

9.2 CODE OF ETHICS

9.2.1 COMMITMENT

All employees are required to observe and adhere to the following:-

- a) To faithfully and diligently perform duties and from time to time accept responsibilities assigned by the Group. Every employee is expected to promote and advance the interest of the Group at all times.
- b) To perform duties in respect of the Company he is attached to and other Companies within the Group.
- c) To observe and comply with all rules, regulations, procedures, practices and policies of the Company or Group, whether expressed or implied.

9.2.2 CONFIDENTIALITY & PUBLICATION

- a) Each employee, in the course of his employment with the Company, may receive training and information which is confidential in nature relating to its business operations.
- b) An employee of the Company shall not, during his employment or thereafter, except in the proper course of his duties, divulge to any person and shall use his best endeavors to prevent the publication or disclosure of, any trade secrets, any information concerning the business or finance of the Company, any dealings, transactions or affairs which may come to his knowledge during or in the course of his employment.
- c) Employees shall not discuss internally or externally confidential information regarding the Company, its directors, business partners, customers, employees, or others except when required by law or in the normal and direct transaction of the Company's business whereby such information is required.
- d) Each employee must know what information can be discussed for example when, where and with whom to discuss it with. Share facts only with employees who have a responsibility of updating the information.
- e) Any information which is generally not available to the public is classified as confidential in nature and shall not be divulged to a third party or used to influence an investment decision in connection with the purchase or sale of securities.
- f) Any employee who receives a subpoena or other requests seeking disclosure of Company information is to contact his Head of Department/Business Unit or the Head of Group Human Resource Department for guidance.

- g) If the employee is found to have divulged or have caused to divulge or to have failed to use his best endeavors to prevent the publication or disclosure of such secrets or processes, the Company reserves the right to terminate the contract of employment forthwith without notice and/or to take the appropriate legal action against such an employee.
- h) An employee shall not publish or cause to be published any article, book, photograph or letter or give interview, broadcast or deliver any lectures or speeches on any matters which concern his duties, the business of the Company or any other matter without the prior written consent of the Company.

9.2.3 PRESS RELEASE AND PUBLIC STATEMENT

- a) An employee is strictly prohibited to make any public statement, either orally, in writing or in any other form, on the policies and/or decisions of the Company nor shall he circulate any such statement made either by him or anyone else.

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- b) Only the Group Chairman and Group Managing Director are authorized to make or release any statement on the Company to the media, government or private sector.
- c) An employee shall inform his immediate superior or Head of Department if he is approached by a member of the media to comment on any matters pertaining to the Company.

9.2.4 PUBLIC APPEARANCE AS A GUEST SPEAKER

- a) An employee is not allowed to participate as a speaker in talks/seminars/conferences which is not organized by the Company without the prior written approval from the Group Human Resource Department.
- b) When applying for approval, the employee concerned is required to submit the full text of his talk or speech to be delivered.
- c) If approval is granted and the employee delivers his speech or talk, the employee should not digress by divulging any confidential and pertinent information relating to the Company's business, operations and policies.
- d) If it is established that the employee has divulged confidential and pertinent information of the Company, the employee shall be subjected to the appropriate disciplinary action including dismissal.

9.2.5 GIFTS AND UNUSUAL PAYMENTS

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- a) In a business, the giving, receiving or solicitation of “Gifts” is a sensitive matter that can or might appear to, improperly influence the business judgments of those involved (The term “Gifts” includes goods, services, prizes, monies, favors, charitable contributions or anything else of value – but excludes awards, promotions or recognition conferred to employees).
- b) Employees must not solicit or accept Gifts that would, or might appear to, influence their decisions in the course of their employment. If an employee receives a Gift that might be considered improper under this policy, the employee must immediately notify his Head of Department the facts surrounding the Gift. The Head of Department must then consult the General Manager/Head of Business Unit, who will then decide the next appropriate action.
- c) Gifts received from Company Suppliers/Clients, as a gesture of goodwill, must be declared by the recipient to his Head of Department. Failure to do so will result in the recipient being considered as committing a major misconduct

9.2.6 RESTRICTIONS ON USE OF COMPANY’S ASSETS

- a) Company’s assets include property such as furniture, office equipment, computer software, networks, company telephone, company mail systems (including electronic and voice mail) and office connections to the internet. The above list is not exhaustive and may be added from time to time.
- b) Every employee is expected to use Company’s assets only for approved Company’s business activities.
- c) Stationery or forms on which the Company’s name appears shall not be used for personal purposes. The Company’s letterheads should only be used for communication for business purposes of the Company only and signed by a duly authorized representative of the Company.

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9.2.7 INSIDER SECURITIES TRADING

- a) No Employee shall use price sensitive non-public information which may affect the price of the securities of the Company when it becomes publicly known, for personal benefit.
- b) Employees are prohibited to trade in securities or to provide information to others to trade in securities of the Company until the internal information is officially released to the public.

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9.2.8 BRIBERY AND CORRUPTION

- a) We will not tolerate any act of bribery or corruption. All forms of bribery and corruption are strictly prohibited. Any breach of this policy could result in disciplinary action being taken and ultimately could result in dismissal. A bribe does not actually have to take place – an employee just promising to give a bribe or agreeing to receive one is prohibited.
- b) Bribery is prohibited when dealing with any person whether they are in the public or private sector and the provisions of this policy are of general application. However, many countries have specific controls regarding dealing with public officials and this policy includes specific requirements in these circumstances.

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9.2.9 ANTI-MONEY LAUNDERING

- a) Any employee found collecting profits from illegal means and concealing the transformation of these profits from unlawful activities and corruption, into ostensibly “legitimate” assets, strict disciplinary action will be taken, which may include instant dismissal.