

## **CREST - GENERAL CODE OF BUSINESS CONDUCT**

### **1. INTRODUCTION**

#### **1.1 Overview and Scope**

- (i) Collaborative Research in Engineering, Science and Technology Center (“**CREST**”) is committed to conducting its business with integrity, honesty, and accountability. This Code of Business Conduct (“**Code**”) serves as a public statement of this commitment and forms the foundation for specific internal policies and procedures.
- (ii) This Code sets out the ethical and professional standards expected of all individuals and entities employed by, acting on behalf of, or doing business with CREST, including employees, officers, directors, and independent contractors of CREST (“**Personnel**”).
- (iii) While this Code provides a general framework for ethical and lawful conduct of Personnel in CREST’s business dealings with third parties, it is not exhaustive. Personnel should exercise good judgment and, where necessary, seek additional advice to ensure full compliance with relevant legal and regulatory requirements.

#### **1.2 Application**

- (i) This Code applies to all Personnel, including permanent, temporary, and contract employees of CREST, as well as members of the board of directors and third parties acting on behalf of CREST.
- (ii) This Code is not intended to override any applicable laws, regulations, or contractual terms between CREST and its Personnel.
- (iii) If any part of this Code conflicts with existing laws or contractual obligations, the law or relevant contractual provision shall prevail.
- (iv) The requirements in this Code do not replace or modify any legal or contractual duties owed by Personnel to CREST.
- (v) This Code is to be read in conjunction with other internal policies applicable to each department and subsidiary of CREST and the relevant laws and regulations of the jurisdictions in which CREST carries out business activities, as may be amended and/or updated from time to time. Personnel must be aware of local laws governing CREST’s business activities to ensure compliance.

#### **1.3 Amendments**

CREST reserves the right to amend or update this Code from time to time. Personnel are responsible for monitoring and complying with the latest version. CREST will communicate significant changes as appropriate.

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### **2. ETHICAL STANDARDS AND INTEGRITY**

#### **2.1 Commitment to Integrity**

CREST is committed to upholding the highest standards of ethical conduct, integrity, and accountability in all business dealings and relationships.

#### **2.2 Personal Conduct**

All Personnel are expected to demonstrate honesty, responsibility, and professionalism. Personal integrity forms the cornerstone of ethical decision-making; therefore, Personnel must act in a manner that protects CREST's reputation and best interests at all times.

#### **2.3 Acting in CREST's Best Interests**

Personnel shall place CREST's legitimate interests above personal or financial interests. Actions that compromise or appear to compromise the interests of CREST are strictly prohibited.

### **3. LEGAL AND REGULATORY COMPLIANCE**

#### **3.1 General Compliance Obligation**

All Personnel are required to adhere to all applicable laws, regulations, guidelines, and contractual terms in every jurisdiction where CREST operates or conducts business.

#### **3.2 Compliance With Licences**

Personnel must also obtain and comply with all necessary licences, permits, authorisations, and approvals as required by law.

### **4. ANTI-BRIBERY AND ANTI-CORRUPTION**

#### **4.1 Zero-Tolerance Policy**

- (i) CREST adopts a zero-tolerance approach to all forms of bribery, fraud, extortion, and corruption.
- (ii) CREST is committed to conduct all its business dealings and relationships in an ethical, responsible, transparent and efficient manner to the highest level of integrity and accountability.
- (iii) CREST aspires to reinforce good governance, preventive measures and systems and ensuring compliance with all applicable processes, procedures and all laws and regulations in force.
- (iv) No Personnel shall offer, give, solicit, or accept any improper advantage in any form, whether directly or indirectly.

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- (v) All business dealings must be accurately documented, fully transparent, and comply with the Malaysian Anti-Corruption Commission Act 2009 and any other applicable legislation.
- (vi) CREST awards contracts and employment positions purely based on merits. Support letters in all forms shall not be recognised as part of the business decision making process.
- (vii) All Personnel are required to strictly comply with the provisions of the Malaysian Anti-Corruption Commission Act 2009 and all other applicable laws and regulatory requirements in respect of anti-bribery and anti-corruption.

### **4.2 Prohibited Activities**

All Personnel of CREST are prohibited from engaging in or facilitating any form of:

- (i) Bribery (i.e. the act of offering, promising, giving, receiving or soliciting of any gratification or undue advantage of any value (which could be financial or non-financial) as an inducement for a person acting or refraining from acting in relation to the performance of that person's duties);
- (ii) Corruption (i.e. the abuse of entrusted power for private gain, including but not limited to practices such as bribery, facilitation payments, fraud, extortion, embezzlement, collusion, and money laundering); and/or
- (iii) Offering or receiving gifts, hospitality, or honoraria that could influence (or be perceived to influence) business decisions, in line with CREST's No Gift Policy.

### **4.3 Anti-Bribery and Anti-Corruption Policies**

- (i) In furtherance to the above, CREST implements policies which all its Personnel are required to comply with, including without limitation, such policies addressing the following ("**ABAC Policies**"):
- (a) Anti-bribery and anti-corruption;
  - (b) Gifts and hospitality;
  - (c) Donations, sponsorships, and political contributions;
  - (d) Conflicts of interest;
  - (e) Facilitation payments;
  - (f) Arrangements with business associates and other third parties;
  - (g) Reporting and whistleblowing in relation to suspected wrongdoing by CREST, its Personnel, suppliers, clients, business associates, or other third parties; and
  - (h) Maintenance of accurate books and records.
- (ii) All Personnel are expected to comply with the spirit and intent of CREST's ABAC Policies, which provides further guidance on preventing and detecting corrupt practices.

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- (iii) Failure to comply with the above may result in CREST undertaking appropriate disciplinary action against Personnel, and in the context of business associates, may result in termination of CREST's business relations with such business associates.
- (iv) For further information regarding our ABAC Policies, please contact Human Resources Department at +604-6520088.

### **4.4 Gifts, Hospitality, and Honorarium**

- (i) CREST adopts a "No Gift Policy". CREST prohibits both the giving and receiving of gifts, hospitality, and/or honorarium from any individual or organization, that could influence, or be perceived to be capable of influencing, a business decision.
- (ii) Personnel are expected to adhere to CREST's "No Gift Policy" and are strictly prohibited from directly or indirectly offering/receiving gifts, entertainment, travel or other form of gratification to/from others that could influence—or appear to influence—business decisions, or which may give rise to the perception or appearance of a potential conflict of interest during a procurement process (e.g. tender or competitive bidding).
- (iii) Honorarium may be paid to persons of professional or scholarly standing or individual Personnel in conjunction with activities or events that are of an educational, academic, or public service nature and no specific deliverable or specific result is requested or expected. For example, participation in a seminar or workshop as a guest, speaker or panellist, provided such services are furnished on a one-off basis. The provision or acceptance of honorarium by CREST and/or any Personnel shall be subject to the fulfilment of applicable conditions prescribed by CREST.
- (iv) Business associates must not offer CREST Personnel any gift, entertainment, or incentive and not purchase and/or deliver any gift to any Personnel, the relevant department, and/or CREST's office, at any time, for any reason whatsoever.
- (v) Reasonable, modest gifts or hospitality of nominal value may be acceptable if imposes no sense of obligation on the giver or recipient; is not extravagant or excessive and shall be nominal in value; does not result in any special or favoured treatment between the giver and recipient. Anything beyond this threshold must be disclosed to, and pre-approved by, CREST's management where required.

### **4.5 Facilitation Payments**

- (i) Facilitation payments are strictly prohibited. Any requests for such payments must be immediately reported to CREST.
- (ii) Personnel are strictly prohibited from directly or indirectly soliciting or offering facilitation payments or any other form of gratification or inducement to illegally secure or expedite the performance of any function or duty, routine or otherwise.

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### **5. TRANSPARENCY AND ACCOUNTABILITY**

#### **5.1 Accurate Records**

Personnel must maintain accurate and truthful records, accounts, invoices, and other reporting documents. Falsification of any records or deliberate misrepresentation is strictly prohibited.

#### **5.2 Disclosure of Information**

All information provided to CREST, regulators, or other stakeholders must be complete, timely, and accurate. Manipulation, omission, or misrepresentation of information to gain improper advantage is unacceptable.

#### **5.3 Record-Keeping**

Personnel specifically are required to ensure that all transactions and payments are promptly and accurately recorded in accordance with established accounting standards and internal procedures.

### **6. CONFLICTS OF INTEREST**

#### **6.1 Avoiding Conflicts**

Personnel must avoid situations in which their personal interests (whether financial or otherwise) may conflict—or appear to conflict—with the interests of CREST.

#### **6.2 Disclosure and Recusal**

Any actual, potential, or perceived conflicts of interest must be promptly disclosed in writing to the appropriate department or supervisor. Personnel affected by a conflict shall recuse themselves from any decision-making or transactions related to the conflict.

### **7. CONFIDENTIALITY AND INTELLECTUAL PROPERTY**

#### **7.1 Protection of Confidential Information**

- (i) All Personnel shall safeguard CREST's confidential, proprietary, or sensitive information against unauthorised disclosure. Such information shall be used solely for legitimate business purposes and only shared with authorised parties.
- (ii) All Personnel shall comply with CREST's information and security policies and procedures to ensure maintenance and protection of the confidentiality, security and privacy of CREST's assets and information.

#### **7.2 Written Consent for Disclosure**

Personnel must obtain prior written approval from CREST before disclosing any confidential information to third parties, including client or partner information, trade secrets, or technical know-how.

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### **7.3 Intellectual Property Rights**

Personnel must protect and uphold CREST's intellectual property ("IP") rights, as well as those of third parties. Any unauthorized use, dissemination, or replication of CREST's proprietary materials is strictly prohibited. Personnel also must refrain from reproducing or publishing CREST's name, logo, brand or confidential materials without explicit written permission.

### **7.4 Compliance With Licences**

Personnel shall use software and information technology that have been legitimately acquired and licensed, while performing their duties. Such software and information technology must be used in accordance with their terms of use or license

### **7.5 Prohibition of Plagiarism**

No Personnel shall plagiarise or improperly reproduce information from CREST or other sources. Original content must be credited and used in accordance with relevant policies and laws.

## **8. FAIR COMPETITION**

### **8.1 Compliance with Competition Laws**

CREST is committed to fair competition. Personnel must adhere to all relevant competition laws and avoid practices such as price-fixing, market allocation, bid-rigging, or abuse of a dominant market position.

### **8.2 Prohibition of Sensitive Information Exchange**

Personnel are prohibited from exchanging commercially sensitive information with competitors. Any sharing of market data or pricing strategies that could influence market behaviour in an anti-competitive manner is strictly forbidden.

## **9. DATA PROTECTION AND CYBERSECURITY**

### **9.1 Compliance with Personal Data Protection Act 2010**

Personnel handling personal or confidential data must comply with the Malaysian Personal Data Protection Act 2010 and other applicable data protection regulations.

### **9.2 Safeguards and Security Measures**

Adequate technical and organisational measures shall be in place to protect data from unauthorised access, breaches, and misuse. Software used to handle CREST's data must be kept secure and up to date to minimise cyber risk.

### **9.3 Reporting Incidents**

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Any suspected data breach, cybersecurity incident, or system compromise must be reported promptly to the designated department or individual in charge of information security.

### **10. OCCUPATIONAL SAFETY AND HEALTH**

#### **10.1 Compliance with Safety Laws**

All Personnel must adhere to applicable workplace health and safety legislation, including the Occupational Safety and Health Act 1994.

#### **10.2 Duty to Safeguard**

Personnel have a responsibility to take reasonable steps to safeguard their own health and safety, as well as that of others who may be affected by their actions. This includes strictly following all health and safety guidelines set by CREST.

### **11. MODERN SLAVERY**

CREST strictly prohibits all forms of modern slavery, including slavery, servitude, forced labour, human trafficking, and child labour. Personnel must not engage in or support activities that violate fundamental human rights. Any suspected violations must be reported immediately.

### **12. ANTI-SEXUAL HARASSMENT**

#### **12.1 Zero Tolerance**

CREST maintains a zero-tolerance policy against sexual harassment in any form. All Personnel are expected to uphold a respectful, safe, and inclusive environment and not engage in sexual harassment of any nature whatsoever. This prohibition applies to interactions both within and outside the workplace when related to CREST's business or employment context.

#### **12.2 Definition and Scope**

Sexual harassment includes any unwanted conduct of a sexual nature, in any form, whether verbal, non-verbal, visual, gestural or physical, directed at a person which is reasonably offensive or humiliating or is a threat to his/her well-being, and includes, without limitation, unwelcome sexual advances, requests for sexual favours, and any other verbal or physical conduct of a sexual nature that creates an intimidating, hostile, or offensive work environment.

#### **12.3 Reporting and Investigation**

Any individual who experiences or witnesses sexual harassment is encouraged—and, in the case of employees, required—to promptly report the incident through CREST's whistleblowing or designated reporting channels. CREST will investigate all complaints impartially and confidentially, with no retaliation permitted against those who raise concerns in good faith.

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### **12.4 Corrective Action**

Personnel found to have engaged in sexual harassment will be subject to disciplinary action, which may include termination of employment or business relationships, as well as referral to relevant law enforcement or regulatory authorities, where appropriate, in compliance with the Anti-Sexual Harassment Act 2022.

## **13. SUSTAINABILITY, CORPORATE SOCIAL RESPONSIBILITY, AND ESG**

### **13.1 Commitment to Sustainable Practices**

CREST recognises the importance of integrating environmental, social, and governance (ESG) considerations into its operations. All Personnel are expected to support CREST's efforts to conduct business in a manner that is responsible, ethical, and sustainable.

### **13.2 Environmental Stewardship**

Personnel shall adhere to applicable environmental laws and regulations, including the Environmental Quality Act 1974, and strive to minimise any negative environmental impacts arising from their activities. This includes using resources efficiently, reducing waste, and implementing environmentally friendly solutions where feasible.

### **13.3 Corporate Social Responsibility (CSR)**

CREST is committed to positively impacting the communities in which it operates. Personnel are encouraged to participate in CSR initiatives that promote social welfare, education, and community development, while respecting cultural and societal norms.

### **13.4 Continuous Improvement and Reporting**

CREST may publish periodic sustainability or ESG reports, highlighting progress and challenges in meeting CSR and environmental objectives. Personnel should promptly provide accurate information or data requested for such reporting.

## **14. WHISTLEBLOWING AND REPORTING**

### **14.1 Encouraging Reporting**

All Personnel are encouraged to report any concerns or suspicions regarding unethical or illegal conduct, including fraud, corruption, or any breach of this Code, through CREST's designated whistleblowing channels.

### **14.2 Protection Against Retaliation**

Retaliation against any individual who makes a report in good faith is strictly prohibited. CREST is committed to investigating all reported concerns promptly and maintaining confidentiality to the extent possible.



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### **14.3 Mandatory Reporting for Personnel**

Personnel have an obligation to promptly report any suspected act of fraud, bribery, or corruption. Failure to do so may itself constitute a breach of this Code.

## **15. MONITORING, COMPLIANCE, AND CONSEQUENCES OF NON-COMPLIANCE**

### **15.1 Continuous Obligation**

Compliance with this Code is an ongoing requirement. CREST may conduct audits or reviews to ensure adherence and reserves the right to amend this Code as needed to address changes in laws, regulations, or best practices.

### **15.2 Disciplinary Action**

Violations of this Code may lead to disciplinary measures, including termination of employment or contractual arrangements, removal from supplier or vendor lists, and/or reporting to the relevant regulatory or law enforcement authorities.

### **15.3 Remedial Steps**

CREST expects immediate rectification of any identified breach. This may include additional training, policy revisions, or other corrective measures to prevent recurrence.

## **16. ACKNOWLEDGMENT & FURTHER INFORMATION**

### **16.1 Acceptance of Terms**

By entering into an employment or business relationship with CREST, all Personnel acknowledge that they have read, understood, and agree to comply with this Code.

### **16.2 Further Information**

Questions regarding the application or interpretation of this Code should be directed to the Human Resources Department.

## **17. NO WAIVER**

Nothing in this Code shall be construed as a waiver of CREST's legal or contractual rights. CREST reserves all remedies available under law and under its contractual relationships with Personnel.