



CLINICAL RESEARCH MALAYSIA

Your Global Solutions in One Nation

CODE OF CONDUCT



Version 4.0

13th January 2023

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FROM CEO'S OFFICE

The conduct of any business including Clinical Research Malaysia (CRM) must comply with the highest integrity. CRM finally launch our own Code of Conduct which sets out our core values, shared responsibilities, and commitment.

CRM can earn respect and trust from our customers (internal or external), business partners and anyone that works with us when we conduct our behavior to a high standard of ethics and integrity. This Code meant to serve the basic foundations for exemplary behavior.

CRM's legal and ethical obligations should not be limited to what is mentioned in this Code, but it should go far beyond. We must comply with all applicable laws and regulations that are applicable to our business.

Please read the Code carefully and discuss what it means with your colleagues, direct report and line manager. If you have any queries or concerns about compliance and integrity issues, whether it is covered by this Code or not, seek guidance and help from your line manager, CRM HR Team or CRM Integrity and Governance Unit (IGU).

Finally, reading and understand the code will mean more when we practice and live on it. Let us make CRM a respectable organization.

OUR CODE, OUR GUIDANCE

This Code of Conduct is the foundations on how to think and act in the right and ethical manner. Its aim is to establish a common ground of understanding of the standards of behavior expected from all CRM employees. We must rely on our good sense of what our Company's high standards require. You are expected to seek advice when you are unsure of the proper response to a particular situation. This Code serves as a guidance where it provides the framework and sets the expectations for business conduct. It clarifies our responsibilities to each other, clients, business partners, suppliers, government officials, and the communities that we serve. It outlines important legal and ethical issues. Failure to adhere to this code could expose our Company to serious damage and appropriate action will be taken against the employee who is in breach of this Code.

CRM VISION AND CORE VALUES

OUR VISION

To establish Malaysia as a Preferred Destination for Industry Sponsored Research (ISR). We demonstrate our Vision by living our Values in the decisions and actions that we take every day. Our Values set the tone for our work culture and unify us across the Country.

OUR VALUES

CRM's foundation is built on values, which distinguish us and guide our actions. Incorporating our values into our actions helps us to do our work in a socially responsible and ethical manner. These values convey the philosophy behind every decision and move we make.

TRANSPARENCY

We practice transparency and openness in all our operations, including financial processes and budget management.

HONESTY

We aspire to be honest with one another, our clients, and our business partners.

ACCOUNTABILITY

We set a high-performance expectation and hold ourselves accountable for the quality of our work and the results we achieve as individual, as a team and as a Company.

TRUSTWORTHINESS

We adhere to the highest standards of professionalism and integrity and uphold the faith and confidence our clients have placed in us.

WHO MUST FOLLOW THIS CODE?

All employees of CRM must adhere to the standards in our Code. No employee is exempt from these standard requirements.

EXPECTATION

CRM EMPLOYEES	MANAGERS/ TOP MGMT
<ul style="list-style-type: none">• Learn the Code and be familiar with it• Abide and practice the Code	<ul style="list-style-type: none">• All expectations from CRM employees• Provide guidance to direct report• Demonstrate and lead by good example

GENERAL CHANNEL OF COMMUNICATIONS

If you have a question or concern, your line manager is usually a good place to begin with. Other than your line manager, you may also seek for help and advice from: -

- Your line manager's superior
- Human Resource Department
- Legal Department
- Integrity and Governance Unit

WHISTLE BLOWING: WHAT HAPPENS NEXT?

When you report or voice out a concern, your concern will be taken seriously and investigated fully without prejudice. You should be prepared to give detailed information about your concern or report and give full support when required. Your identity and information shared will be kept confidential and you will be fully protected as per company policy.

FOR BRIBERY & CORRUPTION

CRM does not tolerate bribery or any form of corruption. The effects of bribery and corruption are widespread. They are harmful to both businesses and individuals. You must not give or receive bribes or engage in other corrupt practices. If you suspect (in good faith) any of the foregoing happening, it can be reported through the following avenues:

- a) letter to CRM Board of Directors/IGU; or
- b) via IGU email: igu@clinicalresearch.my

FOR DISCRIMINATION & HARASSMENT (INCLUDING SEXUAL HARASSMENT)

CRM is committed to fostering a positive work environment free of discrimination and harassment (including sexual harassment). We follow all applicable employment laws, including but not limited to the Malaysian Employment Act 1955 (and its amendments thereto). If you suspect (in good faith) that discrimination and harassment, including sexual harassment, is taking place, you can report it to:

- a) Immediate Superior; or
- b) Department Manager; or
- c) Head of Department; or
- d) Any Manager; or
- e) Human Resources Manager/Representative; or
- f) Integrity Governance Unit Officer (IGU).

Following receipt of the report, a preliminary investigation will be conducted by a Human Resources Manager/Representative or/and an IGU officer.

NO RETALIATION POLICY

Anyone who reports a concern or misconduct in good faith, and with the reasonable belief that the information is true, is demonstrating a commitment to our values and following our Code of Conduct. CRM has no tolerance for acts of retaliation against anyone for raising a concern or cooperating in an investigation. Any employees who engage in act of retaliation will be subjected to disciplinary action, which may include dismissal. However, anyone who knowingly makes a false accusation or knowingly gives false information may be subjected to disciplinary action.

COOPERATING IN AN INVESTIGATION

You are required to give full cooperation with any investigation into alleged violations of our Code, laws, regulations, policies, or procedures. You are expected to be honest, truthful, and forthcoming during the investigation. This includes situations where you are an involved party, a witness, or asked to provide information as part of an investigation. Any attempt to withhold information, sabotage or otherwise interfere with an investigation may be subject to disciplinary, which may include dismissal. Investigations are company confidential matters. To protect the integrity of the investigation, and to the maximum extent permitted by applicable law, you are not allowed to discuss any aspect of an investigation, even the fact that an investigation is being conducted, with other employees or the public.

CODE 1: RESPECTING OTHERS

1.1 MUTUAL RESPECT AND PROFESSIONAL TREATMENT

All human beings are entitled to be treated with respect, care, and dignity. CRM is committed to create a workplace that provides dignity and respect. You must respect the personal dignity, privacy, and rights of each individual you interact with during the course and must not in any way cause or contribute to the violation of human rights.

You are expected to treat your fellow employees professionally. When dealing with others, you should be able to accommodate and tolerate different opinions and perspectives and sort out your differences with rational discussion. Maintaining a good working relationship with fellow employees is very important as we all must work together to achieve CRM common goals. You are obliged to work and carry yourself professionally. You are also expected to observe and obey all reasonable instructions, orders of work given by your superior or managers.

1.2 DISCRIMINATION & HARASSMENT (INCLUDING SEXUAL HARASSMENT)-FREE ENVIRONMENT

All employees must be treated with respect and dignity. CRM will not tolerate harassment and discrimination in the workplace.

CRM Harassment Free Policy: CRM prohibits **ALL** inappropriate conduct of a sexual nature in the workplace, regardless of the severity of the conduct or whether the conduct is unwelcome, and all favoritism based on personal relationships. CRM also strongly discourages romantic relationships between a manager and any employee over whom that manager has influence with respect to terms of employment (i.e., pay, promotions, assignments, training, etc.) in order to avoid favoritism based on sex, or even the appearance of such favoritism, that could create a hostile environment. The company encourages disclosure of such relationships to its Head of Human Resources in order for management to determine the feasibility of transferring one of the individuals to a position where issues of favoritism can be avoided.

Our commitment to discrimination and harassment (including sexual harassment)-free environment applies in all work-related settings and activities, whether on or off company premises, and extends to employee's actions towards clients, business partners and vendors. If you believe you or anyone else in the workplace is being treated in a discriminatory or harassing manner, it is your obligation to report the behavior as per the applicable whistleblowing line of communication.

For the sake of clarity, the following definitions are provided:

Discrimination: Discrimination occurs when the Company or one of its managers impermissibly uses any of the protected characteristics to make a decision regarding any term, condition or privilege of employment, including hiring and firing, compensation, benefits, assignment, classification, transfer, promotion, layoff or recall, job advertisements, recruitment or job testing.

**Protected characteristics mean:*

- *age*
- *disability*
- *marriage*
- *pregnancy and maternity*
- *race*
- *religion or belief*
- *sex*

Harassment: Harassment can be verbal, physical or include visual images where the effect creates an offensive atmosphere. It can take many forms and includes jokes, slurs and offensive remarks, whether delivered verbally, graphically or in electronic media, including e-mail.

Sexual Harassment: Any unwanted conduct of sexual nature, whether verbal, non-verbal, visual, gestural or physical, directed at a person which is offensive or humiliating or is a threat to his wellbeing arising out of and in the course of his employment

1.3 SAFETY & SECURITY

CRM is committed to establish and maintain a safe and healthy working condition at all locations. Listed below are some of the principles to maintain a safe and secure workplace:-

- Workplace must be free from aggression. CRM will not tolerate any threats, intimidating behavior, or act of violence in the workplace.
- You must not use, possess, sell, or transfer illegal drugs or company property. In addition, you will not be permitted to work if you are using illegal drugs or impaired by alcohol.
- You must not bring weapons onto company property. This includes weapons used for sporting purposes or otherwise legal to possess. Weapons of any kind are prohibited in the work environment.
- CRM maintains a smoke and tobacco free office. No smoking or other use of tobacco products (including, but not limited to, cigarettes, e-cigarettes, pipes, cigars, snuff, or chewing tobacco) is permitted in any part of the building or in vehicles owned, leased, or rented by the Company.

However, employees may smoke in designated areas during breaks. When smoking or otherwise using tobacco or similar product outside, do not leave cigarette butts or other traces of litter or tobacco use on the ground or anywhere else.

- You should be alert to individual who are on company premises without proper authorization. Make sure you observe all physical access rules in your location and report incidents of unauthorized entry to your line manager.

CODE 2: DILIGENCE & INTEGRITY

2.1 ANTI-CORRUPTION AND ANTI-BRIBERY

CRM ANTI-BRIBERY POLICY: CRM practices ZERO tolerance towards bribery and corruption throughout our business transactions whereby the Integrity and Governance Unit will oversee and continually improve the implementation of anti-bribery practices in line with CRM Code of Conduct and all applicable regulations.

CRM strongly believes that integrity and fair dealing are essential in conducting the business. Whoever you deal with, and wherever you operate, you are committed to doing so lawfully, ethically and with integrity. As part of this commitment, all forms of bribery and corruption are unacceptable and must not be tolerated.

Bribery is an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory or personal advantage.

You must never offer, give, ask for, accept, or receive any form of bribe. A bribe occurs when someone attempts to influence a decision by offering some form of undue or improper advantage, favor, or incentive.

You shall always exercise caution in relation to offering or accepting gifts and business courtesies. Unless it falls under CRM Gift Policy, you shall not accept gifts or other remuneration especially if there is reason to believe that purpose is to improperly influence business decisions. If in doubt, make sure you consult your superior.

The areas of business where corruption, including bribery can most often occur include:

- Gifts, Entertainment and Hospitality
- Facilitation Payments
- Procurement Process
- Political, Community and Charitable Contributions

Gifts, entertainment, and hospitality are acceptable if they are reasonable, proportionate, made in good faith, and in compliance with our company policies. These activities must be in compliance with our Code and disclosure must be made to the Company.

You must at all-time respect and comply with Malaysian laws and policy on Anti-Bribery and Anti-Corruption.

2.2 AVOIDING CONFLICT OF INTEREST

CRM is dedicated and highly committed to follow a high standard of personal and professional independence. To maintain CRM's good image and reputation, all employees regardless of their level must avoid any conflict of interest. You are expected to always act in a way that reflect CRM's reputation.

A conflict of interest is where someone is compromised when their personal interest or obligations conflict with the responsibilities of their job and position, meaning that their independence, objectivity, or impartiality can be called into question.

Conflict of interest can be:

- Actual – where the conflict already exists
- Potential – where the conflict is about to happen or could happen
- Perceived – where other people might reasonably think that a person has been compromised

A conflict of interest can be positive or negative. You could be seen to favor or benefit someone or be against them and disadvantage them. While conflicts of interest should be avoided wherever possible, they often happen innocently. It is how they are managed that counts.

You must therefore avoid conflicts of interest between your personal dealings and your duties and responsibilities in the conduct of CRM's business. In particular, the use of CRM office position, confidential information, assets, and other CRM resources for personal gain, or for the advantage of other with whom you are associated is strictly prohibited.

2.3 GIFTS AND ENTERTAINMENT

- **CRM GIFT POLICY**

CRM adopts "Gift Policy" where all employees regardless of their positions are prohibited from directly or indirectly providing or receiving gifts. To avoid any conflict of interest, all CRM employees must follow this policy as providing or receiving gifts can be perceived as bribery and may tarnish CRM good image and reputation.

However, CRM acknowledge that business gifts and entertainment can be important in building relationships. Thus, there are certain instances where giving or receiving a gift is acceptable. Below are the exceptions to CRM Gift Policy: -

Giving / Exchanging Gifts

- Exchange of gifts as the company-to-company level (e.g. gifts exchanged between companies as a part of an official company visit/courtesy call) and such gift is treated as company property with a limit of not more than RM500;
- Gifts from CRM to external institutions or individuals in relation to the company's official functions, events, and celebrations (e.g. commemorative gifts or door gifts offered to all guests)

- attending the event) with a limit of not more than RM100 to each guests;
- Gifts from CRM to employees and directors and/or their family members in relation to an internally or externally recognized Company function, event, and celebration (e.g. in recognition of an employee's and/or director's service to the Company) with a limit of not more than RM4,000;
 - Token gifts of nominal value with CRM name and logo (e.g. plaque, t-shirts, pens, diaries, calendars, and other small promotional items) that are given out to members of the public, delegates, customers, partners, and key stakeholders attending events such as conferences, exhibitions, training, etc. and deemed as part of the company's brand building or promotional activities; and
 - Gifts to external parties who have no business dealings with CRM (e.g. monetary gifts or gift in-kind to charitable organizations) with a limit of not more than RM20,000 provided always that a written approval from the CEO is obtained.

Receiving / Accepting Gifts

- In the event of CRM employee being offered gift from the external parties for any amount equal or more than RM50, the employee shall declare the same to the company by filling up 'Gift & Hospitality Declaration Form' and obtain superior's approval.

Gifts and entertainment should be defined in the broadest sense to include but not limited to money, securities, business opportunities, goods, services, discounts on goods or services, entertainment, corporate tickets, company sponsored events, food, drink, and any similar items.

- **BUSINESS ENTERTAINMENT**

CRM allows entertainment during business meetings provided it is approved by line manager. Only eligible employees are allowed to provide entertainment as per CRM Limits of Authority. CRM prohibits entertainment which are illegal, unduly dangerous, indecent, sexually oriented, inconsistent with CRM's commitment to mutual respect, or for the purpose of improperly influencing someone to act in favor of CRM.

CRM employees are required to declare any entertainment, business meal, etc. provided to them by external parties amounting to equal or more than RM50 by filling up 'Gift & Hospitality Declaration Form' and obtain superior's approval.

2.4 HONORARIUM

Honorarium is a payment made for services like delivering lectures or training. The intent is to show appreciation for participating in CRM activities.

To qualify for an honorarium payment, a service must be characterized by all of the following:

- The service is provided on a one-time or highly infrequent basis
- Payment for such services is not the recipient's primary source of income
- Payment is generally considered to be a token of appreciation rather than an obligation

CRM employees are also permitted to receive an honorarium as described above, provided that all conditions are fulfilled. CRM employees are required to declare any honorarium provided to them by external parties amounting to equal or more than RM50 by filling up 'Gift & Hospitality Declaration Form' and obtain superior's approval.

2.5 DEALING WITH FAMILY AND CLOSE PERSONAL FRIENDS

You should be particularly sensitive to business situations involving family members, household members or close personal friend. In general, a family member or close personal friend should not have any business dealings with you or with anyone who reports to you.

You must disclose any such situation to your superior and cooperate with all efforts to resolve such conflict.

2.6 SPONSORSHIP BY CRM

In line with CRM's vision and 5 Key Strategies, CRM may from time to time provide a sponsorship to relevant individuals and/ or organizations for any events or activities relating to clinical research, provided that the sponsorship is approved by CRM Management. Sponsorship must also be done according to CRM policies and guidelines.

CODE 3: CONDUCTING BUSINESS

3.1 MAINTAINING CONFIDENTIALITY & PERSONAL DATA

At CRM, we value and protect our confidential information and we respect the confidential information of others. Confidential information means any nonpublic information pertaining to company's business. It may include information disclosed by company to you and information developed or learned by you during the course of or as a result of your employment with CRM.

You must also protect the confidential information of other such as CRM business partners, clients, vendors and patients. You must treat such information with the same care as if it was CRM's confidential information. You must also protect all confidential information that you have obtained in the course of your employment with CRM.

This obligation continues beyond the termination of employment. Unless required by law or authorized by CRM Management, you must not disclose confidential information or allow such disclosure.

Apart from the above, it is our policy to comply with laws and regulations governing the collection, use, distribution and security of any Personal Data we create, receive, maintain or transmit. The use of any personal data must comply with the Malaysian Personal Data Protection Act 2010 (and its amendments thereto) and are also internally regulated by CRM PDPA Guidelines (Version 1 as of January 2020) (and its amendments thereto).

3.2 DRESS CODE: GROOMING & ATTIRE

Dress and personal appearance are important elements of professional presentation. You have a responsibility to dress appropriately and in a manner that:

- Maintain respect
- Establishes credibility
- Upholds the good reputation of the company

Employees must ensure their personal appearance and presentation are clean, tidy and appropriate for their work role and takes into account the particular circumstances of their workplace. When determining grooming and dress:

- i. Employees should wear professional attire for work, and when attending a company meetings and events or when attending events which require you to interact with CRM business partners, clients, community as CRM representatives.
- ii. Employees must not wear revealing clothes such as those exposing bare midriffs, strapless tops/dresses or clothes that may be construed as suggestive and/or offensive.
- iii. Employees must not wear inappropriate clothes such as singlets, t-shirts, tracksuits or rubber thongs (except for sport and organized physical activities), ripped or dirty clothes with inappropriate slogans such as advertising for tobacco, alcohol and sex.

CODE 4: PROTECTION OF COMPANY PROPERTIES & ASSETS

4.1 COMPANY PROPERTIES & ASSETS

You should protect the Company's assets and ensure they are used only for legitimate business purposes throughout your employment with CRM. Improper use includes unauthorized personal appropriation or use of the Company's assets, data or resources, including computer equipment, software, systems and data. You must safeguard and make proper use of CRM's assets and property. You must seek to protect CRM's assets and property from loss, damage, misuse, theft, fraud and destruction.

Your responsibility in protecting company assets will include: -

- Secure your laptop in the office and if you are travelling you have to take proper care of your laptop and dongle;
- Use the internet responsibly and access only internet sites containing content that is appropriate for the workplace;
- Printing and photocopying facilities are for official use only. You must not abuse or misused the facilities for your personal reasons;
- Immediately report any loss/ potential losses of company laptops, smartphones, dongle, and any data storage devices containing CRM or client data; and
- Do not allow another person to use your laptop, sharing your password or using another person's password.

4.2 MAINTAINING PROPER RECORDS

Maintaining a proper record is very crucial as it can serve an essential administrative, legal and historical purpose. All of our books and records must be supported with enough documentation in order to provide a complete, accurate, valid and auditable record.

To maintain an accurate books and records, we follow our internal processes and procedures. This includes capturing information in the proper system and labelling it correctly.

You have a personal responsibility to understand the reporting and documentation requirements needed for your position and to document and report information accurately and honestly. In particular, you have a responsibility:

- to create and maintain full, accurate record for your work-related activities, decisions and business transactions
- to store company and your word record at a secure and safe place
- you must not destroy records without authority or permission from your supervisors or manager
- you must maintain the confidentiality of all official information and documents which are not publicly available
- you must ensure the traceability, retrievability, retention and destruction of records & documents when required

CODE 5: COMMUNITY AROUND US

5.1 MANAGING POLITICAL, COMMUNITY AND PERSONAL ACTIVITIES

CRM does not discriminate against employees on the basis of political beliefs or opinions. As an individual, you have the right to participate in political and community activities provided that your obligations to the Company will not be compromised. It is your obligation to ensure that your involvement in any political party, industrial organization, or community and personal activity is understood to represent your view or those of the organization you represent, and not those of the CRM.

In participating in any political, community and personal activity, you must:

- not make any comment that may cast doubt on your capacity to implement CRM policies and guidelines objectively
- not participate in private political activities in the work environment and during working hours
- not claim to represent CRM
- not use CRM resources such as stationary, printing supplies, mail services, phone, email and vehicle to assist your political, community or personal activities

5.2 MEDIA RELATIONS

CRM is committed to honest and transparent communications. When speaking publicly or publishing documents, you should provide information that is truthful and consistent with CRM policies on quality and confidentiality.

Business Development must approve all contacts with the media, including speeches and other public statements made on behalf of the Company or about its business. You may not respond to any request for interviews, comments or information from any television channel, radio station, newspaper, magazines, either on or off the record, unless you have express authorization from Business Development.

CONCLUSION

Our Code of Conduct is integral to the way we do business. It helps define our culture of doing what's right and provides all of us with the same frame of reference for dealing with issues that can be both sensitive and complex. Your compliance to Our Code is pertinent to CRM's success. Failure to comply with the Code may result in disciplinary actions, up to and including dismissal, and contract termination or non-renewal. If the breach of the Code includes a violation of the law, the matter can be referred to the appropriate law enforcement authorities. In addition, CRM reserves the right to take any additional action, including legal proceedings, against individuals who have engaged in and/ or benefited from activities that are illegal and/or contrary to our Code in order to recover any damages incurred by CRM and any amount or benefit that was wrongly paid or received.