

CIMB's VENDOR CODE OF CONDUCT

CIMB's Vendor Code of Conduct ("VCOC") applies to CIMB's procurement vendors of goods and/or services ("Vendors"). The VCOC defines CIMB's expectations and requirements of its Vendors, and the responsibility of Vendors towards its stakeholders and the environment. CIMB may modify the VCOC as required and the latest version of the VCOC can be found in CIMB Group's homepage. In addition to this VCOC, Vendors must also review specific agreements with CIMB (e.g. general terms and conditions of the purchase order, regional / local terms and conditions, etc.) for additional obligations and requirements.

This VCOC includes three key areas (Economic, Environmental, and Social or EES), where CIMB encourages the Vendors to make voluntary disclosures.

- **Anti-Corruption**
 - CIMB adopts a zero-tolerance approach to any and all acts of bribery or corruption perpetrated by its stakeholders, including the Vendors with whom CIMB works or who act on CIMB's behalf.
 - CIMB works with the Vendors who adhere to the local anti-bribery and anti-corruption legislations and laws and provide the Vendors a safe platform to report such incidences.

- **Environment**
 - CIMB takes a precautionary approach to managing its environmental impact and therefore, call upon the Vendors to raise its environmental consciousness / awareness and manage its negative impacts, if any.
 - CIMB does not condone any and all kinds of direct environmental harm while the Vendors execute CIMB's contracts. These specifically include illegal logging, uncontrolled use of fire for clearing forest lands, natural resource development within UNESCO World Heritage sites (unless there is prior consensus with both the government authorities and UNESCO, etc).
 - CIMB supports the Vendors who adhere to environmental laws and regulations to proactively manage their emissions / carbon footprint in conducting business with CIMB, while also leveraging opportunities to create net positive impact on the environment through activities such as recycling etc.

- **Human Rights & Labour**
 - CIMB promotes values of diversity and mutual respect that is free of racial, gender, ethnic, religious or other forms of discrimination in the conduct of all the Vendors in the Group.
 - CIMB works with the Vendors who abide by local regulations and CIMB does not condone forced labour, child labour, exploitation, human trafficking, and breach of basic human rights in relation to health, safety, education amongst others. This also means, CIMB does not restrict the Vendors' freedom of association, collective bargaining, and equitable opportunities for business, or learning and growth.

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Vendors must comply with the following:

- (a) Legal compliance
 - i. Vendors must comply with the laws and regulations of the applicable jurisdictions. Vendors are strictly prohibited from involved in:
 - (1) conducting transactions linked to the financing of and/or parts mainly and solely used for of arms and munitions, and/or
 - (2) casino and/or gaming.
- (b) Anti-corruption, bribery or illegal payments
 - i. Vendors must not engage in any form of corruption or bribery or kickbacks, including giving, offering or requesting any payment or other forms of the benefit conferred for the purpose of improperly influencing decision making. Should it come to CIMB's knowledge of such activities, Vendor acknowledges that CIMB is under statutory obligations to report such activities in accordance to the law.
 - ii. The Vendor must promptly and in good faith report to CIMB in the event that any of CIMB's personnel is involved in any activities as specified under Clause (b)(i) above.
 - iii. Vendor agrees to respond promptly to CIMB's enquiries and shall co-operate and provide necessary assistance during any investigation relating to any allegations of bribery or corruption.
- (c) Gift and entertainment
 - i. CIMB adopts a "No Gift" policy to demonstrate its commitment to uphold good ethics and as such, Vendors are not allowed to offer, send or exchange gifts and entertainment with CIMB employees as CIMB is committed to working with the highest standards of integrity. This is to prevent any conflicts of interest or appearance of such in its business dealings.
- (d) Conflict of interest
 - i. Vendors must disclose any information that may raise a possible conflict of interests. For example, a relationship (including family members, partner or close friends) with an employee of CIMB.
- (e) Labour practices and human rights
 - i. Vendors are encouraged to comply with all applicable labour and employment laws and regulations, including the Minimum Wages Order 2018.
 - ii. Vendors must promote equal opportunities and treatment of their employees.
 - iii. Vendors must not practice any kind of discrimination and respect the personal dignity, privacy, and rights of each individual.
 - iv. Vendors must not employ or force anyone to work against his or her will, involving child labour, forced labour or human trafficking.

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- (f) Confidentiality and Protection of Personal Data
 - i. Vendors must keep all data or information shared by CIMB confidential at all times (during and after the business relationship). Vendors must not share such data and information with third parties unless an official written consent is provided by CIMB.
 - ii. In all instances where CIMB's confidential information is to be disclosed to a vendor, or another external party, it is mandatory to execute a Non-Disclosure Agreement ("NDA") prior to disclosure in order to protect the CIMB's information and interests and those of its customers.
 - iii. Vendors to comply with all applicable laws, rules and regulations relating to confidentiality, banking secrecy as well as protection of personal data and privacy.

- (g) Employee health and safety
 - i. Vendors must take reasonable steps to provide control hazards and a safe working environment for its employees.
 - ii. Vendors must take precautionary measures against accidents and occupational diseases.

- (h) Environmental protection
 - i. Vendors must comply with all applicable environmental regulations and laws.
 - ii. Vendors must minimise environmental pollution and continuously strive to protect the environment.
 - iii. Vendors are strictly prohibited from engaging in illegal logging or uncontrolled use of fire for clearing forest lands, destruction of natural carbon sinks, habitat and ecosystems
 - iv. Vendors are strictly prohibited from conducting transactions relating to natural resource development within UNESCO World Heritage Sites, unless there is prior consensus with both the local government authorities and UNESCO that such operations will not adversely affect the Outstanding Universal Value of the site.

- (i) Lawful competition
 - i. Vendors must not discuss prices, distribution practices, customers, product development, and use of vendors or company plans or activities with a competitor and must adhere to all applicable laws and regulations relating to competition or anti-trust.

As part of good corporate governance, CIMB has established a whistle blowing policy that sets out avenues for legitimate concerns to be objectively investigated and addressed. Vendors will be able to raise concerns about illegal, unethical or questionable practices (especially in relation to the expectations set out in VCOC) in confidence and without the risk of reprisal. Vendors can share concerns or report malpractices or any breaches in a safe and secured manner by emailing on whistleblowing@cimb.com. All the matters reported will be investigated by a neutral independent authority. CIMB commits to ensure that all disclosed information, including the identity of the complainant shall be treated with strictest confidence.