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# **Code of Business Ethics**

**2.0**

**W.E.F 08 December 2025**

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	<b>URUSHARTA JAMAAH SDN BHD</b>	<b>GRC Department</b>	
		Doc No: UJ/GRC/L1-POL/004	Rev No.: 2.0
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### VERSION CONTROL

**Department : Governance, Risk, and Compliance Department**


**Revision : Version 2.0**

Version	Status	Date of Approval	Remarks
1.0	Approved by the Board	11 December 2020	New Policy
2.0	Approved by the Board	08 December 2025	Standardisation Template - ABMS

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### AMENDMENT LOG

Version No.	Section	Page No.	Brief details
1.0	All	All	
2.0	All	All	Editorial Changes including formatting
	Abbreviations	vi	Added item – GHET, MACC Act and PDPA
	1.0 – Introduction	1	Refinement item 1.1
	2.0 – Responsibilities Regarding The Code Of Business Ethics	3	Addition to item 2.2 (g)
	10.0 – Fighting Bribery and Corruption	30	Added item 10.3
	12.0 – Records	30	Added new section
	13.0 – Review of the Code	30	Refinement
	Appendix		Addition of Appendix II – Integrity Pact

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## Foreword

The vision of Urusharta Jamaah Sdn Bhd (“UJ”) is to be a responsible asset management company, delivering sustainable and continuous growth. UJ in the carrying out of its operating and business activities strives to continuously achieve superior financial and operating results while carefully adhering to its “Code of Business Ethics”.

In line with its position as a company wholly owned by the Minister of Finance Incorporated and in pursuit of its continuous efforts to maintain a high level of competency, transparency and integrity in its day-to-day management and business undertakings, we recognize that employees are the Company’s greatest strength. The resourcefulness, professionalism and dedication of every employee and representative of the Company will ensure that UJ remains competitive in the short term and be well positioned for sustained and continuous success in the long term.


As employees of UJ, we are responsible for developing and implementing ideas and actions designed to achieve the Company’s objectives. The methods we employ to attain such results however are just as important as the results themselves. As such, the Company expects that its employees and representatives observe the highest standards of integrity, professionalism and fairness in the conduct of UJ businesses.

To realise this noble aspiration, it is most pertinent that each of us within the ecosystem conduct business the right way – with honesty, integrity and professionalism in all dealings with stakeholders including amongst ourselves.

This Code of Business Ethics sets forth important policy statements that deal with UJ standards of business conduct. UJ’s reputation as a responsible corporate citizen depends on the complete understanding of and compliance with these policies by all its employees. It is essential for everyone to understand and abide by the requirements of the Code.


The Code itself is continuously reviewed in accordance with changes in laws and practices as well as to ensure its continued suitability and relevance to the Company’s current organizational needs. This Code has been established with a view of providing clear guidance on our ethical obligations when conflicts arise between business ethics and organizational demands.

Thank you.


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## ABBREVIATIONS

<b>Abbreviations</b>	<b>Definition</b>
ABAC	: Anti-Bribery and Anti-Corruption;
GHET	: Gifts, Hospitality, Entertainment and Travel;
MACC Act	: Malaysian Anti-Corruption Commission Act, 2009;
PDPA	: Personal Data Protection Act, 2010; and
UJ or “the Company”	: Urusharta Jamaah Sdn. Bhd.

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## GLOSSARY

<b>Term</b>	<b>Definition</b>
Assets	: means tangible or intangible resources controlled by the Company as a result of past transactions or events and from which future economic benefits are expected to flow to the Company;
Business Partners	: means a person or entity, which UJ has engaged with or entered into a procurement process of acquiring supplies of goods and services in order to fulfill, among others, the Company's strategic and operational needs. A Business Partner may include but is not limited to suppliers, service providers, contractors, sub-contractors, vendors, consultants, representatives, and others acting for or on behalf of UJ;
Competitors	: means persons or entities that render the same or very similar services or supply the same or similar products in any one or a number of business environments;
Conflict of Interest	: means any actual or perceived conflict of interest. A conflict of interest arises where an Employee has a personal interest that could be seen to have the potential to interfere with their objectivity in performing their duties or exercising their judgment on behalf of UJ;
Customers	: means persons or entities to which UJ provides and render services;
Employees	: shall encompass all Company personnel including the Chief Executive Officer, executives and non-executives employees under the employment of the Company;
Ethics	: refers to standards of conduct, which indicate how to behave, based on moral duties and virtues arising from principles on right and wrong. Ethics involve two aspects namely the ability to distinguish right from wrong and the commitment to do what is right;
Gratification	: shall have the meaning as assigned to it under the Malaysian Anti- Corruption Commission Act 2009 (Act 694);
Information	: shall mean all communications and all information whether written, visual or oral and all other materials (i) supplied to the Employee during the Employee's employment with UJ, (ii) relating to any invention, improvement, report, recommendation or advice given to UJ by the Employee in pursuance of his employment with UJ, and (iii) concerning the business,

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associations, transactions or financial arrangements of UJ with any other persons or bodies, including other technical or commercial cooperation agreements;

**Inside Information** : shall mean any general or specific information that is not generally available which on becoming generally available, a reasonable person would expect it to have a material effect on the price or value of listed securities;

**Inventions** : shall mean all patentable and non-patentable inventions, discoveries and improvements, processes and know-how, copyright works (including without limitation computer programs), new designs or the like discovered or created by any employee in the course of or for the employment or discovered or created by the Employee as a result whether directly or indirectly of anything done by the Employee in pursuance of his duties with UJ and/or (as the case may be) based whether directly or indirectly on any item of the Information;

**Management** : shall mean members of the Management Executive Committee (MEC) and Heads of Departments;

**Proprietary Information** : refers to information held by a person or entity concerning the know-how, trade secrets or other information of any kind, whether in printed or electronic format, including but not limited to intellectual property rights, technical information, business processes, customer lists or potential customer information, financial records or operations which is regarded as being confidential in nature (whether or not labelled as confidential or strictly confidential) and belongs to and owned by UJ;


**Relative or Relatives** : shall have the same meaning given to definition of “relative” under the Malaysian Anti-Corruption Commission Act 2009 (Act 694);

**Senior Management** : shall mean members of the MEC;

**Sexual Harassment** : shall mean any unwanted conduct of sexual nature having the effect of verbal, non-verbal, visual, psychological or physical harassment that might, on reasonable grounds, be perceived by the recipient as placing a condition of a sexual nature on his or her employment or as an offence or humiliation or threat to his / her well-being, but has no direct link to his/her employment;

**Strictly Confidential and Confidential Information** : shall include:

a) any information in any form whatsoever not generally known, and proprietary to UJ including but not limited to information relating to their processes, operations, trade, products, research, development, purchasing, business, business

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prospects, transactions, affairs, activities, know-how, intellectual property, accounting, finance, planning, Customers, technology, marketing, merchandising and selling, proprietary trade information, payroll figures, personal data of Employees, Customers' list, records, Agreements and information, technical and other related information, and any books, accounts and records kept by UJ for the purpose of its business;

- b) all information disclosed to the Employee or to which the Employee obtains access during his tenure which he has reason or ought to have reason to believe to be Confidential Information and this shall be presumed to be Confidential Information and this shall include (but shall not be limited to) price lists, business methods, records, information and inventions; and
- c) any such information as described in a) and b) above which relate to any of UJ Suppliers and Business Partners; and

**Suppliers** : shall mean persons or entities that provide products and/or render services of any nature to the Company.

In this Code, unless the context requires:

- a) The headings in this Code are for convenience only and shall not be deemed to be part hereof or be taken into consideration in the interpretation of this Code;
- b) A reference to any statute, regulation, proclamation, ordinances or by-law amending, consolidating or replacing them and a reference to a statute includes relevant regulations, proclamations, ordinances, by-law issued under that statute and any other re-enactment made thereof;
- c) Words importing the singular include the plural and vice-versa; and
- d) Words importing a gender include any gender.

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## 1. INTRODUCTION

### 1.1 Objective

The Code of Business Ethics (hereto referred as “the Code”) forms part of UJ initiatives to promote good corporate governance practices within the Company by instilling, internalizing and upholding our shared Core Values of “INTEGRITY, PROFESSIONALISM and FAIRNESS” in our corporate culture.

The objective of the Code is to support our Core Values by informing the Management and Employees and all other stakeholders of the Company of acceptable and unacceptable business conduct and behaviour.

This Policy is to be read together with the following policies: -


- a) Asset Declaration Guidelines;
- b) Conflict of Interest Policy;
- c) Anti-Bribery Anti-Corruption Policy;
- d) Chinese Wall Policy & Personal Account Dealing;
- e) Disciplinary Guidelines;
- f) Procurement Policy; and
- g) Sponsorship & Donation Policy.

### 1.2 Scope

The scope of the Code covers all Employees and other authorised representatives of the Company and Business Partners including subsidiary and/or joint venture companies who are required to ensure compliance with the Code at all times.

The policies in the Code are applicable across the Company and communicate a set of rules and principles aimed at governing the business conduct and relations of UJ Employees, its Suppliers and all other Business Partners. It is meant to provide guidance for, among others, the identification, management and resolution of ethical issues one may encounter in undertaking their respective roles and responsibilities for the Company.

The Company may have more specific internal policies and guidelines whose requirements exceed those mentioned in the Code; the same may be true of local

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law, rules and regulations. In all instances, one must follow the stricter policy, practice or law.

The Code is not meant to be an exhaustive document but serves to act as a baseline guidance, or otherwise minimum thresholds which if read in isolation, may not necessarily be adequate. As such, Employees are reminded to ensure that the Code is read and applied together with all other applicable internal policies and guidelines and subject always to the relevant local laws, rules and regulations. In the event the applicable local law conflicts with the Code, but permits different alternatives, one must choose the option most closely aligned with the Code requirement. If in doubt, please contact the department primarily in charge of legal or human resource matters for guidance.


To ensure the Code maintains its relevant application for the Company, the Code may be reviewed, changed and updated from time to time in keeping with any new developments in business practice, environment and legal requirement. Therefore, Employees and other representatives of the Company are required to be apprised of and familiar with all developments and updates pertaining to the Code and its contents.

### 1.3 Compliance with the Code

All Employees and other representatives of the Company have a responsibility to understand, apply and comply with the requirements of the Code and to ensure that it is read together with all other internal and external legal requirements. Violation of the law or the Code or other policies of the Company could result in disciplinary action, which may include action leading up to and including termination or dismissal.

In the event the internal policies and guidelines of the Company are in conflict with the Code, the policies contained in this Code shall take precedence and prevail to the extent of such conflict.

***“Under rare and exceptional circumstances, Employees and other representatives of the Company may seek for a waiver from a specific provision of the Code. Approval for any such waiver must be sought in advance and prior to any such act, and may be granted only by the Chief Executive Officer of the company. Where a waiver has been granted, the Chief Executive Officer shall ensure that appropriate controls are in place to protect the Company.”***

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## 2. RESPONSIBILITIES REGARDING THE CODE OF BUSINESS ETHICS

### 2.1 Responsibilities of Management

- a) To ensure that all Employees under Management's supervision and control, receive a copy of the Code and sign an acknowledgement of receipt, whether during the course of employment or for new Employees, upon the Employee reporting for duty;
- b) To ensure that Employees are conversant with the Code, including by way of providing guidance for new Employees and ensuring there are regular and sufficient training opportunities available including on ethical behaviour and legal compliance, relevant and applicable to the Employees job responsibilities, from time to time;
- c) To ensure that all of the Company's standards, policies and guidelines comply with the Code and are communicated and disseminated accordingly to all Employees;
- d) To report any violations of the Code up through the chain of command;
- e) To ensure that all ethical matters that are unable to be sufficiently resolved in a timely manner, are properly escalated to the appropriate level;
- f) To ensure that every Employee completes the Annual Declaration of Assets form and the Certificate of Acceptance of this Code (where applicable); and
- g) To ensure that a record is maintained of all Declaration of Interest and Assets forms received from Employees, and that these records are stored securely and safely to preserve its confidentiality.

### 2.2 Responsibilities of Employees

- a) To read, understand and comply with the requirements of the Code and ensure that all roles and responsibilities are conducted with integrity, professionalism and fairness and always in a competent and professional manner;
- b) To abide by the requirements and expectations of behaviour embodied in the Code and in the Company's internal policies and guidelines and subject always to all other relevant and applicable legal requirements;
- c) To keep updated of any changes pertaining to the Code and its requirements and to comply with such changes;
- d) To seek advice and information in relation to the Code, including from direct supervisors, Management, or from the Company's department

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primarily responsible for risk or human resource matters, as and when needed. Employees must understand that ignorance of the Code will not be an excuse for any breach of the requirements of the Code;

- e) To report any violation of the Code to Management or through other channels provided by the Company as appropriate, including the Company's Whistleblowing Policy;
- f) The onus is on the concerned Employee to annually complete and submit a new Declaration of Assets form together with the Certificate of Acceptance of this Code; and
- g) To perform annual Integrity Pact attestation.

### 3. OUR DEALING WITH EMPLOYEES

#### 3.1 Respect for the Individual

UJ strives to provide a healthy and responsible work environment wherein all Employees are treated fairly and with respect.


The Company expects all Employees to treat one another with respect and fairness and in a manner consistent with how the Employee themselves wishes to be treated. The Company is committed to promoting and respecting diversity among its Employees and understands the value and benefit of having a competent and diverse workforce.

UJ is also committed to ensure that all personal information of its Employees remain private and confidential. Access to and knowledge of Employees' records is strictly restricted to authorized personnel in the Company, who require the information for approved legitimate purposes, and on a purely need to know basis only.

#### 3.2 Harassment

Abusive, harassing or offensive conduct will not be tolerated, whether verbal, physical or visual. Examples include derogatory comments based on gender, religion, racial or ethnic characteristics and unwelcome sexual advances.

The Company does not tolerate any forms of sexual harassment and will ensure compliance with any prevailing Human Resource Policy on Sexual Harassment and Act A1419, Employment (Amendment) Act 2012, Part XVA, Sexual Harassment.

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All Employees are encouraged to speak out when the conduct of other Employees results in the affected Employee feeling uncomfortable, and to report any form of harassment immediately to Management.

### **3.3 Safety, Health and Environment**

Employees are all collectively responsible for maintaining a safe workplace by following the safety, health and environment rules and practices. All Employees have a responsibility to immediately report accidents, injuries, and unsafe equipment, practices or conditions to Management for the necessary onward action and escalation. UJ is committed to keep its workplaces free from hazards.

In order to protect the safety of all in the Company, each Employee shall be responsible to report to work, free from the influence of any substance that could prevent the Employee from conducting work activities safely, effectively and in good health. Wherever necessary, the Company shall ensure that the Employee is sufficiently equipped with the necessary tools and equipment, to carry out the required duties and responsibilities.

The onus is on the Employee to declare immediately any dangerous / contagious disease, e.g. AIDS, SARS, etc., that he / she is afflicted with to Management, for onward escalation and action.


### **3.4 Drugs, Alcohol and Prohibited Substances**

Employees are strictly prohibited from being involved in or participating in activities involving the use, possession, distribution or sale of illegal drugs, alcohol or prohibited substances including while on Company premises, in Company vehicles or while conducting Company businesses.

Employees are strictly prohibited from conducting or undertaking any UJ business while under the influence of drugs, alcohol or any other prohibited substances. Employees suspected to be under the influence of illegal drugs, alcohol or prohibited substances shall be required to undertake a special test at authorized Company clinics or designated government clinics or hospitals. Positive test results or refusal to comply with the required test or medical procedures, is grounds for disciplinary action including termination.

### **3.5 Weapons**

Unless licensed or otherwise duly authorized, Employees are strictly prohibited from the possession of any weapons or illegal materials or equipment, imitation or otherwise, including but not limited to firearms, explosives or knives including

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while undertaking Company business, while on Company premises or while using Company assets.

### **3.6 Threats and Violence**

Threats or acts of violence or physical intimidation are prohibited. Any Employee who has any knowledge of the prohibited conduct or has concerns regarding his/her safety or the safety of a colleague, Customer or Business Partner must immediately report the matter to Management.

### **3.7 Immoral Activities**

Employees shall not engage or be involved in any immoral behaviours and activities such as gambling, indecency, obscenity, vulgarity or other vices throughout their tenure of employment with the Company.

Employees are strictly prohibited during business hours, or otherwise, from using Company assets or premises to be involved in acts of pornography, displaying or viewing pornographic materials and/or for any other illegal or immoral activity(ies).

Any violation in this regard shall be dealt with in accordance with the Company's disciplinary policies and procedures.

### **3.8 Criminal Breach of Trust**


Employees who have been trusted with property or dominion over property shall not commit a criminal breach of trust in violation of any law of the country in which the business is conducted.

In the context of Malaysian law, criminal breach of trust is fully defined under the Penal Code (Act 574).

### **3.9 Subversive and Other Criminal Activities**

Employees must at all times uphold the good name and reputation of UJ during and after office hours, throughout their tenure of employment with the Company. Employees shall not engage or be involved in any behaviours or activities that may be categorized as subversive, or which has the potential to bring the Company into disrepute, or to commit any criminal offence punishable under the law.

In the event an Employee is found guilty by any court of law and/or is found to be involved in subversive activities or criminal offences that may be detrimental to the image and reputation of UJ, he/she shall be dealt with under the

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Company's disciplinary policies and procedures and also liable in the court of law.

### **3.10 Offences Relating to Racial and Religious Harmony**

UJ is committed to providing a safe, healthy and productive working environment for all its Employees. As such, all Employees are responsible to ensure that they do not by words (written or spoken), sign, visible representation or any act, activity or conduct, cause disharmony, disunity, or feelings of enmity, hatred or ill-will or prejudices within the Company, nor attempt to prejudice the maintenance of harmony or unity on grounds of religion or race.

### **3.11 Employees Giving Evidence in Court**

Employees who are subpoenaed or required to give evidence in court in any legal proceedings regarding any matter involving and/or related to the Company, are required to notify their immediate superior for escalation to Management for consultation with the Chief Executive Officer and the department primarily in charge of legal related matters, prior to the making of any such disclosure.

In order to be properly mandated and advised on the matters required to be disclosed in the court of law, an Employee who is subpoenaed or required to testify and / or to provide information on evidence, as referred to the above, represents UJ in the matter, and such Employee who testifies and or provides information without consulting with their immediate superior and the department primarily in-charge of legal related matters shall be subjected to disciplinary actions which may include dismissal.


## **4. OUR DEALING WITH CUSTOMERS**

UJ gives its commitment to serve its Customers professionally and with high standards of service level quality as outlined below.

### **4.1 Total Commitment to Customers**

Employees are expected to, in dealing with its Customers:-

- a) to be proactive in dealing with Customers' needs and strive to exceed Customers expectations in a manner that is reasonable and appropriate;
- b) to be sensitive to Customers' needs and requirements; and
- c) to be responsive and to carry out their role confidently and professionally.

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#### 4.2 Service Quality and Safety

In order to uphold UJ's professional reputation and credibility, Employees are required to always comply with the Company's service delivery quality and standards. Failure to do so, may adversely affect or damage the Company's good name and/or reputation.

Employees are expected to always strive to honour any reasonable commitments made to Customers. In the event such a commitment is unable to be fulfilled, such an event must be dealt with in accordance with the Company's organisational guidelines and procedures so as to ensure that timely and sufficient feedback is given to the Customer.

#### 4.3 Customer Information


The Company is under an obligation to protect customer information that is sensitive, private or confidential. As such, Employees are required to comply with all internal policies and guidelines including all relevant applicable regulatory requirements provided under the law in relation thereto. Only those who are authorized and/or approved may have access to such private or confidential information. In this regard, Employees are required to ensure strict compliance to the requirements of the Personal Data Protection Act 2010.

Any request for such Customer information from any legal parties, as well as any other request made by a regulatory or public authority including but not limited to the Royal Malaysian Police, Royal Malaysian Customs Department, Malaysian Anti-Corruption Commission etc, must be channelled to the department primarily in charge of legal related matters.

#### 4.4 The Government as a Customer

Employees must take proper care and carry out proper due diligence to ensure that the Company is in compliance with all its legal and contractual obligations, in dealing with the Government.

It should be noted that most federal and state level governments all around the world have specific and varied procurement laws and regulations for purposes of protecting public interest. These requirements, where relevant and applicable to the Company, shall be complied with by all Employees at all times. These laws generally prohibit or put strict limits on gifts, lavish entertainment and travel offered to government officials. They also often apply to the hiring of current or recently retired officials and their families, and to any conduct that may be viewed as improperly influencing objective decision- making.

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Employees who deal with or transact with government officials are responsible for knowing and complying with the Code, all internal policies and guidelines as well as all applicable laws and regulations.

UJ as a company shall ensure it does not offer employment to any officials or ex-officials ("revolving door") that it currently deals with or has previously dealt with as a form of inducement to act for the benefit of the Company.

#### **4.5 Business Dress and Attire**

Employees are expected to present a clean and professional appearance when representing the Company, whether within or outside the office premises.

Wherever the Company provides uniform or special attire with a request that it be worn for a specified period/event, Employees are required to comply with such requests.

### **5. OUR DEALING WITH SUPPLIERS AND BUSINESS PARTNERS**


#### **5.1 General**

Building quality corporate relationships with other companies gives UJ a competitive advantage. It is important however that such relationships be built and maintained on terms consistent with UJ Core Values of "INTEGRITY, PROFESSIONALISM and FAIRNESS".

#### **5.2 Doing Business with Others**

Employees in undertaking business activities on behalf of the Company and consistent with UJ values, should:

- a) practice honesty in all acts and statements and demonstrate trustworthiness;
- b) exhibit sincerity in all interpersonal relationships;
- c) carry out their roles and responsibilities with full commitment and dedication;
- d) treat all UJ stakeholders with respect, fairness and honesty;
- e) treat information related to UJ business affairs confidentially; and
- f) abide by all Company policies, standard operating procedure and processes.

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UJ shall not do business with parties who are viewed as likely to harm or bring UJ's reputation into disrepute. As an example, UJ shall avoid doing business with parties who intentionally and/or continually violate the law. These laws include, for example, employment, safety and anti-corruption statutes and requirements.

UJ Suppliers/Business partners are prohibited from using the name or logo of UJ, without the prior written consent of UJ.

All dealings and arrangements with third parties must be in strict adherence to the Malaysian laws, particularly the MACC Act, and all internal anti-bribery and anti-corruption related policies and/or guidelines, as deemed fit by the Company.

All arrangements with third parties must comply with the Company's internal policies and guidelines and subject always to compliance with the relevant and applicable laws and regulations. UJ shall not be involved or engaged with third party(ies) that carry out any acts(s) prohibited by law and carry out any acts in breach of the Code.

### **5.3 Facilitation Payments**


Contracts should be documented and clearly identify the services or rate of commission or fees paid to agents and intermediaries and the fees must be reasonable in relation to the value of the work that is actually being done and the payment made in accordance with the appropriate procurement process and the Company's Approving Authority.

The Company does not accept and will not make any form of facilitation payments of any nature and accordingly, Employees are therefore prohibited from accepting or making any such facilitation payment.

### **5.4 Agents and Consultants**

Purchasing agreements should be clearly and sufficiently documented including providing sufficient details on the scope of work/services/goods which is the subject matter of the agreement and the agreed services or commission rates or fees to be paid. The rates and fees must be reasonable and proportionate to the scope and value of the work to be carried out by the Supplier or Business Partner.

Employees are prohibited from initiating any facilitation payment in accordance to the laws of Malaysia.

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## 5.5 Procurement Practices

All procurement decisions must be made solely based on UJ's best interests.

Suppliers / Business Partners are to be selected based on product or service suitability, capability, price delivery and quality. The amount of payment and/or the applicable price rate or fee, must commensurate with the value of the product/service provided. Any payment made in relation to such product/services, must be in accordance with the appropriate procurement process and the Company's Approving Authority.

## 6. OUR DEALING WITH COMMUNITIES

### 6.1 Personal Community Activities

UJ is a responsible corporate citizen in all the communities in which it carries out business.

Employees are encouraged and are free to support any community, charity, non- governmental or causes of their choice. The Employee however must ensure and make it known, that any view or opinion expressed and any action taken in relation thereof, has been made purely in the Employees personal capacity and is in no way representative of UJ's view or position.


Employees are also required to ensure that any outside activities which the Employee undertakes, does not interfere with or appears to interfere with, the Employee's job performance or ability to carry out their roles and responsibilities effectively and objectively.

### 6.2 Communicating to External Audiences

Any requests or queries from the media should be communicated to the Chief Executive Officer expediently, so as to ensure professional and consistent handling.

UJ Employees are expected to cooperate with all reasonable requests for information from government agencies and regulators. Employees however are required to consult with the department primarily in-charge of legal related matter prior to responding to any such requests.

All information provided or communicated to external audiences must be accurate. UJ explicitly prohibits any alterations to and any act(s) to destroy any

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documents or records, or any part thereof, in response to an investigation or other lawful request.

## 7. OUR DEALING WITH GOVERNMENTS

### 7.1 Compliance with the Law

UJ is a responsible corporate citizen and has an obligation to comply with all relevant and applicable laws and regulations. Employees are required to ensure that all activities undertaken for and on behalf of UJ, complies with all legal and contractual obligations in dealing with the government. Federal and state level governments have specific procurement laws, regulations, procedures and practices that have been established to protect the public interest. Perceived pressures from supervisors or Management or demands due to existing business conditions are not valid reason nor excuse for violating such laws.

Where there is a question or concern about the legality of an action, Employees are required to check with Management and/or the department primarily in-charge of legal related matters for guidance.


### 7.2 Political Contributions

UJ is not permitted to make any contribution towards a political cause or purpose nor to use UJ's name, funds, property, equipment or services for the support of political parties, initiatives, committees or candidates. This restriction shall include any contribution of value whether monetary or non-monetary in nature.

### 7.3 Political Activities

All Employees have the right to participate as individuals in political activities. Employees participation in political activities must be carried out entirely on the Employee's own accord, in their own time and with their own resources. The Company itself should not be seen to be supporting or giving preference to any political party, individual or cause as a result of such participation.

Employees are required to ensure that any involvement in such political activities is to be kept completely separate from their role and responsibilities as a UJ Employee. Any statements or opinions communicated in relation to or as part of such activities should be clearly delivered as the personal opinion of the Employee involved and should not be able to be construed as being representative of UJ or as communicating UJ's position or stance.

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Any Employee who wants to actively participate in full time politics or to be nominated as a candidate in any election or elected as a representative in a Federal or State Legislative Body, must firstly resign from UJ.

## **8. OUR DEALING WITH COMPANY ASSETS**

### **8.1 General Obligation**

All Employees are required to protect Company assets, including Confidential Information, and are required to use such assets in the best interest of the Company.

### **8.2 Protecting UJ Assets**


Reference to UJ assets are not limited purely to the physical assets entrusted by the Company to its Employees, but also intangible assets such as intellectual property which includes inventions, copyrights, patents, trademarks, technology and trade secrets.

Employees have a responsibility to protect all Company assets which are used in the carrying out of their roles and responsibilities and are required to ensure that all reasonable steps are taken to prevent theft or misuse of, or damage to, such property. Employees are reminded that any utilisation of Company assets must only be made pursuant to legitimate and authorised UJ businesses or purposes.

UJ assets are prohibited from being used by Employees to carry out or facilitate any illegal activity. Similarly, any use of UJ assets or proprietary information by an Employee for a business purpose or in personal activities from which the Employee (or others connected to the employee) might materially benefit from, is strictly forbidden. All company assets and proprietary information must be returned to UJ upon cessation or termination of employment with UJ.

Equipment, tools, materials, supplies, and Employees' time during official work hours, should only be used and applied towards legitimate Company business purposes.

Company assets must not be borrowed, loaned, or disposed of, except in accordance with the relevant Company policies and operating procedures. Similar to how Employees are prohibited from misusing or misappropriating Company assets, Employees are also prohibited from, for example, disposing of Company assets in an unauthorized manner such as by selling, lending or

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giving such assets away without proper authorization or permission and/or in accordance with the relevant Company guidelines.

**a) Company Assets**

All purchases of assets shall follow the Company's prevailing procurement policy and procedures and Authority Manual and any deviation thereto shall require the Chief Executive Officer's approval.

In addition to the above, Employees are required to ensure that the transaction is genuine and properly documented when spending or committing Company funds and that the Company receives the appropriate and proportionate value in return.

**b) Supplier Assets**

In the same way that Employees are responsible to take reasonable care of all physical Company assets which are entrusted into their custody, Employees are also responsible to take reasonable and due care of any assets of a Supplier or Business Partner or Customer which has been authorized by the third party to be entrusted into the Company's custody.


Employees are to take reasonable care of such third party assets as they would the Company's assets, and to take reasonable care not to damage it, deface it or remove it or utilize it for personal use, unless authorized to do so.

**c) Information Technology (IT) Assets**

Employees are required to understand and strictly comply with all Company IT policies and operating procedures, and to strictly abide by its terms of use.

**8.3 Confidential Information**

All UJ Employees are required to exercise due care and diligence in the discharge of their duties without causing detriment to the interests of UJ and shall not (except in the proper course of such duties or otherwise as approved or authorised in writing) disclose to any person or otherwise make use of Confidential Information concerning or relating to the Company. Employees are also required to ensure that they use their best endeavours to prevent the publication or disclosure of any Confidential Information concerning or relating

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to the Company and to comply with any and all relevant and applicable Company policies and/or guidelines relating to Confidential Information.

In principle, Employees are required to comply with the following general requirements in relation to Confidential Information concerning or relating to the Company:


- (a) not to directly or indirectly communicate or cause to be communicated whatsoever from the Confidential Information, whether in whole or in parts, to another person who is not authorized to receive the Confidential Information;
- (b) not to misuse or abuse the Confidential Information for his/her own advantage/financial gain or in any other way except for purposes of carrying out his/her duties; and
- (c) to exercise due care in safeguarding the confidentiality of the Confidential Information.

Further to the above, all Employees shall keep with complete secrecy all Confidential Information entrusted to them, and shall not use or attempt to use any such information in any manner which may or is likely to injure or cause loss, either directly or indirectly, to the Company.

The restriction above shall continue to apply even after the termination or cessation of the Employee's employment or contract with the Company without any limit in point of time, but shall cease to apply to any information or knowledge which has come into the public domain otherwise than as a result of a breach of this Article.

In the event the Employee is legally required to disclose any Confidential Information, the Employee shall immediately notify their immediate supervisor for escalation to the relevant head of department for consultation with the Chief Executive Officer and the department primarily responsible for legal matters. The Employee shall obtain the written authorisation of the Company, prior to any such disclosure.

The Employee acknowledges and agrees that the Company would be irreparably damaged by any breach of the provision of this Article and shall be entitled to injunctive relief and specific performance in addition to all other remedies available in law.

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#### **8.4 Accuracy of Company Records**

The Company requires the honest and accurate recording and reporting of information in order to make responsible business decisions. This includes such data on quality, safety, and personnel records, as well as all financial records. All financial books, records and accounts must accurately reflect transactions and events, and conform to the Malaysian Financial Reporting Standards (MFRS), Companies Act, 2016 and / or other prevailing statutory accounting standards as well as other Company policies and systems of internal controls.

No false entries pertaining to inaccurate or false transactions may be made. When a payment is made, it can only be used for the purpose spelled out in the supporting document.

All Employees have a responsibility to ensure the proper expenditure of Company funds. This includes ensuring that all transactions executed or about to be executed are genuine and properly documented.


No secret fund of the Company's cash or other unrecorded assets shall be set up for whatever purpose.

#### **8.5 Communicating, Recording and Retaining Business Communications**

All business records and communications should be clear, truthful and accurate. Business records and communications often become public through litigation, government investigations and the media. As such, all Employees are expected to refrain from utilising exaggerated, colourful language, guesswork, legal conclusions, and derogatory remarks or characterizations of people and companies. This applies to communications of all kinds, including e-mails and informal letters and/or memos.

Records and/or communications should always be retained by the respective division/department. In the event business records and/or communications are to be destroyed, the prior written approval from the appropriate level of authority must be obtained.

Employees are responsible to ensure verbal and instant-messaging communications are being supplemented with formal written communication (e.g. email or memo), for audit trail and record-keeping purposes.

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## 8.6 Sharing Best Practices

The Company allows and encourages the sharing of documents, information and knowledge with another company or organization for the purposes of sharing better practices provided that the information and knowledge shared are not regarded as proprietary information and not detrimental to or adversely affecting the Company's business and competitive advantage. The sharing must also always be preceded by the proper recorded approval and/or authorization by the relevant approving authority and in accordance with Company policies and procedures.

## 8.7 Dealing with Personal Data

Personal data relates directly or indirectly to a data subject, who is identified or identifiable from that information or from that and other information in the possession of a data user, including any sensitive Personal data and expression of opinion about the data subject. For example: name, identity card number, date of birth, mobile number, loan / financing details and etc.

The Personal Data Protection Act, 2010 ("PDPA") regulates the processing of Personal Data in regards to the Company's day-to-day business transactions.

All Employees must exercise due care and diligence in the discharge of his/her duties without causing detriment to the interests of the Company and must fully comply with all relevant provisions of the PDPA.


## 9. CONFLICT OF INTEREST

### 9.1 General Considerations

UJ is committed to promoting and maintaining the highest levels of integrity within the organization. Accordingly, Employees are expected to act with the highest level of integrity and ethics and to maintain their professional independence in carrying out their roles and responsibilities on behalf of the Company.

### 9.2 Potential Conflict of Interest

Employees are expected to avoid and be free from all actual and potential conflicts of interest and business decisions must be carried out based on the best interests and considerations of the Company. The general rule is that where an Employee's ability to perform his/her Company duties effectively and

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impartially is potentially impaired by an outside appointment, relationship or activity, a situation of conflict of interest will arise.

For example, a real or potential conflict of interest arises when an employee's participation in a decision could place him/her in a position to exploit his/her professional or official capacity for the benefit of:

- a) the Employee themselves;
- b) the Employee's family; or
- c) the Employee's close friends.

Conflict of interest may also arise where an Employee's ability to perform his/her Company duties responsibly and impartially is potentially impaired by relationships or affiliations with other individuals. Such relationships or affiliations could arise if the other individual:


- a) has an opportunity to receive a gain, benefit or advantage as a result of the Employee's position in UJ; or
- b) is in a position to influence the decision or judgement of the Employee resulting in a gain, benefit or advantage to the individual or any other person.

UJ Employees are prohibited from taking improper advantage of their positions as Employees of the Company or of information obtained in the course of their employment.

### **9.3 Avoiding Perceived and Actual Conflict of Interest**

All Employees must be and appear to be seen, as impartial and free from any conflicts of interest and must act and conduct themselves in a manner consistent with the following:

- business decisions must be carried out based on the best interests of the Company and the actions of Employees must not be motivated by personal interests, considerations or relationships;
- Employees must ensure that their objectivity in relation to any task or assignment is not endangered as a consequence of any personal relationship;
- Employees should not take improper advantage of their position as an Employee of the Company or of any information obtained in the course of employment, which they may in the ordinary course of work, obtain or possess, including in relation to material inside information of public listed companies or any other Confidential Information; and

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- financial involvement with an external party can affect objectivity. Employees are therefore required to ensure that they avoid such involvement insofar as to ensure no actual or perceived conflict of interest arises.

In addition to the above, any other activity(ies) which has the potential to lead to conflict of interest with respect to any Company business, which may adversely affect the reputation of the Company or has the potential to create legal or regulatory exposure to the Company, are strictly prohibited.

Employees are expected to exercise basic common sense in avoiding conflict of interest situations and are expected to act in a manner consistent by giving their full-time services to the Company.


On occasion, however, the question of whether or not conflict of interest exists may be less clear and open to interpretation. Whenever such a case arises the Employees concerned should consult his respective head of department or the department primarily in-charge of risk or human resource related matters for guidance.

Employees should take this Code into account when forming their own judgment about any outside role, relationship or activity(ies) concerning them. Articles 9.4 – 9.11 should therefore, be treated as being general guidelines that all Employees should comply with.

#### **9.4 Outside Business Appointment, Directorships / Undertakings**

Employees may not work for or receive payments for services from any competitor, Customer, Supplier or other Business Partner of UJ without the prior approval of the Chief Executive Officer. Any outside activity must be strictly separated from UJ employment and should not harm the affected Employees job performance at UJ. Employees must ensure that the skills we learn and use at UJ are not used in such a way that could adversely affect the business of UJ.

The general rule is that Employees may not accept employment in or undertake work for any other company, firm or organisation. Any outside business appointment or undertaking, whether as an employee, executive or non-executive director, active or silent partner, adviser, agent, manager or consultant, whether on a paid or gratuitous basis may only be undertaken in exceptional cases and only with the prior written permission of the Chief Executive Officer.

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Employees are not allowed to accept outside directorships or become partners in entities, that have any form of business dealings with the Company whether directly or indirectly.

#### **9.5 Relative or Close Personal Friendship Interests**

Employees whose relatives or close personal friends have interests (whether this be in the form of directorships, partnerships, consultancies, advisories or through agencies) in entities, which have any form of business dealings with the Company whether directly

or indirectly, and who are involved in any decisions regarding the dealings (whether directly or indirectly) with such entities in the course of their duties with the Company, should declare to the Chief Executive Officer in writing of such interests prior to being involved in such decisions or entering into any such dealings.


Employees must also disclose to the Chief Executive Officer, if any of their relative(s) works or provides any kind of services whether direct or indirect to any Suppliers or Business Partners. Employees shall avoid or abstain from participating or making decision involving such deals after such disclosure.

Notwithstanding the above, UJ Employees are required to take note of Section 3 of the Malaysian Anti-Corruption Commission Act, 2009 (“MACC Act”) which provides a wider definition of the word relatives; and that Employee may be charged under Section 23 of MACC Act if it is proven that the Employee has used his office or position for any gratification for himself or his relative.

#### **9.6 Personal Account Dealing**

Employees personal trading and investment in securities has the potential to cause or create the appearance of a conflict of interest. Employees are therefore required to comply with all Company policies and guidelines relating to personal account dealing to ensure that no conflict, or perception of conflict, occurs.

The Equities Department in particular, has been designated an Insider Department, as this is where it is reasonable to assume that Employees may be given or have access to inside information on a public issuer in the normal course of business. As such, the Equities Department occupies separate floor space from all other Non-Insider departments in the Company. To protect against allegations of insider trading, Employees who work in the Equities Department are required to comply with the Company’s Personal Dealing Account Policy. A key feature of the personal dealing account policy is the

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requirement that all Employees personal trading in securities of public issuers is subject to the prior approval of a relevant authorized person. The trading must also be conducted through a disclosed trading account.

In addition to the personal dealing account requirements, Employees who work in the Equities Department are also subject to trading restrictions relating to stocks listed on the Restricted List as well as being required to comply with, among others, the Company Policy on Inside Information and Confidential Information and the Company's Chinese Wall Policy.

### **9.7 Contractual Dealings with Employees**

The Company shall not purchase or lease property, equipment or materials from or enter into contractual arrangements (other than employment contracts) with its Employees. In exceptional circumstances, the Company may enter into contractual dealings with Employees, however this must always be preceded by the Chief Executive Officer's written authorization.

### **9.8 Proprietary Information**


Employees must not disclose proprietary information to any person within or outside of UJ unless authorized to do so, including to third parties. As an example, third parties may include independent consultants, external auditors and solicitors, who are bound by secrecy and confidentiality obligations or a professional code of ethics, prohibiting disclosure of such proprietary information. Included in this prohibition, is any disclosure of proprietary information by the Employee to relatives and friends.

It is the Employee's responsibility to know what information is confidential and to obtain clarification when in doubt. This obligation of confidentiality continues even after the employee ceases employment with the Company.

The use of Company's information for personal gain is strictly prohibited. In particular, Employees should not trade the Company's information or conduct "information brokering" with unauthorized parties.

Where proprietary information is authorized to be shared with persons outside of the Company, efforts must be made to ensure the continuing protection and confidentiality of that proprietary information. Within the Company, proprietary information should only be disclosed on a "need-to-know" basis.

Employees must not use proprietary information for unauthorized purposes. Employees must also take reasonable care to protect proprietary information against loss, theft, unauthorized access, alteration, or misuse. Departing or

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Employees who have ceased to be employed by the Company and has had access to UJ proprietary information are reminded of their continuing responsibility to protect it and maintain its confidentiality after leaving the Company.

Any information that is lawfully within the public domain can be exchanged or disclosed by Employees to competitors, as part of the ordinary and normal course of carrying out their roles and responsibilities for the Company. However, any other information that is commercially sensitive, must not be disclosed or exchanged.

## 9.9 Gifts, Hospitality, Entertainment and Travel

Gifts, hospitality, entertainment and travel (“GHET”) means anything of value, monetary or non-monetary, including without limitation, discounts, paid conferences (including virtual seminar and conferences), loans or other securities, prizes, transportation, travel (flight tickets, pleasure trips, accommodation, holidays, tickets to cultural or sporting events, use of vacation facilities and/or meals, lunches / dinners, tangible goods including food, hampers, mobile phones etc.), preferred allocations of stocks / shares and special privileges.

### a) General


UJ adopts a “**No Gift Policy**”, and as such this means that an Employee shall not, whether for his own benefit or otherwise, directly or indirectly:

- (i) offer, give or promise to offer or give; or
- (ii) solicit, accept or receive,

any GHET benefits, as part of a reward or consideration, whether or not arising in the course of their duty, other than as provided in the limited exceptions below.

It is the responsibility of Employees to inform external parties involved in any business dealings with the Company that it practices a “No Gift Policy” and to request the external party’s understanding for and adherence with all relevant Company policies which communicates UJ’s zero tolerance towards bribery and corruption.

### b) Exceptions

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Notwithstanding the Company's No Gift Policy, the Company understands that there may be situations where it would be impractical or damaging to refuse or return certain GHET benefits. The Company also recognizes that during certain festive seasons, it is customary for certain Suppliers or Business Partners to give consumable gifts e.g. hampers, gift baskets etc. to UJ Employees.


In recognition of the foregoing, the Company's policy is that should the GHET benefit be of little or no value such as promotional items bearing another company's name, or other small items of the like, the Employee is permitted to retain such gifts upon disclosure and authorisation, where applicable, by the relevant approving authority as per Table 1 below.

Where the item appears to be of a substantial value and it would be impractical or damaging to refuse or return the gift, Employees are required to disclose and refer the situation to the department primarily in charge of risk or human resource related matters for guidance. We must ensure that all UJ transactions are handled in a manner which avoids any question or appearance of bribery, kickbacks, or any suspicion of impropriety.

In dealing with GHET benefits, all Employees are required to adhere to the following based on the conditions specified in Table 1 and Table 2 below:

- (i) Receiving or giving monetary gifts (such as cash, vouchers, and cash equivalent) is strictly prohibited.
- (ii) Non-monetary gifts of a nominal value are permitted: receiving or giving non-monetary gifts is permitted if the gift is customary and of nominal value such as a pen, calendar, or a small promotional item.
- (iii) Business meals are a common practice in today's business environment. Entertainment and / or corporate hospitality involving a business-related meal, provided that the value of the entertainment must remain modest.
- (iv) Employees are required to seek approval for any GHET benefit that is given or received in the course of their work (including any gifts received during the festive seasons).
- (v) Employees may accept transportation and lodging provided by the Suppliers or Business Partners other third parties subject to approval requirements as specified in Table 1 below.

### c) Gifts Register

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In the event the Head of Department approves the acceptance of a GHET benefit, he must also determine the treatment of the gift, including whether to:

- (i) donate to charity; or
- (ii) hold it for departmental display, where relevant; or
- (iii) share with other Employees in the department; or
- (iv) permit it to be retained by the Employee.


In determining the above, the respective Head of Department is expected to exercise proper care and judgment in each case, taking into account pertinent circumstances including the character of the gift, its purpose, the position / seniority of the person(s) providing the gift, the business context, reciprocity, applicable laws and cultural norms.

The intention behind a GHET being given or received should always be considered. If there is any uncertainty, please refer to the relevant Company policies on anti-bribery and anti-corruption and seek the advice of Management.

GHET benefits given and received are to be recorded, documented, and appropriately reported in accordance with the conditions outlined and summarized in Table 1 and Table 2 below.

**TABLE 1 – RECEIVING GHET**

GHET ITEM	THRESHOLD VALUE	GIFTS REGISTER	
		RECORDING	APPROVAL
GHET benefits (excluding meals and travel)	RM500 and below (per item)	YES	Not Required
	Above RM500 (per item)	YES	Immediate Supervisor (Head of Department level)
Meals	N/A	YES	Not Required (Employees are expected to use their own good judgment in accepting a meal invitation)
*Travel	Involves Family	YES	Chief Executive Officer

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	Not Involving Family	YES	Chief Executive Officer
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*Note:-*

*\*Travel which is not paid for by the Company and is defined as follows:*

- i. involves travelling outside of Malaysia; or*
- ii. where the mode of travel is other than by private vehicle; or*
- iii. where accommodation is provided.*

**TABLE 2 – GIVING OF GHET**


Recipient	GHET item	GIFTS REGISTER	
		RECORDING	*ENDORSEMENT
GHET to Public Officials	Corporate gift items with the Company's name / logo	YES	Not Required
	Other than the above	YES	Chief Executive Officer
GHET (excluding meals) to Non-Public Officials		YES	Not Required
Meals		YES	Not Required (Employees are expected to use their own good judgment in providing business meals to third parties)

*Note:-*

*\*All approvals to purchase / reimburse any provision of GHET benefits must always be subject to compliance with the Company's Authority Manual.*

As a guiding principle, Employees are not permitted to accept anything that might make it appear that their judgment or conduct on behalf of UJ is compromised.

Notwithstanding the table 1 above, where the Employee is uncertain as to whether the GHET benefit may be viewed as being of a substantial value or whether it may be retained or how it should be treated, the Employee is

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required to consult with the department primarily in charge of risk or human resource matters for guidance.

The onus to report to the Company in relation to any GHET benefits received, rests entirely upon the Employee involved. Therefore, in executing the receiving and giving of GHET, employees are required to immediately record the GHET in the Gifts Register or any other form as determined by the department primarily responsible for managing human resources in the Company.

#### **d) Dealing with Public Officials**

The Company does not allow the giving or receiving, directly or indirectly, of any gifts or hospitality (exceptions as specified in paragraph 9.9(b) above), kickbacks or gratuities to public officials.


Employees in their dealing with public officials require particular care and consideration and must exercise more caution when working with public officials.

In situations where it becomes necessary to provide gift or hospitality to a public official in maintaining good business relationship, it must be made in legal and ethical manner and made in accordance with the Company's Approving Authority.

#### **e) Miscellaneous**

If there is a conflict of interest situation (for example, in relation to the procurement of goods or services by UJ) and notwithstanding the exceptions provided in paragraph 9.9(b) above, the relevant Head of Department is not permitted to approve acceptance of the GHET benefit in such situations. Employees are also prohibited from receiving any GHET benefits from a third party (in whatever form) where it relates to the continued retention of services and/or renewal of contracts by a third party to the Company.

Similarly, the giving of GHET benefits or the provision of gratuitous services by UJ Suppliers or Business Partners such as bankers, dealers or from UJ Customers to Employees, is not encouraged, as this could place Employees in a position whereby their independent business judgment may be prejudiced. In no case should any Employee or his relatives solicit GHET benefits including gratuitous services from such parties.

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### **9.10 Charitable Contributions, Sponsorships and Donations**

The Company allows donation to charities as part of its corporate social responsibility initiatives, whether through services, knowledge, time or direct financial contributions (cash or otherwise). However, such initiatives must be carefully examined for legitimacy and not be made to improperly influence a business outcome. Employees must be careful to ensure that charitable contributions and sponsorships made on behalf of the Company are not used to facilitate and conceal acts of bribery. The Company will ensure all charitable donations and sponsorships made are legal and ethical under local laws, guidelines and practices, and that charitable donations and sponsorships are offered or made in accordance with the Company's Approving Authority.

### **9.11 Public Service, Recreational, Sporting and Community Activities**

Generally, Employees may participate in unpaid voluntary public service, recreational, sporting, welfare and other community activities outside working hours. insofar as it does not interfere or hinder the effectiveness or contribution of the Employee to the Company.


The general rule is that Employees invited to serve on local bodies, or as appointed or elected officials must be able to combine their outside activities with full-time Company employment. The Employee must be able to discharge their dual responsibilities satisfactorily both in respect of the time taken up by the outside activity and the compatible nature of the duties involved.

Employees wishing to serve on statutory or public bodies must obtain the prior written permission of the Chief Executive Officer. In the event the Employee considers such a role sufficiently important for them to take time off during official working hours to perform their duty, the Employee may only do so by applying for time off using their earned annual leave entitlement.

However, helping the community by serving on boards of non-profit or community organizations does not require prior approval so long as the activities are not to the disadvantage of the Company and should not adversely affect the Employees' job performance at the Company.

### **9.12 Declaration**

All UJ employees are required to make a declaration to the Chief Executive Officer of the Company using the prescribed Annual Declaration of Assets Form. The department primarily in charge of human resource and/or risk related matters shall coordinate, compile and ensure the safekeeping and the confidentiality of the Declaration of Assets Forms.

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### 9.13 Conduct in the event of a Conflict of Interest

In the event a conflict of interest situation occurs, the affected employee is obliged to make a disclosure on the conflict of interest to the Company for decision by the relevant deciding authority.

There can be no prescriptive guidance to determine how Management should manage conflict for each specific situation since conflict of interest is a topic of great subjectivity. Notwithstanding, the relevant deciding authority shall endeavour to expeditiously address any conflicts of interest situations; and where required, in consultation with senior management.

The relevant deciding authority in addressing such conflicts of interest may either:

- a) Control the conflict of interest – where upon assessing and evaluating those conflicts, decide to implement and adopt an appropriate response and mitigating measures to control/manage those conflicts; or
- b) Avoid the conflict of interest.

All conflict of interest situations must be logged in the conflict of interest register, maintained by the department primarily responsible for risk.

## 10. FIGHTING BRIBERY AND CORRUPTION


### 10.1 Compliance to Laws

The Company and all its Employees are expected to comply with the MACC Act and all other anti-bribery and anti-corruption laws and regulations of the countries where it does business.

Any Employee of UJ shall not indulge in any corrupt practices as it may expose himself to prosecution for various offences under the MACC Act and it may also expose the Company to prosecution under Section 17A of the MACC Act.

### 10.2 Bribery and Corruption

All Employees are prohibited from accepting or soliciting, giving or offering any form of gratification as an inducement or reward to do or forbear any act in relation to any Company matter in which any Suppliers, Business Partners, friends or Families or any other person has an interest whether directly or indirectly.

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UJ Suppliers and Business Partners are also prohibited from offering and/or giving any form of gratification as an inducement or reward for UJ employees to use the office of the Company or the position of the Employee in the Company when making any decision, or take any actions in relation to any matter in which the Business Partners, Suppliers, friends or Families or any other person who has an interest whether directly or indirectly.

In the event that any request for a bribe is received or any offer for a bribe are being made, it is the Employees duty to submit together with the full and true description of the facts and circumstances including, if known, the name of the person who solicited, or obtained or attempted to obtain the gratification as provided in the Escalation Procedures below.

Any offence of accepting, soliciting, giving or offering of any form of gratification will be dealt with under the MACC Act or any other laws applicable.

No employee shall suffer demotion, penalty or other adverse consequences for refusing to pay bribes even if such refusal may result in the company losing business.


### **10.3 Training and Compliance**

New personnel shall receive Anti-Bribery and Anti-Corruption (“ABAC”) training and be provided access to the ABAC Policy upon commencement of employment. All Employees are required to remain familiar with and adhere to the provisions of this Code and the ABAC Policy. Any violations of this Code, including the ABAC provisions, may result in disciplinary action, up to and including termination of employment.

## **11. ESCALATION PROCEDURES**

All Employees should be alert and sensitive to situations that could result in an act carried out by themselves, or others, which may be in violation of this Code.

If an Employee is uncertain about what is proper conduct in a particular situation or wishes to raise any matter arising in connection with the activities of the Company or behaviour of any Employee which knowingly or unknowingly may have violated this Code, it is the Employee’s obligation to make a report to Management or to the department primarily in charge human resource or risk related matters or to any other channel provided for by the Company, including under the Company’s Whistleblowing Policy.

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All complaints raised must be made in good faith and where possible, supported with relevant information and evidence.

UJ is committed to ensure that it provides a healthy corporate environment which promotes the value of integrity, professionalism and fairness and to create an ethical environment across the organisation from which its Employees can all benefit. The

Company undertakes that if any concerns are raised, pertaining to the Code, every reasonable effort will be made to maintain the confidentiality of the person raising the issue or concern. The UJ Board of Directors and Management shall support the individual who reports in good faith.

## 12. RECORDS

Where applicable, this Policy shall specify a minimum retention period of seven (7) years for records, in line with UJ's Documented Information Guideline and ABMS requirements, which covers but not limited to: -

- i. CoBE Certification of Compliance;
- ii. GHET Register record; and
- iii. Integrity Pact.


## 13. REVIEW OF THE CODE

To reflect the Company's dynamic nature, the Code may be revised in future to suit the Company's needs and circumstances from time to time. This would include changes in the law that affects the Company and the Company's business requirements.


GRC Department shall arrange for periodic review of this Policy for at least once in three (3) years or as and when is necessary to ensure its operation at maximum effectiveness.

Any amendments to this Policy shall be recommended by Board Audit and Risk Committee for Board's Approval.

----- **END** -----

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## APPENDICES

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## **APPENDIX I: CERTIFICATION OF COMPLIANCE**

### **CERTIFICATION OF COMPLIANCE** **TO THE URUSHARTA JAMAAH SDN BHD (“UJ”) CODE OF BUSINESS ETHICS** *(As at 8 December 2025)*

I hereby certify that I have read and understood UJ Code of Business Ethics (the “Code”) and I understand that the Code applies to all Employees and other representatives of the Company including agents, consultants, and Suppliers of UJ.

I agree that any business decisions and actions that I am dealing with, shall be based on the best interest of UJ and shall not be motivated by personal interest, considerations or relationships. My relationships with prospective or existing Suppliers, Customers, or regulators shall not affect my independent and sound judgment on behalf of the Company.

I also certify that neither I, my spouse, dependant, nor any of my immediate relative has shares, conducts business, has other direct or indirect financial interest or liability or serves as an officer, director, committee member or employee of any business entity that will have potential interference or affect any of my business decisions and area of responsibilities.

I further certify that I do not know of any other matters, including relative or personal relationship, as defined by Malaysian Anti-Corruption Commission Act 2009 (Act 694) which might give rise to an apparent or possible conflict of interest involving my present employment.


I also certify that I do not perform any outside employment or activity that conflicts with my official duties.

I am also aware of the prohibitions regarding GHET acceptance from any business entity with whom I am dealing with, and I certify that I have not violated those prohibitions.

I hereby agree that I will fully comply with all provisions of the Code and understand my responsibility to immediately report any known or possible conflict of interest situations or suspected violations to my immediate supervisor and / or the Management.

I also certify my understanding that any failure by me to comply with this Code may result in disciplinary action taken against me, up to and including dismissal.

**I CERTIFY THAT THIS STATEMENT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.**

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Signature :

Name :

Staff Number :

Designation /  
Department :

Date :

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## APPENDIX I: CERTIFICATION OF COMPLIANCE

### **PERAKUAN PEMATUHAN KOD ETIKA PERNIAGAAN URUSHARTA JAMAAH SDN. BHD. ("UJ")** **(8 Disember 2025)**

Saya dengan ini mengesahkan bahawa saya telah membaca dan memahami Kod Etika Perniagaan UJ ("Kod") dan saya memahami bahawa Kod ini terpakai kepada semua kakitangan dan wakil-wakil Syarikat yang lain termasuk ejen, perunding, dan pembekal UJ.

Saya bersetuju bahawa apa-apa keputusan dan tindakan yang berurusan dengan saya, hendaklah berdasarkan kepentingan terbaik UJ dan tidak boleh didorong oleh kepentingan peribadi, pertimbangan atau hubungan. Hubungan saya dengan bakal atau Pembekal sediaada, Pelanggan, atau pengawal selia tidak akan menjejaskan pertimbangan bebas bagi pihak Syarikat.


Saya juga mengaku bahawa saya, isteri saya, tanggungan saya atau mana-mana ahli keluarga terdekat saya tidak mempunyai saham, menjalankan perniagaan, mempunyai kepentingan lain secara langsung atau tidak langsung atau liabiliti kewangan atau berfungsi sebagai pegawai, pengarah, ahli jawatankuasa atau pekerja mana-mana entiti perniagaan yang akan mempunyai gangguan yang mungkin berlaku atau menjejaskan mana-mana keputusan perniagaan saya dan kawasan tanggungjawab.

Saya juga mengesahkan bahawa saya tidak mempunyai pengetahuan mengenai apa-apa perkara lain, termasuk keluarga atau hubungan peribadi, seperti yang ditakrifkan dalam Akta Suruhanjaya Pencegahan Rasuah Malaysia 2009 (Akta 694) yang mungkin menimbulkan konflik jelas atau mungkin kepentingan yang melibatkan pekerjaan saya.

Saya juga mengaku bahawa saya tidak melakukan sebarang pekerjaan luar atau aktiviti yang bercanggah dengan tugas rasmi saya.

Saya juga sedar tentang larangan mengenai penerimaan GHET dari mana-mana entiti perniagaan dengan siapa saya berurusan, dan saya mengesahkan bahawa saya tidak melanggar larangan tersebut.


Saya dengan ini bersetuju bahawa saya sepenuhnya akan mematuhi semua peruntukan Kod dan memahami tanggungjawab saya dan akan dengan segera melaporkan sebarang konflik yang diketahui atau mungkin situasi kepentingan atau pelanggaran yang disyaki kepada penyelia saya serta-merta dan / atau Pengurusan.

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Saya dengan ini mengesahkan dan memahami bahawa sekiranya saya tidak mematuhi Kod ini boleh menyebabkan tindakan tatatertib diambil terhadap saya, termasuk tindakan pembuangan kerja.

**SAYA MENGAKU BAHAWA KENYATAAN INI ADALAH BENAR DAN BETUL BERDASARKAN PENGETAHUAN SAYA.**

Tandatangan :  
Nama : -  
No. Pekerja : -  
Jawatan / Jabatan :  
Tarikh :

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## APPENDIX II: INTEGRITY PACT

Year: \_\_\_\_\_

I,

**Name:**

**Identification Card Number:**

**Position/Job Title:**

hereby solemnly and truly declare and attest that:

- **I shall not engage in any act of corruption or bribery** with any party whatsoever, whether directly or indirectly, in the performance of my **responsibilities as a UJ employee** or on behalf of UJ.
- **I shall not conspire with or be unduly influenced by any party** (including third parties, clients, or suppliers) in carrying out my duties.
- **I shall declare in writing any personal interest or vested interest** and shall recuse myself from making any related decision or participating in any relevant process (e.g., procurement, asset valuation).
- **Should there be any attempt at corruption or bribery from any party, I shall immediately report the matter** to the Malaysian Anti-Corruption Commission ("MACC") office or the nearest police station or through UJ Whistleblowing Channel.
- **I am aware that my failure to do so constitutes an offense** under the Malaysian Anti-Corruption Commission Act 2009 [Act 694].

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### Employee Acknowledgment

**Signature:**

**Name:**

**Date:**