

CODE OF CONDUCT AND ETHICS

Principles

The Principles on which this Code is based encompasses transparency, integrity, accountability and corporate social responsibility.

Objectives

This Code is formulated to enhance the standard of corporate governance and behaviour with a view to achieve the following objectives:-

- (1) To establish standard of ethical conduct for directors based on acceptable belief and values that one upholds.
- (2) To uphold the spirit of social responsibility and accountability of the Company in line with the legislations, regulations and guidelines governing it.

Code of Conduct and Ethics

In the performance of his duties a director should always:-

- (1) have a clear understanding of the aims and objectives, capabilities and capacity of the Company;
- (2) devote time and effort to attend meetings and to know what is required of the board and each of its members and to discharge those functions;
- (3) ensure at all times that the Company is properly managed and effectively controlled;
- (4) stay abreast of the affairs of the Company and be kept informed of its compliance with relevant legislations and contractual requirements;
- (5) at all times exercise his powers for the proper purpose and aims of the Company and for the benefit and prosperity of the Company;
- (6) disclose immediately all contractual and personal interests whether directly or indirectly with the Company;
- (7) neither divert to his own advantage any business opportunity that the Company is pursuing nor use any confidential information obtained by reason of his office for his own advantage or that of others;
- (8) at all times act with utmost good faith towards the Company in any circumstance and to act honestly and responsibly in the exercise and discharge of his powers and duties;
- (9) be willing to exercise independent judgment;
- (10) be conscious of the interest of shareholders, employees, creditors and customers of the Company;
- (11) ensure adequate safety measures and provide proper protection to employees at work places;
- (12) ensure that the activities and operations of the Company do not harm the interest and well-being of the community.
- (13) avoid taking advantage for personnel gain from information or opportunities obtained from the Group. Prohibition of insider trading according to the Capital Market and Services Act, 2007 must be strictly observed and complied.

- (14) avoid engaging in concealing funds of dubious or illegal origin and/or then disguising them as legitimate proceeds of lawful activities and/or providing funding to terrorism activities as described under the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001.
- (15) ensure communication flows down to employees, suppliers, customer and other stakeholders on the grave matters to bribery and corruption. Directors must at all times comply with the provisions of the Malaysian Anti-Corruption Commission Act (MACC) 2009.