

INTRODUCTION

In line with good corporate governance practices, the Board have made a commitment to create a corporate culture to operate the businesses in an ethical manner and to uphold the standards of professionalism and exemplary corporate conduct.

The Code of Ethics and Conduct (“the Code”) lays down the standards of conduct that shall apply to its Directors and employees. The Code should be read in conjunction with the Company’s other policies that govern employee conduct.

CORE AREAS OF CONDUCT

✓ Conflict of Interest

The Directors and Employees should avoid involving themselves in situations where there is real or apparent conflict of interest between them as individuals and the interest of the Group. Directors and Employees must not use their positions or knowledge gained directly or indirectly in the course of their duties or employment for private or personal advantage (directly or indirectly).

In addition, a Director or an Employee shall avoid any situation in which the Director or Employee has an interest in any entity or matter that may influence the Director or Employee’s independent judgement in the discharge of responsibilities. In such circumstances, the Directors concerned are required to declare their respective interest and abstain from deliberating and vote in transactions or matters affecting their personal, business and professional interests. The Employee that becomes aware of a personal interest , or may be viewed as, in conflict with that of the Company should promptly present the situation and the nature of the possible conflict to their Head of Department for appropriate consideration.

✓ Confidential Information

All Directors and Employees have a contractual and moral obligation to safeguard any confidential information entrusted to them in the course of their employment. All employees are prohibited from disclosing any confidential information unless authorised to do so by Management.

In the event that a Director or an Employee is aware of material information affecting the Group which has not yet been publicly released, the material information must be held in the strict confidence by the Director or Employee involved until it is publicly released.

✓ Inside Information and Securities Trading

Director or Employee shall not use price sensitive non-public information, which can affect the price of the securities of the Company when it becomes publicly known for personal benefit.

Directors and Employees are prohibited to trade in securities or to provide information to others to trade in securities of the Company until the Inside Information is publicly released. Directors or Employees shall not trade in securities in any other companies where they have inside Information which they obtain in the performance of their duties.

✓ Protection and Proper Use of Company's Assets and Resources

Directors and Employees must handle and protect the Company's assets and resources including information such as customer lists, financial information and intellectual property, fixed assets, information technology and financial assets with due diligence and against theft, unauthorised disclosure, misuse, trespass and careless handling.

The use of the Company's assets is strictly for legitimate business purpose and not personal benefit. Abuse or misuse of the Company's assets and resources is a serious violation of the Code.

✓ Business Records and Control

It is the duty of employees to ensure all the Company documents are completed accurately, adequate, truthfully, in a timely manner and properly authorised. The maintenance of proper records is to meet its operational, regulatory and legal obligations. All books, records and accounts should conform to generally accepted and applicable accounting principles, rule and regulations.

✓ Compliance with the Law

The Company seeks to abide by applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions in the conduct of its affairs. Directors and Employees have responsibility to know and comply with the laws and regulations that apply to their job functions and responsibilities.

The Company reserves the right to report any actions or activities suspected of being criminal in nature to relevant authorities.

✓ Gifts and Entertainments

The Company prohibits the Directors and Employees from offering or accepting any gifts, payments or other personal benefits in connection with his/her work at the Company that will or will appear to influence objective and fair business decisions.

Notwithstanding the above, the gifts and entertainment that deemed to create goodwill and sound working relationships and not to gain improper advantage or facilitate approvals are permissible.

✓ Health, safety and Environment

The Company will use its best endeavours to ensure a safe workplace and maintain proper occupational health and safety practices to commensurate with the nature of the Company businesses and activities. Directors and Employees are required abiding Company policies and procedures, government laws and regulations in work activities.

✓ Discrimination and Sexual Harassment

The Company provides equal opportunity in all aspects of employment without regard to race, religion, gender, nationality, age and disability to its employees. Sexual harassment by or of any person employed by the Company is unacceptable and strictly prohibited. Any questions

concerning issues of such should be directed either to your superior or the Human Resource Department. All such reports and/or complaints shall be treated as strictly confidential.

✓ Outside Interest

No Employees may engage in an outside interest that would encroach on his time and / or attention that is required to be devoted to the Company.

✓ Misconduct

No employee is to be involved in or abet any activity that is deemed by the Company to be an act of misconduct (includes use and abuse of drugs).

REVIEW OF THE CODE

The Code has been adopted by the Board on 23/02/2015. The Code shall be reviewed periodically to ensure that it continues to remain relevant and appropriate.

WIAVER OF THE CODE

Waiver of this Code will be granted on a case by case basis and only in extraordinary circumstances. Waiver of this Code can be made only by the Board or the appropriate Board Committee.

- End -