



SPRITZER BHD

Registration No. 199301010611 (265348-V)
(Incorporated in Malaysia)

**BUSINESS PARTNER
CODE OF CONDUCT
POLICY**

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Business Partner Code of Conduct Policy

Spritzer Bhd (“the Company”) is committed to conducting business with integrity, transparency, and accountability. This Business Partner Code of Conduct (“the CoC”) outlines the ethical, social, environmental, and governance standards expected of all Business Partners, including vendors, suppliers, contractors, and customers. Compliance with this CoC is mandatory and forms part of our contractual relationship.

1. Labour and Human Rights

- **Employment Practices**
Business Partners shall ensure that employment is freely chosen and not based on forced, bonded, indentured, or involuntary prison labour.
- **Child Labour**
Business Partners shall not engage in or support child labour. Minimum age for employment must comply with applicable laws.
- **Working Hours and Wages**
Business Partners shall comply with national laws governing working hours, overtime, and minimum wage. All overtime must be voluntary and fairly compensated.
- **Freedom of Association and Collective Bargaining**
Business Partners shall respect the rights of workers to freely associate and bargain collectively.
- **Non-Discrimination**
Business Partners shall provide equal opportunities and shall not discriminate based on race, gender, religion, age, nationality, sexual orientation, disability, or other protected characteristics.
- **Workplace Conduct**
Business Partners shall prohibit abuse, harassment, and offensive behaviour in the workplace.

2. Health and Safety

- **Safe Working Environment**
Business Partners shall provide a safe and healthy workplace in compliance with applicable laws.
- **Emergency Preparedness**
Business Partners shall implement emergency response plans and conduct regular training and drills.
- **Industrial Hygiene and Physically Demanding Work**
Business Partners shall identify and manage exposure to hazardous agents and physically demanding tasks.
- **Facilities and Living Condition**
Business Partners shall ensure clean, safe, and accessible facilities and dormitories for workers.

3. Environmental Responsibility

- **Legal Compliance**
Business Partners shall comply with all applicable environmental laws and regulations.
- **Pollution Prevention and Waste Management**
Business Partners shall minimise emissions, discharges, and waste generation through responsible practices.
- **Energy Efficiency and Climate Resilience**
Business Partners shall strive to reduce energy consumption and consider climate risks in operations.
- **Biodiversity and Hazardous Materials**
Business Partners shall avoid harm to ecosystems and manage hazardous materials safely.

4. Governance and Compliance

- **Anti-Bribery and Corruption**
Business Partners shall not offer, promise, give, request, or accept bribes or improper advantages.
- **Conflict of Interest**
Business Partners shall disclose any actual or potential conflicts of interest involving Spritzer personnel.
- **Gifts and Hospitality**
Business Partners shall not offer gifts or hospitality beyond representational norms.
- **Anti-Competitive Conduct**
Business Partners shall comply with anti-trust and competition laws.

5. Information Protection

- **Data Privacy and Cybersecurity**
Business Partners shall protect sensitive, confidential, and proprietary information and comply with data protection laws.
- **Intellectual Property**
Business Partners shall respect intellectual property rights and prevent unauthorised disclosure.

6. Monitoring and Continuous Improvement

- **Audits and Inspections**
Spritzer reserves the right to conduct audits and inspections of Business Partners' operations.
- **Corrective Actions**
Business Partners shall cooperate in resolving non-compliance and implement corrective action plans.
- **Continuous Improvement**
Business Partners are encouraged to exceed minimum standards and adopt best practices.

7. Subcontractor Responsibility

Business Partners shall ensure that their own suppliers, subcontractors, and third-party vendors comply with this CoC.

8. Enforcement and Consequences

Violation of this CoC may result in termination of the business relationship and legal action. Spritzer expects full compliance and will take necessary steps to uphold the standards outlined herein.