

KECK SENG (MALAYSIA) BERHAD GROUP

Subject: Code of Conduct	Policy No: 01-01
Applies to: All Employees and Directors	Page: 1 of 3
Date: 25 March 2020	Approved by: Dato' Ho Cheng Chong @ Ho Kian Hock

Objective:

To define ethical and work standards.

A. LABOUR

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

1. 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.
2. Ensure that workers are not forced to work more than the number of hours set by the local laws.
3. Ensure fair compensation for work performed. Meeting or exceeding the local legal requirements.
4. Maintain a safe and diversified working environment.
5. Encourage diversity in the workplace, which allows for a wider pool talent, different culture, background and expertise.
6. Stamp out workplace discrimination, prejudice based on race, colour, gender, age, sexual orientation, marital status, nationality, religion and disability.
7. Say no to any form of harassment whether sexual in nature or not, physical abuse, bullying or threat.
8. Adhere to the protection of personal information of our employees.
9. Respect the rights of the employees in accordance with local laws.
10. Encourage continuous long-term learning among our employees.

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B. ETHICS AND ANTI – CORRUPTION

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

1. Accepting bribes, personal gifts, hospitality or other means of obtaining undue and improper advantage or means that will influence business dealings and decisions is strictly prohibited.
2. Engaging in an outside interest that may result in a loss to the Group is not allowed.
3. Ethical business dealings.
4. Avoiding situations where there is a conflict of interest or situations where judgement may be influenced in discharging their duties and responsibilities.
5. Prohibition on using price sensitive information for personal gains.
6. Safeguarding confidential and price sensitive or material information, unless the disclosure has been duly authorised by the Chairman and Managing Director.
7. Adhering to Listing Requirements and regulations.
8. Safeguarding the assets of the Group, including protection of intellectual property rights.
9. Ensuring compliance with laws, rules and regulations of the government, commissions and exchange. This includes upholding all laws relating to Anti-Corruption and prohibiting all forms of criminal activities.
10. Ensuring accurate, timely and reliable records are maintained to meet all legal and statutory obligations.

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C. SAFETY AND HEALTH

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

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

D. 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 committed to:

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

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.

Violation of the Code's provision can result in disciplinary action including termination of employment.