



A member of **UEM Group**

CODE OF

ETHICS • INTEGRITY • ACCOUNTABILITY

CONDUCT

For Our Business Partners

2019 Version
UEMEd/MSP/RICD/02(COC)G01

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INTRODUCTION

At UEM Edgenta and its Business Divisions (collectively known as “UEM Edgenta”), being a good corporate citizen has always been an integral part of the way we do business. We are committed to operating our business in an ethical, legal and socially responsible manner.

We expect our suppliers, contractors, consultants, suppliers, agents and/or other business partners (“Business Partners” or “you”) to embrace the spirit of our commitment to integrity and our same high ethical standards as set out in this Code of Conduct for Our Business Partners (“Code”). All our Business Partners are to adhere to the Code when conducting business with UEM Edgenta.

This Code sets the expectations for our dealings with you. A commitment to full compliance with this Code is a fundamental requirement to working for, or with UEM Edgenta. Failure to comply with this Code or applicable laws and regulations will be sufficient cause for UEM Edgenta to terminate its relationship with a Business Partner. UEM Edgenta believes our sustainable business relationship is based on key principles of integrity, honesty, accountability and compliance with applicable laws and regulations.

PRINCIPLES OF THE CODE

The Principles of this Code support the core values and the Code of Conduct of UEM Edgenta.

The 8 Principles of UEM Edgenta Code of Conduct for Our Business Partners

1. Compliance with Laws

Our Business Partners must understand and comply with all laws, rules and regulations, including, but not limited to, laws related to anti-bribery, competition, occupational health and safety, privacy and data protection, and any other laws described herein or that are otherwise applicable to their business wherever conducted throughout the world.

Business Partners shall comply with all applicable labour, employment, and human rights legislation, including, but not limited to minimum wage, minimum age for employment, and maximum hours of work.

2. Act with Integrity

Our Business Partners will conduct its business with integrity, respect and trust. You shall:

- Behave ethically and transparently in all business dealings.
- Never offer, give, promise, request, accept, or authorise any bribe, gift, fee, reward, advantage, or anything of value directly or indirectly to any government officials, private parties or entities to obtain a business advantage or to improperly influence any action or decision.
- Never make facilitation payments, whether directly or indirectly.
- Ensure all your subcontractors, referral parties, and affiliates appointed to provide goods/services to UEM Edgenta adhere to these standards and have not engaged in, and shall not engage in, improper or illegal conduct.
- Must maintain complete and accurate books and records relating to all business/transactions with UEM Edgenta, together with supporting documentation, in accordance with applicable accounting principles, laws, and regulations.
- Must act lawfully & responsibly when using social media.

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3. Maintain Accountability

Our Business Partners maintain full accountability for services rendered/goods provided and honour their commitment on a timely basis and in accordance with their obligations under the specific agreements and undertakings with UEM Edgenta.

4. Avoid Conflict of Interest

Business Partners with a real or potential conflict of interest must disclose this to UEM Edgenta even if such knowledge arises after the appointment and to take action proactively to address the conflict as soon as it is known. If in doubt, you should highlight your concerns to UEM Edgenta.

5. Maintain Confidentiality

Our Business Partners respect UEM Edgenta's intellectual property, trade secrets and other confidential, proprietary or sensitive information. You may not use or disclose any such information to unauthorised parties. Independent use of UEM Edgenta's data is prohibited.

You are to comply with all applicable data privacy and data protection laws and implement policies and controls to ensure that the privacy rights of personal data subjects are respected.

6. Provide a Safe Working Environment

Our Business Partners shall provide a healthy and safe workplace for their employees, and comply with all applicable health and safety laws, regulations and standards, including any site-specific safety requirements.

Any person providing on-site services in UEM Edgenta operations sites is required to adhere to UEM Edgenta's occupational health and safety standards.

The 8 Principles of UEM Edgenta Code of Conduct for Our Business Partners

7. Maintain a Healthy Work Culture

Business Partners and their employees shall not be involved in illegal use of drugs or alcohol consumption in UEM Edgenta's premises or while carrying out duties for UEM Edgenta. Prohibited substances may not be brought, kept, consumed, sold, purchased or dealt with in any way on UEM Edgenta's premises.

Violent behaviour or harassment that includes unwelcome verbal, visual, psychological, physical or other conduct of any kind that creates an intimidating, offensive or hostile work environment are unacceptable behaviours which UEM Edgenta does not condone.

8. Prohibit Any Form of Gift/Business Courtesy

Business Partners shall not offer a bribe, a kickback, bartering arrangement for goods/services or cash or any other incentives to UEM Edgenta employees and their families in order to obtain or maintain UEM Edgenta's business. You should report to UEM Edgenta if any employee or business associate request for any such incentive or any form of gift or favour.

UEM Edgenta practices a **"No Gift Policy"** and our Business Partners are expected to observe UEM Edgenta's No Gift Policy.

COMPLIANCE WITH THE CODE

1. Our Business Partners should read and understand the Code and consult their UEM Edgenta key contact or UEM Edgenta Risk, Integrity & Compliance Department if they have any questions. Our Business Partners shall embed the standards outlined in this Code into your work with or on behalf of UEM Edgenta and are responsible of self-monitoring their compliance with this Code.
2. Our Business Partners shall proactively extend the principles defined in this Code to your own suppliers and business partners.
3. If and when any situation arises that causes our Business Partners to operate in violation of this Code, our Business Partners shall immediately inform their UEM Edgenta key contact or UEM Edgenta Risk, Integrity & Compliance Department.
4. Business Partners are expected to cooperate fully in any investigation and shall provide UEM Edgenta with reasonable access to business records, documents, personnel and facilities related to matters involving UEM Edgenta.
5. Business Partners who act in contravention of this Code and/or other applicable laws and regulations risks termination of all existing and future UEM Edgenta business.
6. UEM Edgenta reserves the right, as a condition of doing business, to monitor compliance with the Code. The process of such monitoring may include an initial collection of Code-related information by UEM Edgenta, questionnaires, an on-site audit, or other means deemed appropriate.



RAISING CONCERNS

1. Our Business Partners are obligated to report to UEM Edgenta any conduct, including conduct of any UEM Edgenta employees, that you believe – in good faith – to be an actual, apparent or potential violation of this Code or any policies or applicable laws and regulations.
2. If you have questions or concerns about compliance or ethics issues while working for UEM Edgenta, or want to report potentially illegal or unethical activities, you may contact UEM Edgenta confidentially via any of the following channels:
 - Email to whistleblowing@edgenta.com
 - In writing using the prescribed Whistleblowing Lodgement Form to: Chairman of the Board of Directors - chairman@edgenta.com; or Chairman of the Board of Governance and Risk Committee - chairmanBGRC@edgenta.com
 - For more information on UEMEd Whistleblowing Policy, visit <https://whistleblowing.uemedgenta.com>
3. The identity of the concerned Business Partner and the details of the concerns raised will be treated as confidential and if these need to be revealed, it will be discussed with the concerned Business Partner.
4. UEM Edgenta does not tolerate any retribution or retaliation taken by its employees or business partners against a concerned Business Partner who has in good faith and with a reasonable basis, sought our advice or has reported questionable behaviour and/or possible violation.

CODE OF CONDUCT FOR BUSINESS PARTNERS

ACKNOWLEDGEMENT AND ACCEPTANCE

The undersigned Business Partner(s) acknowledge and agree that:

1. I/We have received, read and understand the UEM Edgenta Business Partners Code of Conduct (this “Code”);
2. I/We shall comply with and agree to be bound by this Code and will not take any action or fail to take any action on behalf of UEM Edgenta contrary to this Code;
3. I/We shall ensure that our employees, subcontractors, and other representatives that supply products and/or services to UEM Edgenta act in accordance with this Code; and
4. This Code shall form part of any agreement entered into, between UEM Edgenta and us whether or not expressly incorporated into such agreement.

Company Name: _____

Signatory Name:
Designation:
Date:

Signatory Name:
Designation:
Date:



A member of **UEM Group**

UEM Edgenta Berhad (5067-M)

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