



Tradewinds
(M) Berhad

SUPPLYING VALUE THE RIGHT WAY

BUSINESS PARTNER CODE OF CONDUCT
FOR TRADEWINDS (M) BERHAD AND ITS GROUP OF COMPANIES

1 INTRODUCTION

- 1.1 Tradewinds (M) Berhad and its group of companies (“the Group”) value the commitment by its business partners to uphold the spirit of integrity as the central and fundamental foundation in all our business relationships.
- 1.2 This Business Partner Code of Conduct (“this Code”) stipulates the key principles that govern the Group’s business relationships. These principles are the minimum standards that the Group expects all its business partners to respect and adhere to when conducting business with the Group.
- 1.3 The Group appreciates that there will be specific business practice situations which may require further clarification, and in such instances, business partners are encouraged to contact their counterparts from the Group, who will in turn seek guidance internally.
- 1.4 To facilitate the *Raising Concerns* process, this Code outlines a secured communication channel which is available for business partners to report any action or behaviour deemed in violation with the principles of this Code.

2 OBSERVING THIS CODE

- 2.1 Obligation to comply with this Code is a pre-requisite in all our business relationships. Business partners are responsible for ensuring adherence as well as self-monitoring their compliance with the principles of this Code.
- 2.2 In order not to give rise to undesirable perceptions, business partners must also endeavour to avoid practices that give the appearance of violating the principles of this Code.
- 2.3 In instances where the Group is required to perform compliance checks or undertake investigations, business partners are expected to cooperate fully with authorised representatives from the Group.

3 THE 6C PRINCIPLES OF THIS CODE

3.1 PRINCIPLE I

CORRUPT-FREE BEHAVIOUR AND ACTIONS

- 3.1.1 Business partners must never, either directly or indirectly such as through third parties purporting to represent the Group, engage in **bribery, embezzlement, offering kickbacks, extortion or blackmail** to obtain an unfair or improper advantage.
- 3.1.2 The Group recognises the exchange of modest promotional items and hospitality as acceptable business practice, where this should be in line with the giver’s and receiver’s policies on such practices, **never be intended to exert undue influence** on any business decision and undertaken in an open manner during the course of business.

3.2 PRINCIPLE II

AVOIDING CONFLICTS OF INTEREST

- 3.2.1 Business partners should **avoid any actual or potential conflict** of interest and are expected to promptly **disclose and manage** such situation so as to promote objectivity and independence when making any business decision.

3 THE 6C PRINCIPLES OF THIS CODE (cont'd)

3.3 PRINCIPLE III CAPABILITIES

- 3.3.1 Business partners must earnestly provide an **honest disclosure of their knowledge, expertise, experiences and qualifications**.
- 3.3.2 The Group also expects business partners to **submit genuine and impartial references** on their previous engagements and work done.

3.4 PRINCIPLE IV COMMITMENT

- 3.4.1 When providing a quotation or participating in a tender, business partners must do so with **firm commitment to proceed with the contract**.
- 3.4.2 The Group expects business partners to take **full responsibility and accountability** in honouring all aspects of their commitments, whether embodied in writing or otherwise.
- 3.4.3 The Group encourages its business partners **to strive for continuous improvement and to apply best practices** in order to enhance the delivery of products, services and works to the Group.

3.5 PRINCIPLE V COMPLIANCE

- 3.5.1 The Group expects its business partners to comply and to act in accordance with **all applicable laws and regulations**.
- 3.5.2 It is also necessary for business partners to **keep abreast of developments and changes in the relevant laws and regulations** to ensure continuous compliance.

3.6 PRINCIPLE VI COMPETITIVE

- 3.6.1 Business partners **should not conspire or collude** with other parties when submitting quotations and participating in a tender.
- 3.6.2 The Group expects business partners to provide **commensurate price that reflects the true value** of their products, services and works.

4 RAISING CONCERNS

- 4.1 Concerns on violations of the principles in this Code can be made in confidence via e-mail to **bpcc@twinds.com.my**
- 4.2 A business partner should raise a concern in good faith and with a reasonable basis by:
- ✓ Identifying himself or herself; and
 - ✓ Providing fair information describing the situation and where possible, evidence to support such concern.
- 4.3 The Group will keep confidential all concerns raised and actions thereof to protect the integrity of the process and the confidentiality of all parties involved.
- 4.4 The Group does not tolerate any form of retaliation and retribution as a result of raising a legitimate concern.



Tradewinds
(M) Berhad

Group of Companies



BERNAS
PADIBERAS NASIONAL BERHAD



CENTRAL SUGARS
REFINERY SDN BHD



GULA PADANG TERAP
SDN BHD



MARDEC
BERHAD



Tradewinds
Plantation Berhad

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This code is subject to change and will be revised as and when required.

This code is available in English and Bahasa Malaysia. In the event of any conflict between the English and the Bahasa Malaysia versions, the English version shall prevail.

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