



Code of Conduct and Ethics

1.0 Introduction

This Code of Conduct and Ethics (“Code”) is established by the Board to reflect the Company’s underlying core ethical values and commitment. It lays down standards of integrity, transparency, fairness, accountability, contributing towards the social and environmental growth of the surroundings in which the Company operates.

2.0 Purpose

For purpose of the Code, the following measures must be put in place: -

- (a) The mechanism to handle actual or potential conflict of interest;
- (b) The mechanism to prevent corrupt practices which include the offering and acceptance of gifts and other form of benefits;
- (c) To encourage the reporting of unlawful or unethical behaviour;
- (d) To protect and ensure the proper use of the Company’s assets; and
- (e) To ensure compliance with laws, rules and regulations.

3.0 Application of the Code

The Code applies to the directors, officers and employees (whether permanent, contract, part-time or casual) of the Company and its subsidiaries, sales representatives, third party business associates, contractors and others with certain duties and obligations to the Company are also expected to abide by all applicable provisions of the Code and adhere to the principles and values set out in the Code when representing the Company to the public or performing services for or on behalf of the Company.

4.0 Compliance of the Code

At all times, the Code must be complied with as follows: -

A. Avoid Conflict of Interest

- (i) To create sustainable shareholder’s value and to ensure that all business actions and decisions are in the Company’s best interest;
- (ii) To avoid all interactions, relationships or situations that could reasonably give rise to a conflict of interest or the appearance of a conflict of interest including any related party transaction; and
- (iii) To disclose immediately to the Board if an actual conflict, potential conflict or the appearance of a conflict of interest arises.

B. Anti-Bribery and Corruption

- (i) To build trusting relationships with stakeholders including employees, customers, suppliers, business partners, shareholders, communities and governments;
- (ii) To do business with integrity and honesty; and
- (iii) Not to accept anything of value that may be seen as an attempt to influence an action or a decision in order to obtain or retain business or acquire an improper advantage including money, gifts, favors, use of company resources, entertainment or other items of value.

C. Reporting of Unlawful or Unethical Behaviour

- (i) To report any non-compliance of the Code or any practices or actions believed to be inappropriate under the Code and also under the whistleblowing policy; and
- (ii) To report suspected or potential illegal or unethical behaviour without fear of retaliation.

D. Proper Use of the Company's Assets

- (i) To safeguard and make only proper and efficient use of the Company's resources, properties and assets (whether tangible or intangible) including confidential, proprietary and personal information; and
- (ii) Not to engage in fraudulent or any other dishonest conduct involving the property or assets or the financial reporting and accounting of the Company or any third party.

E. Compliance with Laws, Rules and Regulations

- (i) To comply with all applicable laws, by-laws, ordinances, rules, regulations, directives, license/permit conditions, codes, standards, terms and conditions of agreements and contracts;
- (ii) To adhere to internal policies, procedures, directives, guidelines, rules and regulations of the Company; and
- (iii) To cooperate with internal and external investigations.

5.0 Review of the Code

The policies of the Code should be integrated into company-wide management practices and be periodically reviewed by the Board as they deem fit.

Dated: 12th August 2017