4 Center's work in investigating corruption within the labour market, representatives from Jaringan Pekerja Kontrak Kerajaan (JPKK) and Parti Sosialis Malaysia (PSM) attended a meeting at C4 Center's office.

The discussions touched on potential reforms within the tender process for contractors. These discussions largely centred around the need to better the system to prevent contract workers from being mistreated by such companies.



Meeting with CSO Platform for Reform

Held in Petaling Jaya on 13th of March 2024

On the 13 March, CSO Platform for Reform stopped by C4 Center's office to hold a brief introductory session for the new members of their Sabah and Sarawak chapters. During the meeting, several ideas on future collaboration were shared along with a discussion on the latest developments pertaining to future laws in Malaysia.



Launch of 2023 Racism Report by Pusat Komas

Held in Petaling Jaya on the 15th of March 2024

C4 Center's Policy and Legal Research Officer Prishanth Linggaraj attended Pusat KOMAS' launch of the Malaysia Racism Report 2023 on 15 March. This report series aims to provide a snapshot of trends in racial discrimination in Malaysia for a given year.

This report provides important qualitative data on racism in Malaysia for C4 Center to consider as well, given the intersectional nature of racism and corruption, where racially discriminatory policies allow for the entrenchment of patronage and corruption in Malaysia.

It is important to continue establishing lasting connections with fellow CSOs to create opportunities for collaboration and mutual support in the long run, and C4 Center is always ready to work together with ideologically aligned parties towards our common goals.



The Fourth Investigative Journalism Summit

Held in Kuala Lumpur on the 23rd of March 2024

On the 23 March, C4 Center attended a full-day investigative journalism workshop organised by The Fourth Media. A private event involving around 40 participants representing several different media organisations, NGOs, and public advocacy groups, this summit involved a range of discussions on investigative strategies, collaboration methods, and the impact of civil society organisations within the investigative journalism sphere.

During these discussions, participants were exposed to a wide range of speakers including individuals from Malaysiakini, the Centre for Independent Journalism (CIJ), Sinar Project and Tempo Digital. Throughout the event, participants were encouraged to interact and share with one another their ideas on the practical applications of investigative journalism within a Malaysian context via 'breakout' sessions. These sessions encouraged a degree of collaboration between representatives from the many organisations that attended. With this, The Fourth sought to open the door for future partnerships that would centre around investigative journalism works, in a sense creating a multi-sectoral community that strived to produce "impact-driven" investigations in Malaysia.



Contribution on Corruption and Governance for SUARAM'S Annual Malaysia Human Right's Report 2023

Report Launched on the 27th of March 2024

SUARAM's Annual Human Rights Report is an important resource for data-driven advocacy in Malaysia, as it provides a concise yet extensive overview of the human rights situation in the nation for a given year - tracking areas of progress, regress, and avenues for improvement.

In this regard, C4 Center is grateful for the opportunity to contribute a chapter on "Corruption and Governance" which explores the intersection between national anti-corruption efforts and good governance with the promotion, protection, and enjoyment of human rights (particularly the full realisation of economic, social, and cultural

rights) for the year 2023. A preliminary version of this chapter was released last year in the Human Rights Report 2023 Overview, while the full report was launched by SUARAM on 27 March.

This chapter – which was authored by Policy and Legal Research Officer Prishanth Linggaraj and peer reviewed by Research Officer Bryan Cheah – posits that the full enjoyment of human rights is wholly dependent upon the existence of effective, accountable, and transparent public institutions and public service delivery systems.

Therefore, the occurrence of human rights violations are symptoms of broader institu-

tional failures that impair the government's ability or willingness to govern in a manner consistent with a rights-based approach.

C4 Center's diversified approach to understanding corruption allows us to identify a wider range of causal links that both entrench and aggravate the problem, resulting in a more holistic perspective overall. This also creates the opportunity for us to modify our advocacy strategies to enlarge our target audience and discover new possibilities for collaboration and cooperation. To this end, we shall continue striving to work beyond the confines of our 'silos'.



COMANGO Post-Review Advocacy Strategy for UPR Recommendations

Held in Kuala Lumpur in April and May 2024

Malaysia participated in the 4th cycle of the Universal Periodic Review (UPR) on 25/1/2024, where it received 348 recommendations on measures to improve the domestic human rights situation from 131 member states of the UN Human Rights Council. These recommendations covered a wide range of thematic areas, both emerging and longstanding. Under the UPR process, any recommendations received by a state under review may be accepted (either in full or partially) or noted. The state under review shall be expected to implement the accepted recommendations within the current UPR cycle. Therefore, it was important for COMANGO to push for the maximal acceptance of recommendations received - to add another dimension to our advocacy moving forward.

Thus, two consultations were held on 25/04 and 15/05 for COMANGO members to reflect on COMANGO's efforts over the past UPR cycles, and to strategise on the best ways forward in engaging with the government. Our continued collaboration across thematic areas shows C4 Center's commitment to working outside of silos. We strongly believe that civil society is stronger when we work together, and we are committed to upholding this practice.



BERSIH Congress 2024

Held in Kuala Lumpur on the 25th of May 2024

The Coalition for Clean and Fair Elections (BERSIH) held the annual national BERSIH Congress at the Kuala Lumpur and Selangor Chinese Assembly Hall (KLSCAH) on 25/05, bringing together civil society groups, youth organisations, and activists to discuss collective reform agendas and strategies.

At the Congress, C4 Center representatives consistently voiced out our concerns and perspectives on the suggested reform agendas. These proposed agendas would, if voted and passed, form a core part of the BERSIH coalition's advocacy moving forward. Therefore, we had to ensure that the nuances and complexities of the issues brought forward were considered by all present.

In the end, the Congress voted on a variety of motions covering police accountability reform, local council elections, and repealing repressive laws such as the Sedition Act 1948 and the Security Offences (Special Measures) Act 2012. These long-standing issues shall continue to be an important part of C4 Center's push for improved governance and transparency and accountability of state institutions.



Meeting with Liga Rakyat Demokratik

Held in Petaling Jaya on the 25th of October 2024

The C4 Center team hosted members of Liga Rakyat Demokratik for a discussion on various issues relating to corruption and its impact on marginalised groups, as well as an exchange of perspectives on youth involvement in anti-corruption movements. C4 Center looks forward to closer collaborations in the future.



Capacity Development Workshop on Open-Government Advocacy

Workshops held in October to December of 2024

Between the months of October and December 2024, C4 Center conducted the “Capacity Development Workshop on Open-Government Advocacy” alongside the International Republican Institute (IRI), the Institute for Democracy and Economic Affairs (IDEAS), and Sinar Project. Seeking to empower Malaysian civil society at the subnational level, these workshops took place throughout the country, with three-day long programmes held in Penang, Selangor, Terengganu, and Sabah. These programmes were held in the hopes that local, grassroots civil society organisations (CSOs) were equipped with the knowledge and understanding of open government principles to better hold their own governments accountable.

Representing C4 Center were Head of Research & Policy Advocacy Arief Hamizan and Research & Communications Officer Benjamin Tiong. In their capacities as both speakers and facilitators, the pair provided in-depth explanations and conducted engaging activities that exposed participants to a wide range of topics including:

- The ways to track and identify the misuse of public funds

- The methods of inquiry and research through public information
- The forms of laws and legal frameworks in Malaysia that impact civil society
- The viable approaches in advocacy and campaigns

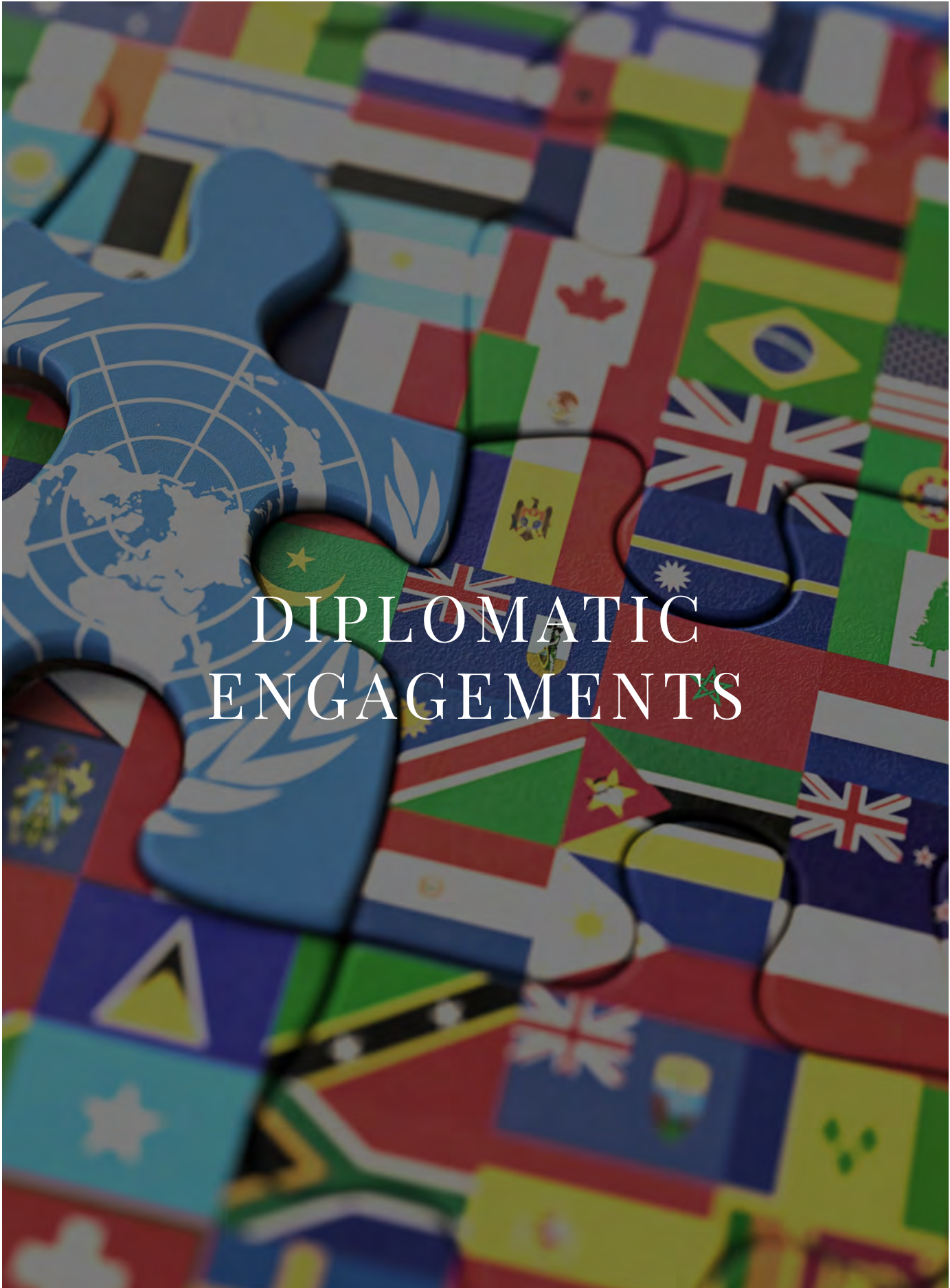
With a well-historied track record in these areas, C4 Center shared the key concepts present within their experience advocating for anti-corruption and good governance over the past 10 years. From these experiences, participants were exposed to a greater degree of knowledge in the field of anti-corruption, and its vast implications on our lives.

More than just a simple training programme, these workshops also allowed C4 Center to connect and build networks among civil society all across the country, strengthening partnerships and solidarity within the civic space. Through this, the potential for future engagements and collaborations that address issues at both national and subnational levels are strengthened. All of which works towards a stronger and more capable civil society in Malaysia.



SUARAM 35th Anniversary Celebration and Launch of Forum Anak Muda SUARAM

On the 14th of December, Policy and Legal Research Officer Prishanth Linggaraj attended the 35th anniversary celebration of Suara Rakyat Malaysia (SUARAM) on behalf of C4 Center. SUARAM has played a pivotal role over the years in fighting for justice and human rights, and we are grateful to be able to consider them friends and allies in our shared goals. This celebration also saw the launch of the Forum Anak Muda SUARAM (SUARAM Youth Forum), which aims to provide a space for university student groups to collaborate and advocate for issues which impact them. This event allows CSOs to strengthen connections and network in order to identify opportunities for cooperation and mutual support in the long run, and C4 Center is always ready to collaborate on shared goals.





Visit by the Spanish Ambassador

Held in Petaling Jaya on the 26th of April 2024

It was our pleasure to host His Excellency José Luis Pardo Cuervo, the Ambassador of Spain, on 26 April at our office. What was meant to be casual get-to-know session became a “roundtable discussion” that went on for almost 2 hours. Many important topics were discussed, including the context of corruption in Malaysia, CPI rankings, and the perception of corruption from various communities. We also shared the many reforms we advocate for and what we expect from the Madani government. We were happy to share our work, perspectives, insights and expertise on Malaysia’s challenges in addressing corruption. Thank you to His Excellency for honouring us with your presence.



Children's Rights Forum

Held in Kuala Lumpur on 30th of April 2024

The Swedish Embassy, in collaboration with C4 Center, the EU delegation in Malaysia and DBKL, hosted a forum as part of the Jom Kita Bincang initiative. The focus was on children's rights, featuring esteemed speakers Elisabeth Dahlin, Sweden's former Ombudsman for Children's Rights, and Bruce Adamson, Scotland's former Commissioner for Children and Young People. Our very own Pushpan Murugiah, C4 Center CEO, moderated the event.

Children's literature wields immense influence, shaping positive norms for both young readers and adults. Safeguarding children's rights is our top priority, necessitating collective efforts from society. Legislation, institutions, education, and public awareness all play pivotal roles. By reinforcing these rights through everyday actions, we can cultivate a culture of respect for human rights.



3rd Quarter Embassy Visits

Towards the end of July to early September of 2024, C4 Center had the pleasure of making courteous visits to the Embassy of the Federal Republic of Germany, the Embassy of Switzerland, the Delegation of European Union to Malaysia, the Australian High Commission, the Embassy of the United States of America, Canadian High Commission and the Embassy

of Sweden. C4 Center initiated these visits in hopes of better understanding the contributions and initiatives made by the embassies and high commissions in Malaysia, in addition to discussing the anti-corruption landscapes between their respective countries and Malaysia in the areas of policy-making, business and economics.



C4 Center is very honoured to have had fruitful discussions and thankful for the hospitality shown by the ambassadors, high commissioners, and their representatives. We look forward to future collaborations and the partnerships fostered!





Closed Door Session with the Anti-Corruption Delegation from Uzbekistan

Held in Kuala Lumpur on the 19th of August 2024

On 19th August 2024, C4 Center had a closed door session with the Anti-corruption delegation from Uzbekistan comprising the Director of the Anti-Corruption Agency, a Member of Parliament, the Chairman of the Committee of the Legislative Chamber of Oliy Majlis on Anti-Corruption and Judicial Affairs, the First Deputy Head of the Department for combating economic crimes under the General Prosecutor's Office, and Chief Inspector of the Department for work with complaints, public relations and international cooperation of the Anti-Corruption Agency and First Secretary, Embassy of Uzbekistan in Malaysia (based in KL).

C4 Center was represented by our Chairman, Dr Terence Edmund Gomez, Founding Director, Cynthia Gabriel, CEO, Mr Pushpan Murugiah and Head of Research and Policy Advocacy, Arief Hamizan.

We shared some of our initiatives and reform agendas, as well as a discussion on good governance policies. It was a good first meeting and we hope to have future engagements that further develop anti-corruption policies in both nations.



4th Quarter Visits with Foreign Delegations



In the months of October to November, C4 Center had the gracious opportunity of making courteous visits to the Embassy of the Kingdom of the Netherlands, the American Malaysia Chambers of Commerce (AMCHAM), Embassy of Finland, the US-ASEAN Business Council, the Royal Norwegian Embassy and the New Zealand High Commission.

These visits were held as a way to better understand the ongoing initiatives and contributions by the embassies, high commission and business council chapters in Malaysia. We engaged in various conversations from anti-corruption efforts in Malaysia, concerns over current institutional reform agendas and discussions on future collaborative projects.

We are greatly honoured to have these meetings and look forward to future collaborations with them!





Sime Darby's Integrity Campaign 2024

Held in Petaling Jaya on the 7th of February 2024

On the 7 February, C4 Center CEO Pushpan Murugiah was invited to serve as the moderator for the panel discussion on corruption and integrity at the launch of Sime Darby's Integrity Campaign 2024.

The esteemed panelists included Dato' Sri Akhbar Satar, President of the Malaysia Association of Certified Fraud Examiners, and Tan Sri Abu Kassim Mohamed, Former Chief Commissioner of the Malaysian Anti-Corruption Commission (MACC).

We look forward to further collaboration on strengthening anti-corruption efforts and transparency.

EMERGING TRENDS SHAPING BUSINESS SUSTAINABILITY & HUMANITY



6 March 2024
Wednesday

9.00am to
5.30pm

Via
zoom



Complimentary Webinar

SPEAKERS



TAN SRI DR LIM WEE CHAI
Founder and Executive Chairman
Top Glove Corporation Bhd



LIM CHEONG GUAN
Managing Director
Top Glove Corporation Bhd



IZWAN ZAINUDDIN
Chairman of
ADFIM Council & PUNB



SHARMILA SEKARAJASEKARAN
Chair, Board Sustainability Committee
Top Glove Corporation Bhd



**TAN SRI SHAHRIL
RIDZA RIDZUAN**
Chairman, Independent
Non-Executive Director
Axiata Group Berhad



**YM TUNKU ALIZAKRI
BIN RAJA MUHAMMAD
ALIAS**
Chairman
Penjana Kapital



**DATUK WIRA
SHAHUL DAWOOD**
Chief Executive Officer
HRD Corp



**DATIN SERI
SUNITA RAJAKUMAR**
Chairperson,
Climate Governance
Malaysia



PROF DR ONG KIAN MING
Director, Philosophy
Politics & Economics
(PPE) Program



**DATO' MOHD
AIZUDDIN**
Chief Executive
Officer, Yayasan
Prihatin Nasional



LUANNE SIEH
Group Chief
Sustainability Officer
CIMB Group



MOHD HASRAFF HASHIM
Head, Private Sector
Section, Community
Education Division
MACC



**MOHAMED PRASAD
HANIF**
Secretary General
ADFIM



FAROZE NADAR
Executive Director at
UNGCMYB



RAMANA RAJALINGAM
Head, Project Delivery
Office, MD Office
Khazanah Nasional Bhd



**PUSHPAN
MURUGIAH**
Chief Executive Officer
C4 Centre



MICHELE KYTHE LIM
President & Chief
Executive Officer
ICDM



GLADYS CHUA
Chief Executive
Officer
RAM Sustainability



KHADIJAH ISKANDAR
Business Consultant
& CEO
Restu Efektif Sdn Bhd



TAN ZHI YING
Director of
Member Relations
UNGCMYB



MIR NADIA NIVIN
International
Development Professional
Former UNDP Team Leader



IDRIS ABD HAMID
Independent Non
Executive Director
Bank Rakyat

MODERATORS



DATO LEE KIM MEOW
Non Independent
Non Executive Director
Top Glove Corporation Bhd



**EMERITUS PROF DATUK
DR NORMA**
Independent
Non Executive Director
Top Glove Corporation Bhd



DATUK NORIPAH KAMSO
Chairman (Designate)
Arabesque Malaysia
Former Board Member
of Top Glove



AZRINA TUN ARSHAD
Independent
Non Executive Director
Top Glove Corporation Bhd

Top Glove: Emerging Trends in Business Sustainability & Humanity

Held on 6th of March 2024

C4 Center CEO Pushpan Purugiah was invited as a speaker and panellist in a webinar titled, "Emerging Trends In Business Sustainability & Humanity" by the Top Glove Corporation on the 6 March. Pushpan spoke on the new and emerging threats to governance and board, giving his input through his background in researching corruption and governance issues.



Build My-Town Play Session with CSO Platform for Reform and Pusat Komas

Held in Petaling Jaya on 18th of March 2024

On the 18 March, C4 Center was invited to the office of both CSO Platform for Reform and Pusat Komas to conduct a Build My-Town play session. As several of CSO Platform's members had arrived from Sabah and Sarawak, they were not exposed to the game prior to this.

Thus, in hopes of increasing sales in East Malaysia, C4 Center was invited to conduct a play session to introduce the game and its concept to them. Within the merriment and fun of playing the game, the overall importance of implementing institutional reform was stressed as well.



Legal Aid Programme in Collaboration with Selangor State Bar Committee and Legal Aid Centre Selangor

As part of a continuing partnership with the Selangor State Bar Committee and Legal Aid Centre Selangor, C4 Center has taken on one batch of 15 pupils as part of their legal aid duties. This group represents the third batch of pupils that C4 Center has taken on during this partnership. The legal aid programme is pursuant to Rule 10.06 of the Bar Council Rules and Rulings and as part of the mandatory 9-month pupillage period, for any person to be admitted as a qualified legal practitioner with the right appearance in court, they must perform 14 days of legal aid services. During their time with us, they were exposed to anti-corruption and good governance and the legal issues arising therefrom.

Every Wednesday for 14 weeks, the pupils underwent workshops on various topics relevant to C4 Center's mandate, such as whistleblower protection, government procurement, political financing, and environmental governance. These sessions were generally conducted by the research officers in a conversational and informal manner, in order to stimulate open and free discussions on the nuances of these often complex issues.

The nature of these sessions were oftentimes interactive, with constant back-and-forth occurring to create thoughtful discourse on matters pertaining to corruption in Malaysia. The pupils were tasked with conducting inde-

pendent research to come up with solutions to some of the inadequacies in Malaysian laws which allow for the perpetration and perpetuation of corruption. They were also encouraged to voice out their own opinions and disagreements with any of the suggestions or ideas presented to them.

From these discussions, it is hoped that C4 Center would be able to grant them a deeper understanding of the laws which form part of their day-to-day occupations. It is C4 Center's hope that by providing this exposure to the pupils, they might be encouraged to pursue future careers focused on public interest issues – particularly legal reform.



BMT Play Session and Legal Talk at ATC Penang

Held in Georgetown, Penang on 16th of April 2024

On the 16th of April, C4 Center was invited by ATC Penang to conduct a legal talk to a group of law students and faculty members which was led by our CEO, Pushpan Murugiah, on the current corruption climate in Malaysia and introduce the good governance and reforms in Malaysia. It was an insightful session with various engaging and interesting discussions on understanding the advocacy on anti-corruption and the need to push for more reforms. Following the talk, the students were introduced to our card game, 'Build My-Town' and were able to get a first hand experience of what it is like to portray an MP for their constituency and their roles in Parliament by tabling and passing reforms. C4 Center would like to extend our appreciation to ATC Penang and is looking forward to future collaborations.



BMT Tournament with Karangkrak Mall at SMK Sungai Ramal

Held in Kajang on 15th of May 2024

On the 15th of May, C4 Center was invited by Karangkrak Mall to facilitate a Build My-Town Tournament they conducted at SMK Sungai Ramal, Kajang. The idea to conduct a tournament using the Build My-Town card game was created by the Karangkrak Mall team. A total of 40 students took part in this tournament. The objective of this tournament was to introduce the concept of what roles a Member of Parliament has to play when running their respective constituencies and in Parliament when advocating and tabling for reforms.

The tournament consists of 3 rounds of game play. The players are allocated into teams representing different constituencies and are then assigned to their respective playing groups. The tournament works on a point system whereby points are tabulated for each constituency team and individual players. The C4 Center team was invited to conduct the introduction portion of

the session whereby they introduced the organisation as well as the origins of the game and the tutorial of the game to the students.

To conclude the event, despite a couple of hiccups, the event was a success as the students were able to understand the mechanics of the game pretty quickly after playing Build My-Town a few times. The students were curious as to the meanings of some of the reforms and how some of these actions are played out in real life. They too were intrigued with the card game in itself and found the card game to be fun. This form of engagement has shown that there is interest amongst the youths to understand how corruption works and think of anti-corruption measures that could be taken into consideration.



BMT Tournament with Karangkrak Mall at SMK Seksyen 19, Shah Alam

Held in Shah Alam on 6th of June 2024

On 6 June 2024, C4 Center was invited to SMK Seksyen 19, Shah Alam to conduct a Build My-Town tournament alongside our valued partners, Karangkrak Mall. A total of 40 students participated in this tournament. The objective of this tournament was to educate the students on their roles as citizens to be aware of what is currently happening in the political sphere in our country as well as learn ways to hold the Member of Parliament of their constituencies accountable to their actions as well as to fine-tune some of the hiccups faced in the previous tournament as well. The C4 Center team took over the introduction portion of the session to talk about the tutorial of the game as well as the purpose of the formation of this card game.

The tournament consisted of 1 round for demonstration and 3 rounds of game play. The players were allocated into specific teams representing a constituency and were then directed to their respective playing tables. The tournament followed a point system whereby overall team points and individual points were tabulated. At the end of the event, the C4 Team had time to talk to the students to get their feedback on the tournament. The majority consensus was that they found the card game to be really fun and interesting to play. They got to learn more about the advocated reforms and were curious to know more about the work we do and resources they could refer to to read up more about anti-corruption measures.



Corruption Talk and BMT Play Session at New Era University, Kajang

Held in Kajang on 6th of July 2024

On 6 July 2024 C4 Center was invited to New Era University in Kajang, Selangor to present a talk on corruption, while also there being room for a Build My-Town play session. During the talk session, C4 Center CEO Pushpan Murugiah spoke at length on the different types of corruption present within Malaysia's systems, providing various examples of high profile cases involving different methods of corruption. The young crowd of students were engaged in this session, asking questions about specific aspects of corruption relevant to them.

The play session exposed students to the role that a Member of Parliament (MPs) plays in our current political system, educating them on how legislation is passed. Overall, it was a productive session that not only informed university students about the endemic nature of corruption in Malaysia, but it also managed to deliver this information in an entertaining fashion.



Driving Transparency and Integrity 2024 National Conference

Held in Kuala Lumpur on the 1st of October 2024

Thank you to the Institute of Internal Auditors Malaysia for the invitation to Mr Pushpan as a speaker on the topic, Driving Transparency and integrity: The internal audit perspective on beneficial ownership and corruption prevention. The National Conference was held on the 1st of October 2024.

He spoke about the definition and how to identify beneficial owners (BO). He also discussed, why BO is important in our fight against

corruption. It was also important for internal auditors to see the value of strengthening their internal mechanism to address BO reporting and registration as well as the verification process. All these are part of the initiatives to promote transparency as well complying with the requirements of FATF.



National Conference on Integrity and Governance 2024

Held in Petaling Jaya in 9th October 2024

Thank you to the Association of Development Finance Institution of Malaysia (ADFIM) for inviting Mr Pushpan to this year's National Conference on Integrity and Governance 2024 as a keynote speaker which held on the 9th of October. He spoke on the topic: Highlighting Global Crises Exacerbated by Corruption.

He wanted the participants to look at issues and corruption through a wider lens and how the majority of our grand corruptions function

and thrive in an environment that was perfected over many decades. He also shared how this ecosystem has led to Malaysia being complicit in many international crises, for example plastic waste smuggling, human trafficking, scam centers and operation, and Rare Earth Elements (REE) theft's that's been happening.

More importantly, the public needs to know the limitations of our anti corruption provisions and how those in power are able to get away with profiteering and corruption.



Meeting with Parliamentary Centre Asia (PCAsia) on Ethics Code for Parliamentarians

Held in Petaling Jaya in November 2024

We extend our heartfelt thanks to Mr. Dararith Kim Yeat, Founder of the Parliamentary Centre of Asia (PCAsia), and Mr. Christophe Pallez, former Ethics Officer of the National Assembly of France, for their invaluable insights during their visit to our office in November 2024.

Our discussion centered around the proposed ethics framework drafted by Mr. Christophe, exploring key issues that need to be addressed from Malaysia's perspective. It was an enriching exchange, and we are optimistic that this initiative will significantly enhance accountability among members of parliament.

At the last regional conference in 2023, C4 Center emphasized the urgent need for PCAsia to lead the development of a comprehensive code of ethics framework for parliamentarians. Such a framework would serve as a guideline for member states to adapt within their legislatures.

In Malaysia, for instance, the lack of a dedicated code of ethics for members of parliament is a glaring gap. The current reliance on a few standing orders fails to address critical issues, such as conflicts of interest (COI). COI remains a pervasive issue, even among national leaders who champion anti-corruption efforts. Many do not fully grasp how COI serves as both an enabler and a manifestation of grand corruption.

We are hopeful that this collaboration will pave the way for more robust ethical governance, setting a higher standard for accountability across the region.



BAC Law Society Cabinet Talk

Held in Petaling Jaya on 13th of December 2024

On the 13th of December, C4 Center was invited by the BAC Law Society to be a speaker for their Cabinet Talk series showcasing talks from various professionals across multiple fields of work. We were invited to speak on good governance and the anti-corruption agenda in Malaysia.

Our Head of Research and Policy Advocacy, Arief Hamizan represented C4 Center to speak at this event. He spoke on the corruption landscape in Malaysia and the importance of whistleblowers in combating corruption. He addressed the various forms of corruption as well as the categories of corruption that can be seen

day-to-day, petty corruption and a more complex and prevalent form of corruption in Malaysia which is grand corruption. These examples were shown in the form of case studies.

He moved on to speak on the roles of GLCs in corruption and why the voices and roles of whistleblowers are important in combating corruption. It was an engaging and thought-provoking session as many students were eager to know more and were quick with asking various questions. We hope to continue this collaboration with the BAC Law Society to educate and empower more legal students to join the fight against corruption!



International Think Big Summit 2024: Crossroads

Held in Shah Alam on 15th of December 2024



On the 15th of December 2024, C4 Center was invited by the Malaysian Philosophy Society to be a booth partner at their International Think Big Summit 2024: Crossroads alongside 15 other booth partners in their special feature “Think Big Lane”. We were excited to connect and network with the participants and partners to share some of the work we do in C4 regarding our advocacy and research projects. It was an interesting and engaging platform to share and learn more about the various communities and organisations in Malaysia advocating for various important and needed causes. We hope to participate in more collaborations such as these in the future!

Acknowledgements

C4 Center extends heartfelt appreciation to our esteemed partners and funders. We would like to recognize the National Endowment for Democracy (NED), East-West Management Institute (EWMI), Break Free From Plastic (BFFP) through the Global Alliance for Incinerator Alternative (GAIA), International Republican Institute (IRI), The Knowledge hub for Regional Anti-corruption and Good Governance Collaboration (KRAC), and the International Labour Organization (ILO) for their generous financial support.

We also express our gratitude to the United Nations Office on Drugs and Crime (UNODC) for their ongoing partnership and collaborative efforts. Furthermore, we are incredibly grateful for the support from all our friends in civil society, the government, and the diplomatic corps. It is through collective endeavours that we have delivered tangible results to the public.

All of these contributions have been instrumental in enabling C4 Center to create impactful outcomes for Malaysia. Without this moral and financial assistance, and the dedication of Malaysians committed to combating corruption, our achievements would not have been possible. Lastly and above all, we extend sincere thanks to fellow Malaysians for their unwavering support of our programmes.



FINANCIAL REPORT

Donors and Other Income	Duration	Total (MYR)
National Endowment for Democracy (NED)	2024 - 2025	668,083.00
East-West Management Institute (EWMI)	2024	190,296.00
Break Free From Plastic Movement (BFFP) thru the Global Alliance for Incinerator Alternative Philippines (GAIA)	2024	50,375.00
International Republican Institute (IRI)	2024	18,119.00
The Knowledge hub for Regional Anti-corruption and Good Governance Collaboration (KRAC)	2024	41,265.00
International Labour Organization/UNDP (ILO)	2024	26,609.00
Donations and Local Funding	2024	3,991.00
Total		998,738.00

Projects and Programme Expenditure	Total (MYR)
Right to Information (RTI) & Open Government	75,215.00
Institutional/Legal Reforms	32,680.00
Cross Border Corruption	80,620.00
Environmental Governance	59,965.00
Procurement	31,720.00
Ombudsman	52,000.00
Youth Engagement	17,350.00
C4 Center General Operations	746,000.00
Total	1,095,550.00

MEDIA ENGAGEMENTS

24

*Press Statements released
in 2024*

At least **I24** *mentions of C4
Center in the media*

At least **25** *Live interviews on
broadcast media
(BFM, Awani, NSTTV, and more)*

At least

I7000

reach on Facebook

At least

I3000

reach on Instagram

At least

2484

interactions on Facebook

At least

924

interactions on Facebook

At least

4127

visits on Facebook

At least

I763

visits on Instagram