

VENDOR CODE OF CONDUCT (VCOC)

INVEST ENERGY Group of Companies ("INVEST ENERGY" or "Company") has established conduct standards for its business relationships that reflect our shared values of excellence, decorum, teamwork, integrity, innovation, quality, and transparency. INVEST ENERGY expects its vendors to share and embrace our commitment to regulatory compliance.

While vendors are independent entities from INVEST ENERGY, the business practices and actions of a vendor, when conducting business with or on behalf of the Company, may significantly affect and reflect our Company. Therefore, INVEST ENERGY expects all vendors and their employees, agents and subcontractors to abide by our high ethical standards set forth in this Vendor Code of Conduct ("VCOC") guidelines, while conducting business with us or on our behalf.

1. The VCOC applies to all Vendors supplying goods and services to INVEST ENERGY Group of Companies.
2. As reflected in the INVEST ENERGY's VCOC, INVEST ENERGY is committed to high standards of integrity and sustainability. INVEST ENERGY has a "zero tolerance" policy when it comes to unethical business behaviour, such as bribery, corruption, and forced labour. We expect all of our vendors to adhere to similar standards and to conduct their business ethically.
3. As vendors of INVEST ENERGY, you must comply with all applicable laws and regulations, the requirements set out in this VCOC and your respective contractual obligations to us.
4. This VCOC defines the main principles underlying your business activities as one of our vendors. The following three (3) principles ensure sustainable development in our supply chain:
 - i. Environment
 - ii. Social
 - iii. Governance & Ethics

i. Environment

Safety, Health and Environmental

- Vendors shall be responsible for the safety of all persons who may be affected by the activities and shall comply with the company's safety regulations and procedures.
- Vendors shall ensure that all works undertaken comply with all the safety, health and environmental regulations and guidelines of Malaysia at all times.
- Vendors shall comply with all applicable Local Authority's requirements and regulations. Permits and records shall be obtained, kept and properly recorded.
- Vendors are encouraged to supply less environmentally and socially damaging products which take into account all phases of the products lifecycle i.e. production, transportation, maintenance and disposal.

ii. Social

Professional Conduct

- Vendors shall respect the personal dignity, privacy and rights of each individual.
- Vendors shall not engage or be involved in any type of harassment and violence.
- Vendors shall avoid prohibitive behaviour including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.
- Vendors shall not engage or be involved in any activities that may be categorised as a crime that is punishable under any Malaysian laws.

Wages & Working Hours

Vendors shall ensure that their employees are fairly compensated and that, at a minimum, they comply with all applicable wage and hour laws, or industry standard.

Labour Standards & Protection

Vendors shall ensure fair labour condition and all immigration regulations in Malaysia are adhered to with respect to the employment and work permits of their employees.

Community Engagement

Vendors are encouraged to help foster social and economic development and contribute to the sustainability of the communities within which it operates.

iii. Governance & Ethics

Anti-Bribery & Corruption

- Vendors must conduct business in ethical manner.
- Vendors shall not engage or be involved in any forms of bribery or corruption. The offer of a bribe or other inducement to any person with the view to influence the placing of the order/contract will result in the instant rejection of any purchase/tender.
- Vendors shall comply with all applicable laws and regulations and to avoid practices that may be considered as bribery, corruption and prohibited business practices under Malaysian law.

Maintain Accountability

Vendors shall maintain full accountability for services rendered / goods supplied and honour their commitments on a timely basis and in accordance with their obligations under the specific agreements and undertaking with INVEST ENERGY.

Fair Dealings & Integrity

- Vendors shall conduct all procurement and business relationships with honesty, integrity, respect and in a fair manner.
- Vendors shall endeavor to deal fairly and should not take unfair advantage of anyone through the manipulation, concealment, abuse of privileged information, misrepresentation of material fact or any other unfair business practices.

Intellectual Property Rights

Data of any kind, such as sketches, models and the like shall be returned to INVEST ENERGY as soon as they are no longer necessary for the completion of works.

Gifts & Entertainment

- Vendors are not permitted to offer or sponsor any social entertainment or personal trips for employees.
- During a tender / RFQ process, vendors shall refrain from entertaining or treating any INVEST ENERGY employee involved in the evaluation of the tender or RFQ by offering special invitations to travel.
- This prohibition of offering gifts and entertainment includes offering the same to the family members of INVEST ENERGY employee.

Honest Representation

- Vendors shall provide honest and open representation of their organisation, their qualifications, experience, and capabilities.
- Vendors shall disclose accurate references of their previous work or engagements that have been undertaken.

Conflict of Interest

- Vendors must make a disclosure on any interest held in their business by an employee of INVEST ENERGY.
- Vendors shall declare any potential or actual conflicts of interest to INVEST ENERGY even if the discovery is made after their appointment, and/or to immediately address the conflict as soon as it is known or discovered.
- If in doubt of the existence of a conflict, vendors shall highlight the potential conflict to INVEST ENERGY immediately.

Confidentiality of Information & Data Protection

- Vendors shall undertake that all confidential information disclosed, given access to, procured, gathered, collected, received, or handled shall not be made available to any third party without the written consent of INVEST ENERGY.
- Vendors shall not make use of the INVEST ENERGY name or the name of an employee of the company for publicity purposes without the written consent of the parties.

INVEST ENERGY looks forward to hold regular engagement sessions with its vendors in order to achieve compliance to this VCOC and to understand the concerns of the vendors. Should vendors have difficulty in implementing the requirements of the VCOC, INVEST ENERGY is willing to work with them towards achieving full compliance.

Self-Assessments

INVEST ENERGY reserves the right to request vendors to self-assess their compliance by answering questionnaires on the matter.

On-site Audits

INVEST ENERGY and/or an authorised third party acting on our behalf may verify compliance to the VCOC on-site.

Reporting of Improper Activities / Whistle Blowing

Any irregular business dealings between vendors and employees or any third party must be reported directly to INVEST ENERGY.

I/We confirm that I/we have read the Vendor Code of Conduct and agree to abide by the code.

Signature & Company Stamp

Name:

Designation:

Date: