

## **Code of Conduct and Ethics for Suppliers**

INTI relies on its suppliers and service providers for the delivery of many important and vital services, goods and work. While supported with a contractual relationship, this reliance needs to be based on a bond of trust and grounded on ethical behaviour.

All of our suppliers and service providers are an extension of our business and on many occasions, suppliers interact with our customers, stakeholders and the government on our behalf, every day. This code exists to help you, our suppliers, understand the standards and behaviours that are expected of you when you work with us at INTI.

It is expected that all suppliers and service providers meet these commitments and ensure that their employees, partners and subcontractors will do the same.

### **1. LEGAL AND ETHICAL RESPONSIBILITIES**

INTI's suppliers and their sub-contractors must comply with Malaysian and other applicable laws and regulations including those laws relating. Where the provisions of law and this Supplier Code of Conduct address the same issue, the provision that is most stringent will apply.

### **2. RECORDS AND REPORTING**

Suppliers must keep accurate records of all matters related to their business with INTI, including the proper recording of all expenses and payments. If INTI is being charged for a supplier employee's time, time records must be complete and accurate. Suppliers should not delay sending an invoice or otherwise enable the shifting of an expense to a different accounting period.

### **3. ASSETS AND INFORMATION**

Suppliers should protect INTI's assets and information. Suppliers who have been given access to INTI's assets, whether tangible or intangible, should use them only within the scope of the permission granted by INTI and for the purposes of the engagement with INTI. Suppliers who have been given access to INTI's confidential information should not share this information with anyone unless authorized to do so by INTI. If a supplier believes it has been given access to INTI's

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confidential information in error, the supplier should immediately notify its contact at INTI and refrain from further distribution of the information.

Suppliers should not share with anyone at INTI information related to any other person or organization if the supplier is under a contractual or legal obligation not to share the information.

### **4. CONFLICT OF INTEREST**

INTI's employees are contractually bound to act in the best interest of INTI.

Suppliers are expected to report to INTI any situation that may appear as a conflict of interest, and disclose to INTI if any INTI employee or professional under contract with INTI may have an interest of any kind in the supplier's business or has any kind of economic relationship with the supplier.

If a supplier has a family or friend who is an employee of INTI and that may represent a conflict of interest, the supplier is advised to disclose this to INTI.

### **5. GIFTS, MEALS, ENTERTAINMENT, AND OTHER BUSINESS COURTESIES**

No gifts or business courtesies shall be given or promised that could create suspicion of an intention to influence business transactions with INTI or give the impression that individuals have been or may have been influenced in exercising their duties in the company. A modest degree of Business Courtesies or gifts in keeping with a normal business relationship may be offered, e.g. refreshments or a working lunch when visiting suppliers' premises, but should be within the value of RM250.00 and must not be by way of cash. A gift or hamper maybe given to INTI during festivities that do not exceed RM 250.00 in value and the said item should not be addressed to any individual but addressed and delivered to the office of INTI's Chief Executive Officer (CEO).

### **6. BRIBERY AND CORRUPTION**

INTI has a zero tolerance policy for making or accepting bribes or kickbacks. In connection with any transaction as a supplier to INTI, or that otherwise involves INTI, suppliers must not transfer anything of value, directly or indirectly, to anyone, including government officials, employees of government-controlled entities, or employees of INTI or any other organization, in order to obtain any improper benefit or advantage. Suppliers acting on behalf of INTI must comply with the

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Malaysian Anti-Corruption Commission Act 2009, as well as all applicable local laws dealing with bribery. Suppliers must keep a written accounting of all payments (including any gifts, meals, entertainment or anything else of value) made on behalf of INTI, or out of funds provided by INTI. Suppliers must furnish a copy of this accounting to INTI upon request.

### 7. SPEAKING UP

Suppliers who believe that an INTI employee, or anyone acting on behalf of INTI, has engaged in illegal or improper conduct, should report the matter to INTI. Suppliers can raise the issue to INTI's Compliance Officer at [compliance@newinti.edu.my](mailto:compliance@newinti.edu.my)

Supplier's relationship with INTI will not be affected by an honest report of potential misconduct but rather appreciated.