

Big Dataworks Sdn. Bhd. Document No. ABMS DOC 8.2a	RESTRICTED BUSINESS PARTNERS CODE OF CONDUCT POLICY		
	Effective Date 20 Dec 2019	Version No. 1	Revision No. 1



BUSINESS PARTNERS CODE OF CONDUCT

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BDW Business Partner Code of Conduct

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

Under certain circumstances, BDW 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 BDW.

OUR PRINCIPLES

Through the acceptance of any Business Dealing(s) with any company under BDW, 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

BDW 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.

2. Conflict of Interest

A conflict of interest may arise when a Business Partner has a competing professional or personal interest during carrying out BDW business dealings. All Business Partners must avoid any Conflict of Interest in their work with BDW. 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 BDW.

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 BDW without prior written authorization from BDW.

4. Competitive Practice

All Business Partners must respect their contractual commitments to BDW. 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**

BDW 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 BDW'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 BDW 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 BDW, or any other person representing any company or associate company under BDW 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 BDW 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.

BDW expects its business partners to:

- maintain the integrity of the information provided to BDW at all times.
- Respond promptly to enquiries from authorised representative of BDW 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 BDW.
- Report/update any change in circumstances and business partners' details which may have an impact to BDW or the Business Dealing(s).

Whistleblowing Policy

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 BDW.

Our Whistleblower Policy 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 BDW's business environment is encouraged to report such matters, in good faith, without fear of reprisal.

Report concerns and misconduct through:

Email: whistleblowing@bigdataworks.com.my

Implementation of Business Associates Integrity Pact

Business Associates Integrity Pact promote clean operations for both BDW 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 BDW 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 Business Associates Integrity Pact, BDW 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 BDW 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 BDW may deem appropriate.