



KHAZANAH
NASIONAL

SUPPLIER CODE OF BUSINESS ETHICS

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“Khazanah Nasional Berhad (“Khazanah”) believes that all supplier relationships should be founded on principles of good governance such as integrity and accountability and we strongly oppose any form of bribery and corruption. These principles extend to all of Khazanah’s procurement activities. The principles are given force in this Supplier Code of Business Ethics (“Code”) which will be constantly revised to capture changes in law, reputational demands and changes in the business as appropriate. All Khazanah’s business associates are required to comply with the Code.”

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1. INTRODUCTION

- 1.1 Khazanah expects its suppliers and providers of goods and services (hereinafter to be referred to collectively as “suppliers”) to embrace the spirit of our commitment to integrity as set out in this Supplier Code of Business Ethics (“Code”). All suppliers are to adhere to the Code when conducting business with Khazanah.
- 1.2 This Code provides guidance to both Khazanah employees and suppliers on what Khazanah believes to be sustainable business relationships based on the key principles of integrity, honesty, accountability and compliance with applicable laws and regulations.
- 1.3 The word “suppliers” in the context of this Code extends to Khazanah professional service providers including advisors, consultants and other business associates in addition to suppliers of goods and other services. This Code shall apply to whatever form of entity incorporated and unincorporated, local and international.

2. COMPLIANCE WITH THE CODE

- 2.1 Suppliers should read and understand the Code and consult their Khazanah key contact if they have any questions.
- 2.2 Suppliers are responsible for self-monitoring their compliance with this Code although Khazanah will also review such compliance. If and when any situation arises that causes the supplier to operate in violation of this Code, supplier should inform its Khazanah key contact as soon as possible. Suppliers are expected to cooperate fully in any investigation.
- 2.3 Khazanah may take the necessary action for breaches of the Code which includes but not limited to termination and preclusion from proposing for any work for Khazanah for a pre-determined period. In addition, all legal rights of Khazanah are reserved notwithstanding any action undertaken by Khazanah in respect of this clause.

3. PRINCIPLES OF THE CODE

- 3.1 The principles of the Code support the core values of Khazanah and are consistent with the Red Book, which is a reference manual for procurement best practices (the details of the Red Book can be obtained from www.pcg.gov.my).

Table 1: Six Principles of the Code

1. Act with integrity	Suppliers will conduct all procurement and business relationships with integrity, respect and trust and will not disclose confidential or competitive information or data to any unauthorised party.
2. Maintain accountability	Suppliers will maintain 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 Khazanah.
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 Khazanah 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 Khazanah.
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 representation	Suppliers will provide honest and open representation of the organisation, its qualification, experience and capabilities. Suppliers will also disclose accurate references of previous work or engagements which they have undertaken.
6. Prohibit any form of gifts/ 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 gifts/business incentives to Khazanah employees and/or their families in order to obtain or maintain Khazanah's business. Suppliers should report to Khazanah if any Khazanah employees or business associates request for any such incentives During a bid or evaluation process, suppliers should refrain from entertaining or treating Khazanah employees involved 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 Khazanah's policy that employees declare internally on any gifts received.

4. RAISING CONCERNS

- 4.1 If a supplier wishes to report a questionable behaviour or possible violation of the Code (“Concerned Supplier”), a Concerned Supplier is encouraged to work with his or her primary Khazanah contact (typically a Director) in resolving a business practice or compliance concern. However, Khazanah recognises that there may be times when this is not possible or appropriate. In such instances, a Concerned Supplier should write in confidence to the Head of Governance, Risk and Compliance of Khazanah.
- 4.2 In line with the accountability principle, a Concerned Supplier should identify himself/herself when raising a concern and should also raise concern in good faith. The identity of the Concerned Supplier and the details of the concern raised will be treated as confidential and if these need to be revealed (for example during an investigation), this will be discussed with the Concerned Supplier.
- 4.3 Khazanah will not tolerate any retribution or retaliation taken by its employees or suppliers against a Concerned Supplier who has, in good faith and with a reasonable basis, sought our advice or has reported questionable behaviour and/or a possible violation.
- 4.4 Khazanah will respond to concerns received and will carefully evaluate each concern before it is referred for investigation if appropriate. Khazanah will endeavour to undertake follow-up actions on a timely basis but this may not be apparent or communicated to the Concerned Supplier due to the need for confidentiality of all parties involved in such situation.
- 4.5 The outcome of such investigation or any other follow-up actions is confidential and will be shared as and when Khazanah deems appropriate.

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COMPLIANCE CONFLICT
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MUTUAL RESPECT
ETHICAL **TEAMWORK**
TRUST **INDEPENDENCE**
PROFESSIONALISM CULTURE
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COMPLIANCE **DILIGENCE**
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