



**APEX EQUITY HOLDINGS BHD  
AND GROUP OF COMPANIES  
("APEX")**

**VENDOR CODE OF CONDUCT  
("VCC")**

**VCC / RMD V1(2025)**

<b>Prepared by</b>	Group Risk Management Department
<b>Reviewed by</b>	Group Board Risk Committee
<b>Approved by</b>	Board of Directors

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## 1. Purpose

1.1 Apex Equity Holdings Berhad and its group of companies (“APEX”) are committed to conducting business ethically, responsibly, and in full compliance with all applicable laws and regulations.

1.2 This Vendor Code of Conduct (“VCC”) applies to all vendors engaged by APEX, including suppliers, contractors, consultants, agents, and any individuals or entities appointed by them to deliver goods or perform any part of the services. This includes their employees, agents, suppliers, and sub-contractors (collectively referred to as “Vendors”). The Vendor Code of Conduct (VCC) outlines the standards of ethical business practices and professional conduct expected of all Vendors engaging with or providing services to APEX.

1.3 APEX expects all Vendors to comply with the VCC when engaging with the company and throughout the course of their business relationship with APEX.

1.4 This VCC sets out the obligations, standards of business ethics, and professional conduct required of all Vendors working with or on behalf of APEX.

1.5 All Vendors are required to read and understand the “**Vendor Compliance Acknowledgement & Declaration Form**”, either on their own or after receiving a briefing. They must then complete and sign the form, which serves as a declaration of their commitment to comply with the Vendor Code of Conduct, as well as all applicable laws and regulations.

## 2. Scope

Apply to all third-party services providers, including:

- Vendors / Suppliers
- Contractors / Subcontractors
- Consultants
- Agents
- Other service providers

## 3. Objectives

<b>Integrity and Ethical Conduct</b>	Vendors must act with honesty in all representations and uphold the highest standards of ethical conduct and integrity in their dealings.
<b>Accountability</b>	Vendors are expected to be fully accountable for the goods and services they provide. They must fulfil their obligations efficiently and within the agreed timelines, in accordance with the established terms and conditions.
<b>Protection of Assets and Information</b>	Vendors must safeguard APEX’s confidential information and ensure it is not disclosed to any unauthorized party under any circumstances.
<b>Workplace Practices and Culture</b>	Vendors must comply with all applicable laws and regulations related to workplace practices and safe working environmental standards.

## 4. Vendor Responsibilities & Compliance

4.1 Vendors are responsible for ensuring that their representatives understand and comply with the VCC. If a Vendor becomes aware of a breach or potential breach of the VCC, it must promptly report the matter to APEX accordingly.

4.2 APEX may request, from time to time, additional information or a written attestation confirming the Vendor's compliance with the VCC. Vendors are required to provide such information as requested, in a timely and accurate manner.

4.3 In the event of a breach of the VCC, APEX reserves the right to take any action it deems appropriate, including but not limited to:

- Suspension or termination of the contract;
- Withholding or deducting payments due to the Vendor;
- Requiring the Vendor to replace any representative who has breached or acted inconsistently with the VCC; or
- Disqualifying the Vendor from future tenders or procurement exercises.

4.4 Vendors are expected to fully cooperate with APEX in any investigation involving allegations of misconduct or unethical behaviour by APEX employees or the Vendor's representatives in connection with any business engagement or procurement activity.

## 5. Principles of the Code of Conduct

### 5.1 Integrity and Good Ethics

#### (a) Managing Conflict of Interest

- Vendors must avoid conflicts of interest and not seek improper advantages with APEX employees.
- Vendors must disclose any APEX employee or their family member's interest in their business or any family relationships with APEX employees.
- Any actual or potential conflicts or improper advantages must be reported to **whistle@apexequity.com.my** immediately.

#### (b) Anti-Bribery / Corruption

- Vendor is prohibited from directly or indirectly soliciting or accepting any form of bribery.
- Vendors must not engage in extortion, kickbacks or facilitate such activities.
- Vendors must not offer any form of gratification (e.g. gifts, entertainment, special invitations) to APEX employees or their family members to gain an advantage in the procurement process.

#### (c) Gift, Entertainment, Corporate Hospitality, Sponsorship, Charitable and Political Contribution

- Vendors and their representatives must not offer gifts, entertainment, or incentives to APEX employees, directors, family members, or agents.
- The policy covers food, beverages meals, personal trips, and events (e.g., sports, parties, conferences, and social gatherings).

- APEX employees may attend public or industry events at APEX's expense, with no sponsorship involved.
- Any gifts, entertainment or sponsorship from suppliers must be approved by the Group Deputy CEO and documented in the gift register.

(d) Misrepresentation

- Vendors are strictly prohibited from making misrepresentations about their capabilities to secure procurement with APEX or other entities.

## 5.2 Accountability

- The Vendor must be accountable and honour its commitment in accordance with the terms and conditions of the contract which has been agreed between the Vendor and APEX.

## 5.3 Protection of Assets & Information

(a) Confidentiality Obligation

- Vendor must keep APEX-related information confidential and not disclose it without prior written consent.
- Disclosure is only permitted for procurement obligations, with written consent.
- Vendor must implement controls to protect APEX's confidential information and ensure compliance by its representatives.
- Any personnel or representatives of the vendor who are granted access to APEX's confidential business data, financial data or client data must sign a Non-Disclosure Agreement (NDA) prior to gaining such access.
- Confidentiality obligations remain after the engagement ends.

(b) Data Protection

- The Vendor must comply with the relevant laws and APEX's policies in relation to protection of personal privacy, including personal data.

(c) Restriction on Making Public Statement and Giving of Reference

- Vendors are prohibited from making public statements or using APEX's name for marketing without prior consent.

(d) Protection Intellectual Property

- Vendor must respect intellectual property (IP) rights and protect IP during technology transfers.
- Vendor must use only legitimately acquired and licensed software and technology.
- Vendor must comply with APEX's IP rights and those of third parties; APEX will take legal action against IP infringements.

## 5.4 Workplace Practices & Culture

### (a) Cybersecurity & Physical Security

- Vendors must implement strong cybersecurity and data protection measures to safeguard APEX's confidential information.
- Ensure only authorized access to APEX systems and promptly revoke access when no longer needed.
- Conduct regular vulnerability assessments, including asset inventory, penetration testing, and patch management.
- Provide cybersecurity and data privacy training to employees and subcontractors.
- Maintain confidentiality, integrity, and availability of APEX data; monitor and respond to threats promptly.
- Establish and document an Incident Response Plan (IRP).
- Obtain APEX's approval before using cloud services and ensure proper physical and environmental security controls.

### (b) Professional Workplace Environment and Employment Practices

- Vendors must maintain professional behavior and appearance when performing duties for APEX.
- APEX strictly prohibits abuse, child labour, discrimination, and substance abuse on its premises or during contract performance.

### (c) Security and Access

- Vendors must follow APEX's security policies while on-site and cooperate with security vetting procedures.
- Security passes must be visibly worn, and access is limited to authorized areas necessary for work duties.

### (d) Whistleblowing or Reporting of Potential Breach

- Vendors or any party aware of a potential breach of the Vendor Code of Conduct (VCC) should report it confidentially to [whistle@apexequity.com.my](mailto:whistle@apexequity.com.my).
- Reports will be handled discreetly, and identities kept strictly confidential.
- APEX prohibits retaliation against anyone who reports concerns in good faith.

### (e) Safety and Health

- Vendors must comply with all Malaysian safety, health, environmental, and local authority regulations, and maintain required permits and records.