



Suite 301, Block F, Pusat Dagangan Phileo Damansara 1, No. 9,
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FRONTKEN
FRONTKEN CORPORATION BERHAD (651020-T)

Frontken Corporation Berhad

Code of Conduct

The Directors and Management of Frontken Corporation Berhad and its group of companies (“the Group”) are committed to adhering to the best practice in corporate governance and observing the highest standards of integrity and behavior in activities conducted by the Group, including the interaction with all its stakeholders, which include its Directors, customers, suppliers, shareholders, employees and business partners.

All the Directors, Management and employees of the Group are expected to discharge their respective duties with highest level of integrity in line with relevant laws and regulations and the Group’s policies, guidelines and best practices and failure to comply may result in the commencement of disciplinary proceedings that may lead to termination of employment.

Conflicts of Interest

The Group expects that Directors, Management and employees will perform their duties conscientiously, honestly, and in accordance in the best interest of the Group. Employee must not engage in activities that directly or indirectly involve, or could appear to involve, a conflict between their personal interests and the interests of the Group.

Directors, Management and employees must not use their positions or the knowledge gained as a result of their positions for private or personal gain/advantage. Any actual or potential conflicts of interest are to be fully disclosed to appropriate supervising manager and/or Board of Directors and where such circumstances are permitted by management and/or Board of Directors to continue, shall not be deemed a breach of this Code.

Group Funds and Other Assets

Directors, Management and employees who have access to Group funds in any form must follow the prescribed procedures for recording, handling, and protecting money as detailed in the Group’s policies and procedures or other explanatory materials, or both. The Group imposes strict standards to prevent fraud, dishonesty, bribery and money laundering. If Directors, Management and employees become aware of any evidence of such fraud, dishonesty, bribery and money laundering, they should immediately advise the appropriate supervising manager and/or Senior Independent Non-Executive Director (SINED) so that the Group can promptly investigate into the matter and to take appropriate actions thereon.

When an employee’s position requires spending Group funds or incurring any reimbursable personal expenses, that individual must use good judgment on the Group’s behalf to ensure that good value is received for every expenditure. Group funds and all other assets of the Group are purposed for the Group only and not for personal benefit.



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Group Records and Communications

Accurate and reliable records of many kinds are necessary to meet the Group's legal and financial obligations and to manage the affairs of the Group. The Group's book and records must reflect in an accurate and timely manner for all business transactions. The Directors, Management and employees responsible for accounting and record keeping must fully disclose and record all assets, liabilities, or both, and must exercise diligence in enforcing these requirements.

Directors, Management and employees must not make or engage in any false or misleading record or communication of any kind, whether internal or external, including but not limited to:

- False expense, attendance, production, financial, or similar reports and statements
- False advertising, deceptive marketing practices, or other misleading representations

Prompt Communication

In all matters relevant to customers, suppliers, government authorities, the public and others in the Group, all Directors, Management and employees must make every effort to achieve complete, accurate, and timely communications – responding promptly and courteously to all proper requests for information.

Confidentially

Directors, Management and employees must keep confidential all information that would reasonably be considered to be confidential, including but not limited to terms and conditions of contracts entered into by the Group, employee and customer details, performance and financial details and policies and procedures of the Group.

Dealings in Securities and Insider Trading

The Directors, Management, Principal Officers and employees shall observe all the prohibitions and dealings in the shares or securities of the Company as stipulated by the laws and regulations, including but without limiting the Capital Markets And Services Act, 2007 and the listing requirements of Bursa Malaysia Securities Berhad and shall not themselves and/or any person connected to them who have or has access to any unreleased price sensitive information must avoid conduct known as "Insider Trading" and avoid any adverse inference being drawn from unfair dealings by them.

Amendments and Updates

The Code of Conduct may be updated from time to time. All Directors, Management and employees will be required to comply with the Code of Conduct as updated.

Amendments to this Code of Conduct must be approved by the Board of Directors and all updates and amendments are to be communicated to Directors, Management and employees.

Approved by the Board on 12 February 2019