

BUSINESS ASSOCIATES CODE OF BUSINESS CONDUCT



ACRE WORKS SDN BHD

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Group of Companies

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Business Associates Code of Business Conduct

AWSB is proud of the values with which it conducts business. It has and will continue to uphold the highest levels of business ethics and personal integrity in all types of transactions and interactions.

AWSB’s Business Associate Code of Business Conduct (hereafter “BACoBC”) applies to AWSB’s clients, contractors, sub-contractors as well as suppliers and vendors of goods and/or services (hereafter “Business Associates”). The BACoBC defines AWSB’s expectations and requirements of its Business Associates, and the responsibility of Business Associates towards their stakeholders and the environment. AWSB may modify the BACoBC as required, and Business Associates are expected to accept these changes. In addition to this BACoBC, Business Associates must also review specific agreements with AWSB (e.g. general terms and conditions of the purchase order, regional / local terms, and conditions, etc.) for additional obligations and requirements.

This BACoBC includes three key areas, where we encourage our vendors to make voluntary disclosures.

- **Anti-Bribery & Anti-Corruption (ABAC) Policy**
 - We adopt a zero-tolerance approach to any and all acts of bribery or corruption perpetrated by our stakeholders, including vendors with whom we work or who act on our behalf.
 - We work with vendors who adhere to the local anti-bribery and anti-corruption legislations and laws and provide them a safe platform to report such incidences.
- **Human Rights & Labour**
 - We promote values of diversity and mutual respect that is free of racial, gender, ethnic, religious, or other forms of discrimination in the conduct of all vendors in the Group.
 - We work with vendors who abide by local regulations and we do not condone forced labour, child labour, exploitation, human trafficking, and breach of basic human rights in relation to health, safety, education amongst others.
- **Occupational Health Safety and Environment (OHSE)**
 - We are committed to operating in a safe and responsible manner, respecting the health of our employees, the environment, and the communities in which we operate. All employees are expected to follow these policies and procedures to act safely and to report unsafe conditions to their supervisors in a timely manner. AWSB safety tagline: “Safety First – From Start to Finish”.
 - We take a precautionary approach to managing our environmental impact and therefore, call upon our vendors to raise their environmental consciousness / awareness and manage their negative impacts.
 - We do not condone any and all kinds of direct environmental harm while vendors execute our contracts. These specifically include illegal logging, uncontrolled use of fire for clearing forest lands, natural resource development within UNESCO World Heritage sites (unless there is prior consensus with both the government authorities and UNESCO).
 - We support vendors who adhere to environmental laws and regulations to proactively manage their emissions / carbon footprint in conducting business with us, while also leveraging opportunities to create net positive impact on the environment through other activities.



Business Associates must comply with the following within the context and definitions articulated in relevant policies of the AWSB:

(a) Legal compliance

Business Associates must comply with the laws and regulations of the applicable jurisdictions. Business Associates are strictly prohibited from involved in conducting transactions linked to the financing of and/or parts mainly and solely used for of arms and munitions

(b) Anti-Bribery & Anti-Corruption (ABAC)

Business Associates must not engage in any form of corruption or bribery or kickbacks, including giving, offering, or requesting any payment or other forms of the benefit conferred for the purpose of improperly influencing decision making.

(a) Gift and entertainment

AWSB adopts a "No Gift" policy to demonstrate our commitment to uphold good ethics and as such, vendors are not allowed to offer, send or exchange gifts and entertainment with AWSB employees. This is to prevent any conflicts of interest or appearance of such in our business dealings.

(b) Conflict of interest

Business Associates must disclose any information that may raise a possible conflict of interests. For example, a relationship (including family members, or close friends) with an employee of AWSB.

(c) Labour practices and human rights

- Business Associates are encouraged to comply with all applicable labour and employment laws and regulations, including the Minimum Wages Order 2018.
- Business Associates must promote equal opportunities and treatment of their employees.
- Business Associates must not practice any kind of discrimination and respect the personal dignity, privacy, and rights of each individual.
- Business Associates must not employ or force anyone to work against his or her will, involving child labour, forced labour or human trafficking.

(d) Confidentiality and Protection of Personal Data

- Business Associates must keep all data or information shared by AWSB confidential at all times (during and after the business relationship). Business Associates must not share such data and information with third parties unless an official written consent is provided by AWSB.
- In all instances where AWSB's confidential information is to be disclosed to a vendor, or another external party, it is mandatory to execute a Non-Disclosure Agreement ("NDA") prior to disclosure in order to protect the AWSB's information and interests and those of its customers.
- Business Associates to comply with all applicable laws, rules and regulations relating to confidentiality, banking secrecy as well as protection of personal data and privacy.



(e) Employee health and safety

- Business Associates must take reasonable steps to provide control hazards and a safe working environment for its employees.
- Business Associates must take precautionary measures against accidents and occupational diseases.

(f) Environmental protection

- Business Associates must comply with all applicable environmental regulations and laws.
- Business Associates must minimise environmental pollution and continuously strive to protect the environment.
- Business Associates are strictly prohibited from engaging in illegal logging or uncontrolled use of fire for clearing forest lands, destruction of natural carbon sinks, habitat and ecosystems.
- Business Associates are strictly prohibited from conducting transactions relating to natural resource development within UNESCO World Heritage Sites, unless there is prior approval by both the local government authorities and UNESCO.

(g) Lawful competition

- Business Associates must not discuss prices, distribution practices, customers, product development, and use of vendors or company plans or activities with a competitor and must adhere to all applicable laws and regulations relating to competition or anti-trust.

As part of good corporate governance, AWSB has established a whistle blowing or the Speak Out policy that sets out avenues for legitimate concerns to be objectively investigated and addressed. Business Associates will be able to raise concerns about illegal, unethical, or questionable practices (especially in relation to the expectations set out in BACoBC) in confidence and without the risk of reprisal. You can share your concerns or report malpractices or any breaches in a safe and secured manner by emailing on directors@acreworks.com.my Rest assured that all the matters reported will be investigated thoroughly. AWSB commits to ensure that all disclosed information, including the identity of the complainant shall be treated with strictest confidence.

Business Associates who violate or fail to comply with the BACoBC will be reported immediately to the appropriate authorities and may face serious disciplinary action and / or penalty measures, including termination of contract and blacklisting of vendors from providing goods or services to AWSB.

For any additional information or clarification on any of the clauses or statements made in this BACoBC, kindly email to contract@acreworks.com.my



BUSINESS ASSOCIATE LETTER OF DECLARATION (“BALOD”)

Our company, _____ (*Company Name*)
bearing Company Number _____,
(hereinafter “**Business Associate**” which includes its Directors, Officers and Employees who
intend to conduct Business Transaction(s)¹ with the Acre Works Sdn Bhd Group of Companies
[AWSB]) hereby:

1. PLEDGES AND UNDERTAKES THAT:

- a. We have read and understood, and will comply with the following requirements (collectively, “Requirements”):
- (i) the attached Business Associate Code of Business Conduct (“BACoBC”) which outlines the standards of behaviour required from the Business Associate relating to:
 - Anti-Bribery & Anti-Corruption (ABAC)
 - Human Rights & Labour
 - Occupational Health Safety and Environment (OHSE)
 - (ii) all applicable laws and regulations relating to MACC (Amendment) Act 2018 and
 - (iii) the following ABAC principles:
 - committing to promote values of integrity, transparency, accountability, and good corporate governance
 - strengthening internal systems that support corruption prevention
 - fighting any form of corrupt practice and
 - supporting corruption prevention initiatives by the Government and the local authorities
- b. We will ensure our subsidiaries, affiliates, and all other parties that we appoint to conduct work for AWSB also comply with the Requirements.
- c. We have not been convicted nor are we the subject of any investigation, inquiry or enforcement proceedings by the relevant authorities of any actual or suspected breach to the Requirements and will report any actual or suspected breach to the Requirements as soon as reasonably practicable and to the extent permitted by law, to AWSB.

2. AGREES THAT:

- (a) In the event that we are in breach of any of the above sections, AWSB may immediately revoke the contract award, or terminate the contract for the Business Transaction(s) without

¹ *Business Transaction(s) is (are) defined as Tenders, Quotations, Contracts, Letter of Awards and Purchase Orders.*



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any liability whatsoever on the part of the AWSB to the Business Associate. This is without prejudice to any other rights or remedies that the AWSB may have or any other appropriate action which the AWSB may seek under the terms of the applicable tender/contract or applicable laws and regulations.

- (b) Should any person attempt to solicit any bribe or advantage (whether financial or otherwise) from the Business Associate or any other person connected to the Business Associate either as an inducement or incentive to be selected or as a reward, gift or bonus for being selected in the Business Transaction(s)*, or where the Business Associate has reasonable grounds to suspect any breach of the obligations in this BALOD or the BACoBC, the Business Associate will report such act to the AWSB as soon as reasonably practicable.

For and on behalf of the Business Associate,

Yours sincerely,

Name of Company Director (or Equivalent):

IC/ Passport No. :

Position :

Name of Company :

Company stamp :

Received & acknowledged by:

Name and IC/ Passport No :

Position :

AWSB Stamp:

This document, when duly completed and signed, should be sent back to contracts@acreworks.com.my