

CODE OF BUSINESS CONDUCT POLICY

1. Introduction

It is the policy of the Company/Group to promote and practice the highest standards of integrity in all aspects of our business and all employees (inclusive of Directors of the Company) are expected to adhere strictly to them.

This policy has been adopted by the Company/Group since 2014 and it is in an increasingly demand to measure a corporation's business conduct domestically and worldwide. As a public listed issuer, Bursa Securities Malaysia Berhad has also promote under good corporate governance practices that all corporation shall commit to operate the business in an ethical manner and to uphold the highest standards of professionalism and exemplary corporate conduct.

2. Objective

The objective of the Code is to provide a guidance of the standard of behaviour where all the Employees (inclusive of the Company Directors) are expected to behave and conduct within the Code for which is not intended to be exhaustive when performing their duties.

All Employees shall always observes and ensure compliance with all applicable laws and regulations to which they are bound to observe whenever they are discharging of their duties.

3. Scope and Applicability

This Code is applicable to all Directors and employees (including full time, part time, probationary, contract and temporary staff) (herein after refer to as "Employees") of the Company/Group.

All employees will be briefed on the Code during the orientation and to pledge their compliance by signing the form as attached in our Group Human Resource Policies and Procedures. Thereafter, any violation of any of the code will be subject to disciplinary action therein governed by our Group Human Resource Policies and Procedures.

For Directors, any clarification or deviation of the Code, shall be refer to the CEO/EXCO and/or Chairman of the Board.

4. Core Business Conduct

4.1 Conflict of Interest

A situation whereby there is a conflict between the Employees' personal interest and the interest of the Company/Group is term as conflict of interest.

Employees must not use their positions or knowledge gained directly or indirectly in the course of their duties or employment for private or personal advantage and shall avoid such conflict situation which may influence their judgement in discharging their duties and responsibilities.

Such situation may arise where (for which may not be exhaustive) :-

- a) have any direct or indirect financial interest with customer, supplier or competitor;
- b) maintain outside employment with a customer, supplier or competitor; and

- c) conduct company business with person related to you by blood or marriage, or their business organization.

4.2 Gift and Other gratuities

Generally, accept or provide inappropriate gifts, gratuities or favoured treatment (either personally or other family members) that could reasonably viewed as being done for unfair business advantage and may create conflict of interest and influence business decision.

Acceptance of inexpensive “token” non-cash gifts which are occasional, customary gifts during festive or special occasions and gifts from social events attended by the Directors or Employees is permissible. In addition, infrequent and moderate business meals and entertainment with clients and infrequent invitation to attend local social events and celebratory meals with clients can be appropriate aspects of promoting good business relationships, provided that they are not excessive and do not create the appearance of impropriety.

Should there be any doubts or any such event arise, employees are encourage to report to higher management and seek for advice and approval prior to accepting or providing gifts or other gratuities.

4.3 Integrity of Company Assets and Information

4.3.1 Confidential Information

Due to the course of their employment, employees shall exercise the caution and due care to safeguard any confidential and sensitive information of the Company/Group to ensure those information are prohibited to disclose to any party unless it was duly authorized or legally mandated by the CEO/EXCO.

In compliance with relevant law and regulation, in the event that a Director or employee knows any material information affecting the Company/Group of which has not been publicly released, such information must be held in the strictest confidence by the Director or Employee involved until it is publicly released by the Company/Group.

4.3.2. Business record management and control

All books, records and reports (e.g. expense report, hours worked, finance reports etc.) shall be accurately and honestly prepared on timely basis and conform to generally accepted and applicable laws and regulation as well as the Company’s internal control policies.

No unauthorized, false, improper or misleading documents or records shall be made. The Company/Group viewed such an offense as a serious offence for which if such act is suspected criminal in nature, the Company/Group reserves the right to take necessary legal action.

4.3.3 Payment Practices

Not to make contributions or payments to political parties, candidates or campaigns, unless such payments are clearly permitted by law and approved by the CEO/EXCO.

4.4 Insider Trading

No Director or Employee shall, whether directly or indirectly, use or communicate price sensitive non-public information, which can affect the price of the Company's securities for personal benefit or other person who used for personal gain.

Violation to insider trading under the Code may result in civil or criminal penalties.

4.5 Cultivate Conducive Working Environment

4.5.1. Health and Safety

The Company/Group strives to provide a safe and conducive workplace environment and has embedded in its Human Resource Policies since 1999 to maintain a proper occupational health and safety practices to commensurate with Occupational Health and Safety Act of the country as well as the Group's policies and procedures.

4.5.2. Fair, equal and non-discrimination

Every Employee is to treat their fellow Employees fairly and with respect. It has also regulate under the Group Human Resource Policies and Procedures that shall not create any form of discrimination in the workplace with regard of races, gender, religion, nationality, age or disability shall be practised within the Company/Group.

4.5.3 Sexual Harassment

Sexual harassment is illegal under federal, state and local laws. It is the Group's policy ruled under the Group Human Resource Policies and Procedures to provide Employees with working environment that free from any form of sexual harassment.

Details of the guide are therein stipulated under the Group Human Resource Policies and Procedures.

4.6 Misconduct

Disciplinary action will be taken onto an employee whom has involved in any activities that is deemed to be an act of misconduct stipulated in our Group Human Resource Policies and Procedure.

4.7 Compliance to the laws and regulations

The Group will comply with all applicable law, rules and regulations governed by authorities within which the Group operates. Directors and Employees are required to understand and comply therewith.

The Group reserves the right to take necessary actions against any activities undertaken by Director or Employees for which suspected to be criminal in nature.

4.8 Administration of the Code

4.8.1 Reporting of Violations of the Code

Any Employee who knows of or suspects any violation of the Code, the Group has also set its policy on how to report the grievances or irregularities arise in the Group Human Resource Policies and Procedures as well as the Whistle Blowing Policy. Employees are encouraged to seek advice via the proper channel and no individual shall be discriminated against or suffer from any act of retaliation for reporting in good faith on violation of the Code.

4.8.2 Review of the Code

The Executive Committee has been assigned by the Board to monitor the compliance with the Code and review the Code regularly to ensure that it continues to remain relevant and appropriate.