



CENTRAL CABLES BERHAD

ASSOCIATED THIRD PARTY CODE OF BUSINESS CONDUCT

Document Code : ABC03-00



ASSOCIATED THIRD PARTY CODE OF BUSINESS CONDUCT

1. INTRODUCTION

- 1.1 All employees must ensure that all dealings with third parties are carried out consistently with values and principles of the Code, and in compliance with the applicable laws and regulations relating to bribery, corruption and fraud.
- 1.2 Central Cables Berhad expects all third parties acting for or on its behalf to have an acceptable standard of integrity in the conduct of their business.
- 1.3 Central Cables Berhad expects its employees to use good judgment and common sense in assessing the integrity and ethical business practices of third parties and therefore, has provided the below as a guideline.

2. DEALING WITH THIRD PARTIES

- 1.1 To ensure third parties share Central Cables Berhad's standards of integrity, it is the responsibility of employees to:
 - 2.1.1 undertake appropriate due diligence to assess the integrity of the prospective business counterparties. The due diligence should also take into consideration elements of corruption including bribery
 - 2.1.2 ensure all third parties are made aware of and understand this Anti-Bribery and Corruption (ABC) Policy by executing the Associated Third-Party Letter of Declaration (ATPLOD); and
 - 2.1.3 monitor the performance of third parties and business practices periodically to ensure ongoing compliance

Note: **Refer to Appendix I for Associated Third-Party Letter of Declaration**

- 2.2 Any third parties who act in a manner inconsistent with this Anti-Bribery and Corruption (ABC) Policy during the due diligence exercise or in the dealings with a third party warrant further investigation, and must be sufficiently addressed before engagement of the third party.
- 2.3 To ensure procurement activities with any contractors or vendors are in line with this Anti-Bribery and Corruption (ABC) Policy, employees shall:
 - 2.3.1 undertake appropriate due diligence of contractors and vendors before they are registered with Central Cables Berhad. Contractors and vendors known or reasonably suspected of corrupt practices or bribery should be avoided



Revision No.	: 00
Page No	: 2 of 2
Date	: 18/11/2021

- 2.3.2 ensure all contractors and vendors are made aware of, understand and comply with the relevant policies of this Anti-Bribery and Corruption (ABC) Policy; and
 - 2.3.3 monitor the performance of contractors and vendors periodically to ensure ongoing compliance
- 2.4 In the event that any contractors and vendors commit bribery or attempt to commit bribery, or act in a manner which is inconsistent with this Anti-Bribery and Corruption (ABC) Policy, Central Cables Berhad reserves the right to terminate their services.

3. DEALING WITH GOVERNMENT OR PUBLIC BODIES

- 3.1 Caution must be exercised when dealing with public officials as it is an offence for a public official to obtain any gift from any person involved in any proceeding or business transaction with him / her.
- 3.2 Offering a gratification by corrupt or illegal means to influence a public official or offering gratification for the exercise of personal influence with a public official is also an offence.

4. RECRUITMENT OF EMPLOYEES

- 4.1 Central Cables Berhad will conduct proper background checks to ensure that the potential employee has not been convicted in any corruption and / or bribery cases. More detailed background checks shall be taken when hiring employees for management positions.

Note: The guidelines and procedures on the recruitment functions are elaborated in Employee Handbook. For further details, refer to the respective People and Development personnel.



Revision No.	: 00
Page No	: 1 of 2
Date	: 18/11/2021

ASSOCIATED THIRD PARTY LETTER OF DECLARATION (“ATPLOD”)

Our company, _____ (*Company Name*) bearing Registration Number _____ (*MOR/ PKK/ CIDB/ ROS/ ROC/ ROB/ Others*), (hereinafter **“Associated Third-Party”** which includes its **Directors, officers and Employees** who intend to conduct Business Transaction(s)* with the Central Cables Berhad) hereby:

1. PLEDGES AND UNDERTAKES THAT:

- a. We have read and understood, and will comply with:
 - (i) the attached **Associated Third-Party Code of Business Conduct (“ATPCOBC”)**;
The ATPCOBC outlines the standards of behaviour required from the Associated Third-Party relating to:
 - (a) Labour & Human Rights;
 - (b) Environment, Safety & Health; and
 - (c) Ethics & Management Practices.
 - (ii) **all applicable laws and regulations relating to anti-bribery, fraud and corruption; and**
 - (iii) the following **anti-corruption principles**:
 - (a) Committing to promote values of integrity, transparency, accountability and good corporate governance;
 - (b) Strengthening internal systems that support corruption prevention;
 - (c) Fighting any form of corrupt practice; and
 - (d) Supporting corruption prevention initiatives by the Government and the local authorities;to the best of our knowledge (collectively, “The Requirements”).
- b. We will ensure our subsidiaries, affiliates and all other parties that we appoint to conduct work for the Central Cables Berhad also comply with The Requirements.
- c. We have not been convicted nor are we the subject of any investigation, inquiry or enforcement proceedings by the relevant authorities of any actual or suspected breach to The Requirements and will report any actual or suspected breach to The Requirements as soon as reasonably practicable and to the extent permitted by law, to the Central Cables Berhad.

2. AGREES THAT:

- a. In the event that we are in breach of any of the above sections, the Central Cables Berhad may immediately revoke the contract award, or terminate the contract for the Business Transaction(s)* without any liability whatsoever on the part of Central Cables Berhad to the **Associated Third Party**. This is without prejudice to any other rights or remedies that Central Cables Berhad may have or any other appropriate action which Central Cables Berhad may seek under the terms of the applicable tender/contract or applicable laws and regulations.



Revision No.	: 00
Page No	: 2 of 2
Date	: 18/11/2021

- b. Should any person attempt to solicit any bribe or advantage (whether financial or otherwise) from the **Associated Third Party** or any other person connected to the **Associated Third Party** either as an inducement or incentive to be selected or as a reward, gift or bonus for being selected in the Business Transaction(s)*, or where the **Associated Third Party** has reasonable grounds to suspect any breach of the obligations in this **ATPCOBC**, the **Associated Third Party** will report such act to Central Cables Berhad as soon as reasonably practicable.

For and on behalf of **Associated Third Party**,

Yours sincerely,

Name of Company Director (or Equivalent):
IC/ Passport No. :
Position :
Name of Company :
Company stamp :

Received & acknowledged by:

Name and IC/ Passport No. :
Position :
Central Cables Berhad

**Business Transaction(s) is (are) defined as Tenders, Quotations, Contracts, Letter of Awards and Purchase Orders.*