

This BPCC applies to customers, wholesalers, distributors, rice suppliers, cargo surveyor, vessel provider, Bumiputra Rice Millers, business partners, suppliers, contractors, consultants, joint venture and consortium partners.

BERNAS BUSINESS PARTNERS CODE OF CONDUCT (BPCC)



BERNAS BUSINESS PARTNERS CODE OF CONDUCT

1.0 STATEMENT OF POLICY

BERNAS is committed to uphold principles of integrity, accountability and fairness in its business relationship. Accordingly, BERNAS expects its business partners to share the commitment to these principles as set out in this Business Partners Code of Conduct (BPCC).

BPCC is intended to complement BERNAS Anti-Bribery & Corruption Policy, Procurement Procedure, Dealing with Customer Procedure and BERNAS other policies and procedures.

All our business partners are expected to act in accordance with BPCC, including aligning guidelines, policies and practices, and communicating and enforcing the BPCC provisions throughout their organisation and across their supply chain.

2.0 RELATIONSHIP WITH APPLICABLE LAWS

The business partners shall comply with all national laws and all laws applicable to the business partners and its operations. Where the requirements of such applicable laws and the principles differ, or are in conflict, the business partners shall comply with the highest standard consistent with applicable laws.

3.0 COMPETITION

The business partners shall always meet competitors in an honest and professional manner. The business partners shall not cause or be part of any breach of applicable competition laws and regulations, such as illegal cooperation on pricing and illegal market sharing.

4.0 BRIBERY, CORRUPTION AND FRAUD

The business partners shall comply with applicable laws and regulations concerning bribery, corruption and fraud.

The business partners shall not offer, give, ask for, accept or receive any form of bribe, facilitation payment or undue or improper advantage, favour or incentive to/from any public official, international organisation or any other third party (either in private or public sector), whether directly or through an intermediary.

The business partners shall maintain an effective anti-bribery and corruption programme designed to ensure compliance with applicable anti-corruption laws and regulations. The programme shall be proportionate to the risks faced by the business partners and shall include procedures to monitor compliance and detect and address violations.

5.0 GIFTS, HOSPITALITIES AND ENTERTAINMENT

The business partners shall not, directly or indirectly, offer or give gifts, hospitality and entertainment to BERNAS's employees or representatives or anyone closely related to



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them. Cash or cash equivalents shall not be offered or given. Hospitality such as social events, meals or entertainments is allowed provided that such hospitality are for bona fide business discussion or meetings and not an attempt to influence business decision.

Personnel travelling on BERNAS business shall be paid (including all its related expenses) by BERNAS, unless otherwise specified in the relevant work or service contract, and such waiver must be made after obtaining prior approval from the Top Management. Hospitality, expenses or gifts shall not be offered or given in situations of contract negotiation, bidding or award.

The business partners shall not, directly or indirectly, offer or give any gifts, hospitality and entertainment to any third party, including public officials, in order to obtain or retain business or a business advantage for the business partners.

6.0 MONEY LAUNDERING

The business partners shall be firmly opposed to all forms of money laundering and shall only conduct business with partners involved in legitimate business activities with funds derived from legitimate sources. The business partners shall take reasonable steps to prevent and detect any illegal form of payments, and prevent its financial transactions from being used by others to launder money.

7.0 CONFLICT OF INTEREST

A conflict of interest may arise when a business partner's employee has a competing interest, professionally or personally, during business dealings with BERNAS. Business partners' management must avoid any actual, potential or perceived conflict of interest in their work with BERNAS.

Business partners shall disclose any suspects, actual, potential or perceived conflict of interest immediately in writing to BERNAS.

8.0 CONFIDENTIALITY

Business partners are expected to conduct all 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 BERNAS without prior written authorisation from BERNAS.

9.0 TRAINING

Business partners will be required to undertake any relevant anti-bribery and corruption training for personnel which BERNAS reasonably requires.



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10.0 AUDIT

Business partners will maintain complete and accurate books and records in relation to the scope of work under contract. These will include corporate records, time sheets, work records, supply records, accounts, receipts, invoices and other supporting documentation. Business partners will retain these books and records for at least three (3) years following the period to which they relate.

During the term of this agreement, BERNAS may at any time appoint an auditor (who may be an employee of BERNAS or a third party) to conduct an audit of the books and records of the business partners relevant to scope of work under contract. Business partners will, for the purposes of such audit, provide all reasonable assistance to BERNAS auditor.

11.0 SUB-BUSINESS PARTNERS

Business partner is required to pass on BERNAS BPCC to its sub-business partners appointed to carry out project or works for BERNAS. Business partners shall monitor its sub-business partners with respect to conformity with BERNAS BPCC.

12.0 INVESTIGATION

Business partners shall report any attempted, suspected, and actual misconduct, or any violation of or weakness in the BERNAS anti-bribery management system through BERNAS Whistleblower channel (Talian Etika).

A whistleblower reporting in good faith and based on reasonable grounds will be protected by BERNAS.

In the event of a breach of any term of BPCC, or of any suspected or actual corruption, BERNAS may institute an investigation. Any suspected or actual corruption will be reported to the authorities

Business partners will provide all reasonable assistance, information and documentation to BERNAS during the course of the investigation.

13.0 TERMINATION

In the event of any breach by business partners of this BPCC, BERNAS shall have the right to terminate the agreement with immediate effect by giving notice to business partners.

Business partners will indemnify BERNAS for any liability or loss suffered by BERNAS due to a breach by this BPCC.