



## **VENDOR CODE OF BUSINESS ETHICS**

**VENDOR CODE OF BUSINESS ETHICS (“COBE”)**

**CONTENTS**

<b>No.</b>	<b>Clause</b>	<b>Page</b>
1.	Introduction	1
2.	Compliance with COBE	1
3.	Principles of the COBE	1
4.	Raising Concerns	2

**APPENDIX A:**

Declaration of Compliance

## VENDOR CODE OF BUSINESS ETHICS

### 1.0 INTRODUCTION

- 1.1 KUB Malaysia Berhad and its subsidiaries ("**KUB Group**") expects its joint venture vendors, contractors, subcontractors, consultants, suppliers, agents and other providers of goods and services who are doing business directly and indirectly for KUB Group ("**Business Associates**") to follow this Vendor Code of Business Ethics ("**COBE**") and all other relevant policies of KUB Group as a condition of doing business with KUB Group.
- 1.2 This COBE provides guidance to all Business Associates on what KUB Group believes to be sustainable business relationships based on the key principles of integrity, honesty, accountability and compliance with applicable laws and regulations.

### 2.0 COMPLIANCE WITH COBE

- 2.1 All Business Associates shall comply with this COBE and all applicable laws and the policies and procedures of KUB Group.
- 2.2 Any violation of this COBE and all applicable laws and the policies and procedures of KUB Group will be dealt with seriously including but not limited to a review of business arrangements which may lead to termination of business relationship, blacklisting and/or reporting to the authorities consistent with the applicable laws and regulations.

### 3.0 PRINCIPLES OF THE COBE

- 3.1 KUB Group expects all Business Associates to be advocates of ethical and responsible business practices by applying this COBE and other relevant policies of the KUB Group throughout its value chain.
- 3.2 All Business Associates shall conduct its business by adhering to the following principles: -

Act with Integrity	Business Associates will conduct all business relationships with integrity, respect and trust and will not disclose confidential or competitive information or data to any unauthorised party.
Maintain Accountability	Business Associates will 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 undertaking with KUB Group.

Avoid the Appearance of or Actual Conflicts of Interest	Business Associates with real or potential conflict of interest are expected to declare this to KUB Group even if such knowledge arises after the appointment and to take action to proactively address the conflict as soon as it is known. If in doubt, this should be highlighted to KUB Group.
Abide by the Rule of Law	Business Associates will comply with all applicable laws and regulations and will avoid practices which can give rise to charges of bribery, corruption and prohibited business practices.
Honest Representation	<p>Business Associates will provide honest and open representation of the organization, its qualification, experience and capabilities.</p> <p>Business Associates will also disclose accurate references of previous work or engagements which they have undertaken.</p>
Prohibit any Forms of Gifts/Business Courtesy to Procure Favours and/or Unfair Advantage	<p>Business Associates will never offer a bribe, kickback, bartering arrangement for goods or services or cash or any other incentives to the directors and/ or employees of KUB Group in order to obtain or maintain business with KUB Group. Business Associates should report to KUB Group if any directors and/ or employees of KUB Group request for any such incentives.</p> <p>During a bid or evaluation process, Business Associates should refrain from entertaining or treating directors and/ or employees of KUB Group involved in the evaluation such as providing special invitation to events or other functions.</p> <p>Any gifts given or received must be in compliance with the law and they shall not influence, or be perceived to be able to influence, business decisions or outcomes. Business Associates shall be aware that KUB Group Directors and Employees are discouraged from giving or receiving gifts, entertainment, and hospitality and other benefits from Business Associates and it is KUB Group's policy that its directors and/ or employees to declare internally on any gifts received.</p>

#### 4.0 RAISING CONCERNS

4.1 If any Business Associates is aware or has knowledge on any misconduct and/ or violation of this COBE that causes unfair advantage or personal benefit to certain parties in securing business arrangements for the Business Associates which constitutes an actual or potential bribery or other corruption offence has taken place, the Business Associates are to raise its concerns or report any instance of actual or suspected violation of this COBE by sending an email to [whistleblower@kub.com](mailto:whistleblower@kub.com).

For more information on KUBM Whistleblowing Policy, please visit [www.kub.com](http://www.kub.com).

4.2 KUB Group is committed to ensuring that no one suffers any reprisal as a result of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. All reports will be treated confidentially.

**VENDOR CODE OF BUSINESS ETHICS**  
ACKNOWLEDGEMENT AND ACCEPTANCE

---

Name of organisation represented :	
Nature of business relationship with KUB Group :	

- 1. I/We agree to comply with the applicable laws and regulations of the KUB Group Vendor Code of Business Ethics, and terms and conditions governing the business relationship with KUB Group.
- 2. I/We shall ensure that our employees, subcontractors, and other representatives that supply products and/or services to KUB Group act in accordance with this Vendor Code of Business Ethics; and
- 3. This Vendor Code of Business Ethics shall form part of any agreement entered into, between KUB Group and us whether or not expressly incorporated into such agreement.

Name : \_\_\_\_\_

Identity Card / passport Number : \_\_\_\_\_

Signature : \_\_\_\_\_

Designation : \_\_\_\_\_

Company Stamp : \_\_\_\_\_

Date : \_\_\_\_\_