

VENDOR OR THIRD PARTY CODE OF CONDUCT

1. Introduction

SEG International Bhd and its subsidiaries (“SEGi”) are committed to conducting its business and its daily operations with honesty and integrity. SEGi requires that vendors and third parties that wishes to deal with SEGi to adhere to the same standards. This Code of Conduct (“Code”) provides a guideline as to what SEGi expects. Please note that this is only a guideline and is not exhaustive.

2. Applicability

Compliance of this Code is mandatory for any person who performs services for or on behalf of SEGi such as, but not limited to, contractors, suppliers, vendors, agents, consultants, advisors, joint-venturers, partners, organisations controlled by SEGi or other intermediaries (“Vendor or Third Party”).

This policy shall apply to all jurisdictions in which SEGi operates or conducts its business.

The Vendor or Third Party must cooperate with any inquiry or investigation by SEGi in relation to any allegation of breach of this Code including any complaints of unethical behaviour regarding any SEGi’s employees or representatives.

This Code shall be deemed to be incorporated as a term for all contracts, agreements, arrangements or engagement (whether written or otherwise) between SEGi and the Vendor or Third Party.

3. Consequence of breach

SEGi views any breach of this Code as a serious matter and will take appropriate action against the breach, including but not limited to:

- (a) disqualifying the Vendor or Third Party from participating in any supply, procurement or tender
- (b) requiring the Vendor or Third Party to substitute its representative who is in breach of this Code
- (c) suspension or termination of contracts
- (d) severing all relationships with the Vendor and Third Party, including being blacklisted
- (e) deduction or withholding any amount of money paid or promised to be paid

4. Code of Conduct

SEGi expects its Vendors or Third Parties to adhere to the following principles:

- (a) **Comply with the laws, regulations and SEGi policies**

Vendors and Third Parties shall:

- comply with laws and regulations of the applicable jurisdictions in which it operates

- comply with SEGi policies on personal data protection, anti-bribery and anti-corruption, and such other policies expressed to be applicable to Vendors and Third Parties from time to time
- conducts its business with proper valid licenses, approvals, registrations, etc as required by the authorities
- respect and refrain from infringing the intellectual property belonging to others
- comply with applicable labour practices and provide their employees with a safe work environment in accordance with health and safety standards required by the law
- comply with applicable environmental regulations and laws
- conduct its business according to principles of fair competition
- commit to the prevention of any form of tax evasion in any areas of its business and supply chain
- ensure that slavery and human trafficking is not taking place in any part of its business or any part of its supply chains

(b) Anti-bribery and anti-corruption

Vendors and Third Parties must adhere to SEGi's *Anti-bribery and Anti-Corruption Policy* and in particular, shall not engage in any form of bribery or corrupt practice, whether or not to obtain or retain SEGi's business, or to carry out any services for or on behalf of SEGi.

(c) Conflict of Interest

SEGi prohibits Vendors and Third Parties from gaining improper advantage due to their relationship with SEGi's employees / directors (i.e. any immediate family which applies to parents, parents-in-law, siblings, spouse, children including adopted child and step-child and nominees of the employees / directors).

Vendors and Third Parties with actual or potential conflict of interest are expected to declare in writing to SEGi, even if the knowledge arises after being engaged by SEGi.

(d) Act with integrity and accountability

Vendors and Third Parties will conduct themselves with integrity, respect and trust, in particular, they shall not disclose SEGi's confidential or proprietary information or data to unauthorised third parties unless required by law; must have appropriate security controls to safeguard SEGi's information; must maintain full accountability for goods and services provided; honour their commitments on timely basis according to agreement; provide honest and accurate information requested of them with regards to their qualification, experience, capabilities, references etc pertaining to goods and services provided by them.

5. Responsibilities

Any party or Vendor with knowledge of a breach or potential breach of any part of this Code should promptly raise those concerns via whistleblowing@segi.edu.my which SEGi shall maintain in confidence.

Vendors or Third Parties who are aware of or suspect any questionable or unethical behaviour by a SEGi employee are obliged to disclose such incidents to SEGi using the channel stated above.