



**CODE OF CONDUCT & ETHICS
POLICY AND SOP**

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**CODE OF CONDUCT & ETHICS
POLICY AND SOP**

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CAPE EMS BERHAD
199901026859 (501759-M)

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1.0 PURPOSE

- 1.1 The purpose of this Code of Conduct and Ethics (Code) is to establish a systematic guideline for all CAPE EMS BERHAD (CAPE EMS - Company) and its subsidiaries (CAPE GROUP - Group) employees, personnel, suppliers, business associates and third party intermediaries who provide, or shall provide products and services and acting on behalf of the Group are aware of our Code sets forth our core values, expectations and standards of business conduct and ethics to guide the Board of Directors, the management, employees and personnel of CAPE Group.
- 1.2 CAPE Group is committed to promote and maintain the highest levels of Governance, Integrity, Accountability and Transparency (GIAT) in the conduct of our business activities, dealings, relationships, and operations and to establish an ethical corporate environment.
- 1.3 This Code provides guidance to ensure that ethical conduct is upheld in our daily work. However, separate guiding regulations can be established by the Board or Key Senior Management of the Group when more detailed standards of conduct are deemed necessary by the Board or other governing body within the Group.

2.0 SCOPE

- 2.1 The scope of this Code applies to all personnel (as defined in Section 3.14 of this Code) of CAPE Group, business associates and third-party intermediaries who provide, or shall provide products and services or acting on behalf of CAPE Group and extends to all internal and external multi-stakeholders and interested parties to embrace the spirit of our commitment to build a culture of GIAT and our same high ethical standards.
- 2.2 This Code is not intended to be all-encompassing nor exhaustive, and there can be other obligations or expectations of Directors, Key Senior Management and Personnel when performing their duties. Although this Code is not meant to address every issue, it defines the spirit in which CAPE Group intends to do business and guide all personnel in their daily conduct.
- 2.3 This Code is formulated to achieve the following objectives:
- (a) To uphold the spirit of corporate and social responsibility in line with the legislation, regulations and guidelines for administrating an organization in Malaysia;
 - (b) To articulate the highest levels of Governance, Integrity, Accountability and Transparency (GIAT) and law-abiding behaviour within CAPE Group;
 - (c) To improve self-discipline to provide good quality services;

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- (d) To ensure that all CAPE Group personnel are aware of their ethical obligations; and
- (e) To enhance the standard of corporate governance.

2.4 This Code applies in all countries, territories, or jurisdictions where CAPE Group operates. Where local customs, standards, laws, or other local policies apply that are stricter than the provision of this Code, the stricter rules shall be complied with. However, if this Code stipulates stricter rules than local customs, standards, laws or other local policies, the stricter provisions of this Code shall apply.

3.0 TERMS AND DEFINITIONS

3.1 “Applicable statutory laws and regulatory requirements” : –

Means the principal anti-corruption laws that CAPE Group personnel are expected to understand and comply with in respective jurisdictions, but not limited to; :-

- (i) Companies Act 2016 (Act 777);
- (ii) Malaysian Anti-Corruption Commission (MACC) Act 2009 (Act 694);
- (iii) Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (Act 613);
- (iii) Malaysian Penal Code (Act 574);
- (iv) Election Offences Act 1954 (Act 5);
- (v) Criminal Procedure Code 2012 (Act 593);
- (vi) Police Act 1967 (Act 344);
- (vii) Customs Act 1967 (Act 235)
- (v) Singapore’s Prevention of Corruption Act 1960; and
- (vi) other applicable statutory laws and regulatory requirements related to corporate liability in term of anti-bribery and anti-corruption in the countries or jurisdictions where CAPE Group operates.

3.2 “ABC Policy” :-

means CAPE Group’s Anti-Bribery and Corruption Policy and SOP.

3.3 “Audit Committee (AC)” : –

means Audit Committee constituted by the Board of Directors of CAPE EMS BERHAD.

3.4 “AMLA Policy” :-

means the Anti-Money Laundering Policy.

3.5 “Board” :-

means the Board of Directors of CAPE EMS BERHAD, also known as the Governing Body.

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- 3.6 “Business Associate” :-
means any persons who providing products or performing services for or on behalf of the CAPE Group, apart from the Group’s employees, including contractors or subcontractors, distributors, business contacts, agents, advisers, joint venture partners, intermediaries, sales representatives, consultants, sponsors, service providers and business partners.
- 3.7 “CMSA” :-
means Capital Market Services Act 2007.
- 3.8 “Code” :-
means the Code of Conduct and Ethics.
- 3.9 “Conflict of Interest” : –
mean occurs when an individual or organization is involved in multiple interests, one of which could possibly corrupt, or be perceived to corrupt, the motivation for an act in another. Conflict of Interest arises in a situation where you are or may be in a position to take advantage of your role by using assets, confidential information, proprietary information or intellectual property for the benefit of yourself or a family member or closely related person.
- 3.10 “Disciplinary Actions” : –
means any action that can be taken on the completion of or during the investigation proceedings including but not limited to a warning, suspension from official duty, termination, or dismissal or any such action as deemed fit considering the gravity of the matter in accordance with the Disciplinary Procedures (HRA-SOP-07).
- 3.11 “Director” or “Directors” :-
means the director(s) of the Company and its subsidiaries and shall have the meaning given in Section 2(1) of the Act and Section 2(1) of the Capital Markets And Services Act 2007.
- 3.12 “Improper Conduct” : –
means a breach of discipline or violation of applicable laws and regulations, Code of Conduct and Ethics or the rules and regulations set out in any handbooks, policies and procedures statements or in any other documentations of CAPE Group.
- 3.13 “MMLR” :-
means Listing Requirements of Bursa Malaysia Securities Berhad for Main Market.
- 3.14 “Personnel” : –
means any person at all levels and grades, including, directors, senior managers, key senior management, managers, executives, officers, non-executives, employees (whether permanent, full-time, part-time, contract, or temporary, employed by CAPE

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Group, trainees, seconded staff, home-workers, casual workers and agency staff, volunteers, trainees, interns, protégé pupil, sponsors, or any other person associated with the Group.

- 3.15 "Price-Sensitive Information" :-
means information that "on becoming generally available would or would tend to have a material effect on the price or value of securities" as referred to in section 185 of the Capital Market Services Act 2007.
- 3.16 "Related Party Transaction" :-
means transaction as defined under Paragraph 1.01 of MMLR.
- 3.17 "Third-Party Intermediaries" : –
means any external individual or organisation that CAPE EMS has, or plans to establish, some form of business relationship. This can include actual and potential clients, customers, contractors, suppliers, distributors, business contacts, agents, advisers, joint ventures, joint venture partners, intermediaries, sales representatives or consultants and government and agencies and public bodies – this includes (but is not limited to) their advisors, representatives, public officials, politically exposed persons (PEPs), and political parties.
- 3.18 "Wrongdoing" : –
means action(s) or omission(s) that shall cause harm.

Wrongdoing can include, but is not limited to the following:

- (a) Bribery and corruption including money laundering, insider trading;
- (b) Fraud (misappropriation, embezzlement or theft) of CAPE Group funds or assets, improprieties and irregularities in accounting and financial reporting, or blackmail;
- (c) Conflict of interest, abuse of authority and discrimination, gross negligence and mismanagement;
- (d) Disregard or serious non compliances with CAPE Group policies and procedures, financial, legal or regulatory obligations;
- (e) Breach of law (national or international), breach of CAPE Group relevant code of conduct and policies such as fraud or deliberate error in documentation, bribery and corruption, criminal breach of trust, illegal or criminal offense;
- (f) Unauthorised disclosure or use of CAPE Group confidential information including commercial or manufacturing secrets, calculations or designs;
- (g) Any unlawful act, whether criminal or civil in nature;
- (h) Conduct, act or omission which is likely to create a substantial or specific danger to the health and safety of personnel or other individuals or give rise to risk of damage to assets and properties;

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- (i) All forms of harassment including but not confined to unwelcome verbal or physical advances and sexually or otherwise derogatory or discriminatory statement or remark;
- (j) Acts, omissions or concealments of wrongdoing knowingly, wilfully and intentionally which are detrimental to CAPE Group interests or reputation;
- (k) Collaborating with a person(s) to commit any of the above wrongdoings.

4.0 APPLICABLE FORMS

- 4.1 Appendix icAPE-02-F : ABC Policy, Whistleblowing & Code of Conduct Acknowledgement Form

5.0 RESPONSIBILITIES AND AUTHORITIES

- 5.1 The Board of Directors (Governing Body) and Key Senior Management of Vice Presidents (Top Management) are responsible for establishing, implementing, and maintaining this Code of Conduct and Ethics that sets forth our values, expectations and standards of business conduct and ethics to guide the Board of Directors, the management, employees, and personnel of CAPE Group.
- 5.2 This Code is in accordance with all applicable statutory laws, rules and regulatory requirements and it is the responsibility of the management of each department to ensure that all CAPE Group personnel, business associates and third party intermediaries are aware of this Code so as to maintain the highest levels of Governance, Integrity, Accountability and Transparency (GIAT) in the conduct of our business activities, dealings, relationships and operations and to establish an ethical corporate environment.
- 5.3 This Code shall be reviewed on an annual basis during the Management Review Meeting and, in addition, can be reviewed from time to time to take account of, for example, changes to legislation, regulatory developments or organizational changes.
- 5.4 The Chief ESG Officer shall be responsible for incorporating any amendments and updates into this Code, obtaining approval from the MD / CEO or the Board of Directors (Governing Body) for the amendments and updates, as well as distributing the same to the relevant parties.

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6.0 PROCEDURE

6.1 Code of Code and Ethics Policy Statement

CAPE EMS BERHAD is committed to promote and maintain our Core Values of Governance, Integrity, Accountability and Transparency (GIAT) in all our business activities, dealings, relationships, and operations as a recognized and reputable EMS contract manufacturer through proper implementation of ISO 37001:2016 Anti-bribery Management System (ABMS); Ministerial Guidelines on Adequate Procedures (GAPs) and establishing a Code to prevent, detect, and respond to potential bribery risks.

To achieve this goal, **CAPE EMS BERHAD** shall :

Commit to implement (a) Fair Workplace with Health, Safety, Security and Environment Practices; (b) Fair Labour and Employment Practices; and (c) Fair Business Practices;

Assure our core values towards building a culture of governance, integrity, accountability and transparency with responsible business conduct and ethical personal conduct;

Prioritize a zero-tolerance approach against all forms of bribery and corruption and be responsible of every one of us; for our products and services;

Ensure all our records, financial or otherwise, are accurately, completely, precisely, and timely recorded and the protection of information security, and intellectual assets.

We expect our personnel, customers, business associates and third-party intermediaries to embrace the spirit of our commitment to build a culture of GIAT and set our same high ethical standards as described in our Anti-Bribery & Corruption (ABC) Policy, Whistleblowing Policy and this Code of Conduct and Ethics. A commitment to full compliance with this Code is a fundamental requirement and failure to comply with this Code or applicable laws and regulations can be a sufficient cause for **CAPE EMS BERHAD** to terminate its relationship with you as personnel, customers, business associate or third-party intermediary.

We are very grateful and most appreciative most if our personnel, customers, business associates and third-party intermediaries can show and support your commitment to build a strong business relationship build on the culture of GIAT with **CAPE EMS BERHAD** through this Code.



Ms Christina Tee
MD / Group CEO
On behalf of Board of Directors – Governing Body
Date : 28th February 2023

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6.2 Implementation Guidelines

- 6.2.1 The objective of this Code of Conduct and Ethics which sets forth the values, expectations and standards of business conduct and ethics to guide the Board of Directors, the management, employees, and personnel of CAPE Group.
- 6.2.2 CAPE Group personnel shall maintain the highest standard of business conduct and ethical behaviour in the performance and exercise of responsibilities as personnel of the Group or when otherwise representing the Group. The CAPE Group personnel shall further conduct themselves in a manner that reflects the corporate values and overall spirit of this Code.
- 6.2.3 As the CAPE Group personnel are placed in a position of trust, which includes overseeing and managing the Group's resources, having access to information, and making decisions (where applicable) that affect the interests of the Group, they are expected to be honest and impartial when carrying out their respective duties and responsibilities to maintain confidence in the Group and to advance the good name of the Group.
- 6.2.4 CAPE Group personnel have to avoid dealing with prospective business associates and third-party intermediaries known to be paying bribes or involved in any other forms of corruption. It is expected that our business associates and third-party intermediaries who provide or shall provide products and services and acting on behalf of the Group complies with this Code and the ABC Policy and SOP when performing such work or services.
- 6.2.5 CAPE Group personnel shall always observe and ensure compliance with all applicable statutory laws, and regulatory requirements to which they are bound to observe in the performance of their duties. The personnel are also required to comply with the ethical and technical requirements of any relevant regulatory or professional body.
- 6.2.6 As a guide, any types of illegal, unethical, questionable practices, or improper conduct committed or about to be committed within CAPE Group, include, but are not necessarily limited to, are identified as wrongdoings as follows :-
- (a) Bribery and corruption including money laundering, insider trading;
 - (b) Fraud (misappropriation, embezzlement or theft) of CAPE Group funds or assets, improprieties and irregularities in accounting and financial reporting, or blackmail;
 - (c) Conflict of interest, abuse of authority and discrimination, gross negligence and mismanagement;
 - (d) Disregard or serious non compliances with CAPE Group policies and procedures, financial, legal or regulatory obligations;

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- (e) Breach of law (national or international), breach of CAPE Group relevant code of conduct and policies such as fraud or deliberate error in documentation, bribery and corruption, criminal breach of trust, illegal or criminal offense;
- (f) Unauthorised disclosure or use of CAPE Group confidential information including commercial or manufacturing secrets, calculations or designs;
- (g) Any unlawful act, whether criminal or civil in nature;
- (h) Conduct, act or omission which is likely to create a substantial or specific danger to the health and safety of personnel or other individuals or give rise to risk of damage to assets and properties;
- (i) All forms of harassment including but not confined to unwelcome verbal or physical advances and sexually or otherwise derogatory or discriminatory statement or remark;
- (j) Acts, omissions or concealments of wrongdoing knowingly, wilfully and intentionally which are detrimental to CAPE Group interests or reputation;
- (k) Collaborating with a person(s) to commit any of the above wrongdoings.

6.2.7 CAPE Group recognises that some situations are not easy. Ethics is often about arbitrating a conflict of principles. Our Code sets standards for the Group in several “grey areas”, where, beyond the law, a discretionary decision is required. No document can anticipate and address every situation that can arise.

6.2.8 We can reach an ethical dilemma or a situation where values are at stake and where a choice has to be made from several alternatives based on virtue: duty and calculated risk. So whenever you are faced with this type of decision, ask yourself the following questions :-

- (a) Is it in line with the Code of Conduct and Ethics? Reflection on values.
- (b) Is it legal? Reflection on compliance, laws, and regulations.
- (c) Is it in line with our Core Values : Governance, Integrity, Accountability and Transparency?
- (d) How would my actions affect our stakeholders, and could I justify my decision?
- (e) Would I be comfortable if my decision was made public internally or externally? Reflection on consequences on a specific action on self and others.

If the answer to one of these questions is ‘NO’, or if you have any doubts, the golden rule is to consult the appropriate people (your superior, line manager, Head of Department or ESG Department) and discuss the matter openly before acting.

6.2.9 The Code of Conduct and Ethics does not replace any existing policies, and you should continue to refer to whatever rules and standards have been set in your workplace. This Code aims to provide a framework for these policies and standards, so that it is easier for you to understand the rationale behind them.

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6.3 Code of Conduct and Ethics

6.3.1 Our Code of Conduct and Ethics sets forth our values, expectations and standards of business conduct and ethics to guide the Board of Directors, the management, employees, and personnel of CAPE Group. These are our fundamental commitment to conducting business ethically and honestly. We are committed to our Core Values: (a) Governance; (b) Integrity; (c) Accountability and (d) Transparency (GIAT). We shall always act with governance and integrity, take accountability for results, and do the right thing, even when the right thing is hard to do with transparency.

6.3.2 As CAPE Group personnel, we count on each other to build on our GIAT and live the values that drive our Group. So, we are accountable and not to violate our Code, laws, and regulations. It is everyone's responsibility to abide to our Code and policies. If any personnel have breached not only this Code but also violate any compliance requirement shall be considered to have committed a serious disciplinary offence and shall face disciplinary action.

6.3.3 Our Code of Conduct and Ethics covers three (3) principal pillars namely (a) Fair Workplace with Health, Safety, Security and Environment (Environmental); (b) Fair Labour and Employment Practices (Social) and (c) Fair Business Practices (Governance).

6.4 Environmental Sustainability – Fair Workplace with Health, Safety, Security and Environment Practices

6.4.1 Fair Workplace

CAPE Group is committed to maintaining a healthy and safe workplace that allows our personnel to balance the personal lives and work. The Group understands and strives to comply with all applicable laws and regulations related to safety and sanitation such as Occupational Safety and Health Act, 1994 (Act 514). We maintain a Workplace that supports a Spirit of Freedom and Open-mindedness.

6.4.2 Free of Pandemics and other NCD threats

CAPE Group is committed to maintaining a secure and conducive workplace that is free of pandemics and other noncommunicable diseases (NCD) and mental disorders. Global environmental changes (GEC) have become a source of disease importation and reintroduction. The Group shall ensure that promotion of good lifestyle choices, treatment of common mental disorders and management of people at risk for heart attack and stroke.

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6.4.3 Environmental Stewardship

CAPE Group is committed to building a more sustainable society and respects the environment. The Group seeks to minimise its environmental impact and carbon footprint by conserving resources and protect our planet through ISO 14001 EMS programs and complying to Environmental Quality Act, 1974 (Act 127). To achieve net zero GHG emissions for CAPE Group using standard, framework, or voluntary initiative. It is everyone's responsibility to seek to reduce that impact wherever possible. Every small step counts.

6.5 Social Sustainability - Fair Labour, Employment Practices and Our Community

6.5.1 Inclusive and Equal Employment Opportunity

CAPE Group is committed to recruiting, hiring, training, promoting and otherwise treating applicants, employees, and personnel without discrimination. The Group strives to promote diversity and create a culture that allows all CAPE Group personnel to contribute their unique talents and skills to provide the best products and services to our customers. We believe in the power of people. We respect for individuals of all backgrounds, capabilities, and opinions.

6.5.2 No Forced Labour and Child Labour

CAPE Group is committed not to use any form of forced or involuntary labour where people are forced to work against their will, including forced labour to work off a debt, prison labour or human trafficking. The Group shall not use child labour who are younger than 15 years old. The Group adopts sound labour and employment practices and endeavours to ensure CAPE Group personnel are treated in accordance with the applicable laws and regulations of the countries and regions in which the Group operates.

6.5.3 Harassment and Discrimination

CAPE Group is committed to maintaining a workplace that is free of harassment and discrimination. Each of us has the right to respect human dignity. The Group ensure that any behaviour or action likely to infringe this right, and in particular any form of harassment, bullying and discrimination is not acceptable.

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6.5.4 Contribution to Our Community

CAPE Group is committed to supporting the communities where our employees and personnel live and work. The Group is a responsible stakeholder in society, a good neighbour and a concerned citizen committed to the communities in which we do business. We encourage our personnel to play an active role in the community. We also explore ways to address broader challenges in society.

6.6 Governance Sustainability - Fair Business Practices

6.6.1 Fair Competition

CAPE Group is committed to working in an industry where business practices are fair and reputable. The Group respects all stakeholders in our professional sphere, including competitors. We treat them the way we would like them to treat us. Our position as leader in the EMS industry reinforces our duty to set a good example in this field.

6.6.2 Inside Trading

CAPE Group does not wish to restrict the freedom of employees and personnel to make appropriate personal investments, each of us must always bear in mind the rules with regards "insider trading". We never use or disclose material, non-public information about the Group for the purpose of buying or selling securities. Nor do we ever attempt to manipulate the price of publicly traded securities.

6.6.3 Financial Integrity and Business Records

CAPE Group is committed to making sure that all our records, financial or otherwise, are accurately, completely, precisely, and timely recorded. The Group views that these are essential part of running our business legally, honestly, and efficiently to ensure that our business activities are not used to launder money from criminal activities. "Money laundering" is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate.

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6.6.4 Honesty Advertising

Cape Group is committed to complying with the importance of accuracy and transparency in advertising and promotion.

6.6.5 Anti-money Laundering

CAPE Group is committed to strengthening anti-money laundering governance and remaining vigilant in the prevention against money laundering and terrorist activities. The Group prioritizes a risk-based approach, conducting due diligence and providing timely disclosure of suspicious transactions to the relevant law enforcement agencies through our Anti-money Laundering Policy and SOP (icAPE-GP-06).

6.6.6 Tax and Trade Controls

CAPE Group is committed to be a good corporate citizen and complies with applicable tax and trade control laws and regulations wherever it operates. The Group shall scrupulously respecting tax laws and trade control laws and regulations which prohibit or restrict sales or other transactions involving certain products, services, software and technologies to certain countries, individuals, or entities to secure international peace and security.

6.6.7 Bribery and Facilitation Payments

CAPE Group is committed to promoting and maintaining the highest levels of Governance, Integrity, Accountability and Transparency (GIAT) in all our business activities, dealings, relationships, and operations as a recognized and reputable EMS contract manufacturer as stipulated in our Anti-bribery and Corruption (ABC) Policy and SOP (icAPE-GP-02). The Group shall not offer or accept any form of payment or incentive intended to improperly influence a business decision.

6.6.8 Gifts and Hospitality

CAPE Group is committed to promoting the practise of giving and receiving business gifts and hospitality that help to build understanding and improve working relationships. The Group recognises that gifts and hospitality vary between companies, countries, regions, cultures, and religions, so the “golden rules” are full disclosure to your management, staying within reasonable limits and always asking oneself how this would be perceived by the wider public as described in our ABC Policy and SOP (icAPE-GP-02).

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6.6.9 Charitable Donations and Political Contributions

CAPE Group, as part of its corporate citizenship, is committed to undertaking social and philanthropic programmes that are in line with their respective business strategies or that will benefit the broader interests of the community, while complementing the efforts of the industry and Government. The Group encourages contributions to charitable organizations and has a policy of strict political neutrality.

The Group does not make political donations or contributions to any political parties, organisations, or individuals engaged in politics nor does it incur any political expenditure as described in our ABC Policy and SOP (icAPE-GP-02). The Group is committed to respecting its personnel's right to participate as individuals in the political process – so long as they make sure that, in doing so, they do not represent the Group.

6.6.10 Political Activities and Lobbying

CAPE Group is committed to respecting its personnel's right to participate as individuals in the political process – so long as they make sure that, in doing so, they do not represent the Group. The Group does not contribute to political parties, politicians, or related institutions. However, CAPE Group, as a leader in the EMS industry, believes it is our duty to be proactive and take part in the public decision-making process in the countries in which it operates.

6.6.11 Conflict of Interest

CAPE Group is committed to acting in the best interests of the company rather than for personal gain. The Group aims to avoid situations where our personal interests might come into conflict with the interests of CAPE Group as described in our ABC Policy and SOP (icAPE-GP-02).

A full disclosure of all the facts is important and directors shall be governed by the Companies Act 2016 and MMLR on matters relating to disclosures of conflict of interest.

6.6.12 Fraud, Breach of Trust, and Abuse of Power

CAPE Group is committed to promoting and maintaining our core values of Governance, Integrity, Accountability and Transparency (GIAT) in all our business activities, dealings, relationships, and operations.

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The Group shall ensure that all personnel are (a) not engage in any transaction involving dishonesty and fraud; (b) not engage in a behaviour that constitutes a breach of trust and confidence with us; (c) not abuse of authority or power for personal gain or preferential treatment.

6.6.13 Fair Purchasing

CAPE Group is committed to selecting business associates fairly and objectively to ensure the best value for the Group as it is integral to our long-term success of our business. The Group is proud of our reputation for dealing with business associates in a mutually supportive and open way are based on the principles of impartiality, fairness and loyalty without any preferential treatment.

6.6.14 Cybersecurity Protection of Personal and Company Devices

CAPE Group is committed to protecting data and keep the data safe and reliable. The Group shall undertake various IT tools and methodologies to reduce the likelihood of security breaches to gain their trust and to proactively protect our systems and databases.

6.6.15 Privacy, Data Protection, and Confidential or proprietary Information

CAPE Group is committed to respecting the confidentiality of personal information of all our stakeholders, including its personnel, business associates and third-party intermediaries. We all have right to privacy. The Group shall ensure the protection of all data and information as unauthorised disclosure of such information can lead to a loss in value and be detrimental to the Group. Confidential or proprietary information includes all information that is not generally known to the public and is valuable to us or would be helpful to competitors.

6.7 Monitoring and Failure to Comply

6.7.1 It is the responsibility of CAPE Group to ensure full compliance with all the provisions in this Code and to seek guidance where necessary from the respective superior, line manager or Head of Department or the Key Senior Management.

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6.7.2 Any Group personnel can notify his or her superior as soon as possible if he or she believes or suspects that a breach of this Code has occurred or suspected to have occur. The Group personnel can raise his or her concerns in accordance with the Group's Whistle-Blowing Policy and SOP (icAPE-GP-03).

6.7.3 The Whistleblower can speak-up or report in good faith any illegal, unethical, questionable practices, wrongdoings or improper conduct committed or about to be committed within CAPE Group without fear of being subject to detrimental conduct including reprisal and retaliation.

6.7.4 Directors and Key Senior Management shall immediately report any concern about possible or breaches of this Code by any Director to the Chairperson of the Audit Committee or the Senior Independent Director of the Company, where applicable and strictly observe the relevant internal document.

6.7.5 In the event of any breaches of this Code by any Director, the relevant board of directors shall determine appropriate actions to be taken after considering all relevant information and circumstances.

6.7.6 When in doubt, the Group personnel shall be guided by the basic principles stated herein. Failure to comply with this Code can result in disciplinary action, including the possibility of dismissal and, if warranted, legal proceedings or criminal sanctions.

6.8 Compliance to the Law

6.8.1 CAPE Group shall comply with all applicable statutory laws, rules and regulatory requirements of the governments, commissions, and exchanges in jurisdictions within which the Group operates.

6.8.2 CAPE Group reserves its right to report any actions or activities suspected of being criminal in nature to the government agencies, anti-corruption agency, police, or other relevant authorities.

6.8.3 The implementation of this Code is in line with the Whistleblower Protection Act 2010, Companies Act 2016, Malaysian Anti-Corruption Commission Act 2009, Capital Markets and Services Act 2007, Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001, Personal Data Protection Act 2010 and all applicable statutory laws and regulatory requirements in Malaysia wherein provisions have been made to protect whistleblower make disclosures on breach or non-observance of any requirement or provision of the applicable law and regulations or on any serious offence involving wrongdoings, improper conducts, unethical practices or fraud and dishonesty.

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6.8.4 CAPE Group reserves its right to report any actions or activities suspected of being criminal in nature to the anti-corruption agency, police, or other relevant law enforcement authorities.

6.9 Supplementary to Code of Conduct and Ethics

6.9.1 This Code of Conduct and Ethics shall be read in conjunction with CAPE Group various policies and procedures such as :-

- (a) ISO 37001:2016 ABMS Manual (icAPE-ABMS) and Procedures (ABMS-SOP);
- (b) Our Core Values (icAPE-GP-01);
- (c) Anti-bribery & Corruption Policy and SOP (icAPE-GP-02);
- (d) Whistleblowing Policy and SOP (icAPE-GP-03);
- (e) ESG Sustainability Policy and SOP (icAPE-GP-05);
- (f) Anti-money Laundering Policy and SOP (icAPE-GP-06);
- (g) Personal Data Protection & Privacy Notice Policy and SOP (icAPE-GP-07);
- (h) Delegation of Authority Limits (FIN-SOP-10);
- (i) Employee Handbook.

6.10 Immunity and Disclaimer

6.10.1 If any of CAPE Group personnel who participate in any act that constitute the act of violation of laws, policies and procedures mentioned above which he or she reported shall not be given immunity against any investigation or disciplinary and criminal proceeding arising out of the report made. Nevertheless, in such circumstances, the fact that he or she had caused the report to be made can be taken into consideration as a mitigating factor.

6.11 Review of Whistleblowing Policy

6.11.1 The Board of Directors, and Key Senior Management of CAPE Group shall monitor the implementation of this Code of Conduct and Ethics SOP and review this SOP at planned interval to ensure that it continues to remain relevant and appropriate for its suitability, effectiveness and efficiency keeping with the changing business environment, administrative or operational needs as well as changes to statutory laws and regulatory requirements.

6.11.2 The ESG Department shall review and update (when necessary) this Code on a regular basis before forwarding to the Board of Directors and Key Senior Management for approval. This Code is subject to updating and modifications from time to time to be in line with applicable statutory laws and regulatory requirements and organizational changes within CAPE Group.

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7.0 Appendix

- 7.1 Appendix icAPE-GP-02F : ABC Policy, Whistleblowing & Code of Conduct Acknowledgement Form

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Appendix icAPE-GP-02F : ABC Policy, Whistleblowing & Code of Conduct Acknowledgement Form

I, _____, hereby certify and declare that I have read and understood the CAPE EMS BERHAD's Anti-Bribery & Corruption Policy (icAPE-GP-02); Whistleblowing Policy (icAPE-GP-03) and Code of Conduct and Ethics Policy (icAPE-GP-04) with respect to compliance with MACC Act 2009; Whistleblower Protection Act 2010 and Companies Act 2016; and I understand that these three (3) Group Policies and SOPs apply to all CAPE Group personnel (directors, senior management, managers, and employees), business associates and third-party intermediaries.

I agree that any business decisions and actions that I am dealing with, shall be based on the best interest of the organization I am representing, and shall not be motivated by personal interest, considerations, or relationship. My relationships with prospective or existing customers, business associates and third-party intermediaries shall not affect my independent and sound judgment acting on behalf of the organization.

I am aware of the Anti-bribery & Corruption (ABC) Policy regarding gifts and hospitality, receiving from and giving to, any customers, business associates and third-party intermediaries with whom I am dealing with, and I certify that I have not violated these prohibitions.

I am also aware of the Code of Conduct and Ethics (Code) covering three (3) principal pillars namely (a) Fair Workplace with Health, Safety, Security and Environment Practices (Environmental); (b) Fair Labour and Employment Practices (Social) and (c) Fair Business Practices (Governance), and I certify that I have not violated these practices.

To the best of my knowledge and belief after reasonable review, I shall comply with the provisions of our CAPE Group Policies and SOPs and understand my responsibility to immediately speak-up or report any known or possible wrongdoing, conflict of interest situation or suspected violation in good faith to my immediate superior, Head of Department or directly using the secured and confidential Whistleblowing channels.

I also certify my understanding that any failure by me to comply with these three (3) CAPE Group Policies and SOPs shall result in disciplinary action taken against me, including but not limited to withholding of bonuses, increments and merits awards, denial of promotion and termination of my employment or dismissal for gross misconduct.

Signature : _____

Name : _____

Employee ID/Contract Number: _____

Designation : _____