

KECK SENG (MALAYSIA) BERHAD GROUP

Subject: Group Policy - Code of Conduct and Ethics	Policy No: 01-02
Applies to: All Employees and Directors	Page: 1 of 3
Date: 25 November 2022	Approved by: Board of Directors

OBJECTIVE:

The Board of Directors (“**Board**”), Management and employees of Keck Seng (Malaysia) Berhad (“**the Company**”) and its subsidiaries (“**the Group**”) are committed to good business conduct and maintaining a healthy corporate culture that engenders integrity, transparency and fairness throughout the Group. This Code of Conduct and Ethics (“**Code**”) sets out the principles, ethical and standards of business ethics and conduct of the Group. The objective is to assist the Directors, Management, employees, business associates and external providers* in defining ethical standards and conduct at work.

**External providers refer to provider who is not part of the organisation such as sub-contractor, consultant, distributor, retailer or vendor of a product or a service.*

A. CORE AREAS OF ETHICS AND CONDUCT:

1. LABOUR

The Group recognises that our employees are its assets and is committed to:

- a. Ensure no forced or child labour is used in the production of our products or services. Complying to the local minimum age, labour ordinance laws and regulations.
- b. Ensure that workers are not forced to work more than the number of hours set by the local laws.
- c. Ensure fair compensation for work performed. Meeting or exceeding the local legal requirements.
- d. Maintain a safe and diversified working environment.
- e. Encourage diversity in the workplace, which allows for a wider pool talent, different culture, background and expertise.
- f. Stamp out workplace discrimination, prejudice based on race, gender, age, marital status, nationality, religion and disability.
- g. Say no to any form of harassment whether sexual in nature or not, physical abuse, bullying or threat.
- h. Adhere to the protection of personal information of our employees.
- i. Respect the rights of the employees in accordance with local laws.
- j. Encourage continuous long-term learning among our employees.

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2. ETHICS AND ANTI – CORRUPTION

The Group and its business associates are to uphold the highest standards of integrity and ethics, including:

- a. Prohibition on accepting or offering bribes, personal gifts, hospitality or other means for obtaining undue and improper advantage or means that will influence business dealings and decisions.
- b. Engaging in an outside interest for personal financial gain or to become involved in another organisation without prior written permission obtained from the Board Chairman or Managing Director, which may result in a loss to the Group is not allowed.
- c. Ethical business dealings.
- d. Prohibition on using price sensitive information for personal gain.
- e. Safeguarding confidential and price sensitive or material information, unless the disclosure has been duly authorised by the Board Chairman and Managing Director.
- f. Safeguarding the resources and assets of the Group from improper depreciation or loss and in a cost-efficient manner, including protection of intellectual property rights of others with care and caution.
- g. Ensuring compliance with laws, rules and regulations of the government, commissions and exchange in jurisdictions within which the Group operates. This includes but not limited to Anti-Money Laundering and Anti-Terrorism Financing Act 2001, the Malaysian Anti-Corruption Commission Act 2009 and prohibition of all forms of criminal activities. The Group reserves the right to report any actions or activities suspected of being criminal in nature to the police or other relevant authorities.
- h. Ensuring accurate, timely and reliable records are maintained to meet the Group's legal, financial and statutory obligations.
- i. Engaging in money laundering and terrorism financing. Offences covered by anti-money laundering and anti-terrorism financing include prejudicing or obstructing an investigation or failing to report a suspicious activity.

3. SAFETY AND HEALTH

The Group is committed to continuously improve the safety and health and work environment of our employees and business associates by:

- a. Complying to the respective local Occupational Safety and Health Policy, Act or other related regulations which the respective companies subscribes.
- b. Ensuring that regular safety and health campaigns and trainings are regularly conducted to promote awareness of safety and health issues.
- c. Conducting infrastructure and work environment inspection and improvements as required under the respective local laws and Act.

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4. ENVIRONMENTAL

The Group acknowledges that protecting the environment for our future generation is important. It is continuously working towards a sustainability plan to achieve a balance between environmental conservation and its business objectives. The Group's commitments are:

- a. Complying with the applicable statutory and regulatory requirements in relation to environment. Ensuring all relevant licenses and approvals are obtained.
- b. Continuously improve and develop or explore and invent effective technology in environmental control.
- c. Frequently monitor and review the results of our environment control efforts.
- d. Adopt and implement any practices in pollution elimination.
- e. Educate and encourage stakeholders to practice pollution elimination.

5. CONFLICT OF INTEREST

The Directors, employees, business associates and external providers shall avoid involving themselves in situations where there is real or apparent conflict of interest between them as individuals and the interest of the Group. They 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).

B. CONTRAVENTION OF THE CODE

Any suspected breach of the Code can be reported directly to immediate superiors, top level management or through the Company's whistleblowing channel. Please refer to the Company's Whistleblowing Policy.

C. CONSEQUENCES OF A BREACH

Violation of the Code's provision regardless it is intentional or unintentional, may result in disciplinary action including termination of employment and/or criminal liability for the individual involved.

D. WAIVER OF THE CODE

Waiver of the Code may be granted by the Board or the appropriate Committee of the Board on a case-by-case basis and only in exceptional circumstances.

E. REVIEW OF THE CODE

The Board shall monitor compliance with the Code and review the Code from time to time to ensure that it continues to remain relevant and appropriate.

This Code was last reviewed and adopted by the Board on 25 November 2022 and is made available on the Company's website at <https://my.keckseng.com/>.