



# **PRESS METAL ALUMINIUM HOLDINGS BERHAD**

Registration No. 201601027232 (1198171-H)

## **CODE OF CONDUCT**

Abbreviation	Meaning
AMLCFT	: Anti-Money Laundering and Countering Financing of Terrorism Act 2001
Board	: The Board of Directors of the Company
Bursa	: Bursa Malaysia Securities Berhad
CMSA	: Capital Markets and Services Act 2007
COC	: Code of Conduct
Director	: Includes all independent and non-independent directors, executive and non-executive directors of the Group and shall also include alternate or substitute directors.
Employees	: All individuals directly contracted to the Group on an employment basis, including permanent and temporary employees excluding Directors and Management.
Group	: The Company and its subsidiaries, collectively.
Group CEO	: Group Chief Executive Officer of the Group.
MACC Act 2009	: The Malaysian Anti-Corruption Commission Act 2009 and any amendments or additions thereto or re-enactments thereof.
HOD	: Head of department.
Officer	: All Directors, management and employees of the Group
PMAH or the Company	: Press Metal Aluminium Holdings Berhad (Registration No. 201601027232 (1198171-H)).
Subsidiary	: A corporation in which the Company controls the composition of the board of directors, controls more than half of the voting power or holds more than half of the issued share capital excluding preference shares.

## **1. Introduction**

PMAH has adopted the following COC for Directors, management and employees of the Group. This Code is established to promote the corporate culture which engenders ethical conduct that permeates throughout the Group.

## **2. Principle**

The principle of this COC is based on trust, integrity, responsibility, excellence, loyalty, commitment, dedication, discipline, diligence and professionalism. All Officers are not to place themselves in a position where their professionalism and integrity may be compromised.

## **3. Purpose**

COC is formulated with the intention of achieving the following aims:

- (a) To emphasise the Group's commitment to ethics and compliance with the applicable laws and regulations;
- (b) To set forth basic standards of ethical and legal behaviour within the Group;
- (c) To include noble characteristics in performing duties to improve work quality and productivity;
- (d) To improve self-discipline to provide the Group with good and quality service; and
- (e) To enhance skills in the implementation of duties and to be able to adapt to the work environment.

## **4. COC**

Every Officer is responsible to ensure compliance with the COC:

- (a) Know and comply with the COC and the Group's policies and procedures;
- (b) Seek guidance when in doubt;
- (c) Avoid illegal, unethical or otherwise improper acts;
- (d) Report any suspected violation of policies, laws and regulations;
- (e) Take responsibility and accountability for own actions.
- (f) Any irregularities should be notified to the HOD or the Board immediately.

The Company may take appropriate action against any personnel who fails to act in accordance with applicable statutory laws, Policies and Procedures of the Group and this COC.

In performing his or her duties, each Officer must comply with the letter and spirit of the following codes:-

#### 4.1. Human Rights and Labour Rights

The Group supports and respects human rights. The Group treats Officers with dignity and respect in the workplace, provides equal employment opportunities, respects gender equity, creates a safe and harmonious work environment, and will not engage in any form of discrimination. Officers should respect the personal dignity, privacy and rights of each individual they interact with during the course of work and shall not in any way cause or contribute to the violation or circumvention of human rights.

The Group support and respect recognised labour rights. The Group strictly oppose to all forms of child and forced labour, respects the rights to associate freely and respect the right of collective bargaining.

#### 4.2. Health and Safety

The Group provides a work environment that is safe, secure and free of danger, harassment, intimidation, threats and violence. The Group takes appropriate precautions to prevent injuries or adverse working conditions for every Officer. It is the responsibility of each Officer to adhere to the prescribed safety rules and acts as well as to raise any concerns which may represent a potential threat to health and safety. Officers have the right to refuse to any work activity that is deemed dangerous and may cause injury. In addition, Officers are responsible for reporting injuries and unsafe work practices or conditions as soon as they are being discovered or become known.

#### 4.3. Environment

The Group conducts its operations in a manner that safeguards health, protects environment and conserves valuable materials. The Group is committed to protecting the environment by minimising and mitigating environmental impacts throughout the life cycle of operations. Officers should contribute to minimizing the use of finite resources, including energy, water and raw materials. Officers should minimise harmful emissions to environment, including waste, air emissions and discharges to water.

#### 4.4. Gifts, Entertainment, Hospitality, Travel, Donation and Sponsorship

Each and every Officer must not accept entertainment, gifts, or personal favours that could, in any way, influence, or appear to influence, business decisions in favour of any person or organisation with whom or with which the Group has, or is likely to have, business dealings.

The Officers must not accept any other preferential treatment under these circumstances because their positions with the Group might be inclined to, or be perceived to, place them under obligation to return the preferential treatment.

Similarly, the Officers must not corruptly give, agree to give, promise or offer to any person any gratification (as defined under Malaysia Anti-Corruption Commission Act 2009 and any statutory modification, amendment or re-enactment thereof for the time being in force) whether for the benefit of that person or another person with intent to obtain or retain business for the Group or to obtain or retain an advantage in the conduct of business for the Group.

#### 4.5. Anti-Bribery and Anti-Corruption

The Group adopt a zero-tolerance approach towards all forms of bribery and corruption and undertake to comply with all the relevant anti-corruption laws in all the jurisdictions the Group operates in. Officers shall never offer, give, solicit or accept bribes or any other improper payment in order to achieve business or personal advantages for themselves or other persons, or engage in any transaction that can be construed as having contravened the anti-corruption laws.

Officers shall be cognisant of the fact that bribes may be in any form, monetary or otherwise including but are not limited to unauthorised remuneration such as referral fee, commission or other similar compensation, material goods, services, gifts, business amenities, premiums or discounts of an inappropriate value or of an unreasonable level or that are not generally offered to others or that are prohibited by law or may reasonably be viewed as having crossed the boundaries of ethical and lawful business practice.

Prior to giving or accepting any business amenity or other gifts (in whatever form or value), Officers shall assess the appropriateness of their actions by assessing if the action could influence or could reasonably give the appearance of influencing the business relationship of the Group with that organisation or individual or any business decision arising out of that business relationship

#### 4.6. Group Records and Internal Controls

The Group's records must be prepared accurately and honestly, both by accountants who prepare financial statements and by Officers who contribute to the creation of business records, for example, by submitting expense records, time sheets, order and invoice records. The Group takes obligation to maintain business records for operational, legal, financial, historical and other purposes seriously and takes appropriate steps to ensure that the content, context and structure of the records are reliable and authentic.

Reliable internal controls are critical for proper, complete and accurate accounting and financial reporting. Officers must understand the internal controls relevant to their positions and comply with the policies and procedures related to those controls to ensuring that effective and reliable business processes are in place.

#### 4.7. Company Assets

The Group's properties and assets should be managed and safeguarded in a manner which protects their values. Officers are accountable for safeguarding all assets entrusted to them, including information resources, records, materials, facilities and equipment under their care or control, from loss, theft, waste, misappropriation or infringement, and for using the assets to advance the interests of the Group. This includes the Company's name, logo, taglines and innovations. Any intellectual property created by the employees in the performance of job responsibilities belongs to PMAH. All Officers have an affirmative duty to immediately report the theft, loss or misappropriation of any Group assets, including financial assets, physical assets, information assets and electronic assets to the management as stipulated under Violations of COC below.

#### 4.8. Commitment

The Group expects every Officer to give their fullest attention, dedication and efforts to their duties. Officers must avoid any personal, financial or other interest which may be in conflict with their duties and responsibilities to the Group.

#### 4.9. Integrity and Professionalism

Officers should remember that they are the reflection of the Group and are constantly being judged and otherwise appraised by everyone they come in contact with. All Officers should conduct themselves with the highest degree of integrity and professionalism in the workplace or any other location while on Group's business.

#### 4.10. Personal Appearance

An Officer who is provided with uniforms by the Group shall wear them at all times while he / she is at work.

An Officer is expected to be suitably and neatly dressed to maintain an appropriate appearance that is business like, neat and clean, as determined by the requirements of the work area.

Dress, grooming and personal cleanliness standards are important and contribute to the morale of all Officers and affect the business image to the Group's customers and visitors.

#### 4.11. Confidential Information

All information obtained in the course of engagement and/or employment with the Group shall be deemed to be strictly confidential and shall not be disclosed to any third party. This measure applies to Officers both during and after the service with the Group. Examples of such information include but are not limited to trade secret, financial and business forecast, competitive bids, business acquisition and any information that may affect the Company's business and share price. Information of such nature should remain confidential until it is in the public domain.

Those who have left PMAH are expected to maintain confidentiality of proprietary and sensitive information acquired in the course of employment with PMAH.

Except with the permission of the Group, an Officer shall not make any unauthorised public statement, circulate, divulge or communicate with any customer, member of the public, media or government or statutory bodies on the policies or decision of the Group on any issue, or any other information or details in respect of the Group's business. This applies to disclosures by any medium, including the internet, especially via social media sites (e.g. Facebook, Twitter, YouTube, TikTok), internet message boards and/ or blogs. An Officer must take precautionary steps to prevent the unauthorised disclosure of proprietary or confidential information, including protecting and securing documents containing this information.

Personal records and remuneration including the Officer's own remuneration are classified as Private and Confidential information and shall not be divulged. Officers who possess and/or has control over or authorises the processing of personal data must ensure that all personal data handled are protected thereby safeguarding the interests of each individual involved. The Company and Officers involved in processing personal data must comply with any relevant rules, regulations and legislations and controls that are put in place to protect the privacy of the personal information.

#### 4.12. Compliance Obligations

The Group will comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions which the Group operates. Officers are expected to understand and comply with the laws, rules and regulations that are applicable to their positions and/or work activities, including the AMLCFT and the MACC Act 2009. The Group reserves the right to report any actions or activities suspected of being criminal in nature to the police or other relevant authorities.

#### 4.13. Conflict of Interest

The Group expects that the Officers will perform their duties conscientiously, honestly, and in accordance with the best interests of the Group.

Officers must take care to separate their personal roles from their company positions when communicating on matters not involving the Group's business.

Officers must disclose and declare their interest via the “Conflict of Interest Declaration Form” as set out in Appendix 1, in the contemplated transaction or contract of any actual conflict of interest, potential conflict of interest or perceived conflict of interest.

This should be read in conjunction with the Conflict of Interest Policy of the Company.

#### 4.14. Fair Dealing

All Officers, customers, suppliers and third party and have dealings with the Group shall be treated fairly and equally. Any ground of discrimination is strictly not allowed. The Group will compete effectively and fairly in the market which it operates. Moreover, the Group is obliged to ensure its operating activities and its relationship with any business partner is fair, transparent and honest. This includes any form of transaction or termination of relationship. All commercial transactions shall be recorded and documented. Corrupted practices are not allowed either directly or indirectly.

#### 4.15 Anti-Money Laundering

Money laundering is the process of concealing, converting and transferring proceeds from unlawful activities to a legitimate source of income or asset. Money laundering is an offence under the AMLCFT in Malaysia.

Officers shall be aware of the applicable anti-money laundering laws and shall seek to ensure that they are appropriately and adequately informed of developments in the laws relating to this area in order to actively pursue the prevention of money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities. Officers are expected to be mindful of the risk of the Group’s business being used for money laundering activities and to raise any suspicious transactions to their immediate superior and the Board to undertake further investigation.

#### 4.16 Insider Dealing

No Officers who are in the possession of non-public price sensitive information of the Company or any other listed company gained in the course of employment with the Group may deal or advise any other person to deal in any securities of the Company or any securities of another listed company.

No Officers shall disclose non-public price sensitive information to any person (including family members) where such information may be used by such person to his or her profit by trading or in recommending or advising others to trade in any securities of company.

In the context of Malaysian law, insider trading is an offence defined under the CMSA. The laws of other country on insider trading may be applicable in the context of inside information concerning company listed outside of Malaysia.

## **5. Communications and Compliance**

The Company should ensure that this COC is being communicated to all levels of officers of the Group through staff handbook, notice board, intranet, or corporate website. The Company should include briefing of this COC to new Officers in the induction programme.

## **6. Violations of COC**

The Group's Employees should report to supervisors, managers, HODs or Head of Human Resource about the known or suspected illegal or unethical behaviour. The Company's Directors and senior management shall promptly report any known or suspected violations of this COC to the Company's board of directors.

Further, the Company has established a Whistle-Blowing Policy that provides an anonymous, secure and confidential communication channel for all stakeholders to raise genuine concerns or report any misconduct or wrongdoings. The provision, protection and procedure of the Whistle-Blowing Policy for reporting of the violation of the COC are available on the Company's portal.

## **7. Non-retaliation**

The Company makes every effort to maintain the confidentiality of any individual who reports concerns and possible misconduct. Officers who retaliate or encourage others to do so will be subjected to disciplinary actions, up to and including termination of employment or engagement. The Company does not tolerate any form of retaliation against anyone who makes a report in good faith.

## **8. Investigations**

The Company shall investigate reported concerns promptly and confidentially with the highest level of professionalism and transparency. All internal investigations and audits will be conducted impartially and without predetermined conclusions. All Officers shall cooperate fully with audits, investigations and any corrective action plans, which may include areas for continued monitoring and assessment.

Where external investigations are necessary, every officer shall appropriately respond to, cooperate and shall not interfere with, any lawful government inquiry, audit or investigation.

## **9. Periodic Review**

This COC should be reviewed periodically by the Board in accordance with the needs of the Company. Changes to the COC shall be communicated to all Officers. This COC shall be made available on the Company's website.

Adopted by Board: 26 February 2019

Reviewed and Adopted by Board on: 26 November 2020

2<sup>nd</sup> Review and Adopted by Board on: 29 November 2022

3<sup>rd</sup> Review and Adopted by Board on: 29 August 2023

**CONFLICT OF INTEREST DECLARATION FORM**

Name:

Email address:

**Details of Conflict of Interest or Potential Conflict of Interest**

- (a) Description of conflict of interest or potential conflict of interest
- (b) Nature and extent of such conflicts
- (c) Impact / potential impact of such conflicts
- (d) Measures taken to resolve, eliminate, or mitigate such conflicts