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PUBLIC USE

"INFOLINE TEC" GROUP OF COMPANIES

STANDARD POLICY & PROCEDURE	EFFECTIVE 23 May 2023	REV. NO. 1
SUBJECT CODE OF CONDUCT		

1. Code of Conduct

Policy Statements

Group Code of Ethics and Conduct ("**Code**") outlines the Group's vision in pursuit of high standards of ethical business and culture in the preservation of its reputation and success of its operations. The Group is committed to sustain a work environment that fosters integrity, caring, respect and professionalism for all our stakeholders.

This Code comprises of company policies which serve as a guide to all individuals working at all levels and grades, including senior managers, officers, directors (executive and non-executive), employees (in Malaysia or outside Malaysia and whether permanent, fixed-term or temporary basis), trainees and intern. All individuals are responsible for abiding by the Policy in the performance of their duties.

The Board is responsible to define the Code and ensure the objective of the Code are met by appropriate internal control.

The Management is responsible to ensure this Code permeates throughout the Group and is complied with by all levels of Employees. The Management is responsible to the Board for observing the principles of this Code in making operational and business decisions. The Management is expected to demonstrate leadership by example and inspire good behavior. The Management must ensure that their action is consistent with the spirit of this Code.

All Employees in the Group are required to familiarize themselves with this Code; adhere to its provisions; and report any suspected violations provided in this Code. All Employees should be aware that non-compliance with this Code may entail not only disciplinary sanctions but also criminal charges.

1.1 Duties of Good Faith, Diligence, and Integrity

1.1.1 Compliance with Laws, Rules and Regulations

All employees in the Group are required to understand the conduct and behavior expected of them in compliance with applicable laws, rules and regulations with high ethical principles and standards for their work activities. The Group's reputation for integrity, quality and honesty is based on this commitment and helps to ensure its long-term success.

1.1.2 Corporate Responsibility

The Group is committed to enhance sustainability to balance the needs of its stakeholders in generating long-term benefits and business continuity by embedding the core areas of economic, environmental and social measures in the Group's business activities. It strives to make efficient use of natural resources and minimize the environmental impact of its activities and products over its life cycle.

1.1.3 Anti-bribery and Corruption

The Group adopts a zero-tolerance approach against all forms of bribery and corruption in obtaining business and contracts which is unethical and tarnishes the Group's reputation. The Group's employees and their family members shall not directly or indirectly solicit, offer, receive or accept any kind of benefit, gift or favors to or from business partners, government officers, customers and vendors which might compromise, or appear to influence the decision relation to obtaining business or awarding contracts. Please refer to the Anti-Bribery and Corruption Policy for more details.

1.1.4 Offering Business Courtesies

Any employee who offers business courtesies must ensure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon the Group. Accepting business courtesies must be done in an open, transparent manner and in accordance with approved company procedures and Anti-Bribery and Corruption Policy. Management may approve other courtesies, including meals, refreshments, or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.

Employees who are in doubt in providing business courtesies should discuss it with their reporting manager or representative from the Human Resource department.

1.1.5 Money laundering

All directors and management commit to act diligently to prevent involvement in money laundering activities. Money laundering is a process by which persons or

groups try to conceal the proceeds from illegal activities or try to make the sources of their illegal funds look legitimate by surreptitiously passing through legitimate business channels eg. transfer from one person to another. The Group prohibits all directors and management involvement in money laundering activities, either directly or indirectly. All directors and management personnel 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 the Group's business being used by criminals for money laundering activities.

1.1.6 Insider Information and Securities Trading

All directors, employees, family members, friends or anyone are prohibited to trade in the company's securities while they are in possession of material price sensitive non-public information or to provide such information to others to trade in the company's securities. All must refrain from trading or tipping in the company's securities until such information is publicly released.

Violation of this Code can result in civil and criminal penalties.

1.1.7 Political Activities

Employees may participate as individuals in legitimate political activities.

The participation shall be carried out entirely on the employee‘s own accord, own volition, off duty time and own resources. The employee‘s political opinion must be clearly delivered as personal opinions and not representative of the Group's position. The Group prohibits the use of its resources, facilities, and the premise of the concerned employee's political activities.

Any employee who wishes to hold any key position as office bearer in any political party must disclose and obtain prior approval from the Human Resource Department. Any employee who is nominated as a candidate in any election or elected as representative in the Federal or State Legislative Body must resign from the Group.

1.1.8 Conflict of Interest

Conflict of interest arises when a person has a direct or indirect interest in a transaction or is connected to the Group's interest. In a conflicting situation, the employee shall put the best interest of the Group above personal interest in discharging his/her duties. Conflict of interest can arise in many situations including the following but not limited to:

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- Solicit or receive improper personal benefits either directly or indirectly as a result of their positions in the Group or through access to confidential information
- Serving as directors, managers, employees, advisers or agents of any competing business or other business or non-profit organisation that would adversely affect their commitment to the Group, unless such service is specifically approved by the Group.

The Group encourages all employees to participate in community services in their local nonprofit organisation. However, employees must ensure that all activities outside their jobs do not conflict or be perceived to conflict with their employment and commitment to the Group. Any conflict of interest or potential conflict of interest should be reported and disclosed to the employee's reporting manager or representative from the Human Resource department.

2. Workplace Culture and Environment

2.1 Discrimination and Harassment

The Group is committed to a work environment that is free of hostility, intimidation and humiliation. Every employee is treated with respect and dignity, free from unlawful harassment and discrimination. The Group provides fair and equal employment opportunities to potential candidates based on merit and performance irrespective of race, religion, gender, nationality, age or disability. The Group respects each employee and promotes courteous and constructive views, criticisms and exchange of ideas. Workplace discrimination or harassment of any kind based on an employee's race, ethnic origin, nationality, colour, sex, sexual orientation, religion, age, physical disability, marital status, or any other characteristics protected by law, will not be tolerated. Any form of violence or threats of violence is forbidden.

2.2 Sexual Harassment

Sexual harassment is defined as unwanted and/or unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. Sexual harassment may be physical, verbal or non-verbal. The Group prohibits conduct and behavior that constitutes sexual harassment including, but not limited to :

- Sexual comments, jokes, sending explicit messages or degrading language or behavior
- Display sexually explicit or suggestive material such as books, magazines, photographs, cartoons, pictures, calendars, posters, electronic communications, websites or other material
- Unwelcomed physical contact, or any inappropriate touching

- Use of job-related threats or rewards to solicit sexual favors in exchange for favorable terms or conditions of employment

Sexual harassment is prohibited whether between members of the opposite sex or members of the same sex.

2.3 Forced Labour and Child Labour

The Group will not participate in, or benefit from, any form of forced labour including bonded labour, forced prison labour, slavery, servitude, or human trafficking.

Employees must have freedom of movement during the course of their employment. The Group will not withhold any part of an employee's salary, benefits, property or documents (e.g., travel documents, identity cards) to force them to continue serving the Group. The employees are free to leave voluntarily with reasonable notice.

Under the Children and Young Persons (Employment) Act 1966 (Act 350), a "Child" is a person who has not completed his/her 15th year of age. The Group will not tolerate the use of child or forced labour, nor exploitation of children in any of our operations and facilities, both home and foreign. Any form of forced or child labour is unconditionally prohibited under all circumstances.

2.4 Grievance Procedures

The Group is committed to ensuring that employees' grievances are attended to and/or resolved in a just, fair and timely manner in order to preserve harmonious relations.

To this effect, an employee with a work-related grievance should first seek to resolve the grievance with his/her immediate superior or department head. It is the responsibility of the superior or department head to try and resolve the grievance expediently. If unresolved and/or if the grievance involves the employee's superior, the employee may raise the grievance to the attention of the Human Resource Department. If the employee is not satisfied with the decision, an employee may file his complaint appeal to the Board of Directors.

2.5 Drugs and Alcohol

The Group strictly prohibits the consumption of alcohol and/or illegal drugs or substances that are not prescribed by a registered medical practitioner at the premises of the Group. All employees are expected to perform their job duties free from the influence of any substance that could impair job performance or pose an unacceptable safety risk to the Employee or others. In addition, the Group also

strictly prohibits the possession and distribution of illegal drugs or other controlled substances regardless of inside or outside the workplace. All employees should be aware that non-compliance with this Code may entail not only disciplinary sanctions but also criminal charges.

3 Protecting the Group Information, records and assets

3.1 Record-keeping

The Group ensures that relevant information is managed securely and consistent with the period specified in the Group record retention policy and/or in compliance with all applicable law and regulations. All reports, statements, and records, whether held electronically or in hard copy, must be accurate, legible, up-to-date, identifiable and retrievable. Misrepresentation or falsification of any information and records within the Group or to organizations or persons outside the Group is strictly prohibited.

3.2 Protection and Proper use of assets

The employee is entrusted with the care of the Group's property and assets. Each employee has an obligation to safeguard the Group's property from loss, damage, theft, embezzlement, improper use or destruction. In the event of the occurrence of any of the aforementioned, the employee shall immediately file a report to his/her immediate superiors. All assets shall be returned to the Group upon the termination of employment.

3.3 Company Funds

Employees responsible must comply with the Group finance policy on how to handle cash, credit cards and other funds. Employees shall not abuse their positions to use, divert or conduct any transaction with those funds except strictly for authorised purposes. The company agents and contractors should not be allowed to exercise control over the funds. Every employee, agent and contractor must take reasonable steps to ensure that the Group receives good value for the funds spent and must maintain accurate and timely records of each and every expenditure. Expenses reports must be accurate and submitted in a timely manner.

3.4 Information Technology

The Group's Communication and Computing systems are primarily for the business purposes for which they are intended. The systems include access to the Internet, intranet, email services, video conferencing, facsimiles, telephone and all other computer hardware, software and peripherals. The Group does not permit the usage of Communication and Computing systems involving sensitive and illegal matters, defamatory, offensive, harassing messages or files, disclosing confidential

information, infringement of Intellectual Property rights, or unauthorised access that may jeopardise the integrity of the systems.

To the extent allowed by applicable laws in the countries in which it operates, the Group reserves the right to monitor or audit employees' usage of its IT and communication systems, and access, review and/or disclose data stored on systems. Employees should not consider their emails private or personally confidential. This information can be recovered and used as evidence in domestic proceedings and courts of law or disclosed to the authorities or regulatory bodies as the case may be.

3.5 Confidential Information and Data Privacy

Information is one of the Group's most valuable corporate assets. Effective dissemination of information is critical to the success and reputation of the Group. Employees are required at all times, to safeguard and are under no obligation to use or disclose any Confidential Information or proprietary information unless disclosures are required by specific laws or regulations. Confidential information includes any information which is generally not known to the public and is intended to be protected by the Group from public disclosure. This includes information obtained from a third party under the terms of confidentiality or nondisclosure agreement. Confidential Information includes but is not limited to

- Intellectual property, such as trade secrets, patents, trademarks, copyrights, manufacturing know-how, designs, inventions and database;

- business and marketing information;
- salaries information;
- group financial records;
- any material non-public information.

The Group has incorporated Privacy Policy to protect all personal information on employees, customers, business partners or suppliers. It is to be used diligently and treated with the utmost confidentiality. Employees who have access to non-public confidential information are not permitted to use, divulge or share that information for any other purpose except with a clear Group's business need.

3.6 Social Media

Social media is a term for internet-based tools used in the sharing and discussion of information among people. Posting or discussing information concerning the Group's products or business on social media without prior written consent from the Human Resources Department is prohibited. Any other forms of electronic communication used by employees for information sharing currently or in the future are also to be

encompassed under this policy. Employees are therefore encouraged to use sound judgment whenever using any feature of electronic communication. The Employees shall be aware of and understand the potential risks and damages to the Group that may occur, either directly or indirectly, in their personal use of social media and beyond.

3.7 Public Disclosure and Public Information

As a public listed company, the Group is required to comply with various laws and regulations to make timely, full and fair public dissemination and disclosure of information that may materially affect the market for its stock. Employees are prohibited from making or causing a materially misleading, incomplete or false statement to the Management and Group Internal Auditor in preparing the public disclosure. Employees are prohibited to issue any statement, written or verbal to the media and/or general public (including all forms of electronic media) on matters in relation to the Employee's duties or the Group's activities and performance. All enquiries from the public or media shall refer to the Chief Executive Officer or Executive Directors.

Employees are required to obtain approval from Management before making a public appearance in their personal capacities such as guest speakers or panel members in any public forum or event, on topics related and/or relevant to their line of work.

Employees who make public appearances must ensure that their thoughts and actions are not detrimental to, tarnish or implicate the Group's image and interests.

Employees shall report to Human Resource Department if they learn that information in any filing or public communication was untrue or misleading which may potentially cause a negative impact on the Group's image.

4 Professionalism

Employees are required to exercise care and diligence in performing their duties to align with the Group's ethical values of integrity, respect, honesty and professionalism. The Group encourages employee mentoring and continues learning in pursuit of innovations and new ideas from time to time.

5 Accountability

All employees including directors and management are required to comply with this Code of Conduct. Should there be no corrective measures for the violations of the Code of Conduct, the said employee may reprimanded, dismissed and civil and/or criminal prosecution being taken against him/her, depending on the seriousness of the offence. Any changes in, or waiver of this Code of Conduct will be disclosed to all employees.

6 Whistleblowing Channel

All employees have the obligation and right to report any suspected or known violation of the Code, relevant laws or regulations.

The Group has incorporated a Whistleblowing Policy where any employee suspects any irregularity, or suspected irregularity, involving other employees, customers, consultants, vendors, contractors and/or any other parties with a business relationship with the Group may report such concern using reporting channel set out in Whistleblower Policy

7 Waiver of the Code

Waiver of the application of this Code may be granted by the Board or the appropriate Board Committee of Group as it deems fit and appropriate.

8 Review of the Code

The provisions of the Code are subject to periodic review and may be modified by the Board from time to time to ensure it remains appropriate and consistent with the Group objectives and compliance with other regulatory requirements.