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Code of Conduct



KUM HOI ENGINEERING INDUSTRIES SDN BHD

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REVISION HISTORY

Rev	Effective	Affected Page	Change Descriptions
No.	Date		
0	01.06.2013	All	New Issue
1	06.05.2016	All	Added information on Ethics, Intellectual Property, Antitrust and Anti-bribery
2	11.07.2019	8	4.1 Gift and Entertainment: add allowable value per pax
3	23.07.2020	5 – 6, 9	 i. Updated the channels to raise concerns ii. Refined 1.2.5 Non-Retaliation Commitment iii. Added 1.2.7 Ethics Committee Responsibilities iv. Added 1.2.8 Audits v. Updated 4.1 Gifts & Entertainment

	Name	Signature
Reviewed by:	YONG MAN YEW	
Approved by:	CHAN KUM HOI	SAS

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6.0 How We Follow the Laws, Regulations and other Requirements

6.1 Antitrust / Competition Law

Antitrust laws as they are called in the U.S. are often known internationally as "competition" or "antimonopoly" laws. Their purpose is to help make sure that the free market system works properly and that competition among companies is fair. We must all help ensure that KHEI's business is also compliance with these laws. Most of the countries where we do business have such laws. We are committed to complying with antitrust laws, just as we are committed to following all laws.

6.2 Anti-bribery / Anti-corruption

We prohibit all forms of bribery. In particular, we prohibit offering, promising, giving or authorizing others to give anything of value, either directly or indirectly, to any party in order to gain an unfair business advantage, such as obtaining or retaining business. Any payments or gifts on behalf of KHEI and which induce or are intended to induce someone to act improperly and payments, gifts to public officials to influence them in the performance of their duty are matters which will be investigated and may result in disciplinary action, including summary dismissal, against employee concerned.

Gifts or entertainment may only be offered to a third party if they are consistent with customary business practice in the relevant territory, are modest in value and cannot be interpreted as inducements to trade. Where there is any doubt, guidance should be sought from the company counsel. Purchases of services and products from suppliers will be made solely on the basis of quality, performance, price, value and/or for the benefit of the company, and never on the basis of giving and receiving inducements in the form of payments, gifts, entertainment or favours or in any other form.

Employees should not accept gifts, money or entertainment from third party organisations or individuals where these might reasonably be considered likely to influence business transactions. In a culture where such action might cause offence, the gift should be declared to the company and, if practical, donated to an appropriate charity.