



Mynews Holdings Berhad

CODE OF CONDUCT AND ETHICS

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Part 1 : OVERVIEW**1.0 Purpose and Scope of the Code**

This Code of Conduct and Ethics (“**Code**”) applies to all employees and directors of Mynews Holdings Berhad (the “Company”) and its subsidiaries (collectively, “**Mynews Group**”), including full-time or permanent employees, part-time employees, employees on probation, trainees and interns and personnel on fixed-term contracts (collectively, “**Employees**”).

This Code sets out the principles to guide standards of behaviour and business conduct when Employees deal with third party. In this context, third party refers to any individual or organisation the Employee comes into contact with during the course of his/her work, and includes actual and potential customers, competitors, suppliers, contractors, distributors, business contacts/partners, agents, advisers, regulators, government and public bodies and officials, shareholders, investors and the community in which the Mynews Group operates in.

This Code is not a comprehensive guide that covers every ethical situation Employees may encounter in their course of work. In any circumstance which is not covered by this Code or in case of any doubt, Employees shall refer to his or her Head of Department or the Company’s Head of Human Resources Department for clarification or guidance.

2.0 Responsibility and Compliance with the Code

It is the responsibility of every Employee to act in accordance with the policies, principles and guidelines detailed in this Code, and any update or amendment which may be issued from time to time by the Company. It is also the Employee’s responsibility to report violations or suspected violations of this Code and support the implementation of this Code. Any violation or suspected violation of this Code shall be reported to the Chairman of the Board (in the case of any Director) or the Company’s Head of Human Resources Department or Employee’s Head of Department (in all other cases) or such other officer designated by the Company from time to time.

Non-compliance with this Code will be treated seriously and may result in disciplinary action, including the possibility of suspension or dismissal, and if warranted, legal proceedings against the Employee. Violation of applicable laws may subject Employee to civil and/or criminal penalties imposed by a governmental agency or a court, in addition to disciplinary action.

This Code is to be read and applied in conjunction with all other related or applicable policies, procedures and guidelines which are published in the Mynews Group’s Portal.

3.0 Amendments to the Code

The Board of Directors has approved this Code. Updates or amendments to this Code may be made from time to time to be in line with any change in applicable laws and regulations or changes to the Company’s vision and mission or other relevant factors. Employees will be informed of any update or amendment to the Code.

PART II : CODE OF CONDUCT**SECTION A : WORKPLACE CULTURE AND ENVIRONMENT****4.0 Equal Opportunity and Non-discrimination**

Mynews Group upholds the principle of diversity of workforce, equal opportunity, non-discrimination and fair treatment in all aspects of employment, including recruitment and hiring, compensation and benefits, working conditions, training, rewards and recognition, career development and retirement. Employees must strive to create a workplace where everyone is treated fairly and equally.

The right to freedom from discrimination extends to all employees, including full-time, part-time, temporary, probationary and contract staff. However differential treatment or opportunity based upon a bona fide occupational requirement or other specific exception recognized under the law currently in force may be considered acceptable.

Employees who are found to practice discrimination at the workplace may be subjected to disciplinary action.

5.0 Workplace Health and Safety

Mynews Group is committed to providing a safe and healthy work environment to all Employees. Health and safety support and training will be provided to Employees so that they understand their occupational health and safety obligations and diligently comply with all health and safety requirements, policies and procedures set out by the Company. Safety is everyone's responsibility.

6.0 Harassment, Threat and Violence

It is the policy of the Company to promote a safe and healthy working environment that fosters mutual respect where individual employees irrespective of status or position are treated with dignity and free from sexual harassment.

An employee shall not commit workplace harassment which includes unwanted physical, verbal and non-verbal harassment such as violent attacks such as hitting, pushing, destruction of property, inappropriate remarks, sounds, jokes or comments.

Acts of bullying in the workplace, which is an unreasonable act a reasonable person in the same circumstances would see as unreasonable, repeatedly directed towards an employee or a group of employees which may lead to fear, emotional, physical or psychological harm are also prohibited.

Employees are strictly prohibited from engaging in any form of harassment, humiliation and intimidation of a sexual nature.

Employees are responsible to report any harassment, intimidation, offensive or inappropriate behaviour. All complaints or grievances will be investigated and appropriate action will be taken to stop such conduct and prevent future occurrences.

7.0 Drugs, Alcohol and Prohibited Substances

Employees are expected to perform their job duties free from the influence of any substance that could impair job performance or pose unacceptable safety risk to the Employee or others. Mynews Group therefore prohibits working under the influence of alcohol, illegal drugs or controlled substances. In addition, the use, possession, distribution or sale of alcohol, illegal drugs or other controlled substances in the workplace (other than for approved medicinal purposes) is strictly prohibited.

There may be company-sponsored events or functions where the serving of alcoholic beverages is permitted. In these cases, all appropriate liquor laws must be followed.

If an employee knows or suspects that an employee is using, taking, consuming or dealing with any prohibited substances, he or she must inform his or her immediate supervisor or the Human Resource Manager immediately. The Company also encourages employees to bring their personal drinking or drug problem to the attention of their supervisor (who shall inform the Human Resource Manager accordingly without delay), or the Human Resource Manager directly. The Company may at its sole discretion and without prejudice to its rights of dismissal, render assistance to an employee who voluntarily submits himself for treatment for such a problem including rehabilitation at an appropriate centre for treatment.

The Company may from time to time, at its sole discretion require employees to be randomly tested for the use of illegal drugs and substances. Refusal by the employee to undergo such a test may warrant appropriate disciplinary action to be taken by the Company as it deems fit.

The Human Resource shall be responsible for determining the details of such misconduct or problem and the appropriate action to be taken against the said employee, which may include, without limitation, reprimand, suspension or dismissal. The Human Resource may, if it considers appropriate in the circumstances, submit a report of such misconduct to the management together with its recommendation of the appropriate disciplinary action to be taken against the said employee.

8.0 Appearance

All employees must be suitably attired and groomed at all times at the workplace as announced and allowed by the Company appropriate for their respective positions of employment. They are expected to maintain a dignified appearance and be neat, presentable, clean and tidy.

Casual attire including t-shirts (unless approved by the Company), slippers and sandals are not allowed in the work place during working hours.

Suitable and appropriate working shoes. Wearing of slippers on medical ground or in the course of ablution/observing prayers (in the case of Muslims) maybe allowed.

Corporate Uniform is to be worn during official functions or as when required by the Company. Uniformed employee is expected to wear their respective uniforms at all times in the work place during working hour unless otherwise informed by the Company due to operational requirements.

Failure to abide by the above guidelines may result in disciplinary action being taken against the employee concerned based on the Company's process and procedure.

SECTION B : COMPANY INFORMATION, RECORDS AND ASSETS**9.0 Data Integrity and Data Protection**

Mynews Group has put in place the Personal Data Protection Policy, Information Technology Policy and Document Management Policy. Employees shall record, manage, store and transfer all data and records in compliance with applicable legal, tax, regulatory and accounting requirements.

10.0 Protection and Use of Company Assets and Resources

Mynews Group provides its Employees a variety of resources and assets including licensed software for Employees to deliver their work. Employees shall safeguard and make proper and efficient use of the assets and resources in compliance with all applicable laws, company policies and licensing agreements, and take all necessary steps to prevent loss, damage, misuse, theft, fraud or destruction of Mynews Group assets and resources.

11.0 Records and Reporting

Mynews Group has put in place the Document Management Policy which sets out the time period to retain and destroy data and records, based on the specific statutory and regulatory requirements, some of which are specific to a particular business operations or functions. Employees are responsible to retain and store proper records in compliance with company policy, legal and regulatory requirements.

12.0 Proprietary and Confidential Information

Employees are required to protect Mynews Group's confidential information and guard them against unauthorised disclosure or use. Employees are also required to protect confidential information of third party which Employees have access to in the course of their work. Confidential information includes, but are not limited to, data and technical know-how, business plan and budget, product design, customer list and information, information on current and future projects and work processes, and any non-published financial or other data. Unless required by law or authorised by the Company, Employees shall not disclose confidential information or allow such disclosure or use confidential information for unauthorised purposes. This obligation continues beyond the termination of employment.

13.0 Responsibilities of Company's Assets, Facilities, Resources and Records

The specific procedures on the application of the policies referred to in the Code will be spelt out in the Company's policies and procedure manual.

Employees are responsible for protecting Company's assets, facilities, resources and records against waste, loss, damage, misuse, theft, misappropriation or infringement. Any loss or damage suffered by the Company may be recovered from the employees either by way of salary deduction or any other means. The Company may at its discretion take any appropriate disciplinary action against the employee including reporting to the public authorities.

SECTION C : DUTIES OF GOOD FAITH, DILIGENCE AND INTEGRITY

14.0 Conflict of Interest

Employees have an obligation to act in the best interest of Mynews Group at all times. Employees are prohibited from using their position or knowledge gained directly or indirectly in the course of their duties and responsibilities or employment for private or personal advantage.

If Employee at any time thinks that he or she may have a potential or actual conflict of interest, Employee is obliged to disclose the conflict promptly to the Chairman of the Board (in the case of any Director) or the Company's Head of Human Resources Department or Employee's Head of Department (in all other cases) so that a determination can be made as to the existence and seriousness of an actual conflict. When in doubt, Employees shall adopt the highest standard of conduct.

15.0 Accepting & Providing Gifts, Entertainment and other Benefits ("GEHT")

As a general rule, Employees are discouraged from giving or accepting gifts, entertainment or other benefits to or from business partners. Notwithstanding this, Mynews Group recognises that the occasional acceptance or offer of modest gifts and entertainment may be a legitimate custom or practice in business relationships. Hence, subject to limited exceptions and thresholds, the employees are only allowed to offer, give or accept GEHT under reasonable conditions as defined in the Company's guideline.

16.0 Bribery and Corruption

Mynews Group is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates and in implementing and enforcing effective systems to counter bribery and corruption.

Employees shall not offer, give, solicit or accept any bribes in order to achieve any business or personal advantage for themselves or others or engage in any transaction that contravene any applicable anti-bribery or anti-corruption laws.

17.0 Insider Trading

Employees who are in possession of market sensitive information are not allowed to trade in securities of the Company or another listed company if that information has not been made public. Employees are also prohibited from disclosing any non-public price sensitive information to any third party.

18.0 Money Laundering

Money laundering is a 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.

Employees should always ensure that they are conducting business with reputable customers, for legitimate business purposes and with legitimate funds. Employees need to be mindful of the risk of Mynews Group's business being used for money laundering activities and if they suspect money laundering activities, they should report it to their respective Head of Human Resources Department or the relevant person designated by the Company.

19.0 Fraud Management

It is the responsibility of the management and its employees or any other parties who have either direct or indirect business relationships/dealings with the Company to immediately report any fraud or suspected fraud to the respective Heads of Departments/Divisions and/or to the Human Resource Department. Any reports of frauds or defalcation are to be reported within 24 hours from its occurrence or detections.

20.0 Compliance with Laws

Mynews Group is committed to doing business the right way, by acting ethically and consistently with this Code, its policies and all applicable laws, rules and regulations. Employees have a continuing obligation to familiarise themselves with applicable laws relating to their job responsibilities and Mynews Group policies.

21.0 Whistleblower

Mynews Group has put in place a Group-wide Whistleblower Policy to uphold the highest standards of professionalism, integrity and ethical behaviour in the conduct of its business and operations. The policy sets out procedures which enables Employees and members of the public to raise genuine concerns regarding actual or suspected unethical, unlawful, illegal, wrongful or other improper conduct and also sets out the process for managing any action, intimidation or harassment against a whistleblower.

This Code of Conduct and Ethics was adopted by the Board.