

# Code of Conduct & Ethics Policy

<b>Version</b>	1.0
<b>Effective Date</b>	01 June 2025
<b>Approved By</b>	Compliance & Risk Committee
<b>Next Review Date</b>	01 June 2026

# 1. Purpose

Bayarcash Sdn. Bhd. (Registration Number: 202201040365 (1486062-H)) ("**Bayarcash**") is committed to conducting business with the highest standards of integrity, professionalism, and ethical behaviour. This **Code of Conduct & Ethics Policy** sets out the principles and standards expected from all employees, directors, contractors, and business partners in carrying out their duties and responsibilities.

The objectives of this policy are to:

- Ensure compliance with applicable laws, regulations, and Bank Negara Malaysia (BNM) guidelines.
- Promote a culture of honesty, accountability, and transparency.
- Safeguard Bayarcash's reputation as a trusted payment gateway service provider.
- Provide guidance in making ethical business decisions.

## 2. Scope

This policy applies to:

- All Bayarcash employees, managements, and directors.
- Contractors, agents, service providers, and third parties acting on behalf of Bayarcash.
- Third parties acting on behalf of Bayarcash, including partners, vendors, merchants, and service providers.

## 3. Core Principles of Conduct

### 3.1 Compliance with Laws & Regulations

- All employees must comply with Malaysian laws, Bank Negara Malaysia (BNM) regulations, Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act (AMLA), Personal Data Protection Act (PDPA), Payment Card Industry Data Security Standard (PCI DSS), and other applicable standards.
- Any illegal or unethical activity must be reported immediately through the whistleblowing channels.

### 3.2 Integrity & Fair Business Practices

- Conduct business honestly and fairly, avoiding fraud, bribery, corruption, or misrepresentation.
- Do not engage in activities that could create conflicts of interest or compromise Bayarcash's integrity.

### 3.3 Confidentiality & Data Protection

- Protect confidential information, customer data, and proprietary business information.
- Handle all data in compliance with the Personal Data Protection Act 2010 (PDPA) and Bayarcash's **Data Protection Policy**.

### **3.4 Conflict of Interest**

- Avoid situations where personal interests conflict with the company's best interests.
- Disclose any potential conflicts to the Compliance Officer or HR Department.

### **3.5 Anti-Bribery & Anti-Corruption**

- Strictly prohibit bribery, kickbacks, facilitation payments, or any form of improper advantage.
- Comply with the Malaysian Anti-Corruption Commission (MACC) Act 2009.

### **3.6 Workplace Conduct & Professionalism**

- Treat colleagues, customers, and partners with respect and dignity.
- Maintain a safe, inclusive, and harassment-free workplace.
- Prohibit discrimination based on race, gender, religion, age, disability, or any protected characteristic.

### **3.7 Financial Integrity & Record Keeping**

- Ensure accurate and transparent recording of all transactions and financial statements.
- Do not falsify, manipulate, or conceal records.

### 3.8 Use of Company Resources

- Use Bayarcash's assets, systems, and facilities responsibly and only for authorized business purposes.
- Prevent misuse, theft, or unauthorized disclosure of company resources.

### 3.9 Social Media & Public Communications

- Employees must not make unauthorized statements on behalf of Bayarcash.
- Use social media responsibly and in a way that does not harm the company's reputation.

## 4. Reporting & Whistleblowing

- Employees and stakeholders are encouraged to report suspected misconduct, violations, or unethical behavior through the company's **Whistleblowing Policy**.
- Reports will be handled confidentially, and whistleblowers will be protected from retaliation.

## 5. Non-Compliance & Disciplinary Action

- Violations of this Code may result in disciplinary action, including termination of employment or contract, and legal proceedings if applicable.
- Bayarcash reserves the right to take appropriate action against employees, partners, or vendors who breach this policy.

## 6. Responsibility & Accountability

- Every employee and business partner is responsible for understanding and complying with this policy.
- Managers and supervisors must lead by example and ensure their teams uphold these standards.
- The Compliance & Risk Committee shall oversee implementation, monitoring, and periodic review of this policy.

## 7. Review of Policy

This policy will be reviewed annually or as required to reflect changes in laws, regulations, and industry best practices.