



VENDOR CODE OF CONDUCT

CODE

20.0403

9th October 2018

Version Number : 00

OBJECTIVE

The Company is firmly committed to conduct business with the highest level of integrity and in full compliance with applicable laws, rules and regulations. This commitment extends to all our working relationships and dealings with our Vendors.

It is important that our Vendors conduct their businesses in a responsible manner that is consistent with such values and policies of the Group, as more particularly set out in this Code in order to minimize legal, compliance and business risks for the Group and the Vendors.

SCOPE

We reserve the right to audit our Vendors to confirm they are operating in accordance with this Code, and we reserve the right to sever our relationships with Vendors found not to be doing so.

Acknowledgement of the Code is a pre-requisite in all of the Group's contracts for supply. Through the acceptance of a purchase order, letter of award, contract or agreement or performance of any obligation to and agreed by the Group, Vendors shall commit and are deemed to have committed themselves to complying with the Code.

The Code is in addition to and should be read together with other applicable the Group's Policies and Procedures, including but not limited to the Group QHSE Policy and Procedure, the Whistleblowing Policy and Procedure and Code of Business Conduct, a copy of which is available on the Group's website or upon written request by Vendors.

REFERENCES

- NIL -

DEFINITION & ABBREVIATIONS

TERM	DEFINITION
Code	means Vendor Code of Conduct
Code of Business Conduct	means the Code of Business Conduct of the Group
Company	means each of ENRA Group Berhad and its subsidiaries
Group	means ENRA Group Berhad and its subsidiaries
Group Legal	means the Legal Department of ENRA Group Berhad
Group QHSE	means the Quality, Health, Safety and Environment Department of ENRA Group Berhad
Group QHSE Policy and Procedure	means the policy and procedure of Group QHSE
Policies and Procedures	means the policies and procedures of the Group
Vendors	means collectively, vendors, suppliers, contractors, subcontractors and other third party entities that provide goods and services to the Group or who act on the Group's behalf

Vendor Compliance Questionnaire	means the compliance questionnaire issued by the Group to the Vendor to fill out on a yearly basis
Whistleblowing Policy	means the Whistleblowing Policy of the Group

RECORDS

1: - N/A-

PROCESS

1.0 Professional Conduct & Business Ethics

- 1.1 Vendors should conduct all of their activities professionally and to the highest standards of ethical conduct. Vendors are expected to be completely objective in their judgment and any recommendations that they give, so that issues are never influenced by anything, including without limitation, issues of gender, race, creed, color, age or disability, other than the best and proper interests of the Group.
- 1.2 Vendors are expected to be mindful of the well-being of communities and to foster positive social and economic relationships with local communities in which they are working in.

2.0 Compliance with Laws, Rules and Regulations

- 2.1 Vendors actions and advice are expected to always conform to relevant law and regulations of the countries in which they operate as well as extraterritorial laws with which the Group operations must comply, and Vendors shall not engage in corruption, extortion, embezzlement in any form or any criminal or illegal act.
- 2.2 All products and services delivered by Vendors must meet the quality and safety standards required by applicable laws and generally accepted standards including those that the Group are accredited with.

3.0 Human Rights and Labour

- 3.1 Vendors must show respect for human dignity and rights of the individual, including without limitation, their own employees, and shall not traffic in persons or use any form of forced labor. All work must be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice. Vendors shall only employ workers who are legally permitted to work in their facilities and are responsible at their own costs for validating employees' legal eligibility to work through appropriate documentation. Vendors shall prohibit unlawful discrimination and harassment in the workplace.
- 3.2 Child labor is strictly prohibited and Vendors shall not employ children.

4.0 Anti-Corruption / Anti-Competition

- 4.1 While serving the Group in any line of business, Vendors and their employees shall not engage in any form of bribery and/or corruption, extortion, price fixing and/or anti-competitive behavior, embezzlement, or falsification of any information or documents, or do, or omit to do, any act that will cause the Group to be in breach of the laws of any country relating to the foregoing in which the Group operates or conducts business.

- 4.2 Vendors shall further notify their principals, owners, directors, officers, employees, consultants, affiliates, vendors, suppliers, agents, and subcontractors that perform any services for the Group of the requirements of this Code, have its own compliance program, including without limitation, policies, procedures and training, to help ensure compliance with anti-corruption and anti-competition laws and if requested, provide reasonable assistance to the Group in performing any activity that is required by any government or agency thereof in any relevant jurisdiction for the purpose of compliance with the anti-corruption and anti-competition laws.

5.0 Conflict of Interest

- 5.1 Vendors and their employees shall not enter into outside activities, including business interests or other contracts or employment that might interfere/conflict with or be perceived to interfere/conflict with the Vendors' obligations to the Group.

6.0 Health, Safety & the Environment

- 6.1 Vendors shall commit to promoting and creating safe working conditions and healthy work environment for all their workers and shall remove and/or safeguard against physical hazards where possible. Vendors shall comply with all applicable health, safety and environmental laws and regulations, including any general or site-specific safety requirements, demonstrate continual improvement of its environmental performance and provide workers with appropriate personal protective equipment. Workers shall not be disciplined for raising safety concerns and shall have the right to refuse unsafe working conditions without fear of reprisal until management adequately addresses their concerns.
- 6.2 Vendors and their employees shall be responsible and have a joint duty to ensure and prevent the use of drugs and alcohol in all manners and circumstances including the unlawful manufacture of, sale, purchase, offer to purchase or sell, transfer, any distribution, consumption or possession of drug and alcohol at the Group's premises or any premises where Vendors provide goods and services at.
- 6.3 The Vendors shall ensure that they obtain, keep current, and follow the reporting guidelines of all the required environmental laws, guidelines, regulations and those in permits and registrations, to be at all times legally compliant, and shall identify hazardous materials, chemicals and substances, and ensure their safe handling, movement, storage, recycling, reuse and disposal.

7.0 Confidentiality

- 7.1 Vendors shall not disclose information about the Group's businesses, directors, employees, vendors, suppliers, advisors, business partners, performance or business dealings without prior written consent of the

Group save for information that are already in the public domain, and should only use such information and property (including tools, drawings and specifications) for the purpose for which they are provided to Vendors or otherwise agreed in writing and for no other purposes.

- 7.2 Vendors should also take appropriate steps to safeguard and maintain the confidentiality of the Group's proprietary information, including maintaining it in confidence and in secure work areas and not disclosing it to third parties (including other customers, subcontractors, etc.) without the prior written consent of the Group.
- 7.3 Vendors must not refer to the Group in any informational, promotional marketing or advertising without obtaining the prior written consent of the Group. This does not prohibit the release of information, the disclosure of which is required by law, regulation or the rules of any applicable stock exchange, provided that the Vendors, to the extent reasonably possible, provide the Group with a draft of any proposed release and incorporates the comments of the Group.

8.0 Documentation and Records

- 8.1 Vendors shall obtain, maintain, and keep current valid business or other licenses, permits and/or approvals as required by applicable laws and regulations and must keep accurate books, records, and accounts in connection with the services to be performed for the Group.

9.0 Reporting

- 9.1 Vendors or their employees must report any actual or suspected non-compliance of this Code.
- 9.2 Vendors or their employees that have any ethics or compliance related concerns or wish to report a questionable behaviour and/or possible violation of this Code may refer to the Group's Whistleblowing Policy for guidance on the relevant reporting channels.
- 9.3 All reports shall be confidential and will not be revealed without permission unless required by law to do so.
- 9.4 The Group does not tolerate or condone any retaliation taken against any individual who has, in good faith, sought advice or has reported a questionable behaviour or possible violation.
- 9.5 Every year, all Vendors must confirm their compliance with the Code in writing via the Group's Annual Vendor Compliance Questionnaire. In doing so, Vendors will be reaffirming their commitment and adherence to the Code and re-declare any conflicts of interest.

[END]