



Rakan

**RAISING AWARENESS,
KNOWLEDGE AND NETWORKING
WITH BGC**

Business Ethics

What is the Code of Conduct?

- A foundation of ethical business behavior expected from all BGC Vendors when conducting business with BGC.
- Sets out rules, standards and expected behaviours.
- Provides a common understanding of behaviours expected of all Vendors in BGC.
- Guides behaviour through our Core Values
- i.e. **Safety, Honesty, Integrity and Professionalism**
- **Note:** Adopted from BSJV's Code of Conduct.

Key expectations from Vendors



Compliance with Laws and Code

Suppliers must abide by this CoC and its principles, and comply with the laws, rules, and regulations of Brunei Darussalam and the locations in which they operate.

They are expected to be familiar with the business practices of their suppliers and subcontractors, and ensure they also operate according to the standards found in this Code.

This booklet can be downloaded from BGC website. Alternatively, please contact your respective Contract Holder for a printed copy.

BGC may discontinue its relationship with suppliers who fail to comply with this Code.

Key expectations from Vendors



Business Integrity

- BGC requests that suppliers respect its '**No Gifts Policy**'. Suppliers must **not** offer gifts or hospitality to BGC employees, including those of nominal value. The offer or acceptance of gifts or hospitality could lead to **actual** or **perceived** conflicts of interest, and should be avoided.
- Improper Payments, **Bribes**, **kickbacks**, **facilitation payments** and similar unethical practices are strictly **prohibited**. Employees, suppliers, and agents acting on behalf of BGC are **prohibited** from offering or accepting such consideration under any circumstances.

Key expectations from Vendors

Business Integrity

- **Conflicts of Interest** and Transparency Conflict between personal interest and duties to the company must be avoided. Suppliers are required to **disclose** any potential or actual conflicts of interest via BGC's COI form including any existing personal or family relationship with BGC staff.

If a supplier employs **former BGC staff** in **commercially critical positions** who may potentially manage business with BGC, the supplier must **disclose** such potential conflict to BGC.

Corrective action should be taken to **mitigate** conflicts, which may include recusal or reassignment of tasks.



Key expectations from Vendors

Health and Safety

- Suppliers must provide workers with a **safe and healthy work environment**. They should take proactive measures that support accident prevention and minimize health risk exposure.



Key expectations from Vendors



Environment

- Suppliers are expected to conduct their operations in a way that minimizes the impact on **natural resources** and protects the **environment**, customers, community and employees. They must ensure their operations comply with all laws related to air emissions, water discharges, toxic substances, and hazardous waste disposal.

Suppliers must maintain knowledge of input materials and components to ensure they were obtained from permissible sources and origins, in **compliance** with laws and regulations.

Key expectations from Vendors



Confidential Information

- Proper management of **confidential information** is critical to the success of both BGC and suppliers. Suppliers must have appropriate **safeguards** in place to protect all BGC information, electronic data, and intellectual property or technologies.

Any transfer or handling of confidential information must be executed in a way that secures and protects the intellectual property rights of BGC and its suppliers. Suppliers may receive BGC confidential information only as authorized by a **confidentiality or non-disclosure agreement**, and must comply with their obligations to **not disclose** the **confidential information**

Key expectations from Vendors



Labour

Suppliers should:

- Not use **child labour**
- Not used **forced**, prison or compulsory labour
- Not tolerate **discrimination, harassment or retaliation**, and should provide a safe, secure and healthy workplace
- Provide **wages** and benefits that meet or exceed the national requirements
- **Comply** with all applicable laws and regulations on working hours

Communication and training



- Suppliers are expected to assist BGC in **enforcing** this Code of Conduct by **communicating** its principles to their supervisors, employees, and suppliers, and ensuring appropriate **training** is provided to cover the relevant subject matter.
- Suppliers may direct **questions** or **comments** about this Code of Conduct to his/her Company Contract Holder.

Non-Compliance and Reporting



- It is the responsibility of suppliers' staff to **report** any incidents or concerns involving a **potential breach** of this Code of Conduct. Suppliers should provide workers with a dedicated **whistle-blowing** mechanism where grievances related to the above topics can be reported **confidentially**, without fear of retaliation.
- Any reports involving a potential breach of this Code of Conduct must be appropriately addressed and investigated in an **objective** and **timely** manner.

Annual Confirmation

DECLARATION OF CONFLICTS OF INTEREST

I confirm that during the past year while working with BGC:

1. Our company has complied with our responsibilities under the BGC Supplier Code of Conduct as found in the following link: <https://www.bgc.com.bn/wp-content/uploads/2017/05/SUPPLIER-CODE-OF-CONDUCT.pdf>
2. Our company has appropriately resolved, reported or sought advice about Code of Conduct concerns that have come to our attention using the appropriate channels.

Please check the appropriate statement below:

____ I hereby acknowledge that our company, _____, has declared any actual or potential conflicts of interest in year _____ involving any business activities with BGC. The facts were/are the following:

____ I hereby acknowledge that our company, _____, has not had any actual or potential conflicts of interest to declare in year _____ involving any business activities with BGC.]

Name Signature Position

- Suppliers must confirm that they have adhered to the principles contained herein on a **yearly basis**.
- They must also confirm that all relevant ownership and company contact information is up to date, and any **actual or potential conflicts of interest** have been fully disclosed.