

# **BERTAM ALLIANCE BERHAD**

## **Corporate Code of Ethics Policy**

### **1. Objective**

The Board wishes to define its principles of code of ethics to:

- i. Provide guidance to stakeholders on the ethical behaviours to be expected from the Group;  
and
- ii. Communicate, measure and monitor its values and performance designed to achieve objectives and to instill values.

### **2. The Principles of Our Code of Ethics**

We are responsible to:

- i. Our Clients, by constantly striving to improve our quality and competitiveness of our development ethically and responsibly in order to serve our clients better.
- ii. Our Contractors, business associate and partners, subject to their adherence to the universal principles of code of ethics, by allowing them to make a fair profit.
- iii. Our Employees, by creating safe, healthy and secured working environments free from any form of danger and sexual harassment, acknowledging their dignity and recognizing their merit and providing fair remuneration and career for those who qualified and perform.
- iv. Our Communities, by embracing social equity and diversity, complying with regulatory requirements and supporting good causes and charities.
- v. Our Environment, by preserving and protecting the environment and natural resources to ensure sustainability.
- vi. Our Dependents, by treating them fairly and not exercising our position in an abusive way, taking advantage of them or manipulating them with our power and ability to punish or penalize them.

- vii. Our Shareholders, by upholding our code of ethics in conducting our business and creating wealth and rewarding them.
- viii. Our Stakeholders, by not accepting and giving any favors, rewards and benefits with an intention to corrupt and to bribe for improper gain and advantage.

### **3. Board's Responsibility**

The Board should periodically review the code of ethics and to ensure implementation of appropriate communication channel to receive feedbacks and other appropriate internal systems to support, promote and strengthen the awareness and to ensure compliance of this code by its executives when making their business and operation decisions.

### **4. Management's Responsibility**

Management should ensure this Code is readily available to all staff members and communicate the Code with staff members periodically to reinforce its importance and relevance.

In making operational and business decisions, the management is responsible to the Board to observe the principles of this Code. Management shall ensure their action consistent with the spirit of this Code and promote good culture of ethics through their internal and external interaction with all stakeholders of the Group.

### **5. Documentation**

Copy of the approved code of conduct shall be included in Employee Handbook. All employees are required to read and familiarize themselves with the code and acknowledge their understanding and compliance with the Code annually during their employment with the Group.

### **6. Conflict of Interest**

Personal relationships or interests must not affect business activities. This means that you must not create or maintain personal interests, which may pose, or appear to pose, a conflict with the interests of BAB or which might influence, or appear to influence, your judgment in

the performance of your duties. You should, for example, avoid any investment, interest, association, or activity that may cause others to doubt your fairness, integrity or ability to perform your duties objectively.

Employees must disclose any outside activities, financial interest or relationship that may pose a real, potential or perceived conflict of interest. Each employee must inform his manager of any existing or potential conflict of interest and seek a solution together with the manager to avoid, or at least minimize, the conflict of interest.

## **7. Abuse of Power**

Abuse of power includes any abusive behaviour (physical, psychological, sexual or emotional) by a person in a position of authority and trust against someone in a position of vulnerability and/or dependency.

Employee who wish to lodge a complaint about an alleged abusive of power by a BAB's staff should lodge their complaint to her/his line manager as soon as possible after s/he becomes aware of the concern.

## **8. Corruption**

All our business partners, in particular our suppliers, customers, joint venture partners, contractors and distributors, must be dealt with fairly.

BAB expects the same from its business partners. Our relations with all business partners shall be based solely on objective criteria, in particular quality, reliability, competitive prices, as well as compliance with environmental, social and corporate governance standards.

BAB is strictly committed to fighting any kind of corruption. Therefore, BAB prohibits its employees, agents, and other third parties acting on BAB's behalf from engaging in any form of bribery. While dealing with business partners or government officials, they must never demand or accept anything of value (e.g. cash, gifts, entertainment or any other personal benefits) which could be construed as an attempt to influence or induce business decisions. Likewise, employees of other companies or government officials must never be promised or

granted any personal benefits with the intent to obtain or retain business or to gain any improper advantage for BAB.

We require all employees to inform their manager if a business partner or governmental official offers or demands any personal benefits.

## **9. Insider Trading**

As an employee, you may have access to material, non-public information about BAB or the affairs of a third party which, if disclosed, could impact the value of publicly-traded securities, in particular the BAB share. Insider trading laws prohibit making personal use of such information and/or disclosing it to third parties, including friends or family. Examples include information relating to the intended sale of substantial parts of the company, the acquisition or merger of businesses, undisclosed data on profits or particularly promising research results.

## **10. Money Laundering**

No employee, either alone or in collaboration with third parties, may take measures that violate applicable regulations on money laundering.

Where questionable financial transactions involving transfers of cash or cash equivalents are requested, prior review by and approval from the treasurer is required.

## **11. Complaints and Disciplinary Action**

Violation of this Code of Conduct will not be tolerated and may, in accordance with relevant legislation, lead to internal disciplinary actions, dismissal or even criminal prosecution.

Each member of the BAB has a responsibility to handle and respond to any allegations of misconduct they receive from their stakeholders about their employees in line with their organisational policies and related disciplinary measures. Management of BAB should establish proper systems for investigating, recording and dealing with misconduct.

Breaches of the Code of Conduct should be reported immediately to senior management.

## **12. Reporting of Violations**

All reports or complaints would be treated with strictest confidence and individual will not be discriminated against or suffer from any act of retaliation for reporting any violations in good faith.

### **13. Corporate Disclosure Requirement**

Copy of the approved code of conduct shall be published in the corporate website.