

GLOMAC BERHAD

(Company No. 110532-M) (Incorporated in Malaysia)

CODE OF CONDUCT

CONFIDENTIALITY AND NON-DISCLOSURE OF COMPANY'S INFORMATION

It is crucial that in discharging the course of one's duties as a staff of the Company, to keep confidential and not disclose, communicate and/or publicise any internal and external third party, any of the Glomac Group of Companies' material information, policies, employees information, staff movement plans, financial information, communications and negotiations whether marked confidential or not, which will come to your knowledge during the course of your employment.

All of the above may be in the form which may include written, electronic, oral, overheard and/or observed that may prejudice the Glomac Group of Companies' interest and/or integrity with those third party.

The above terms shall continue to exist even after the end of your tenure with the Company.

GENERAL – CODE OF CONDUCT AND DISCIPLINE

Code of Conduct and discipline was developed to provide guidance to all the Company's staff on the standards of conduct required by the Company, assist staff to achieve and maintain acceptable standards of work performance and conduct which is inclusive of but not limited to the action and behaviours, alleged misconduct and culpable poor performance.

Where there is any difference in respect of the meaning or interpretation of any matter in this manual, further reference should be made to the Human Resources Department.

Any clause in any existing contract of service in respect of any employee (including those designated as casual hours, temporary, agency, industrial trainee authorised volunteers or work experience), which is inconsistent with the corresponding provision herewith, shall remain valid with effect from the effective date of this policy, save for the clauses governing salary and/or remunerations. The Company may from time to time, revise, vary or add to any terms, conditions or appendix of this policy. Such amendments will be announced accordingly through circulars and such circular shall form part herewith. The contents of this policy are to be kept strictly confidential and are intended for reference between employees and the Company and its subsidiaries.

Discipline is the force that prompts individuals or groups to observe rules, regulations, standards and procedures deemed necessary for an organisation. Discipline means securing consistent behaviour in accordance with the accepted norms of behaviour, which is essential in every aspect of life and in industrial undertakings. Simply stated, discipline means orderliness. It implies the absence of chaos, irregularity and confusion in the behaviour of employees.



All staff of the Company are expected to act honestly, conscientiously, reasonably and in good faith at all times, having regards to their responsibilities, the interests of the Company and the welfare of colleagues and clients.

It is mandatory that all staff adhere to the general rules set forth in the policy. Any misconduct and/or action by an employee which is a direct / indirect violation of such rules, may result in serious disciplinary action and/or termination of employment. The list of misconducts listed within the policy are not exhaustive.

HARASSMENT / SEXUAL HARASSMENT POLICY

The Company strives to foster a work environment free of unlawful sex discrimination, sexual harassment and/or retaliation.

In the matter of personal conduct, an employee of Glomac is expected to accept certain responsibilities, adhere to accepted business and professional principles and exhibit a high degree of personal integrity at all times.

Their responsibility does not only involve sincere respect for the rights and feelings of others but also demands that both in professional and personal life, employees refrain from any behaviour that might be harmful to another employee, co-worker and/or the Company that might be viewed unfavourably by clients or the public at large.

The Company absolutely forbids one employee to subject another to any form of unlawful harassment based on family, race, colour, religion, creed, sex, age, origin, marital status, sexual orientation or disability.

Sexual harassment includes unwelcome and/or unsolicited sexual advances, requests for sexual favours, the usage of vulgar words on a female staff and other verbal or physical conduct of a sexual nature. All employees are prohibited to subject another employee to language (whether written or spoken) of a sexual nature or with sexual connotation, where such conduct or behaviour is either repeated on numerous occasions or is of such significant nature, which is offensive and detrimental to a reasonable person.

The Company also prohibits any request of any other employee for sexual intercourse, sexual contact or other forms of sexual activity, which contains an implied or overt promise of preferential treatment or an implied or overt threat of detrimental treatment. An employee should not be made to feel that submission to sexual conduct is a term or condition of an individual's employment or that refusal of sexual favours creates an intimidating, hostile or offensive working environment.

CRIMINAL CONVICTION AND/OR IMPRISONMENT

An employee that has been convicted of a criminal offence or have been served for an order of imprisonment, detention, restricted residence, banishment or deportation, under any law, the employee shall be deemed to have committed an act of serious misconduct rendering him liable for immediate discharge.



ALCOHOL AND DRUG ABUSE

The possession, use, sale, purchasing or distribution of any illegal drug(s)/substance(s), drug paraphernalia or alcohol by any employee while in the work place, on or around the office premises or while performing related work on and off-site is strictly prohibited.

In addition, the Company will not permit any employee to report to work or perform his/her duties after having ingested illegal drugs or while under the influence of alcohol or after taking prescribed drugs that adversely affects the employee's ability to effectively perform his/her job functions.

The presence of any detectable amount of any illegal drug / substance in an employee's system while performing the Company's business is strictly prohibited.

Employees currently taking a medication prescribed by their own physician(s) must carry it in a container labelled by a licensed pharmacist. The taking of any prescribed medication that causes drowsiness that will affect your job safety and performance must be made known to your supervisor to determine whether you may continue working while taking the medication.

Any employee who violates this policy shall be subject to disciplinary action up to and including termination.

DISCIPLINARY CODE

In the running of its business, the Company, like any organisation, must ensure that reasonable standards of work are maintained.

The Company is equally concerned to ensure fair treatment to all employees if and when action has to be undertaken in the event of failure to meet necessary standards. Such cases will be dealt with in accordance with the procedure that ensures the observance of rules of natural justice.

The Company has established some rules and regulations in order to promote orderly and efficient operations.

These rules and regulations which may be established from time to time and the procedure for disciplinary action are published as a guide to what is considered unacceptable conduct.