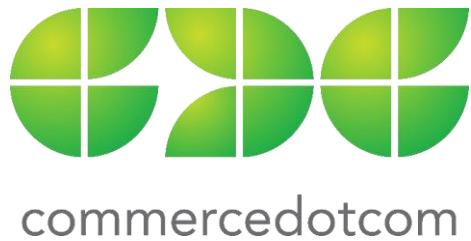


<b>Commerce Dot Com Sdn. Bhd.</b>	<b>RESTRICTED BUSINESS PARTNERS CODE OF CONDUCT</b>	
<b>Document No.</b> POL/BPCC/GIA-CDC/1.0/2019	<b>Effective Date</b> 1 November 2019	<b>Version No.</b> 1.0



## **BUSINESS PARTNERS CODE OF CONDUCT**

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## Distribution Control

This Policy is available electronically on the CDC Group website. Please note that this Policy is considered uncontrolled when printed. Ensure that the version is verified before use. Updates to this document are managed by the Document Custodian.

## Document History

Version No.	Summary of Change	Effective Date
1.0	Establishment of CDC Group Business Partners Code of Conduct	1 November 2019

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## CDC Group Business Partner Code of Conduct

CDC Group is committed to conduct our business and operations to the highest standards of ethical conduct, social and environmental responsibility.

Under certain circumstances, CDC Group can be held legally responsible for the actions of its business partners. Therefore, we expect and encourage all Business Partners to operate in accordance with the principles in this Business Partner Code of Conduct and in full compliance with all applicable laws and regulations. This Business Partner Code applies to the business partner and their employees, contractors, agents and related entities (collectively, the "Business Partner") providing goods and/or services to CDC Group.

## OUR PRINCIPLES

Through the acceptance of any Business Dealing(s) with any company under CDC Group, Business Partners are expected to uphold the 8 principles contained in this Business Partner Code in every aspect of their business.

### 1. Code of Ethic

CDC Group is dedicated to administering its business relationships to be handled with the highest professionalism and ethical standards. We expect all Business Partners to comply with all laws and regulations on anti-bribery, corruption and prohibited practices. All Business Dealings should be transparently performed and must be conducted with honesty, integrity and fairness.

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## **2. Conflict of Interest**

A conflict of interest may arise when a Business Partner has a competing professional or personal interest during carrying out CDC Group business dealings. All Business Partners must avoid any Conflict of Interest in their work with CDC Group. Business Partners should likewise ensure that all sub-contractors avoid such situations.

Any Business Partner which suspects an actual, potential or perceived Conflict of Interest must disclose the situation immediately in writing to CDC Group.

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## **3. Confidentiality**

Business partners are expected to conduct all procurement and business relationship with integrity, respect and trust.

Business partners are expected to always protect the confidentiality of the information and have no right to use any intellectual property or other proprietary information belonging to CDC Group without prior written authorization from CDC Group.

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## **4. Competitive Practice**

All Business Partners must respect their contractual commitments to CDC Group. Business Partners must not collude with other tenderers, distributors, suppliers or contractors, or engage in any other form of anti-competitive behaviour.

## **5. No Gift Policy**

CDC Group is committed to conduct our business in the highest standard of integrity and good governance. Our No Gift Policy aims to avoid a conflict of interest and demonstrate CDC Group's commitment to provide equal treatment to all individuals or organisations that we are in contact with for our business. In this regard, employees of CDC Group shall not solicit or receive any gifts from current or potential Business Partners either directly or indirectly which may influence the employee's judgement in a decision-making process or put the employees in a position of conflict.

All Business partners should avoid to, either directly or indirectly, promise, offer or give any bribe or an improper advantage (whether financial or otherwise) to any person in CDC Group, or any other person representing any company or associate company under CDC Group as an inducement, incentive, reward, gift or bonus during Business Dealing(s).

## **6. Disclosure of information**

All Business partners are expected to disclose information regarding its business activities, structure, financial situation and performance in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentations of conditions or practices in the supply chain are unacceptable.

## **7. Record Keeping**

The Business partners are encouraged to maintain adequate internal controls and procedures to ensure that all transactions with CDC Group are accurately recorded and reported in its books and records to reflect truly the activities to which they pertain such as the purpose of each transaction and to whom it was made or from whom it was received.

CDC Group expects its business partners to:

- maintain the integrity of the information provided to CDC Group at all times.
- Respond promptly to enquiries from authorised representative of CDC Group regarding the implementation and compliance to the Business Partner Code.
- Fully cooperate, provide the access and allow to visit and audit the relevant document, personnel and facilities, upon request from CDC Group.
- Report/update any change in circumstances and business partners' details which may have an impact to CDC Group or the Business Dealing(s).

### **Whistleblowing Policy & Procedure**

We are committed to the highest standards of professionalism, honesty, integrity and ethical behaviour in the conduct of our business and operations. Therefore, it is important that business partners report all compliance violations to this Business Partner Code as well as to other acts that are against the law committed or practiced by the employee or representative of CDC Group.

Our Whistleblowing Policy & Procedure provides business partners a secure mechanism for reporting suspected compliance violations. Anyone who has knowledge or aware of any improper conduct committed or about to be committed within CDC Group's business environment is encouraged to report such matters, in good faith, without fear of reprisal.

#### **Report concerns and misconduct through:**

Email: [whistleblowing@commercedc.com.my](mailto:whistleblowing@commercedc.com.my)

## Implementation of Integrity Pact

Integrity Pact promote clean operations for both CDC Group and the business partners during the execution of a contract. The implementation of Integrity Pact also yields other benefits such as greater transparency in contracting, and enhancement of public confidence and trust.

Integrity Pact must be signed by all CDC Group business partners during the Registration process.

## Non-Compliance

If the business partner is found to violate terms and conditions of the Business Partner Code as well as the Integrity Pact, CDC Group may apply, at its absolute discretion, to the extent permitted by law, any or all of the following sanctions:

- Denial or cancellation of the contract;
- Non-payment of fees/expenses;
- Debarment by CDC Group of selling company and its Directors from being considered for further contracts, for such period as the company may deem appropriate, and
- Other legal proceedings as CDC Group may deem appropriate.