



# Code of Conduct and Business Ethic



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# Code of Conduct and Business Ethics

## Overview



The success of Ranhill’s business is dependent on the trust and confidence earned from employees, customers and shareholders. Ranhill would gain credibility by adhering to its commitments, displaying honesty and integrity and reaching company goals solely through honourable conduct.

It is easy to say what we must do, but the proof is our action. Ultimately, we will be judged on what we do.

Directors, employees and other stakeholders should always act lawfully, ethically, professionally and in the best interest of Ranhill and thereby protect and promote the reputation and performance of Ranhill.

This Code of Conduct and Business Ethics sets out the basic guiding principles in upholding trust, integrity and high ethical standards. This Code is also developed in compliance with the relevant laws and regulations.

All employees are expected to treat subordinates, peers, supervisors and external stakeholder with due respect and dignity at all times.

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# Code of Conduct and Business Ethics



## Objective

The objective of this policy is to provide comprehensive guidelines on the standards of conduct expected of all employees of Ranhill. The standards of Conduct are to ensure that all employees’ behaviour is in line with the Ranhill’s Core Values and Business Principles.

## Scope

This policy is applicable to all Directors (Executive and Non-Executive) and Employees of the Ranhill. This includes employees on secondment to Joint Ventures, affiliates or associates.

Joint Ventures Companies where Ranhill has no management control and associate Companies are encouraged to adopt these or similar standards.

## Policy Statement

This CCBE shall apply to all Directors and employees who are expected to behave ethically and professionally at all times including beyond normal working hours.

With respect to their service on behalf of the Company, Ranhill’s Board of Directors must comply with the relevant provisions of the CCBE including conflicts of interest, insider trading and compliance with all applicable laws, rules and regulations.

All employees of Ranhill Group shall be required to sign off the Employee Acknowledgement & Declaration form (refer to Appendix 1) as a means to confirm their receipt and understanding of the CCBE.

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# Work place CULTURE

Ranhill is committed to provide a harmonious working environment to everyone so that employees will be able to perform their job efficiently.

### Respect one another

All employees are expected to treat subordinates, peers, supervisors and external stakeholder with due respect and dignity at all times.

### Equal Opportunity

Ranhill offers equal opportunities to all employees and highly values “Continuous Improvement Process”, innovation and teamwork for its further progress and continuity. Employment-related decision shall be made based on employees’ performance. Therefore, Employees and Supervisors shall be expected to have a regular consultations and coaching dialogues on work performance.



### Harassment and Discrimination

Any types of harassment and discrimination based on gender, religion, race, age or any other basis shall not be tolerated. Employees have the full liberty to utilise the Grievance P&P and Sexual Harassment P&P for their concerns to be properly addressed.

### Borrowing Money

Employees are prohibited in any circumstances to borrow money from contractors, vendors, consultant, and suppliers.

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# Work place CULTURE

“ Culture is what enables teams of people to defy the odds and achieve the remarkable. ”

### Serious Financial Indebtedness

Serious financial indebtedness from whatever causes shall be regarded as necessarily weaken the efficiency and effectiveness of an employee. An employee shall avoid habitual indebtedness unless he/she proves that such

indebtedness or insolvency is the result of circumstances beyond his/her control and does not result from living beyond means. Employees who are in a serious financial indebtedness status can easily be drawn to commit misconduct such as fraud and dishonesty as and when the opportunity arises and as well as become habitual money borrower from another employee.

An employee shall be required to disclose the full extent of his/her

serious financial indebtedness to GHRD at the earliest opportunity when such indebtedness be made known to the employee. An employee who obtains an annulment of his/her bankruptcy may be treated as having fully restored his/her credit standing

### Criminal Activities

Employees are prohibited to involve in any criminal activities that is under the law of any Country. Employee must report any suspicious transaction or suspected criminal activity to the Whistleblowing channel. Any employee who is found guilty under any criminal activity, in any Country, he/she shall be dealt with in accordance to Misconduct Policies & Procedures

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# Work place CULTURE

### Substance Abuse

Ranhill is committed to providing a safe and productive work environment for its employees; that is free from any substance abuse

Employees are prohibited from taking un-prescribed drugs or any other substance which are narcotic, hallucinatory or additive and the abuse of alcohol. Employee must report to *GHRD* of any incidence of other employee suspected of doing so. Ranhill has the rights to instruct employees to go for drugs /substance test from time to time and disciplinary action as per Misconduct Policy & Procedure shall be taken against any employee violating this policy

Ranhill shall provide employees with health education programme to raise awareness of the danger of drug use and alcohol abuse.

### Gambling

Employees are prohibited involving in any form of gambling or engaging in any game of chance during office hours or off office hours.

### Smoking

Employees are prohibited from smoking (including smoking using electronic cigarette) in the office premises except in areas designated as smoking area.

### Health, Safety and Environment

Ranhill is committed to provide a safe, secure and healthy environment for all employees. Hence, Ranhill supports activities that do no harm to people.

Ranhill shall comply with all applicable laws, standards and procedures imposed on Ranhill’s operations.

Ranhill will intervene any unsafe acts or unsafe condition arises from Ranhill’s operation and respect and appreciate the Communities in which we operate our business.

### Ranhill shall adapt the



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# Conflict of Interest

## General Rules

Employees are expected to make business decisions / judgements in the best interest of Ranhill and shall at all time avoid being in a situation of conflict.

The following are the overall ethical tenets:

No employee may benefit directly or indirectly from Ranhill’s dealings with others.

No employee may serve business interest that competes with Ranhill.

No employee shall allow outside business or work activities interfere with their Ranhill job performance

Employees who are in a situation of conflict shall make a report in writing to their HOD as soon as possible stating the nature of details of the conflicts.

## Outside Employment

If an employee plans to take a **“position of responsibility”** or acquire a significant ownership interest in a business outside Ranhill he/she shall report his/her intentions to his/her HOD before he/she enters into the relationship.



A conflict of interest may be created if that business competes or does business with Ranhill.

Employees are encouraged to discuss the relationship with their HOD before reporting it.

If an employee is holding an **“officer/executive level position”** in Ranhill, he/she is not allowed to accept a position of responsibility with an outside business without the written approval from Ranhill. Arrangements for securing approval should be made through his/her HOD and submitted to the respective HRD. If he/she is promoted to an officer/executive level position and have an outside business position of responsibility, that affiliation must be declared and reviewed to determine whether approval is necessary.



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# Conflict of Interest..cont

## Involvement of Family Members

Employees are expected to make business decisions / judgements in the best interest of Ranhill and shall at all time avoid being in a situation of conflict.

Decision making process of a business activity within Ranhill shall not involve two or more family members. If the situation arises, the employees shall be required to disclose their relationship.

It has become much more common for family members to hold positions of responsibility with establishments, where they are the competitor, customer or supplier of Ranhill. There is a potential risk for inappropriate sharing of Ranhill’s confidential information. If the situation arises, the employees shall be required to make a declaration.

## Personal Transaction with Ranhill’s Clients, Suppliers and Vendors

Employees may, directly or indirectly enter into a personal transaction with Ranhill’s clients, suppliers and vendor. All personal transactions are on no more favourable terms than those offered to the public

## Activities Outside Ranhill

Employees are encouraged to contribute their personal time to community, charitable and service organisation. Volunteerism is heartily endorsed by Ranhill but it does not mean that Ranhill approves the activities of any particular organisation. Ranhill respects employees’ rights to choose their own voluntary affiliations.

Such activities should not conflict with the employees’ roles and schedules in Ranhill. For exceptional cases, all requests are to be made to the GHRD for approval to pursue volunteer activities during working hours.

## Investment Activities

A director or an employee shall refrain from influencing his/her independent judgement on behalf of Ranhill based on his/her personal investment decisions.



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# Safeguarding Against Bribery corruption and unethical Practises



Enquiry of this sections?  
Please contact GCAD

### Bribery and Corruption

Ranhill has zero tolerance towards bribery and corruption. No one shall make, offer to make payment to an establishment, a person or a group of people to secure, obtain or retain a business. Employee must report to GCAD of any suspicious transaction or incidence of suspected giving or receiving of bribe.

### Money Laundering

Ranhill prohibits any involvement in money laundering activities, either directly or indirectly. Employee must report to GCAD any suspicious transaction or suspected incidence of money laundering.

### Discount and Preferential treatment

Employee shall not accept any discount or other preferential treatment conferred, that maybe view as an inducement to secure favoured treatment in return. In some cases, business firms extend modest discounts across the board to all employees simply to encourage sales of their product. These types of discounts may be accepted.

### Gift

Ranhill practices ;



### Travel and Entertainment Expenses

Consistent with the need to maintain an appropriate image, Ranhill shall pay all relevant and reasonable expenses for employees’ business trips. Trips shall not be financed by anyone with whom the employees are doing business. If an employee finds himself/herself in such a situation, he/she should be aware of the opportunities for abuse



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Contributing to the society is part of our values. However, there is a risk if the donation exercise is not properly managed.

**All donations request from outside Ranhill shall be referred to and managed by the Group Corporate Communication (“GCC”)**

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# Protecting Ranhill

## Safeguarding of Assets

Ranhill entrusts employees with Ranhill’s assets in order for employees to perform their jobs. Employees shall protect Ranhill’s assets against theft, waste, loss, damage and misuse

Each tangible asset shall be given a tag number and recorded as per Fixed Asset P&P.

## Safeguarding Technology Resources

All Ranhill’s IT peripheral, programme and password shall be safeguarded against theft and improper usage. Ranhill purchases only licensed and original software. Software shall be installed in Ranhill’s IT peripherals with the knowledge of GIT. Employees are prohibited from installing unauthorised software.

Employees are to safeguard their own password provided by GIT and not disclosing to others. Employee may request from GIT a new password when suspecting that his/her password has been exposed. Employees may also change the password themselves using the auto-change password tools provided by some applications.

Private uses of Ranhill’s IT peripherals and programmes for personal gain are strictly prohibited.

Wherever is allowed and applicable by the law in certain Countries in which Ranhill operates its business, Ranhill reserves the rights to monitor employees’ company email. Ranhill can use the email messages as evidence in the Domestic Inquiry Proceedings and the Courts of Law.



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## Safeguarding Non-Public Information

In the course of performing work, employees may have access to information regarding Ranhill, or even about another Company, which should not be generally made known to the public. Each of us must follow certain steps to protect ourselves, Ranhill and others from misuse of material non-public information as improper handling of non-public information can have extremely serious legal and business consequences.

Both as a matter of law and out of sound business sense, it is wise not to give confidential or privileged information to anyone who does not have a definite need for the information. The following general guidelines shall be observed:-

- i.The responsibility for defining what information is confidential in each area lies with the HOD.
- ii.Confidential information about Ranhill, its employees or other companies shall never be shared with anyone inside Ranhill, except when it is a business necessity, or with anyone outside Ranhill without consulting the GHCD or CE/CEO's offices.
- iii.Employees should never use confidential information about Ranhill, its employees, suppliers, customers or any other Ranhill for personal gain

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## Safeguarding Confidential Information Internally

Even within Ranhill, there are good reasons to handle confidences with care. The types and uses of confidential material are so varied that it is impossible to set practice guidelines for its handling. Employee shall, however, observe at least the following general rules:-

The following Ranhill confidential information are included as not to be disclosed without proper written approval, unless published in the Annual Reports :-

- Revenues
- Gross profits or gross margins
- Expenses
- Pre and after-tax profits
- Orders in hand and/or projected Market share

No one should see a confidential memo unless that person has a definite need to know the information it contains.

Document with confidential information shall be labelled as ‘confidential’ and shall not be left on workstation and

photocopier machine. Ideally, all such document shall be kept in a locked file and should be copied only as necessary, with distribution of such copies closely controlled. Confidential materials should be properly shredded and not dispose in the paper bins.

Good judgement should be used in deciding what is and is not confidential. Overuse of the word “**confidential**” to try to increase the significance of a memo merely leads to the disregard of all confidential material, including that which is truly confidential.

A good practice for distribution of confidential document is to send such document in sealed envelopes with instructions on the outside saying “**to be opened by addressee only**”.

Privileged information derived in the performance of employees’ duties and from meetings with senior Management should not be discussed and divulged to persons not concerned. The disclosure of such information to other executives should be handled with care, bearing in mind the necessity and ranking of the executives concerned.



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## Handling Non-Confidential Information

Employees may release non-confidential information to people with a legitimate interest in Ranhill’s business. Employees shall confine themselves to previously published information, where the information is accurate and not susceptible to conflicting interpretation.

Employees who are become involved in any situation relating to the use, disclosure, dissemination or receipt of confidential information where the application of these standards is unclear are advised to consult their HOD

## Record Management

Ranhill is committed to properly managing the life cycle of records and information to comply with legal, financial and regulatory requirements as stipulated by the Records Management P&P. Employees must maintain accurate, legible records. Such records must be readily available and retrievable.



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# Dealing with Business Partners & Outsiders



Enquiry of this sections?  
Please contact GLC

## Communication with Government / Government bodies

Expression of Ranhill’s position on legislations or regulations relevant to its business can often be critically important. Communication of such position to government bodies (whether oral or written communication) in the preparation of draft legislation or regulations, shall be referred to the GCL Department and/or the CE’s Office. The appointment of retention of Counsel experienced in government relations work shall also be referred to the GCL department and/or the CE’s office.

In all these activities, be sure that applicable legislative and administrative representation rules and that all our practices can stand the test of public scrutiny. Employees, who are contacted by any regulatory agency on matters outside their regular area of responsibility, immediately notify the CE’s office or the GCL department and delay responding until, properly advised.

## Communication regarding



Employees are encouraged to write “letter to the editor” to journals, magazines, the press, or in any similar way in trying to help shape public opinion, avoid using Ranhill stationery, titles or any other means by which employees’ personal views may appear to be those of Ranhill.

As a matter of policy, Ranhill disclaims responsibility for any private statement made by any of its employees. If necessary, Ranhill will publish a retraction of any unauthorized statement if it feels there is a possibility that the statement will be read as representing Ranhill’s position or views on the matters covered.

Accordingly, if an employee’s relationship with Ranhill is made known to a private audience, the employee shall state in his/her opening remarks that any views he/she expresses are his/her own and not those of Ranhill. A suitable statement would be : *“the views expressed here are my own and do not necessarily reflect the views of Ranhill”*.



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## Personal Political Activities

Employee’s participation in the political process is essential to the preservation and improvement of our society. However, employee shall seek the prior written approval of the CEO/CE’s office if he/she intends to hold an executive position or position of responsibility in a political party.

Employees should separate personal political views with Ranhill’s activities to avoid possible misunderstanding and legal difficulties. Expenses must not be incurred on Ranhill’s behalf in connection with personal political activities. No official time-off shall also be approved for employees involved in helping during election campaigns or polling. Leave taken shall be treated as annual leave or unpaid leave if annual leave is not available.

Director/employee who intends to contesting in the General Election is required to relinquish (director) /resign (employee) upon nomination exercise during the General Election.

## Political Contribution

No contributions of corporate funds may be made to election campaigns, political action committees or referenda unless such contributions have been approved by the President/CE’s office and all requirements for disclosure and reporting have been met. All requests for such contributions must be referred to the RAM.

## Competition and Anti-Trust Laws

Ranhill is committed to competing ethically in business market. Employees are required to comply with the anti-trust laws in Malaysia (Competition Act 2010) and in the Countries which Ranhill operates.

Employees must not use illegal methods to compete in business market such as exchanging competitive information with competitors, fixing prices and terms related to prices. Employees are also prohibited from possessing trade secrets of other establishments on behalf of Ranhill without consent of the establishment.



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# CCBE Management



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Do email  
[employee.relations@ranhill.com.my](mailto:employee.relations@ranhill.com.my)

## Sharing views and concern about CCBE

Ranhill practises an open door policy and encourages employees to share views, concerns and suggestions. Employees are encouraged to communicate with their HOD if they are not sure about the policy of CCBE.

### Reporting CCBE violations

Employees have the full liberty to utilise the various channels of reporting for an actual CCBE violation or suspected CCBE violations. This shall depend on the type of CCBE violations which are covered under the Fraud and Whistle blowing P&P, Misconduct P&P, Sexual Harassment P&P and Grievance Handling P&P.

### Investigating CCBE violations

Investigation shall only be conducted based on reports received on any CCBE violation.

All investigation reports made shall be treated in a confidential manner.

Disclosure of information of the investigation to non-related party in the investigation shall be viewed as **serious disciplinary misconduct**.

## Disciplinary actions

Appropriate disciplinary action shall be taken where CCBE violation has been proven.



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# Abbreviations

TERMS	DESCRIPTION
CCBE	Code of Conduct and Business Ethics
GCAD	Group Corporate Assurance
CE	Chief Executive
CEO	Chief Executive Officer
GCC	Group Corporate Communication
GHR	Group Human Resource
GLC	Group Legal & Compliance
HOD	Head of Department
GIT	Group Information and Technology
P&P	Policy and Procedures

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TERMS	DESCRIPTION
Anti-bribery Laws	Regulations that prohibit the offer of cash, goods or services to a person in order to persuade him/her to perform an action in the interests of the person offering the bribe.
Anti-trust Laws	Regulations intended to promote fair competition in the market place by outlawing monopolies for the benefits of consumers
Assets	Tangible or intangible resources owned or controlled by Ranhill as a result of past transactions to produce value to Ranhill. Such resources includes funds, accounts receivable, bonds and stocks, buildings, equipment, tools, goodwill, trademarks, copyright, information, information technology equipment & programmes, documents.
Breach	Conduct that result in any form of disciplinary action against a person or persons.
Bribe	A gift or reward in the form of money, goods, property, privilege, promises bestowed to influence a person / group of people with the intention to influence any decisions
Competitor(s)	A person or an establishment that is rendering same or similar services as Ranhill in the same / similar industries.
Confidential Information	All trade secret and proprietary information of Ranhill, including but not limited to any and all technical, business or financial information or property.
Conflict of Interest	A situation where a personal interest interferes with a person judgment.
Contract	an agreement with specific terms between two or more persons or entities in which there is a promise to do something in return for a valuable benefit known as consideration.
Customer	Persons or establishment that Ranhill renders services.
Directors	Includes Executive and Non-Executive Directors.

TERMS	DESCRIPTION
Employees	All personnel including Senior Management, Managers, Executives and Non-Executives under the employment of Ranhill including under contractual, temporary and internship employment.
Family members	Employee’s spouse, parent, children (including step-children and adopted children), brother, sisters (including step-brothers, step-sisters, step-brothers, step-sisters, grandparents, grandchildren, uncles, aunts, nieces, nephews and in laws
Fraud	An act of dishonesty (by words or conduct) with the intention for personal gain or to cause a loss to another party.
Harassment	Unwanted conduct of behaviour which has the purpose of creating an intimidating, hostile, humiliating environment for a person or group of people
Insider	A person who possess information that is not generally available and which, upon it becoming generally available, would have a material effect on the price or the value of securities.
Insider Trading	The purchase or sale of Ranhill shares affected by or on behalf of a person with knowledge of material but non-public information regarding the company, as well as the disclosure of inside information to others, who then trade in Ranhill shares.
Ranhill	Ranhill Utilities Berhad, its subsidiaries and associate companies.
Policy	A statement which guides decision making based on Ranhill’s mission, objectives and strategies. It sets out the general aim of Ranhill in a specific area of business and includes objectives, responsibilities and arrangement for implementation and monitoring.

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TERMS	DESCRIPTION
Price-sensitive information	Information that “on becoming publicly available would or would tend to have material effect on the price or value of securities”.
Serious Financial Indebtedness	The state where an employee owes money in which the amount incurred has caused financial hardship to him /her.
Position of Responsibility	Either one in which employees may have significant opportunity to influence the decisions of a business or one in which he/she deals frequently with customer of the business.

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