



# **VENDOR CODE OF CONDUCT**

**First Edition  
January 2016**

## **INTRODUCTION**

This Vendor Code of Conduct ("Code") sets forth the principles and standards of conduct that MMC expects Vendors to adhere in their provision of works, supplies and services to MMC Group.

It is the policy of MMC to adopt procurement practices in a transparent and fair manner to support MMC Group's business objectives. Towards this end, MMC strives to adopt procurement practices which supports fair competition, wide participation and good governance in compliance with the relevant laws, regulations and terms and conditions which protects both MMC and Vendors.

MMC is committed to promoting and maintaining high standards of transparency, accountability, ethics and integrity in its business dealings in line with its Integrity, Innovation, Teamwork, Excellence and Commitment ("INTEC") values and MMC expects all Vendors to share this commitment.

This Code is not a contract. It does not confer rights on any Vendor, nor does it impose obligations on MMC and MMC Group. In case of a conflict between this Code and the Vendor's contract, the terms of the Vendor's contract prevail.

## **COMPLIANCE**

At MMC, we expect all our Vendors to comply with this Code without fail. Vendors are also expected to co-operate, maintain business relationships based on respect and trust and adopt a non-adversarial approach in business dealings with MMC. Violations of this Code by Vendors may result in relevant contractual or legal remedies under the law, termination of contract, sanctions and blacklisting by MMC Group from participating in any future procurement activities under MMC Group. Where appropriate, the directors of the Vendor may also be blacklisted.

## PRINCIPLES OF THIS CODE

This Code is guided by following principles of conduct:

- **Safety and Health**  
Vendors shall ensure a safe and healthy working environment for all their employees and others involved in or affected by their businesses and operations.
- **Integrity**  
Vendors shall uphold highest standards of integrity in all business dealings with MMC Group.
- **Accountability**  
Procurement activities shall be conducted in a transparent manner.
- **Fairness**  
Vendors shall not engage in procurement practices that are unfair. Integrity, honesty and trust shall be observed at all times.
- **Zero tolerance towards corruption**  
Vendors shall not engage in any form of corrupt practice in all business dealings with MMC Group.
- **Disclosure of interest**  
Vendors shall disclose any situation of potential conflicts of interest.
- **Confidentiality**  
Vendors shall maintain and safeguard the confidentiality of any confidential information obtained in the course of business dealings with MMC Group including compliance to the Personal Data Protection Act 2010 where applicable.
- **Anti-Competitive practices**  
Vendors shall not collude or participate in any procurement activities that are anti-competitive or contravening the applicable laws of Malaysia.
- **Compliance of law**  
Vendors shall ensure compliance with applicable laws of Malaysia governing their contractual obligations.

**OBLIGATIONS OF VENDORS**

Vendors must observe the following responsibilities:

- Vendors must comply with the principles of this Code.
- Vendors must respond to tender solicitations in a fair, honest and transparent manner, reflect their capability to meet the requirements stipulated in the tender documents.
- Vendors are prohibited from any form of corruption, tender-rigging, collusion or any other form of anti-competitive activity in any tender exercise and during the performance of their works, services or supplies.
- Vendors are prohibited to offer employees of MMC any bribe, money, gifts, goods or services or any form of inducement or benefits or promise to give, in any manner, gratuity to employees of MMC that may give rise to real or apparent influence on their fairness in executing their official duties.
- Vendors shall ensure their relevant employees are being informed of this Code.
- Vendors shall report any violations of this Code.
- Vendors shall cooperate fully in any investigation or audit by MMC in respect to compliance to this Code.

**Signature** : \_\_\_\_\_  
Name : \_\_\_\_\_  
Designation : \_\_\_\_\_  
Date : \_\_\_\_\_