

# **GROUP BUSINESS ASSOCIATES CODE OF CONDUCT GUIDELINE**

## **What to do?**

All business associates shall conduct business dealings and activities responsibly and with integrity. All business associates shall:

- a. record and report all business information and communication accurately;
- b. protect and be responsible for maintaining the physical and intellectual assets of the Group, including property and equipment, when authorised by the Group to use such assets;
- c. when required and as permitted by the law, to disclose information relating to the Group are made accurately and in timely manner; and
- d. protect any data that the Group may share with them in carrying out their scope of work.

## **What are the regulations?**

All business associates shall apply and comply with all the regulations and the amendments at all times during their business activities. In addition, all business associates shall comply with the following:

- a. All Malaysian regulations and laws including the Malaysian Anti-Corruption Act 2009;
- b. The Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001;
- c. Personal Data Protection Act 2010;
- d. Islamic Financial Services Act 2013 – Provision on banking secrecy under Section 145 and 146;
- e. The environmental laws and regulations i.e., relating to hazardous materials, air emissions and all kinds of waste; and
- f. The terms and conditions as set forth in the contractual agreement.

## **Why do you need to follow?**

The Group holds zero tolerance approach against all forms of bribery and corruption. The Group will not tolerate bribery, kickbacks, or corruption directly or indirectly through the business associates. This is to be aligned with Section 17A which was introduced in June 2020 into the Malaysian Anti-Corruption Commission Act 2009 (Amendment 2018) (“MACC Act”) on corporate liability for corruption offences as well as for personal liability of persons involved in the management of a commercial organisation.

All business associates shall not directly or indirectly offer, give, accept, solicit, bargain or promise of an advantage as an inducement in any form including monetary, reward, goods or services, to any of the Group’s employees, family members and acquaintances in return for any decision, opinion, votes, or other action affecting any decision on the acquisition of the business associates’ services which is illegal and unethical.

## **What are the requirements to be complied?**

Upon submission of business interest in the Group, all business associates are required to complete the following GBACOC documents:

- a) **Corruption Risk Due Diligence**  
The questionnaires on the due diligence are based on the following coverages:
  - a) Violation related to corruption;
  - b) Government connection; and
  - c) Compliance with integrity related matters.
- b) **Group Integrity Kit**  
The acknowledge receipt and to comply with the requirements set out in the GIK are in order to ensure that all the business associates and their representatives are aware on all the external and internal laws relating to corruption and bribery in the Group.
- c) **Business Associate Declaration of Interest**  
All the business associates shall disclose any relationship either professionally or personally with the Group’s employees, shareholders or Board of Directors to avoid conflict of interest in any business dealings.
- d) **Business Associate Integrity Pledge**  
This requirement is to ensure the commitment from the business associates to avoid involvement in any corruption activities.

