



OMESTI

CODE OF CONDUCT AND BUSINESS ETHICS

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1.0 INTRODUCTION

1.1 Abbreviations, Acronyms and Definitions

GCEO	Group Chief Executive Officer
ED	Executive Director
COBE	Code of Conduct and Business Ethics
ABC	Anti-Bribery and Corruption Policy
HOD	Head of Department
ISSP	Information System Security Policy
BUH	Business Unit Head
GHC	Group Human Capital

Assets means the tangible or intangible resources controlled by the Company as a result of past transactions or events and from which future economic benefits are expected to flow to the Company.

Associate Company means a company and/or enterprise in which the investor company has significant influence that is the power to participate in the financial and operating policy decisions of the associate company.

Business courtesy means a gift and/or favour from a person and/or a firm, regardless of whether a business relationship exists between the Company and that person and/or firm, for which fair market value is not paid by the recipient, which includes tangible or intangible benefit, such as non-monetary gifts, meals, drinks, entertainment, recreation, prizes, transportation, discounts, tickets, passes, promotional items or use of donor's time, material or equipment.

Business Partners means person and/or entity, where the company has engaged with and/or entered into a commercial arrangement to collaborate with such person and/or to form an alliance through a letter, contract or memorandum of understanding. A Business Partner may include but not be limited to the suppliers, service providers, customers, agents and/or resellers.

Bribes mean an inducement or reward (financial or otherwise) offered, promised or given, directly and/or indirectly, in order to gain any improper commercial, contractual, regulatory, personal or other advantage.

Cash may include but not be limited to money in any currencies, in any transaction form such as bank notes or coins, bank cheque, money order, and postal order.

Corporate hospitality is generally defined as corporate events and/or activities organised by an organisation which involves the entertainment of employees and third parties for the benefit of that organisation.

Corporate events and activities include but are not limited to sporting events, gala dinners, concerts or activity based events such as golf tournaments, Concerts and F1 Race.

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Counterparty is define as any party that Omesti Group is currently in relationship with and/or intends to do business with in the future, either on a regular or once-off basis.

Code means the COBE, a set of rules and policies, which shall govern the business conduct and relations of the Board of Directors, Management, Employees and other Representatives of the Company.

Competitors means any persons and/or entities that render the same or similar services or supply the same or similar products to what the Company renders or supplies, in anyone or a number of business environments.

Conflict of Interest means any personal interest and/or material interest that a Director or an Employee may have and could be seen to have the potential to interfere with their objectivity in performing the their duties or exercising their judgment on behalf of the Company.

Customer means any persons or entities to which the Company provides its products and render its services, which may include potential customers, Suppliers or Competitors.

Directors include all independent and non-independent Directors, executive and non-executive Directors of the Group and shall also include alternate or substitute Directors.

Employee means any person who is in the employment of OMESTI Group including but not limited to permanent and temporary executives, non-executives, secretaries, secondees and individuals on direct hire including contract employees.

Family/household includes spouse(s), children (including step-children and adopted children), parents, step-parents, siblings, step-siblings, grandparents, grandchildren, in-laws, uncles, aunts, nieces, nephews.

Facilitation payment means payments made to secure or expedite the performance by a person performing a routine or administrative duty or function

OMESTI Group means OMESTI Berhad, its subsidiaries and controlled companies. Controlled companies' means Omesti Berhad owns 51% or more shareholding. The expression "Omesti Group" is used for convenience where references are made to OMESTI companies in general. The companies in which OMESTI has direct or indirect shareholding are distinct legal entities.

Harassment means any direct or indirect action, conduct or behaviour which any individual or group of individuals finds abusive, humiliating, intimidating or hostile, whether verbal, physical or visual.

Money laundering means an action occurring when the criminal origin or nature of money or assets is hidden in legitimate business dealings and/or when legitimate funds are used to support criminal activities, including financing terrorism.

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Public or Government official are defined broadly to include officers or employees acting on behalf of a government or public body or agency. It could also refer to officers or employees of a government international organisation, such as the United Nations. It also includes political officials or employees of political parties or candidates for political office.

Representatives mean authorized agents, resellers, consultants, contractors and Suppliers.

Staff includes Employees, trainees and interns, contractors, sub-contractors, agents, representatives and consultants.

Third parties may include customers, potential customers, contractors, external companies, intermediaries, introducers and any other stakeholders with whom a business relationship, whether current, prospective or historic exists.

Trading in influence means the gesture either offered by donor or to a receiver that may affect or perceived to influence the outcome of business dealings such as discount, accommodation, credits, services, travel, token, cash or cash equivalent and gift.

1.2 Objective / Purpose

The Code provides guidance on the standards of behaviour expected of all Directors, Employees, Staff and where applicable, Agents and Business Partners. The standards of behaviour are derived from the Group's Core Values and Business Principles.

The Group is committed to the highest standards of integrity, openness and accountability in the conduct of the Group's business, operations and seeks to conduct its affairs in an ethical, responsible and transparent manner.

2.0 SCOPE OF APPLICATION

This Code is intended to apply to all Directors and Employee of the Group. Joint venture companies in which the Group is a non-controlling co-venturer and associated companies are encouraged to adopt these or similar principles and standards.

The Code serves as a guidance in resolving any business ethical issues that Employee may encounter in conducting business of the Company. This Code is by no means exhaustive nor does it includes all of the policies of the Company. The Board of Directors, Management, Employees and all Representatives of the Company are to apply sound judgement in deciding on the most business ethical means of dealing with any given situation involving Customers, Suppliers, competitors, regulators, public and the Company matters in general.

If a local law conflicts with a policy in the Code, the local law will apply. If a local custom or practice conflicts with a policy in the Code, the Code will prevail.

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3.0 RESPONSIBILITIES / COMPLIANCE

Directors, Management, Employees, Staff and other Representatives of the Group are responsible for complying with all applicable policies, procedures, laws and regulations.

Any disclosure (if any) required under the law and the Code shall be based on the relevant facts and information, which is to the best knowledge of the Directors, Management and Employees.

Violation of the Code may result in disciplinary actions. BUH and HOD are responsible to ensure their policies and procedures are consistent with the Code. For Associate Companies, the Code shall serve as guidance for business ethical procedures and practices.

In the event other policies and procedures of the Group conflicts with the Code, the Code shall prevail.

4.0 WORKING WITH ONE ANOTHER

The Group is committed to fostering an inclusive environment where everyone is treated with respect, trust and dignity.

4.1 Respect

Employee shall treat their superiors, peers, subordinates and external stakeholders with respect, trust, honesty and dignity.

4.2 Equal Opportunity and Non-Discrimination

The Group provides equal opportunities to all and endeavours to ensure that employment related decisions are based on relevant qualifications, merit, performance and other job-related factors and in compliance with all applicable laws and regulations. Employee must not discriminate based on gender, race, disability, nationality, religion, age or sexual orientation unless specific laws or regulations expressly provide for selection according to specific criteria.

4.3 Harassment and Violence

Any types of Harassment and/or violence will not be tolerated. These actions or behaviours include derogatory comments based on gender, racial or ethnic characteristics, and unwelcomed sexual advances, spreading of malicious rumours or use of emails, voicemail and other forms of communication channels to transmit derogatory or discriminatory material.

4.4 Illegal Substances

The Group strictly prohibits the use and/or transfer of illegal drugs or other illegal substances in the workplace.

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4.5 Criminal Activities

Employee must not engage or become involved in any behaviour or activities that may be categorised as subversive or commit any wrongdoing, criminal or otherwise that is punishable under the laws of any country. If they are found guilty by a court of law or found to be involved in subversive activities or commit a criminal offence, they will be dealt with in accordance with the Group's relevant policies and procedures.

4.6 Environment, Occupational Safety and Health

The Group strives to provide a safe, secure and healthy working environment. You must create and maintain a safe working environment to prevent workplace injuries by:

- a) Using all devices provided for your protection;
- b) Ensuring that protective devices are in good working condition;
- c) Reporting immediately unsafe equipment and tools, unsafe behaviours, hazardous conditions and accidents to the Management.
- d) Complying with the Occupational Safety and Health laws and regulations and the Group's environmental, safety and health rules and regulations (if any).

You are also responsible for the safety of fellow workers and the general public and are encouraged to promptly report any breaches of environmental, safety and health laws at the workplace.

5.0 AVOIDING CONFLICT OF INTEREST

All Directors, Employees and Staff are expected to make business decisions in the best interests of the Group.

5.1 General Guidance

A conflict of interest arises when Employees have a personal interest that have the potential to interfere with their objectivity in performing duties or exercising judgement on behalf of the Group. Employees must therefore avoid conflicts of interest between their personal dealings and their duties and responsibilities. In particular, the use of the Group office position, confidential information, assets and other Group resources for personal gain, or for the advantage of others with whom they are associated, is prohibited.

If an Employee finds himself in a situation of conflict whether actual or potential, they must report in writing as soon as practicable stating the facts, nature and extent of the conflict:

- a) Report to the respective HoD and/or BUH.

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Where the conflict involves a contract or proposed contract with the Group, the Management will ensure that the terms of the contract are negotiated and decided independently.

5.3 Dealings with Third parties, Suppliers, Customers, Agents and Competitor

Any Director or Employee or their family members must not have:

- a) Any financial interest in a supplier, customer, agent or competitor of the Group, except that in the case of a public listed company whereby an interest of less than 5% in the equity will be disregarded;

In the case of payments by the Group to officially appointed selling agents, the buyer should have knowledge of the normal commercial practice that commission is payable to the agents, and consequently specific approval from the buyer is not required.

With the exception of the above instances. Employees are prohibited from receiving commissions from Counterparts, Business Partners and competitors of the Group.

5.4 Personal Dealings with Suppliers and Customer

Every Director or Employee must ensure that their personal business dealings with suppliers and customers are on an arm's length basis e.g. purchases which are on no more favourable terms than those offered to the public.

5.5 Second Employment and Activities outside the Group

Employees are not allowed to take up secondary employment outside the Group and/or engage in any outside business and/or enterprise which may be in competition directly and/or indirectly with the Group which give rise to actual or perceived or potential conflict of interests with their duties in the Group as this will lead to poor, diminishing work quality, productivity and take time away from work.

Unless written approval is obtained, Employees are not allowed to be a member of the government, quasi-government, statutory bodies or become office bearers, council member. This restriction does not apply to social or community-related clubs, associations, non-governmental organisations and industry associations.

5.6 Board Membership

Employee may only be allowed to serve on the boards of government agencies/ bodies and/ or companies/ unincorporated entities outside the Group in exceptional circumstances, with written approval from the GCEO. For the GCEO, the Main Board Chairman's approval is required.

The exception to this is where such board appointments relate to family businesses or companies/ unincorporated entities formed by not-for-profit organisations (e.g. social or community-related clubs and associations).

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5.7 Investment Activities

Personal investment decisions made by a Director or an Employee must not influence their independent judgement on behalf of the Group.

6.0 PRACTICES GUARDING AGAINST BRIBERY AND CORUPTION

The Group takes a zero-tolerance approach towards bribery and corruption, and is committed to behaving professionally, fairly and with integrity in all our business dealings and relationships wherever the Group operates, and implementing and enforcing effective systems to counter bribery and corruption.

The consequences of bribery and corruption are severe, and may include imprisonment for individuals, unlimited fines, debarment from tendering for public contracts, and damage to the Group's reputation. We therefore take our legal responsibilities very seriously.

Employees must not influence others or be influenced, either directly or indirectly, by paying or receiving bribes or kickbacks or any other measures that are deemed unethical or will tarnish the Group's reputation.

6.1 Solicitation, Bribery and Corruption

Employee must comply with all applicable anticorruption policies, laws and regulations.

They must not directly or indirectly promise, offer, grant or authorise the giving of money or anything else of value, to government officials, officers of private enterprises and their connected persons to obtain or retain a business or an advantage in the conduct of business.

These include:

- a) Commissions that you have reason to suspect will be perceived as bribes or have reason to suspect will be used by the recipient to pay bribes or for other corrupt purposes; and
- b) Facilitation payments ('grease payments') which are regarded as payments to government officials to gain access, secure or expedite the performance of a routine function they are in any event obligated to perform. The Group does not allow facilitation payments to be made. Employee must inform the appropriate compliance personnel when encountered with any request for a facilitation payment. If the Employee has made any payment which could possibly be misconstrued as a facilitation payment, the appropriate compliance personnel must immediately be notified and the payment recorded accordingly.

Employee must also refrain from any activity or behaviour that could give rise to the perception or suspicion of any corrupt conduct or the attempt thereof. Promising, offering, giving or receiving any improper advantage in order to influence the decision of the recipient or to be so influenced may not only result in disciplinary action but also criminal charges. All Counterparts (when representing the Group) are under a duty not to promise, offer or give any improper advantage on behalf of the Group. Directors and

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Employees must endeavour to ensure that these Counterparts do not promise, offer or give any such improper advantage on behalf of the Group.

7.0 GIFTS, ENTERTAINMENT AND TRAVEL

Employees are required to comply with the policies and procedures under the ABC policy relating to the receipt of gifts and entertainment.

In no event, however, may an Employee or any of their family members accept gifts or entertainment in exchange for an exercise or non-exercise of an Employee's authority or otherwise to the detriment of the Group.

8.0 PROVIDING GIFTS AND ENTERTAINMENT

The Group prohibits the use of gifts, entertainment and travel to influence business decisions. Employee must comply with all applicable policies, procedures, laws and regulations related to the use of gifts, entertainment and travel in all territories where the Group operates.

It is acknowledged that the practice of business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The intention behind the gift should always be considered, so that it does not create an appearance of bad faith and impropriety and should not be misunderstood by others to be a bribe.

8.1 Gifts

Employees or their family members must not solicit any gifts from Counterparts or Business Partners directly or indirectly. Employee or their family members are also discouraged from accepting gifts from these parties.

Employee or their family members may accept or offer the gifts subject to the criteria and approvals set out under the ABC Policy.

Employee must never accept or offer, with or without approval, gifts in the form of cash or cash equivalents, personal services or those otherwise that may put them in a position of conflict, influence their business decision or was otherwise intended or given with the expectation of gaining any advantage, or which may adversely affect the Group's reputation.

8.2 Entertainment

Employee and their family members must not solicit any form of entertainment from Counterparts or Business Partners directly or indirectly. Employee may accept invitations to social events or entertainment within reason according to the scope of their work provided these events or entertainment are not lavish or become a regular feature that may influence business decision making process.

Employees may also offer modest entertainment that is legal and reasonable within the scope of their work. When offering entertainment, Employee must be sensitive to the recipient organisation's entertainment receiving policy.

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Employees must not accept, engage or offer any entertainment that is indecent, sexually oriented or that otherwise might put them in a position of conflict or adversely affect the Group's reputation.

8.3 Travel

Employee may accept lodging and other expenses (e.g. food, transportation) provided by Counterparts, Business Partners or other stakeholders within the host country if the trip is for business purposes and prior approval has been obtained from the Management. The cost of travelling to the host country must be borne by the Group.

Unless prohibited by law or the policy of the recipient's organisation, the Group may bear the costs of transportation and lodging for Counterparts, Business Partners or other stakeholders in connection with a visit to the Group's facility. The visit must be for a legitimate business purpose e.g. on-site examination of equipment, contract negotiations or training. Prior approval in accordance with established procedures must be obtained.

9.0 DONATIONS

Company donations are part of the Group's commitment to society and a way of contributing to worthy causes. Unfortunately, even legitimate donations sometimes have the risk of creating the appearance of bribery and corruption

Employee must obtain prior approval in accordance before making donations on behalf of the Group.

10.0 PROTECTING THE GROUP AND SHAREHOLDERS

The Group is committed to protecting its assets and resources

10.1 Protecting Group Asset

The Group entrusts Employees with the Group's assets in the performance of your job. Employee must protect these assets against waste, loss, damage, abuse, misuse, theft, misappropriation or infringement of Intellectual Property rights and ensure these assets are used responsibly.

10.2 Accuracy of Financial Information

The Group is committed to ensuring the integrity of financial information for the benefit of stakeholders, including but not limited to the Board of Directors, Management, shareholders, creditors and government agencies.

As the Group relies on accounting records to produce reports, Employee must ensure that all business records and documents are prepared accurately, reliably and in a timely manner.

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a) These records must conform to generally accepted accounting principles as well as to all applicable laws and regulations of the jurisdiction in which the Group operates;

b) Such records are important to the Group's decision making processes and the proper discharge of its financial, legal and reporting obligations.

Falsification of financial or any other records or misrepresentation of information may constitute fraud and can result in civil and criminal liabilities for Directors, Employees and the Group. Employees are obliged to report false entries or omissions and to highlight questionable or improper accounting in the books and records of the Group.

10.3 Proprietary and Confidential Information

The Group values and protects all proprietary and confidential information.

In the performance of Employee's duties, they may obtain information not generally available or known to the public or the market. Hence, Employee must not communicate or disclose this information in any manner to competitors, customers, persons engaged in any aspect of the securities industry, members of trade associations or other third parties unless such communication or disclosure is authorised by the Group.

a) Employee must be aware that any unlawful or unauthorised disclosure of proprietary or confidential information may result in irreparable loss and/ or damage to the Group. In such cases, the Group may institute civil and criminal proceedings against the offending party.

b) It is equally important that proprietary or confidential information is only disclosed to other Employees on a need to know basis.

Employee have an obligation to continue to Preserve the proprietary and confidential information even after the appointment/ employment has ceased, unless disclosure is required by any order of any court of competent jurisdiction or any competent judicial, governmental or regulatory authority

10.4 Insider Information

As a public listed company, the Group is required to comply with various laws and regulations to make timely, full and fair public disclosure of information that may materially affect the market for its stock.

Employees or other representatives of the Group are not allowed to trade in securities or other financial instruments based on knowledge that is obtained in the performance of duties, if that information has not been reported publicly.

Employee must also refrain from disclosing insider information to anyone, including your family members and friends, unless disclosure is required by any order of any court of competent jurisdiction or any competent judicial, governmental or regulatory authority in addition to obtaining clearance and consent from the Legal department.

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Disclosure of material, non-public information to others can result in civil and criminal penalties.

10.5 Information Technology

All computer facilities must be safeguarded against theft, damage and improper usage. The Group does not permit the usage of computer facilities involving sensitive and illegal matters, infringement of Intellectual Property rights, unauthorised access, misuse of the company's time and resources and risking the integrity of computer facilities.

The Group reserves the right to monitor your email messages, instant messaging, blogs, use of the internet and contents in Group issued computer facilities and/or devices brought by the Employee and used during office hours and/or office related matters. 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.

Employee must use the Group's computer facilities and/or other devices brought by Employees during office hours responsibly and primarily for the business purposes for which they are intended. The computer facilities include access to the Internet, email services and all other computer hardware, software and peripherals.

Employees must comply and adhere to the ISSP Policy at all times.

10.6 Records Management

The Group's documents and records are meant for business purposes and requirements, compliance with legal, tax, accounting and regulatory laws. Employees must control and maintain such records so that they are accurate, up-to-date, legible, readily identifiable and retrievable. Employees must also ensure that all records are handled according to the appropriate level of confidentiality, in accordance with any applicable policies and procedures and in conformity with all applicable laws and regulations.

10.7 Business Communications

Employee must ensure that all business communication is clear, truthful and accurate. You must avoid misleading information, speculative opinions or derogatory remarks. This applies to communications of all kinds, including e-mail and informal notes or memos.

11.0 DEALING WITH COUNTERPARTS AND BUSINESS PARTNERS

The Group strives to build and strengthen its relationships with Counterparts and Business Partners. Directors and Employees are expected to conduct business ethically, and share the business ethics and principles prescribed in the Code with their Counterparts and Business Partners.

Business dealings shall be impartial, objective and free from any influence, either within or outside the Group. In this respect, Directors and Employees must avoid any

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business dealings with those who are likely to harm the Group's reputation and who violate laws and regulations e.g. safety, environmental, anti-bribery or anti-trust laws.

11.1 Counter Parts

The Group selects its Counterparts impartially and based on merit with consideration to, among others, price, quality, service, integrity and ethical standards

- a) Employee must ensure that all procurement decisions are made solely in the Group's best interests and in compliance with the Group Procurement policies and procedures.
- b) Payments made shall commensurate with the services or products provided.
- c) Commission payments are generally allowed as per local laws and regulations and where covered by the terms and conditions of a legally binding contract between the Group and the Counterparts. The rates of commissions or fees paid to any dealer, distributor, agent or consultant must be reasonable in relation to the value of the product or work that has actually been performed and should be benchmarked against industry practices.

It is important to be aware that an offer/payment to a company rather than an individual is not an automatic safeguard; the same tests must be strictly applied.

If there is any doubt whatsoever as to whether an offer/payment is proper and in accordance with the Group's procedures for commission, then advice should be sought from the Group Legal. Contractors or subcontractors play a vital role as the Group's representatives in fulfilling the Group's contracts and obligations to customers. The Group seeks to do business with those who comply with all applicable legal requirements and act consistently with the Code.

11.1 Customers

Employees must always treat customers with honesty and respect. Employee must provide them with accurate and truthful information about products and services. Employee must also endeavour to enhance the quality and reliability of products and services via continuous process improvement and innovation.

Deliberate misleading messages, omission of important facts, or false claims about the Group's or its competitors' offerings are prohibited.

11.1 Joint Ventures and Business Partners

The Group endeavours to work or associate with companies that share the Group's values and ethics and the principles of the Code.

11.1 Competition and Trust Laws

The Group is committed to competing ethically in the marketplace. You are required to comply with competition and anti-trust laws in the countries in which the Group operates. You must be aware that infringement of such laws can result in civil and

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criminal liability for both you and the Group. In addition, you must not use illegal or unethical methods to compete in the market. This includes without limitation:

- a) Exchanging competitive information with competitors;
- b) Fixing prices or terms related to pricing;
- c) Dividing up markets, territories or customers;
- d) Rigging a competitive bidding process (including arrangement to submit sham bids);
- e) Adopting strategies to illegally exclude competitors from the market, such as without limitation anti-competitive bundling or predatory pricing.

Employee must not misappropriate proprietary information or possess trade secrets obtained without the owner's consent or by pressuring disclosures from employees of other companies.

12.0 DEALING WITH GOVERNMENT AUTHORITIES, POLITICAL PARTIES AND INTERNATIONAL ORGANISATIONS

The Group strives to build transparent and fair relationships with government agencies, public officials and international organisations. Appropriate action must be taken to comply with the applicable laws and regulations in all countries in which the Group operates, as well as the Group's relevant policies and procedures.

12.1 Political Activities

Employees have the right to participate as individuals in the political process. Their participation shall be carried out entirely on their own accord, by their own volition, in their own time and with their own resources. Employee's political opinions must be clearly delivered as personal opinions and not representative of the Group's position.

Any Employee who wishes to hold any key position as office bearer in any political party must disclose and obtain prior approval from the Group. Those who wish to actively participate full time in politics or are nominated as candidates in any election or are elected as representatives in the Federal or State Legislative Body must resign from the Group.

Any Director who wishes to hold any key position as office bearer in any political party must disclose this intention to the Board Chairman.

12.2 Anti-Money laundering and Anti-Terrorism Financing

Money laundering is the process of hiding the true nature or source of illegally obtained funds (such as from the drug trade or terrorist activities) and passing it surreptitiously

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through legitimate business channels by means of bank deposits, investments, or transfers from one place (or person) to another.

Anti-money laundering provisions are designed to help prevent legitimate businesses from being used by criminals for this purpose, and to assist law enforcement agencies to trace and recover criminal assets and terrorist funding.

The Group prohibits your involvement in money laundering activities, either directly or indirectly. The activities may include, but not limited to, the following:

- a) Payments made in currencies that differ from invoices;
- b) Attempts to make payment in cash or cash equivalent (out of normal business practice);
- c) Payments made by third parties that are not parties to the contract;
- d) Payments to or accounts of third parties that are not parties to the contract

13.0 ADMINISTRATION OF THE COBE

13.1 Where to Get Guidance

Employees may seek advice from the Group GHC if you are uncertain as to the interpretation or application of this handbook.

13.2 Raising a Concern or Reporting a Violation

It is Employees responsibility, without exception, to ensure that any instance of actual or suspected violation of the Code is reported promptly.

The Group practises an open door policy and encourages Employees to share their questions, concerns or suggestions with someone who can address them properly. In most cases, their immediate superior is in the best position to address any concerns.

Employees are encouraged to speak or write to either one of the following Heads - Group Legal or Group GHC.

All instances or suspected violation of the Code received will be thoroughly investigated.

When Employee raise a concern or report a violation, their identity will be kept confidential. However, their consent will be sought should there be a need to disclose their identity for investigation purposes. Please take note that the investigation may be impacted if Employees do not provide their consent or if they choose to remain anonymous.

The Group expects all parties to act in good faith and have reasonable grounds when reporting a concern or issue. If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including legal action, where applicable. Employees will not suffer harassment, retaliation or adverse

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employment consequence if they make a report in good faith. A Director or an Employee who retaliates against others make a report in good faith will be subject to disciplinary action up to and including termination of employment or dismissal.

13.3 Investigations of Potential Code Violations and Disciplinary Actions

The Group takes all reports and incidents of possible violations to the Code seriously and shall investigate them thoroughly in accordance with the relevant investigation procedures. Appropriate disciplinary actions shall be taken where violations have been proven.

In respect of Directors and Employees who are found to be in breach of the Code, they will be dealt with in accordance with the Group's relevant policies and procedures.

All reports made on a possible violation shall be treated in a confidential manner, with disclosure limited to conduct a full investigation of the alleged violation. Disclosure of reports to individuals who are not involved in the investigation will be viewed as a serious disciplinary offence which may result in disciplinary action, up to and including termination of employment or dismissal.

Summary of Revision History

Rev	Date	Description	Originator	Reviewed	Approved
1.0	Nov 16	Issue for Implementation	GHC	NK	MXZ

