



CODE OF BUSINESS CONDUCT

This Code of Business Conduct (“the Code”) provides guidance to the Board of Directors and employees of **IFCA MSC BERHAD (IFCA)** on the expected behaviour and key principles of **IFCA** in creating sustainable business relationships, acting with integrity, honesty, accountability and professionally, and to comply with applicable laws and regulations. The following Code must be observed by the Board of Directors and all employees of **IFCA**:

- i. **Do not advance personal interests at the expense of, or in conflict with IFCA;**
- ii. **Refrain from corruption, unfair competition, fraud, waste and abuse;**
- iii. **Do not undertake any practice that is detrimental to the industry, environment, society and IFCA;**
- iv. **Abide by both the spirit and all applicable laws, rules and regulations; and**
- v. **Do not influence the decision of any party, including government officials, agencies, and courts, as well as customers, business partners, suppliers, auditors and etc.**

Board of Directors and all employees of **IFCA** must promote business relationship founded upon an unwavering respect for the intellectual property rights, proprietary information and trade secrets, and customers. The usage of **IFCA’s** assets are solely to achieve the mission and vision of **IFCA**.

IFCA expects its suppliers, vendors, customers, business partners, advisors and others who enter into contract with **IFCA** to understand, respect and abide by **IFCA’s** ethics, standards and culture. **IFCA** has developed THE ORANGE BOOK, an in-house Guide book which provides best practices of procurement activities should act as a reference manual (Refer to Attachment 1) to **IFCA**.

To encourage an open culture of compliance to the Code, **IFCA** has established a Whistle Blowing Policy for the reporting of unethical behaviours which are subjected to investigation by designated officers of **IFCA**.

This Code applies to **IFCA** and its subsidiaries in Malaysia as well as overseas. The Board of Directors and all employees of **IFCA** must comply with various applicable laws and regulations and preserve and protect **IFCA’s** ethical values at all time.

APPENDIX 1

THE ORANGE BOOK – Best Practices on Procurement

The principles of the Code of Business Conduct (Code) support the core values of **IFCA** and are consistent with the Orange Book, which is a reference manual for procurement best practices developed in-house by **IFCA**.

1. Act with integrity

Suppliers will conduct all procurement and business relationship with integrity, respect and trust and will not disclose confidential or competitive information or data to any unauthorised party.

2. Maintain accountability

Full accountability for services rendered / goods provided and honour their commitment on a timely basis and in accordance with their obligations under the specific agreements and undertaking with **IFCA**.

3. Avoid the appearance of or actual conflicts of interest

Suppliers with a real or potential conflict of interest are expected to declare this to **IFCA** even if such knowledge arises after appointment and to take action to proactively address that conflict as soon as it is known. If in doubt, these should be highlighted to **IFCA**.

4. Abide by the rule of law

Suppliers will comply with all applicable laws and regulations and will avoid practices which can give rise to charges of bribery, corruption and prohibited business practices.

5. Honest presentation

Supplier will provide honest and open representation of the organisation, its qualification, experience and capabilities. Suppliers will also disclose accurate reference of previous work or engagements which they have undertaken.

6. No Gift Policy - Prohibit any form of fits/ business courtesy to procure favours and / or unfair advantage

Suppliers will never offer a bribe kickback, bartering arrangement for goods or services or cash or any other incentives to **IFCA** employees and / or their families in order to obtain or maintain **IFCA's** business. Suppliers should report to **IFCA** if any **IFCA** employees or business associates request for any such incentives. During a bid or evaluation process, suppliers should refrain from entertaining or treating **IFCA** employees in the evaluation and/ or their families such as providing special invitation to events or other functions. Any gifts given or received must be in compliance with the law and must not violate the giver's and receiver's policies on such practice. It is understandable that in certain industries, promotional items are part of normal business practice and it is **IFCA's** policy that employees declare internally on any gifts received.

The word "suppliers" in the context of the Code extends to **IFCA** professional service providers including advisors, consultants and other business associates in addition to suppliers of goods and other services.