



## Policies & Procedures

### Code of Conduct for Business Partners



*UEM Group Berhad (UEM Group)'s Policy and Procedures outlines the rules of conduct and responsibility of UEM Group personnel and governs the Company's direction, activities and matters which may directly impact businesses, board members, employees, member of the public and the Company's programmes and services.*



# CODE OF CONDUCT FOR BUSINESS PARTNERS

*ETHICS, INTEGRITY AND ACCOUNTABILITY*

## **INTRODUCTION**

At UEM Group, being a good corporate citizen has always been an integral part of the way we do business. We are committed to operate our business in an ethical, legally 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 Business Partners ("Code"). All our Business Partners are to adhere to the Code when conducting business with UEM Group.

This Code sets the expectations for our dealings with you. A commitment to full compliance with this Code is a fundamental requirement to work for or with UEM Group. Failure to comply with this Code or applicable laws and regulations will be sufficient cause for UEM Group to terminate its relationship with a Business Partner. UEM Group 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 Group.

The 8 Principles of UEM Group Code of Conduct for Business Partners		
1.	<b>Compliance with Laws</b>	<p>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.</p> <p>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.</p>
2.	<b>Act with Integrity</b>	<p>Our Business Partners will conduct all business with integrity, respect and trust. You shall:</p> <ul style="list-style-type: none"> <li>• Behave ethically and transparently in all business dealings.</li> <li>• 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.</li> <li>• Never make facilitation payments, whether directly or indirectly.</li> <li>• Ensure all your subcontractors, referral parties, and affiliates used in connection with UEM Group business adhere to these standards and have not engaged in, and shall not engage in, improper or illegal conduct.</li> <li>• Must maintain complete and accurate books and records relating to all UEM Group business, together with supporting documentation, in accordance with applicable accounting principles, laws, and regulations.</li> <li>• Must act lawfully and responsibly when using social media.</li> </ul>
3.	<b>Maintain Accountability</b>	<p>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 Group.</p>
4.	<b>Avoid Conflict of Interest</b>	<p>Business Partners with a real or potential conflict of interest must disclose this to UEM 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, these should be highlighted to UEM Group.</p>
5.	<b>Maintain Confidentiality</b>	<p>Our Business Partners respect UEM Group's intellectual property, trade secrets and other confidential, proprietary or sensitive information. You may not use or disclose any such information to unauthorised party. Independent use of UEM Group's data is prohibited.</p> <p>You comply with all applicable data privacy and data protection laws and implement policies and controls to ensure that the privacy rights of personal data rights are respected.</p>

6.	<b>Provide a Safe Working Environment</b>	<p>Our Business Partners shall provide a healthy and safe workplace to their employees, and comply with all applicable health and safety laws, regulations and standards, including any site-specific safety requirements.</p> <p>Any person providing on-site services in UEM Group facility is required to adhere to UEM Group's occupational health and safety standards.</p>
7.	<b>Maintain a Healthy Work Culture</b>	<p>Business Partners and their employees shall not be involved in illegal drugs or alcohol consumption in UEM Group premises. Prohibited substances may not be brought, kept, consumed, sold, purchased or dealt with in any way on UEM Group premises.</p> <p>Violence 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 behaviour.</p>
8.	<b>Prohibit Any Form of Gift/Business Courtesy</b>	<p>Business Partners shall not offer a bribe, a kickback, bartering arrangement for goods/services or cash or any other incentives to UEM Group employees and their families in order to obtain or maintain UEM Group's business. Business Partners should report to UEM Group if any UEM Group employee or business associate request for any such incentive or any form of gift or favour.</p> <p>UEM Group practices <b>"No Gift Policy"</b> and our Business Partners are expected to observe UEM Group's policy.</p>

## COMPLIANCE WITH THE CODE

1. Our Business Partners should read and understand the Code and consult their UEM Group key contact 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 Group and are responsible of self-monitoring their compliance with this Code.
2. Our Business Partners shall pro-actively extend the principles defined in this Code to your own suppliers and business partners.

3. If and when any situation arises that cause our Business Partners to operate in violation of this Code, our Business Partners shall immediately inform their UEM Group key contact.
4. Business Partners are expected to cooperate fully in any investigation and shall provide UEM Group with reasonable access to business records, documents, personnel and facilities related to matters involving UEM Group.
5. Business Partners that act in contravention of this Code and/or other applicable laws and regulations risk termination of all existing and future UEM Group business.
6. UEM Group 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 Group, questionnaires, on-site audit or other means deemed appropriate.

## **RAISING CONCERNS**

1. Our Business Partners are obligated to report to UEM Group any conduct, including conduct of any UEM Group 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 Group, or want to report potentially illegal or unethical activities, you may contact UEM Group confidentially in one of the following ways:
  - By sending an email to [whistleblower@uemnet.com](mailto:whistleblower@uemnet.com)
  - By writing to the Chairman of the Board of Directors or the Chairman of the Whistleblower Committee of UEM Group

For more information on UEM Group Whistleblower Policy, visit <https://whistleblower.uemnet.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, this will be discussed with the Concerned Business Partner.
4. UEM Group 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 AGREEMENT**

The undersigned Business Partner acknowledges and agrees that:

1. We have received, read and understand UEM Group Code of Conduct for Business Partners (this "Code");
2. 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 Group or any of its subsidiaries' contrary to this Code;
3. We shall ensure that our employees, subcontractors and other representatives that supply products and/or services to UEM Group act in accordance with this Code; and
4. This Code shall form part of any agreement entered into between UEM Group and us, whether or not expressly incorporated into such agreement.

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Company Name of Business Partner

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Signatory Name:

Title:

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Date: