

CODE OF CONDUCT & BUSINESS ETHICS

This Code of Conduct & Business Ethics sets out the acceptable general practices and ethics that guide the employees of CONWAY Terminals Manufacturer Sdn. Bhd. (CONWAY)

1. Accountability

- 1.1 All employees of CONWAY are responsible for acting in accordance to the Code of Conduct & Business Ethics of CONWAY ("Code") and ensure compliance with the relevant laws, rules and regulations of the respective countries that CONWAY conducts its business in.
- 1.2 Any employee of CONWAY who violates the Code is deemed to have committed a serious misconduct and may be subjected to disciplinary action, including dismissal, depending on the facts, severity and circumstances of each case. Any serious violations may also subject the individual employee to civil or criminal implications.
- 1.3 All employees of CONWAY are obliged to exercise all reasonable care in safeguarding CONWAY's properties and assets, including for the avoidance of doubt, data and intellectual property against any loss, damage, misuse, illegal use and/or theft and are expected to use such resources for CONWAY's business purposes.

2. Non-Discrimination

- 2.1 CONWAY maintains a policy of non-discrimination and greatly values and respects the diversity, cultural and religious differences of its employees.
- 2.2 All employees of CONWAY are expected to cooperate and support CONWAY's vision of cultivating and maintaining a work environment that is free from discrimination and respectful of differences among employees.
- 2.3 During the hiring process, candidates will also be evaluated based on their willingness to adhere to the vision, values and overall corporate culture of CONWAY.

3. Business Communications

- 3.1 All employees of CONWAY are expected to exercise due care, diligence and etiquette in all work-related communications, be it in written form, verbal or otherwise, and to ensure that the contents are clear, truthful, courteous and accurate.
- 3.2 CONWAY exercises a no tolerance policy for any communications made by its employees over the course of business and/or using CONWAY's resources that

contain any material found to be discriminatory, defamatory, offensive, contains sexual connotations, pornographic, misleading and/or any other communications of a similar nature.

4. Record Keeping

- 4.1 All employees of CONWAY are to ensure that they undertake proper record keeping of all commercial arrangements, transactions, accounts, communications and information, particularly where it is required in law. Employees must never delete, destroy or discard any records without authorisation and particularly where it is to hide a wrongdoing or a mistake.
- 4.2 Any falsification or improper alterations of records are strictly prohibited. This includes that an employee of CONWAY should not be giving instructions to any other person, including colleagues and third parties, to prepare or approve false or misleading records to either hide the true nature of the records, or to achieve an improper purpose that will otherwise be in violation of any laws or policies of the company or CONWAY.
- 4.3 Any discrepancies or inaccuracies within a record must be immediately and properly resolved with appropriate corrections, including informing any related parties who need to know of such corrections.

5. Personal Data Protection Notice

- 5.1 CONWAY respects and is committed to the protection of employee's personal information and privacy. The Personal Data Protection Notice issued to employees explains how CONWAY collects and handles employee information in accordance with the Malaysian Personal Data Protection Act 2010.
- 5.2 All employees of CONWAY, particularly employees who have access to personal data of any persons, whether employees, consultants, customers, suppliers, and/or any related party whereby personal data is processed and accessed, must not unlawfully use, access and/or revise such personal data for any purpose or reason. All employees are to ensure that such personal data processed within CONWAY is protected at all material times and in compliance with the applicable laws.

6. Confidential and Proprietary Information

- 6.1 CONWAY greatly values and protects all confidential and proprietary information.
- 6.2 Proprietary information includes but is not limited to emails, documents and all other files, electronic or otherwise, edited and/or stored on CONWAY equipment and are considered to be the exclusive property of CONWAY.

- 6.3 All employees of CONWAY are expected to exercise the highest possible standards of professionalism, ethics and integrity in order to protect the Group's confidential information, assets and standing and ensure the proper use of the same.
- 6.4 Employees of CONWAY may have access to confidential and proprietary information during their employment with CONWAY. Such information cannot be shared, disclosed or utilised for personal gain or any other gain to any individual, business or third party entity, including family and friends, except where expressly approved by the relevant company under CONWAY, required by law and/or reasonably necessary for the purposes of carrying out your duties under employment within CONWAY. This obligation of non-disclosure is effective even after the termination of employment.
- 6.5 Where such confidential and proprietary information needs to be disclosed to persons outside CONWAY, the relevant parties are recommended to undertake all necessary measures to ensure that all confidential and/or proprietary information are sufficiently protected for instance through the execution of a non-disclosure agreement.
- 6.6 CONWAY reserves its right to take any and all appropriate action against previous or current employees who, whether directly or indirectly, breach the aforesaid obligation relating to the confidential and proprietary information of CONWAY.
- 6.7 In the event that you are unsure of what is permissible or non-permissible, you are advised to seek guidance from your head of department or the Human Resource Department.

7. Outside Employment

- 7.1 Employees are hired on the premise that CONWAY is their primary employer and that any other employment or commercial involvement, even outside of working hours is strictly prohibited particularly where it conflicts with the interests of CONWAY, unless express approval is obtained.
- 7.2 Employees and managers are required to obtain written approvals from their head of department or Human Resources Department before participating in outside work activities. If you are already engaged in any outside employment, you are required to disclose and obtain approval from the Human Resource Department. Any approval given is at the sole discretion of CONWAY and can be withdrawn at any time with or without prior notice, and the employee is required to immediately cease such outside employment, failing which CONWAY is entitled to claim compensation for any unlawful profiteering as a result of any conflict of interest.

8. Conflicts of Interest

- 8.1 All employees of CONWAY are obliged to act solely in the best interests of the Group at all times.
- 8.2 All employees of CONWAY are not permitted to:-
- a. engage, either directly or indirectly, in any act or practice that conflicts with, or appears to conflict with, the interests of CONWAY, even in their own time;
 - b. solicit or create business opportunities for themselves or anyone related to them in the course of their employment with CONWAY, particularly where it is a conflict of interests with CONWAY unless otherwise approved by executive director(s) of CONWAY;
 - c. abuse their employment position in any manner to bring any personal, financial or other advantage for themselves or their relatives which is contrary to their employment and interests of CONWAY; or
 - d. use of any of CONWAY's assets, data, intellectual property or resources, or abusing any loopholes in CONWAY's process and procedures for personal interests and gain.
- 8.3 A conflict of interest may arise where:-
- a. an employee has a personal relationship or financial or other interest that would or could potentially interfere with his existing obligations or exercise of judgment in decision making as an employee of CONWAY; or
 - b. where a supervisor or a person in a position to determine the remuneration and/or promotion of a subordinate is in a personal, romantic or intimate relationship with the subordinate.
- 8.4 All employees of CONWAY are obliged to disclose and report in writing as soon as practically possible concerning all potential and real conflicts of interest, stating in detail the facts, nature and extent of the conflict. This written report should be made either to the employee's immediate supervisor(s) and/or executive director(s).
- 8.5 All employees of CONWAY must take prompt action in eliminating the said conflict if requested to do so by CONWAY. CONWAY has the sole discretion in determining the nature of conflict of interests and the next steps or disciplinary action to be taken in relation to it.
- 8.6 Where it is found that an employee of CONWAY is engaged in any activity that is in conflict of interests with CONWAY which provides personal and monetary gain, whether directly or indirectly, particularly where it is at the expense and loss of CONWAY, CONWAY is entitled to claim compensation for such unlawful profiteering from the conflict of interest, which may include deduction of the

employee's salary until such payments are repaid in full or legal action against the employee.

8.7 Political Activities:

- a. All employees of CONWAY have the right to participate as individuals in the political process of their local jurisdiction provided that all acts pertaining to the same are carried out entirely of the employee's own volition, in his/her own time and using his/her own resources. The employee must ensure at all times that such activities will and do not have any impact on his/her performance at the workplace.
- b. The employee must ensure that his/her political views are clearly communicated as his/her personal political views and that it is not reflective of the position adopted by CONWAY and/or any of the companies under CONWAY, if any.
- c. If any employee of CONWAY has any interest or intends to hold any key position as an office bearer in any political party, this interest or intention must first be disclosed to his immediate supervisor and head of department.
- d. Any director of any company under CONWAY who has any interest or intends to hold any key position as an office bearer in any political party must disclose such interest or intention to the executive directors of CONWAY.
- e. Employees of CONWAY are not permitted to endorse any political act, activity and/or event or political donation using CONWAY's name, reputation and/or connections.

9. Anti-Bribery & Corruption

- 9.1 CONWAY is determined to maintain a work environment where trust is of paramount importance.
- 9.2 All companies under CONWAY, and/or their employees shall refrain from offering, promising, giving, demanding or receiving anything of value to them in the form of bribes and/or any other improper gratification.
- 9.3 All employees of CONWAY must refrain from any acts of bribery which takes the form of offering, promising, giving, demanding or receiving anything of value to anyone in the form of bribes, kickbacks and/or any other improper gratification (including gifts, hospitality and entertainment) to improperly influence the outcome of any transaction, whether it is for their own personal benefit or for the benefit of CONWAY.
- 9.4 CONWAY strictly does not tolerate any bribes given for purposes of obtaining or retaining business for CONWAY or provides an advantage to the businesses of

CONWAY. CONWAY does not tolerate any such acts of bribery even in a personal capacity.

- 9.5 "**Gratification**" shall have the meaning defined in the Malaysian Anti-Corruption Commission Act 2009 which includes but not be limited to anything of monetary and non-monetary value or benefit to the person. Gratification can be money, donation, gift, loan, fee, reward, valuable security, property or interest in property, movable or immovable property, financial benefit, office, dignity, employment, contract of employment or services, agreement to give employment or render services in any capacity, any offer, undertaking or promise, whether conditional or unconditional, of any gratification, including favours or promise not to do something which is of value or beneficial to the recipient. Gratification does not have to be directly received by the employee, but it can also be received by anyone related to the employee that is beneficial, of value or advantageous to the employee.
- 9.6 Any gifts to be given by employees of CONWAY to any third parties, if at all, must only be under circumstances which are approved by the employee's head of department or Human Resource Department. It should only be a token gift either for purposes of expressing appreciation or for customary and festive purposes. Such gifts should not at any material time, be given with the intention of obtaining any favour or hopes of retaining business or undue influence for obtaining future business from the recipient of the gifts.
- 9.7 CONWAY recognises that the practice of giving and receiving gift varies between countries, regions, cultures, and religions, so the definitions of what is acceptable and not acceptable will inevitably differ for each. When dealing with public officials, employees of CONWAY should ensure that any giving or receiving of gifts do not relate to, in any form whatsoever, the public official's official dealings or public duty. At all material times, employees are to ensure compliance with laws of their respective jurisdictions, and the higher standard will be applicable to all employees to avoid non-compliance of any laws on anti-bribery which may be applicable to CONWAY as a whole. "**Public officials**" are defined as any person who is a member, an officer, an employee or a servant of a public body.
- 9.8 In respect of any gifts, hospitality or entertainment in the commercial context:-
- a. The intention behind giving or receiving the gift, hospitality or entertainment must always be considered first. It should never be for an improper motive to obtain or retain a business, or to obtain some form of benefit or advantage, whether it is for the business or for the individual employee;
 - b. If an employee is unsure of how to consider the motive behind any gifts, hospitality or entertainment offered, the employee must always disclose and

refer the matter to the immediate supervisor or head of department to obtain advice and also approval before proceeding;

- c. All employees of CONWAY are not allowed to give or receive any gratification, gifts, hospitality or entertainment where it is for an improper purpose and can be deemed as a gratification, regardless of whether it is to benefit the employee individually or to benefit the business of any of CONWAY;
- d. An employee must obtain prior clearance and approval from the immediate supervisor and/or head of department before giving or receiving any gifts to any person which is not of any improper motive;
- e. Where any gift is not improper and received before prior approval can be obtained, an employee must always disclose such gifts to the immediate supervisor and/or head of department, regardless of the value;
- f. Where it is difficult or inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted but it must be declared and surrendered to the employee's immediate supervisor and/or head of department, who will assess the relevant circumstances and take the necessary steps, including returning the gift on the employee's behalf, where appropriate or required to do so.

9.9 Any employee of CONWAY that breaches any of the above rules will be subject to disciplinary action.

10. Anti-Money Laundering

10.1 "**Money laundering**" concerns the process of engaging with and/or concealing, directly or indirectly, the identity of the proceeds of illegal activities or converting the illegal proceeds to a legitimate source of income or asset.

10.2 All employees of CONWAY are prohibited from dealing in any money laundering activities and must comply with the applicable anti-money laundering laws.

10.3 In the event that any employee has a reasonable suspicion of money laundering activities being conducted as part of CONWAY's business, employees are expected to alert their immediate manager or supervision to the same.

11. Responsible Corporate Citizenship

11.1 CONWAY conducts its businesses ethically, honestly, and in compliance with the laws and regulations of the respective countries that it conducts its businesses in.

11.2 CONWAY is committed to being a responsible employer and a good corporate citizen in line with our vision and values.

- 11.3 All CONWAY activities including the sourcing, distribution, sale, repair and end of life treatment of products, must be conducted with respect and in consideration of issues relating to legal rights, health and safety, and the environment.

12.Social Media Policy

- 12.1 Employees of CONWAY are a representative of CONWAY at all times and are prohibited from bringing CONWAY's (and each of the companies under CONWAY) name and reputation into disrepute.
- 12.2 All employees of CONWAY are reminded that any messages or posts made online are presumed to be public and permanent. Online messages or posts can be copied, forwarded or subpoenaed and the original publisher will have no control over the ultimate use, distribution and/or publication of the message or post. As such, all employees are strongly encouraged to exercise discretion at all times when using and publishing on online platforms.

13.Business Associates and Partners

- 13.1 CONWAY works with a vast network of business associates and partners across the region. Whilst they are not employees of CONWAY, we expect them to have policies and principles consistent with CONWAY's Code in all their business dealings whether with CONWAY, on behalf of CONWAY, or any business dealings which are related to CONWAY.
- 13.2 CONWAY has zero tolerance of business associates and partners who do not conduct themselves in accordance to the principles of the CONWAY's Code where it brings disrepute or legal implications to CONWAY. Any non-compliance with the principles of the Code by business associates and partners may lead to the review and/or termination of any agreement with such parties.