



**WENTEL ENGINEERING HOLDINGS BERHAD**  
and its subsidiaries  
[The “Group”]

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**M003**  
**Code of Conducts**

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**PART A: INTRODUCTION**

The Board of Directors (“Board”) of Wentel and its subsidiaries (“the Group”) is committed to its role in establishing a corporate culture which engenders ethical conduct that permeates throughout the Group. This includes adopting best practices in corporate governance and observing high standards of behaviour and integrity in our businesses and activities, including dealings with the authorities and our shareholders, business partners, customers, suppliers and other stakeholders, and in the communities and environment in which the Group conducts its operations.

The Group has adopted this Code of Conduct (“the Code”) to formalise and commit to ethical values and standards of conduct expected of the Group. Our Code is based upon and supplements the Group’s vision, mission and core values; embodies several of the principles contained in various policies adopted by the Group; and gives guidance on how the Group and other people affected by the Code should apply our core values to the Group’s businesses and activities. The Group is also committed to ensure the progressive implementation from time to time of appropriate internal systems to support, promote and ensure compliance with the Code.

Each employee of the Group has a role to play in enabling the Group to achieve sustainable performance and to deliver value to our customers, shareholders and other stakeholders without compromising our ethical standards, values and reputation, and in upholding and enforcing our Code. The Group are expected to conduct themselves professionally in their work and dealings, and comply with the Code.


**PART B: THE FOUNDATION OF THE CODE - THE GROUP’S VISION, MISSION & VALUES**

❖ **Our Vision:**

To safeguard the Company to continue in operation for long-term period for enhancing quality of life and fulfilling daily needs in our life.

❖ **Our Mission:**

To be a responsible company committed to enhancing quality of life and fulfilling the necessity and basic needs in our life by providing sustainable, quality and affordable products and services.

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❖ **Our Core Values:**

*Passion* – We inspire and energize everyone to be the best.

*Teamwork* – We succeed together because we work as one.

*Integrity* – We conduct ourselves with pride in being honest and ethical.

*Responsible* – We honor the trust given to us by being accountable for our actions.

*Respect* - We value differences and sincere intentions as the basis for achieving shared aspirations.

## **PART C: THE CODE OF CONDUCTS**

### **1. Purpose**


The Code sets out standards with which the Group, the Board, the management and its employee are required to comply with when dealing with each other, shareholders, other stakeholders and the broader community. The Code is not exhaustive, and the Group has developed or will develop specific detailed policies, procedures, directives and/or guidelines to support, promote or ensure compliance with the Code. The Code is to be read and applied in conjunction with such policies, procedures, directives and guidelines.

### **2. Applicability**

The Code applies to all our business activities and all our dealings with each other, the authorities, shareholders, customers, suppliers and other stakeholders; and the Board and Management of the Group (“the Group Family”) whether they work full-time, part-time or as casuals or supplementary workers or in executive or non-executive positions, and regardless of their job grade or location.

The Group Family must comply with the Code; all applicable laws and regulations; and other policies, procedures, directives and guidelines of the Group, and abide by our Core Values. Failure to comply may lead to commencement of disciplinary proceedings that may result in dismissal or termination of employment and/or appointment with the Group. In addition, if any member of the Group Family breaks the law, he/she may also be personally liable for his/her action.

The Group Family must familiarize themselves with the Code and other policies, procedures, directives and guidelines of the Group. If you discover any conflict or inconsistency between the provisions of the Code and the provisions of any other policy, procedure, directive or guideline of the Group, the provisions of the Code shall prevail and you must inform your line manager or direct superior of the same who will then notify Corporate Division. If there are any questions about the Code and its application by the Group Family, please request Corporate Division for assistance.

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The custodian of the Code is Corporate Division. All the Group Family are required to confirm their understanding of the Code and shall further be required to confirm their continued compliance with the Code on an annual basis.

How to deal with issues that you are uncertain of its appropriateness? If you are confronted with a situation or are considering behaviour and are still unsure of its appropriateness, ask yourself these questions:

- I. “Is it consistent with our Core Values and in line with our policies, procedures, directives and guidelines”?
- II. “Would I be comfortable telling my family and friends”?
- III. “Would it look ok on the news broadcasted by a television or radio channel or if it appeared in a newspaper or other media”?
- IV. “Is it ethical and legal”?

### 3. Reporting and Review

The Group Family is to report any breach of compliance with the Code.

The reporting of non-compliance with the Code may either be made to: (i) the line manager/ direct superior; or (ii) any Head of Department; or (iii) the Executive Director; or may be made in accordance with the Group’s Whistle-Blowing Policy which aims to.

In order to encourage the Group Family to feel confident in raising serious concerns, the Group provide a formal channel for the Group Family to raise these concerns and receive feedback on any actions taken. The Group will also ensure that the Group Family receive a response to their concerns and ensure that they are aware of how to pursue their concerns if they are not satisfied with the response given; and reassure them that they will be protected from possible reprisals or victimization if they have a reasonable belief that they have made any disclosure in good faith.


The provisions of the Code may be amended, varied, deleted, substituted or updated from time to time. The Group Family will be required to comply with the Code as amended, varied, deleted, substituted or updated.

Amendments to our Code must be approved by the Board of the Group.

The Board of the Group will review the Code on an annual basis.

### 4. Discipline

The maintenance of discipline, good conduct and good behavior amongst the Group Family is important in running the business and is for the common good of the Group and its the Group Family.

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The term “misconduct” means an improper behaviour, act or conduct in relation to duties or work which is inconsistent with the due performance of obligations to the Group and includes a breach of discipline or violation of the Code or the rules and regulations as set out in any handbooks, policies, guidelines or procedure statements or in any documentation of the Group.

Subject to the requirements of applicable law, disciplinary action may be taken against any person to whom the Code applies for misconduct or for non-compliance with our Code or non-compliance with laws, regulations, rules, policies and procedures.

**PART D: CONDUCTING BUSINESS WITH INTEGRITY**

**1. Conducting Business Ethically, Fairly and with Honesty**

The Group shall conduct its businesses ethically, fairly, honestly and with integrity. The Group and the Group Family must not take unfair advantage of any other person, including without limitation participating in illegal practices - for example, misleading and deceptive conduct, misrepresentation and undue influence, as well as conduct which are legal but unethical. Corrupt practices are not acceptable.


The Group Family shall additionally abide with and support all pledges or undertakings made by the Group to any organization, institution or party (whether government related or non-government organization and whether made voluntarily or pursuant to regulatory compliance) relating to the conducting of businesses ethically, fairly, honestly and/or with integrity or any other subject.

**2. Complying with Laws**

The businesses and activities that the Group is involved in are regulated to a certain level. Regulatory compliance is about complying with all laws, by-laws, ordinances, rules, regulations, directives, license/permit conditions, codes, standards and terms and conditions of agreements and contracts.

The Group Family must familiarize themselves with the laws, by-laws, ordinances, rules, regulations, directives, license/permit conditions, codes, standards and terms and conditions of agreements and contracts applicable to their business function and roles. We must comply with our regulatory obligations in the territories that the Group operates.

Failure to comply can impact the operations of the Group’s businesses and can result in prosecution, fines, penalties, damages and losses for the Group and the Group Family, as well as termination of employment or appointment, or imprisonment for the Group Family.

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### 3. Working with Uncompromising Honesty

#### 3.1. Conflict of Interest Policy

A conflict of interest arises when an employee’s personal activities or relationships interfere with his or her objectivity in doing what is best for the Group. Conflicts of interest, be it real, potential and even by appearance, can result in serious consequences for the employee and the Group. Conflicts of interest can occur in both direct and indirect situations. The Group Family is expected to diligently avoid such conflicts.

The Group Family must disclose any outside activities, financial interest or relationship that may pose a real, potential or perceived conflict of interest. Disclosures may be to a supervisor, manager, or Human Resources professional and will vary depending on the job or role of the employee making the disclosure. Management approval must be obtained before accepting any position as an officer or director of an outside business.

The Group Family must periodically update their management regarding any activity that has previously been disclosed pursuant to this Principle.

The Group Family must notify management before serving on the board of a charitable, educational, or other non-profit organization.

It is not possible to list down all conflicts that could arise, below are examples where conflict of interest could occur and should be avoided by the Group Family.

##### A. Outside employment or business activities


Engaging in outside employment that is inconsistent with the Group’s interests, such as working for a competitor or starting own line of business that competes with the Group. Having a second job where the other employer is a direct or indirect competitor, distributor, supplier or customer of the Group. Having a second job or consulting relationship that affects the employee’s ability to satisfactorily perform the Group assignments.

Having an outside employment that requires you to use the Group’s time, facilities or property to perform the job would be considered a conflict of interest. To assess whether a second job will create a conflict of interest, the Group Family are required to obtain approval from their Head of Department before accepting additional employment outside the Company.

##### B. Directorship

Acceptance of a directorship post in any company or non-profit organization without prior approval from the Executive Director, who will determine whether the directorship creates conflicts of interest.



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**C. Investments**

Having a direct or indirect financial interest in or a financial relationship with the Group’s competitor, supplier or customer (except for insignificant stock interests in publicly held companies).

Using non-public information of the Group for personal gain or advantage, or for the gain or advantage of another, including the purchase or sale of securities in a business the Group is interested in acquiring, selling or otherwise establishing or terminating business relations with.

Investing in an outside business opportunity in which the Group has an interest, except for having an insignificant stock interest in publicly-held companies.

**D. Gift and Entertainment**

Accepting gifts, meals, or entertainment that could appear to affect objectivity and judgment.

Receiving personal discounts or other benefits from suppliers, service providers or customers that are not available to all the Group Family.

**E. Communications**

Receiving personal honoraria for performing services that are closely related to the employee’s work at the Group. The Group Family must have their supervisor approve occasional honoraria, such as for a university presentation or symposium.


**F. Relative and friends**

Mixing personal relationships and business—for example, hiring a relative as an employee or vendor; buying goods or services from a family business on the Group’s behalf; or selling the Group products to a family business on favorable terms not seen to be arm’s length.

Taking part in any the Group business decision involving a company that employs a spouse, relative or friend.

The definition of ‘relative’ according to the MACC Act 2009 is as follows:

“A spouse of the employee, a brother or sister of the employee, a brother or sister of the spouse of the employee, a lineal ascendant or descendent of the person, a lineal ascendant or descendent of the spouse of the person, the uncle, aunt or cousin of the employee, the son in-law or daughter in-law of the employee.”

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## G. Relationship

Personal relationships with other the Group Family where being in that relationship may result in one of the persons receiving or giving unfair advantage, or preferential treatment because of the relationship.

Actions or relationships that might conflict or appear to conflict with job responsibilities or the interests of the Group.

Having romantic relationships with the Group Family where, there is a reporting relationship (both direct and indirect) between the Group Family; there is no direct reporting relationship between the Group Family, but where a romantic relationship could cause others to lose confidence in the judgment or objectivity of either employee (e.g. one or both have access to sensitive information), or the relationship could cause embarrassment to the Group.

If there is such a relationship, the parties need to be aware that one or both may at the discretion of the Group be moved, transferred or seconded to a different department, business unit, division or company within the Group and/or other actions may be taken (including but not limited to change of job scope and/or responsibilities).


### 3.2. Anti-Bribery & Corruption Policy

Any form of bribery and corruption is prohibited. The Group Family and any third party acting on the Group's behalf must not provide, offer or accept bribes, kickbacks, corrupt payments, facilitation payments, or inappropriate gifts, to Government Officials or any commercial person or entity, regardless of local practices or customs.

All the Group Family and any third party acting on the Group's behalf must comply with all applicable anti-bribery laws and regulations, including, but not limited to, the Malaysian Anti-Corruption Commission Act (MACC Act).

The MACC Act covers the following conduct:

- the giving and accepting gratification;
- the giving or accepting gratification by an agent;
- corruptly procuring the withdrawal of a tender;
- bribery of an officer of a public body;
- bribery of foreign public officials;
- using an office or position for gratification; and
- dealing with, using, holding, receiving or concealing gratification or advantage in relation of any offence under the MACC Act.

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The expression “gratification” under the MACC Act includes –

- money, donation, gift, loan, property, financial benefit or other similar advantage;
- any office, dignity, employment, contract of services;
- any payment, release or discharge of any loan, obligation or other liability;
- any discount, commission, rebate, bonus or percentage;
- any forbearance to demand any money or money’s worth or valuable thing;
- any favor of any description, including protection from any penalty or proceedings of a disciplinary or criminal nature or forbearance from the exercise of any right, power or duty; and
- any offer or promise of any gratification within the meaning of any of the preceding items.

### 3.3. Gift and Entertainment Policy

Payments to External Parties other than in the circumstances outlined in the Gifts and Entertainment section below, the Group Family is not allowed to directly or indirectly offer or make payments in cash or in kind to any party or person (including but not limited to Government officials, business partners (e.g. suppliers and customers) or their spouses, dependents or the Group Family in an attempt to influence them in their business dealings with any member of the Group.


Receipts by the Group Family other than in the circumstances outlined in the Gifts and Entertainment section below. The Group Family and their spouses or dependents are not allowed to directly or indirectly solicit or accept payments, in cash or in kind, from any party or person having business dealings with any member of the Group for the purpose of influencing individuals to confer benefits or reach favorable decisions.

#### A. Gifts

As a general rule, the Group Family should not accept presents or gifts. However, under certain circumstances, token gifts (not cash) in line with local custom and practice, are acceptable.

In the infrequent circumstances, where gifts are accepted (because, for example, refusal may be taken as an offence by the giver), the following guidelines apply:

- i. All gifts received by the Group Family from the external parties must be declared to the Executive Director. A file note will be kept on the action taken, i.e. whether the gifts are retained or donated to charity.
- ii. As a general rule, festive-related gifts and promotional gifts are acceptable provided that the cost is reasonable, i.e. no more than RM200. However, it is advised that prior to the distribution of the gifts, the following recommendation should be fulfilled:
  - Equality in terms of value of all festive gifts given to external parties.

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- The recipient of the gift should not be to a selected group.
- No preferential treatments to any parties receiving the gifts.
- Not an inducement expecting any future favors that can be deemed as a form of corruption.
- Only relevant individuals should receive the festive gift, e.g. Muslims for Hari Raya only.
- All gifts given to external parties should be declared to the Executive Director.

## **B. Entertainment**

The Group Family is also encouraged to ensure that entertaining by or of third parties is reasonable in its extent and appropriate to the particular business circumstances. The Executive Director will determine appropriate standards.

### **3.4. Competition Law**


The Group Family must comply with all applicable competition laws. The Group Family must strive to adhere to and operate within all laws intended to protect and promote free and fair competition.

The Group Family should familiarize themselves with and always follow all guidelines, policies and directives issued by the Group pertaining to compliance with applicable competition laws. Breaching the provisions of such laws may result in the Group incurring large fines and being exposed to legal action by aggrieved parties. Below are key provisions which must be complied with in this regard but they are by no means meant to be exhaustive.

#### **Key Provisions:**

The Group Family must not talk with or share information (directly or indirectly) with competitors to fix prices or other terms of sale, set production levels, divide up markets, customers or territories, or boycott any customer.

The Group Family should not be involved in any discussions on details of pricing, costs, profits, trading terms, marketing and distribution plans or new product launches with competitors or trade associations.

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When in contact or communicating with the Group’s customers, the following acts are prohibited:

- A. disclosing the commercial terms of one customer to another customer;
- B. passing commercially sensitive information to competitors through customers;
- C. imposing conditions of sale that can exclude competitive products or limit a customer’s scope of resale;
- D. fixing resale prices;
- E. forcing a customer to buy other products which have no connection with the products being purchased or requested (tying practices);
- F. refusing to supply products to any customer without any objective justification;
- G. selling goods at excessively low prices hence preventing a new entrant or forcing existing competitors out of the market; and
- H. charging different prices or imposing different commercial terms on customers in equivalent transactions without any objective justification.


If any of the above prohibited matters or other competition sensitive matters are raised or discussed in any trade association meeting or other meeting with competitors (whether formal or otherwise), the Group Family should immediately object to such discussion and leave the meeting.

The Group Family should not enter into any exclusive arrangements on behalf the Group with any customer or supplier unless the said arrangement has been approved by the Executive Director.

The Group Family should refrain from using competition sensitive language for all internal and external communication. For example, phrases like “being dominant in the market”, “killing off a competitor”, “forcing a competitor out of the market”, “preventing a competitor from entering the market” or suggesting in any way that the Group is not in compliance with any laws or is acting unlawfully.

### **3.5. Securities and Insider Trading**

The Group Family having access to unreleased price sensitive information must avoid conduct known as “Insider Trading” and avoid any adverse inference being drawn from unfair dealings by them. Violation of insider trading laws could result in criminal charges being brought against the defaulting the Group Family.

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### 3.6. Political and Charitable Contribution

It is the policy of the Group not to make contributions to political candidates or parties.

Contributions to charitable funds and bodies should be made only with the written approval of the Executive Director who is responsible for the control of such expenditure.

## 4. Providing Quality and Safe Products

### 4.1. Innovation and Quality

The Group is committed to contribute to society by providing high quality products whilst creating value for our stakeholders. To this end, the Group is committed to Total Quality Management and we aim to achieve Total Customer Satisfaction and to be recognized as a preferred supplier of innovative and quality products and services that consistently meet our customers' evolving needs, whilst meeting all regulatory requirements.

## 5. Protecting the Company's Assets and Information

### 5.1. Formation Communication Technology


The Group's computer and other information and communication technology ("ICT") facilities must be safeguarded against theft, damage and improper usage. The Group does not permit the usage of ICT facilities involving sensitive and illegal matters, infringement of intellectual property rights, unauthorized access, misuse of the Group's time and resources and risking of the integrity of the Group's ICT facilities.

To the extent allowed by applicable laws in the respective countries in which the Group operates, the Group reserves the right to monitor each the Group Family's email messages, instant messaging, blogs, use of the internet and contents in company issued ICT facilities. 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.

Each of the Group Family must use the Group's ICT facilities responsibly and primarily for the business purposes for which they are intended. The ICT facilities include access to the internet, intranet, email services and all other ICT hardware, software, systems and peripherals.

### 5.2. Confidentiality, Privacy and Protection of Company Assets

The Group values and protects all confidential, proprietary and personal information. The Group Family may be given by or may have obtained access to confidential,

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proprietary or personal information from any member of the Group or the Group's customers, suppliers or other stakeholders/parties.

The Group Family must take measures to avoid unauthorized disclosure, e.g. by securing access to confidential company records. The Group Family must not communicate or disclose confidential, proprietary or personal information to competitors, customers, suppliers, consultants, service providers, trade associations or other third parties unless such communication or disclosure is authorized by the Group and a non-disclosure agreement (or confidentiality agreement) has been signed. Confidential, proprietary or personal information or ideas received from third parties should not be used, processed, disclosed or communicated unless the third parties' consent has been obtained and the appropriate safeguards are in place. Any confidential, proprietary or personal information must not be disclosed or discussed outside the scope for which the information was provided.

The Group Family must be aware that any unlawful or unauthorized disclosure of confidential, proprietary or personal information may result in irreparable loss and/or damage to the Group. In such cases, the Group or the relevant the Group entity may institute civil and criminal proceedings against the offending party. Any the Group Family found guilty of such misconduct may also be subject to disciplinary action which may include dismissal.

It is equally important that confidential, proprietary or personal information is only disclosed to other the Group Family on a need to know basis.


The Group Family have an obligation to continue to preserve the confidential, proprietary and personal information even after the appointment / employment has ceased, unless disclosure is required by law, an order of any court of competent jurisdiction or any competent judicial, governmental or regulatory authority.

Misappropriation of property owned by the Group, the Group Family, customers or suppliers will not be tolerated. Any misappropriation should be reported immediately and properly investigated. Appropriate disciplinary and/or legal action will be taken.

In recognizing the importance of respecting the privacy rights of individuals, the Group is also committed to ensuring compliance with the requirements of applicable laws relating to protection of personal data (e.g. the Malaysian Personal Data Protection Act 2010).

Therefore, it is the responsibility of all the Group Family to assist the Group to comply with such laws and the Group's Data Protection Compliance Policy. Breaching the provisions of such laws or policy may result in the Group and the Group Family incurring penalties and being exposed to legal action by aggrieved parties. There may also be negative publicity as a result of any breach that is made public.

The Group Financial Controller will be appointed as Data Protection Officer of the group.

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### 5.3. Intellectual Property

Intellectual property (“IP”) is a property right derived from creations of the mind through intellectual or discovery efforts in industrial, scientific, literary and artistic fields which can be developed and protected. Examples of IP include patent, trademark, copyright, industrial design, trade secrets and know-how. In accounting or financial terms, it is regarded as an intangible asset. The role of IP and its proper management is crucial in realizing the vision and mission of the Group.

The Group has acquired or developed valuable IP. The Group Family have a responsibility to protect these assets.

The Group owns the IP rights to anything that the Group Family create or develop during the course of their employment with the Group (e.g. a report, advertising campaign, web pages, software, a product, service, process or concept, a brand, a song, etc.). The Group is entitled to the exclusive benefit of the works created by the Group Family, and may require that the relevant the Group Family waive his/her moral rights to those works.

The Group is committed to formulating, monitoring and enforcing effective IP creation, acquisition, protection and governance processes within the Group. For the purpose of achieving the said objectives, a set of processes have been created and embodied in an IP Manual in which the standard operating procedures are outlined in detail. The IP Manual is to be adhered to by all the Group Family of the Group.


Any acquisition, disposal, transfer, licensing of or dispute relating to IP must be referred to the Group Financial Controller for assistance. The acquisition, disposal, transfer or licensing of patents, trademarks, copyrighted works or other IP rights is subject to Executive Director’s approval and contractual safeguards. In any event, no statement regarding the ownership, validity, scope, or enforceability of IP rights should be made by the Group Family without the involvement of the Group Financial Controller.

### 5.4. Careful Communication

The Group Family are not allowed to spread malicious rumors about any member of the Group and misrepresenting the Group to others.

The Group Family are also required not to make defamatory, slanderous, seditious or derogatory statements and not to infringe or authorize any infringement of copyright or any other legal right by email or other forms of communication. Any such communication will not be condoned by the Group and is outside the scope of the employment of the individual concerned. The Group will not accept any liability in respect of such communication, and the employee responsible will be personally liable for any damages, penalties or other liability arising.



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## **6. Maintaining Complete and Accurate Business Records**

### **6.1. Proper Documentation and Authorization**

The Group expects that all business transactions are documented properly. The Group has a approval matrix in place to govern the authorizations required in doing business. All the Group Family must be aware of the approval matrix and follow them without any attempt to bypass requirements.

### **6.2. Risk Management**

The Group recognizes the broad spectrum of risks which the company faces along with the opportunities which it seeks in its businesses and operations. It is a strategic objective of the Group to have an effective risk management program and control systems to assess and mitigate these risks and thereby facilitate the Group in meeting all its business objectives. The Group is committed to developing and maintaining a risk management culture in the Group Family through leadership, education, communication and consultation so that risk-based approach is effectively embedded in its business processes and operations.

### **6.3. Accounting and Procurement Procedures**

The Group Family must observe prescribed accounting, financial and procurement procedures and comply with the requirements of the Group's internal control policies, guidelines and procedures. All transactions must be accurately and properly recorded in the books of accounts. Off the record funds and accounts are strictly prohibited.

### **6.4. Records Retention**

The Group Family is expected to know of the Company's record retention practice.


## **7. Respecting Others in the Workplace and Society**

### **7.1. Equal Opportunity and Workplace Diversity**

The Group provides equal employment opportunity and anti-discrimination in the workplace. The Group will strive to ensure that employment opportunities properly reflect gender, ethnicity and age of the Malaysian demographics.

### **7.2. Workplace Health & Safety**

The Group strives to provide safe and healthy working conditions in order to prevent harm to, and promote the health of, all the Group Family and other stakeholders. In order to do so, health and safety programs, rules and regulations apply at all sites. It is the responsibility of each the Group Family to comply with health and safety regulations. The Group and the Group Family will endeavor to prevent any injuries at

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work, both for the Group Family and for our contractors. Beyond this, the Group seeks to adapt work to the capabilities of all the Group Family in relation to their physical and mental health. Care and support should be integral to the response to the Group Family with chronic disability or chronic illness. All the Group Family should have access to affordable health services. In areas with a high prevalence of HIV/AIDS, access to voluntary and anonymous counselling and testing should be encouraged and supported. Smoking in the Group’s premises and vehicles is strictly prohibited. However, smoking is permitted at such areas within the Group’s premises that have been officially designated as smoking areas.

**7.3. Prevention & Eradication of Drug, Alcohol & Substance Abuse**

The Group views seriously the case of the Group Family (or contractors on site) using illegal drugs or indulging in alcohol and other substance abuse at the workplace. Appropriate actions will be instituted against anyone who presents himself at work under the influence of illegal substances or, possesses, distributes, or sells illegal drugs in the workplace.


**7.4. Energy Usage**

While the Group’s premises is in operations, proper care will be taken to ensure the effective utilization of all forms of energy.

Essential to our efforts at continuous improvement is our commitment to the principles of sustainable development. In embracing this corporate philosophy, it is our policy to bring benefit to society and the environment through constructive engagement in the areas of energy conservation, recovery and reuse.

We will achieve this by:

- Identifying, evaluating and implementing feasible energy conservation opportunities.
- Complying with the legal requirements and codes of practice on energy conservation and management.
- Educating, training and creating awareness on energy conservation and management issues.
- Ensuring energy efficiency is an integral part of all new business initiatives.

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## 7.5. Corporate Social Responsibility

The Group is committed to be a responsible corporate organization. We recognize the importance to integrate our business values and operations to meet the expectation of our shareholders:-

- manage our business in the highest standard of integrity and corporate governance practices;
- protect the health and safety of all individuals affected by our activities including the Group Family, contractors and the public by providing a safe and healthy working environment;
- actively assess and manage the environmental impact of all of our operations;
- provide equal opportunity in all aspects of employment and ensure that the Group Family are treated fairly and given the opportunity to grow with the Group; and
- develop and participate in community programs which enhances the quality of life especially those related to healthcare, education, sports and the environment.

*This Code of Conducts (Version No. 1) was reviewed and adopted by the Board of the Company on 22 June 2023.*