

CODE OF CONDUCT FOR VENDORS

<p>1. Introduction, Applicability and Objectives</p>	<p>(i) The Group Code of Conduct for Vendors (“Vendors Conduct Code”) sets out the minimum standards in relation to the general business conduct and ethical practices expected of all Vendors who engage with or undertake work for Kenanga Investment Bank Berhad and its subsidiaries (“KIBB Group”).</p> <p>(ii) The Vendors Conduct Code applies to all third parties (individuals and entities) seeking to do or doing business with KIBB Group; such as contractors, consultants, or suppliers as well as their agents, officers and employees and includes subcontractors, sub consultants and sub suppliers (hereafter referred to as “Vendors”).</p>
<p>2. Vendors Must Comply with the Relevant Regulatory Requirements and KIBB Group’s Internal Policies</p>	<p>(i) Vendors must conduct its business activities in full compliance with the applicable laws, rules, regulations, directives, orders, requirements and guidelines issued by the relevant regulatory authorities.</p> <p>(ii) Similarly, Vendors are also required to comply with certain internal policies and procedures of KIBB Group as communicated to Vendors, as applicable to the products or services being rendered by the Vendors.</p>
<p>3. Vendors Must Avoid Conflict of Interest and Prevent Corporate Crimes</p>	<p>(i) Vendors must exercise reasonable care and due diligence to avoid any act or omission that could result in actual, potential or appearance of a conflict of interest as well as improper advantage or preferential treatment in its relationship with KIBB Group.</p> <p>(ii) Vendors must strictly observe and comply with all requirements of laws designed to prevent corporate crimes, which includes the Malaysian Anti-Corruption Commission Act 2009 as well as the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001.</p> <p>(iii) Vendors must not directly or indirectly offer, give, solicit or accept any form of bribery or take any actions that could be perceived to be as such, and must not engage directly or indirectly, in any fraudulent or corrupt activity, such as extortion, embezzlement, presenting false claims, making or accepting facilitation payments, or requesting or receiving kickbacks.</p>
<p>4. Controls in Relation to Interactions With and Giving Gifts to Persons from KIBB Group as well Provision of Sponsorships by Vendors</p>	<p>(i) Vendors must not provide Gifts (as defined in the Vendors Conduct Code) to any persons from KIBB Group (or relatives of such persons) to induce or influence the decision of KIBB Group in order to obtain any advantage or preferential treatment or to retain the business that the Vendor with KIBB Group.</p> <p>(ii) Any Gifts that are offered must not exceed five-hundred ringgit (RM500) and Vendors are discouraged from providing Gifts to specific individuals from KIBB Group. Vendors must use good judgment, discretion and moderation when offering Gifts taking into account the value, quality and quantity of the Gifts as well as the timing of when the Gifts are given.</p> <p>(iii) If requested, Vendors may elect to provide sponsorships for activities or events related to the general well-being and benefit of</p>

	<p>KIBB Group’s employees, subject to the sponsorship policy that KIBB Group has in place.</p>
5. Vendors’ Obligation of True and Accurate Representations and Responding to Surveys/ Questionnaires	<ul style="list-style-type: none">(i) Vendors must not make any misrepresentation on its capability or capacity, for the purposes of securing procurement with KIBB Group. In this regard, Vendors must not submit tenders without the firm intention, conviction, capability or capacity to proceed with and perform the contract with KIBB Group if successful.(ii) Vendors are also required to respond to the surveys or questionnaires by KIBB Group honestly and objectively to enable collection of sufficient information especially in relation to compliance with the relevant laws and regulations.
6. Protecting KIBB’s Assets and Information and Giving References or Public Statements	<ul style="list-style-type: none">(i) Vendors must treat all information made available to the Vendor or which the Vendors have accessed to by virtue of its contract with the strictest of confidence and only disclose to the authorised person as expressly permitted by KIBB Group.(ii) Vendors must abide by all applicable laws on insider dealing and not use any confidential or price-sensitive information as the basis for trading or for enabling others to trade in the stock or securities of any company.(iii) Vendors must only submit genuine and impartial references relating to previous engagements and work done to testify on its ability and reliability.(iv) Vendors must respect all intellectual property rights and thus, comply with all laws, regulations and contractual obligations concerning intellectual property rights of KIBB Group and that of any other parties.
7. Vendors to Observe KIBB Group’s Workplace Practices	<ul style="list-style-type: none">(i) In the performance of Vendors' contract with KIBB Group, the Vendors must assimilate values and principles that advocates a professional, safe, secure and conducive environment as well as uphold mutual and reciprocal respect, trust and confidence.(ii) Vendors must endeavour to adopt sustainable business practices and reduce or eliminate wastage to minimise the negative impact to the ecosystems and biodiversity.(iii) Vendor must at all times use KIBB Group’s infrastructures and facilities in a responsible and conscientious manner as well as ensure that access to KIBB Group's premises is only given to authorised persons for the performance of the contractual obligations.
8. Whistleblowing	<ul style="list-style-type: none">(i) Vendors must ensure that it has in place proper whistleblowing channels for any party to report any questionable behaviour, breach or potential breach of the Vendors Conduct Code or any other matter. Vendor must also treat all reports with the strictest confidentiality.(ii) Any party with knowledge of questionable behaviour, breach or potential breach of the Vendors Conduct Code, may report such matter to KIBB Group through the KIBB Group's whistleblowing channels that are available [here].