

**B E S H O M**

**BESHOM HOLDINGS BERHAD**

(Registration No. 202101001114 (1401412-A))

Code of Business Ethics  
For Suppliers and  
Business Associates

## **BESHOM HOLDINGS BERHAD AND GROUP OF SUBSIDIARIES**

### **CODE OF BUSINESS ETHICS (“Code”) FOR SUPPLIERS AND BUSINESS ASSOCIATES**

Beshom Holdings Berhad and its subsidiaries (the “Beshom Group” or “Group”) is committed to conducting its businesses in a lawful and ethical manner and to driving and upholding Beshom Group’s corporate values. Similarly, Beshom Group also expects the same level of integrity, honesty, openness, and transparency being upheld by the Group’s Directors, Employees, Suppliers and Business Associates when dealing business with Beshom Group.

This Code of Business Ethics sets out the standards of ethical business practices and conduct that Beshom Group expects from all parties involved in the Group’s business, including its suppliers, vendors, agents, consultants, JV partners, associate companies and business partners as well as service providers etc (“Suppliers & Business Associates”). This Code makes reference Beshom Group’s Anti-Bribery Policy and collectively promote good and sustainable business practices (extract of this policy is available on Beshom Group’s corporate website at [www.beshom.com](http://www.beshom.com)).

#### **1. Laws and Regulations**

Beshom Group has a zero-tolerance approach to bribery and will not pay any bribes to anyone for any purpose. Beshom Group takes the upholding of its anti-bribery stance across the Group’s business seriously and expects the same from stakeholders internal and external to the Group’s businesses, extending to all the Group’s business dealings and transactions in all countries in which it operates. All suppliers and business associates must adhere to Beshom Group’s Anti-Bribery Policy.

All suppliers and business associates undertake to:

- a) not involve in fraud, bribery, corruption, extortion or any other illegal conduct in carrying out business with Beshom Group or on its behalf;
- b) not involve in any form of money laundering or terrorism financing activities;
- c) comply with all applicable laws and regulations applicable in the suppliers/ business associates’ base countries and as well as in any countries in which provision of products or services are made to Beshom Group;
- d) practice fair competition in accordance with applicable laws and to avoid activities restricting competition;
- e) not infringe intellectual property rights in relation to products or services supplied to Beshom Group;
- f) abide by any other applicable laws and regulations which may be applicable from time to time.

#### **2. Business Dealings**

All suppliers and business associates undertake to:

- a) conduct business, either with Beshom Group or on its behalf, with integrity, honestly, fairly, openly, and transparently. Information provided in the conduct of business shall be accurate and not misleading;
- b) not use any “side agreement” which is intended to circumvent an official, primary agreement or contract; or entered into between other third parties and without the consent of the parties involved in the primary agreement or contract
- c) be fully accountable for the delivery of their contractual obligations (based on formal contracts, letter of appointment, or other documentations), including the provision of services and goods, on a timely basis;

- d) protect confidentiality of information from sensitive information to personal data related to business dealings and not utilise this information for own personal advantage, directly or indirectly.

### **3. Conflict of Interest**

All suppliers and business associates undertake to:

- a) avoid situations of any actual, potential, or perceived conflict of interest. Conflict of interest situations arise when the ability to serve its contractual obligation with Beshom Group may be compromised by other external or personal interest or factors;
- b) declare any possible conflict of interest situations to related Beshom Group as soon as possible for Beshom Group to assess the situation and undertake any necessary mitigative actions.

### **4. Labour Standards**

All suppliers and business associates undertake to:

- a) take reasonable measures to ensure their employment practices do not contravene the local legal minimum working age and minimum wage in any country in which the suppliers/ business associates operates;
- b) respect the dignity and human rights of all individuals regardless of their race, age, gender, religion, country of origin, sexual orientation, marital status, disability, or political views by adopting non-discriminatory practices;
- c) not involve in the use of forced labour, trafficked labour, or child labour within its business operations.

### **5. Health & Safety and Environment**

All suppliers and business associates shall take reasonable measures to:

- a) ensure the health and safety of all its stakeholders and creating and maintaining a conducive and productive working environment;
- b) minimise the impact of business operation through strengthened efforts towards protecting the environment.

### **6. Rights to Audit Suppliers and Business Associates**

Subject to the provisions of the business arrangement with Beshom Group, the Group retains a right to audit, at its own cost and expense, its Suppliers and Business Associates in relation to adherence to this Code of Business Ethics. Suppliers and Business Associates shall co-operate and provide the Group's auditors with the information and documents required, especially if the audit is one that is required in relation to compliance with laws and regulations.

### **7. Reporting of violations of this Code**

All suppliers and business associates undertake to report the concerns on any suspects of a violation of the Code through the whistleblowing mechanism set out under the Group's Whistle Blowing Policy, which is available on Beshom Group's corporate website at [www.beshom.com](http://www.beshom.com).

No individual will be discriminated against or suffer any sort of retaliation for raising genuine concerns or reporting in good faith on violations or suspected violations of this Code. All reports will be treated confidentially.