



A member of UEM 

CODE of ETHICS

for CIMA Staff

Ethics | Integrity | Accountability

Together
We Comply
Bersama Kami Patuh

VALUES

**“We are an
ENTERPRISING
entity that
embraces
TEAMWORK,
INTEGRITY and
PASSION
with a focus
on SUCCESS”**



1 ENTERPRISING

We are creative, resourceful and take calculated risk on all initiatives. We take full ownership and accountability.

2 TEAMWORK

We trust, respect, complement and support each other. We demand from each other to be better.

3 INTEGRITY

We ensure high safety standards and practices. We practice the highest ethical standards in everything we do.

4 PASSION

We love what we do and we put our heart & soul into it. We go beyond and call of duty to deliver our best.

5 SUCCESS

We continuously learn and celebrate our achievements. We win, together.

CODE 1



IN THE WORKPLACE

1. Work Culture
2. Conflict of Interest



REGULATIONS

CODE 2

1. Anti-Competition
2. Data Privacy & Protection
3. Intellectual Property & Confidential Information
4. Money Laundering & Terrorism Financing

CODE 3



WORKING WITH EXTERNAL STAKEHOLDERS

1. Bribery & Corruption
2. Gifts & Business Entertainment
3. Dealing with Government Officials & Local Authorities
4. Working with Suppliers & Business Partners

Code of Ethics



PURPOSE

Our customers, business partners, communities, regulators and stakeholders expect us to be a reliable partner. Similarly, our entire business ecosystem is built on trust.

The CIMA Group Code of Ethics ('The Code') expresses our personal commitment to build this trust every day in our business ecosystem, and it outlines ethical behaviour standards in our business activities.

SCOPE

The Code outlines ethical behaviour standards accompanied by important policy statements. The Code explains employee responsibilities and the obligation to report any potential violations and cooperate in any investigation that may follow.

This document should be read in conjunction with the **Employee Handbook**.

APPLICABILITY

The Code applies to directors, officers, and employees of the CIMA Group of Companies ('The Company'), inclusive of Subsidiaries, Operating Companies and Affiliate Companies.

The Company will use its best efforts to ensure third parties, and key stakeholders such as contractors, consultants, agents, suppliers, business partners, non-profit organisations to adhere to the Code.

START READING THE CODE IN THIS MANNER

Business principles are the internal compass for performing our work

The Code provides guidance and helps us to comply with the fundamental requirement

Watch out for common examples that should be avoided in our daily work

CODE 1



IN THE WORKPLACE

01 Work Culture

02 Conflict of Interest

WHAT WE NEED TO

KNOW & DO

Enterprising

- We understand and evaluate business / compliance risk and opportunity to ensure business sustainability.

Teamwork

- We respect each other and work as a team.

Integrity

- We choose to make ethical decisions and act with integrity.
- We are responsible for ensuring healthy and safe working conditions for all.

Passion

- We are passionate about doing the right thing, even when it is hard.

Success

- We respect diversity and we aim to celebrate our achievement together.



We live up to our values, and high standards of behavior to build trust in the workplace.
We aim to win together.



WHAT WE NEED TO

WATCH OUT FOR & AVOID

- Ignore business / compliance risk without taking appropriate measures to manage the risks.
- Discrimination based on gender, race, disability, nationality, religion and age.
- Unwelcome verbal, visual, psychological, physical or other conduct that are intimidating, offensive, abusive or hostile.
- Non-compliance with all safety laws, work rules and procedures, safety-related signs and safety equipment requirements.
- Immoral behaviour and criminal activities such as gambling, indecency, obscenity, vulgarity, pornography, threats and violence, possession of illegal items.
- Harmful or hazardous use of psychoactive substances including alcohol and illicit drugs that affects our health, and productivity at work.
- Make unethical decisions that disrupt operations and put the Company at risk.

WHAT WE NEED TO

KNOW & DO

- We operate and make business decisions in the best interest of the Company and we must avoid situations where there may be real, potential or perceived conflict of interest.
- A conflict of interest arises when the Company's interests and our personal interests collide.
- All Board Members and employees must declare all such interests upon joining the Company, on an annual basis and as and when a potential conflict may arise.
- If we find ourselves in a situation of conflict before the annual declaration exercise, we must declare it in writing within five (5) business days.
- We must abstain from participating in decision making or involve in activities that are hindering us from acting in the best interest of the Company.

“ We act in the best interest of the Company, and we avoid any activities that might damage the reputation of the Company. We declare promptly any interests that might be perceived as affecting our decision-making process. ”

WHAT WE NEED TO

WATCH OUT FOR & AVOID

- Make or influence decisions in preference to our personal interests or the interests of our family, associates or friends instead of the interest of the Company.
- Set up or work for a company that competes directly with the Company (e.g., offering similar services or serving similar clients) while on a full-time employment with the Company.
- Engage directly or indirectly in other forms of employment, even on a part-time basis.
- Hire or supervise our relatives or someone we have a close and intimate relationship with.
- Use the Company's resources, intellectual property or confidential information for personal benefits or benefits of family.
- Be an officer or director of a non-profit organisation that might obtain funding or support from the Company.
- Involve in commission or omission of any act that gives undue advantage to external party in its dealings with the Company.

CODE 2



REGULATIONS

- 01 Anti-Competition
- 02 Data Privacy & Protection
- 03 Intellectual Property & Confidential Information
- 04 Money Laundering & Terrorism Financing

WHAT WE NEED TO

KNOW & DO

- We must seek competitive advantage through lawful means while driving the success of our business.
- Companies that are considered dominant should not abuse their position. We should put in place necessary procedures if our companies are viewed as dominant in a given market.
- We have a responsibility to understand and comply with Competition Act 2010 (Competition Act) and other relevant laws and regulations.



We aim to compete fairly in the marketplace, and we are committed to comply with competition laws everywhere we operate.



WHAT WE NEED TO

WATCH OUT FOR & AVOID

- Enter into exclusive arrangements or non-competition agreements to prevent, restrict or distort competition in the market.
- Bid-rigging or boycotts.
- Directly or indirectly impose unfair purchase or selling price or other unfair trading condition on any supplier or customer.
- Refuse to supply to a particular company or group of companies.
- Discourage new market entry or expansion or investment by an existing competitor.
- Force an existing competitor out from the market or seriously damage it, where the existing competitor is no less efficient than the dominant enterprise.

WHAT WE NEED TO

KNOW & DO

- We respect privacy and protect Personal Data obtained with consent in the course of our business as required by the Personal Data Protection Act 2010 (PDPA).
- We must endeavour to keep Personal Data accurate and up to date.
- We must ensure that we collect, use and retain Personal Data to only minimum amount necessary for business needs. Disclosure is only on a need-to-know basis.
- In the event of transferring Personal Data to third parties, extra care and diligence must be taken to avoid risk of causing harm to individuals. Where consent is required under local laws, we must obtain consent for the purpose.
- We must ensure all Personal Data is disposed of when no longer required in accordance with the Company's retention policy.



We respect privacy and we take appropriate safeguards to protect personal data against unauthorised use or disclosure.



WHAT WE NEED TO

WATCH OUT FOR & AVOID

- Obtain, store, transfer, or use Personal Data without a legitimate business purpose.
- Non-compliance with the Personal Data laws requirements in transferring personal data to jurisdictions outside of Malaysia.
- Unnecessary Personal Data not being shredded and destroyed.
- Improper procedures in transmitting, processing or storing personal data in protected environments.
- Leave personal, employee, customer, and vendor data at a printer, on a shared server, or on a publicly accessible site.
- Disclose Personal Data to any unauthorised persons or organisations.

WHAT WE NEED TO

KNOW & DO

- We are committed to protecting our Intellectual Property ('IP') such as trademarks, copyrights, patents, trade secrets, and other proprietary information.
- We respect the IP of our customers, business partners, competitors and other external parties.
- We must safeguard confidential information of the Company and we are only allowed to disclose the information to third parties who have signed the non-disclosure agreements.
- We are committed to a clean desk culture and keep our working desks free from sensitive content at all times.
- At the end of working day and at known extended periods away from our working desks, we shall keep all confidential information in hardcopy or electronic secured.
- We abide by all applicable laws on insider trading and on securities market abuse.

“ Our investments in intellectual properties are valuable assets, and we actively protect our intellectual property.

We respect the valid intellectual property and confidential information of our stakeholders in the business ecosystem. ”

WHAT WE NEED TO

WATCH OUT FOR & AVOID

- Usage of devices or tools that are alleged to infringe the intellectual property of others.
- Give license, rights, or access to our IP or other information without authorisation.
- Disclose, divulge or discuss confidential information of the Company with external parties or in public area, or on social media.
- Leave confidential information unattended, or unsecured including leaving Company's laptop unsecured or unattended in office or in public areas.
- Share passwords with your colleagues or external parties.
- Involve in insider trading activity or use any non-public information of the Company obtained in the course of our duty for own benefit or for the benefit of others.
- Involve in spreading false information or engage in activities to manipulate the market.
- Retain confidential information after leaving the Company's employment.

WHAT WE NEED TO

KNOW & DO

- We are committed to comply with Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 ('AMLATFA').
- We must conduct due diligence to understand the business and background of our business partners.
- We do not aid in money laundering and terrorism financing activities.

“ “ Money laundering and terrorism financing are financial crimes with economic effects. We take appropriate measures for detecting and preventing money laundering and terrorism financing ” ”

WHAT WE NEED TO

WATCH OUT FOR & AVOID

- Red flags on the third parties' reputation.
- Third parties who are reluctant to provide detailed information about their businesses.
- Inability to verify documents during the due diligence process.
- False documentations provided by the third parties.
- Suspicious transactions / funds from locations of concern.
- Unusual requests to split total payment in several separate transactions.
- Transactions that are unusual, and non-transparent.
- Transactions that are not conducted on a face-to-face basis.
- Ambiguous recipients of funds.
- Large cash transactions.

CODE 3



WORKING WITH EXTERNAL STAKEHOLDERS

- 01 Bribery & Corruption
- 02 Gifts & Business Entertainment
- 03 Dealing with Government Officials & Local Authorities
- 04 Working with Suppliers & Business Partners

WHAT WE NEED TO

KNOW & DO

- We develop business relationships free of corruption and bribery.
- We are committed in conducting our business in an open, transparent, honest and ethical manner.
- We and our business partners must comply with applicable anti-bribery and anti-corruption laws.
- We must not offer or accept bribes or kickbacks and must not participate in or facilitate corrupt activity.
- We do not allow facilitation payments to gain access, secure or expedite the performance of a routine function.
- The requirements of this section apply to all stakeholders.
- If we want to raise concern or feel uncertain on any integrity issue, please contact the Head of Governance, Risk & Compliance Department.



It is our policy to conduct all our businesses in an honest and ethical manner and we take a zero-tolerance approach to bribery and corruption.



WHAT WE NEED TO

WATCH OUT FOR & AVOID

- Make or accept bribes either in the form of cash or non-cash as an inducement to gain any commercial, contractual, regulatory and / or personal advantages:
 - Hospitality
 - Entertainment
 - Gifts such as branded accessories, jewelry, gadgets
 - Holidays and travel packages
 - Cruises
 - Tickets to sporting events
 - Shares / securities
 - Debts write-off
 - Special 'discounts'
 - Massages terms & padding' of contracts
 - Medical check-up at prestigious hospital
- Make facilitation payments as an incentive for relevant authorities to complete some action or process expeditiously.
- Offer business or employment opportunities for personal benefits or for the benefit of third party prior to the awarding of contract.

WHAT WE NEED TO

KNOW & DO

- We are committed to a '**No Gift Policy**'. We do not accept or receive or offer or provide gifts.
- We and any of our immediate family members must not accept any form of gifts or favours or gratuities or kickbacks from current or potential vendors, contractors, suppliers, clients, or any other party.
- We may accept or offer:
 - Modest and reasonable business meals or refreshment provided during a business meeting with legitimate business reasons.
 - Inexpensive token of appreciation after a presentation or speaking engagement.
- The most senior person from the Company in presence shall pay for the business meals.

“ Our business decisions should never be based on gifts and entertainment provided through our business relationships. We do not solicit or receive gifts and business entertainment from any third party ”

WHAT WE NEED TO

WATCH OUT FOR & AVOID

- Give or accept cash or any form of gifts.
- Accept lavish meals or entertainment or paid holiday from the current or potential vendors, contractors, suppliers, clients or government agencies.
- Accept personal services that may put ourselves in a position of conflict or influence our decision.
- Ask a representative, such as business partners, agent, or sub-contractor to give gifts, hospitality, or travel on our behalf.
- Accept or offer products / services at discounted rates that are not made available to the general public.
- Give donation for a charity or organisation to induce decisions in favour of our business.

WHAT WE NEED TO

KNOW & DO

- We strive to protect the Company's interests through lawful and transparent advocacy with the government and local authorities.
- We comply with the applicable laws and regulations in all countries in which we operate.
- Employees can participate as individuals in the political process on their own accord, own volition, own time, and with own resources. Political opinions are personal opinions and must not represent the Company.
- Those who wish to hold a position as an office bearer in any political party must disclose and obtain approval from Head of Human Resource & Administration Department.

“ When interacting with the officers, we follow high ethical standards and act in a transparent manner while maintaining good working relationships. ”

WHAT WE NEED TO

WATCH OUT FOR & AVOID

- Not providing information to the officers when they have a right to such information in line with the local relevant laws and procedures.
- Provide donations to charities or organisations that may be afflicted with the officers.
- Pay facilitation fees for 'fast' clearance of goods and services.
- Authorise a third party to make payment to expedite a service on our behalf.
- Non-compliance with the public procurement or tender process.
- Offer gifts, hospitality, entertainment or travel to the officers or their families beyond our policies and procedures.

WHAT WE NEED TO

KNOW & DO

- We engage a third party for services only if there is a genuine business need, and only in the necessary amount.
- We do business only with suppliers and business partners who share our values and our commitment in ethics and integrity and comply with our Policies and all applicable legal requirements.
- We conduct due diligence to understand the business and background of our suppliers and business partners before agreeing to appointment.
- It is important that we choose to work or engage suppliers and business partners who do not cause reputational damage to the Company.
- We are accountable for the works or services delivered by our suppliers or business partners.



We want to work with suppliers and business partners who have similar values as us and uphold the same standards as we do.



WHAT WE NEED TO

WATCH OUT FOR & AVOID

- Suppliers or business partners implicated in bribery acts.
- Suppliers and business partners without proper selection and due diligence process.
- Suppliers or business partners that resist our standards and requirements, such as Code of Ethics, Anti-Corruption Guidelines, Health and Safety and the Environment Policy.
- Suppliers and business partners that do not address concerns, take corrective actions pro-actively, or highlight audit findings in a timely manner.
- Suppliers and business partners owned or controlled by government officials who claim that it can exert an improper influence over the decision making of the government and / or its officials.

RAISING CONCERNS


- You are obligated to raise a concern promptly should you become aware of a potential or suspected violation of the Code or any Policies or applicable laws and regulations.
- Violations of our Code of Ethics erodes the trust we have built with our shareholders, customers and other stakeholders.
- By raising concerns promptly, you are taking prompt action to tackle the causes of concern and manage reputational risk.
- The Company will not tolerate any adverse action against an employee who raises a concern in good faith.

REPORT YOUR CONCERNS

 Online reporting system through **Secured Postbox**;

Welcome to Secured Postbox 

 Email to whistleblower@cima.com.my

 In writing to the **Chairperson of CIMA Board of Directors Audit & Risk Committee**, either by **email** at arc.chairman@cima.com.my or by **letter** passed through the **Company Secretary**