



CODE OF CONDUCT

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GLOSSARY

ABC	Anti-Bribery and Corruption
BOD	Board of Directors. This includes all independent and non-independent directors, executive and non-executive directors.
Business Associates	External party (e.g., Counterparties and Business Partners) with whom SK Kaken (M) Sdn Bhd has, or plans to establish, some form of business relationship. This includes clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors, as defined by ISO 37001 - Anti-Bribery Management Systems.
Company	SK Kaken (M) Sdn Bhd
Confidential Information	Information which concerns or relates to the trade secrets, processes, operations, style of work, production, sales, shipment, purchases, transfers, identification of customers/clients, personal information of employees, inventories, or amount, or source of any income, profits, losses, margins, expenditures, or any other information of commercial value.
Conflict of Interest	When a person's personal interests either influence or could potentially influenced or are perceived to have influence on their decision making.
IGU	Integrity & Governance Unit
Operation Director (OD)	The Director managing the day-to-day operation of of SK Kaken (M) Sdn Bhd
Employee	A person employed by SK Kaken (M) SdnBhd. This includes those who are permanent, on probation, employed on contract, on a temporary basis, on secondment, or retain or appointed by SK Kaken (M) Sdn Bhd for a fixed or indefinite term to perform any function for SK Kaken (M) Sdn Bhd (including interns and apprentices).
HOD	Head of Department/Division
Management	Refers to any individual/group/committee which has authority to make decision on certain issues/ areas

TABLE OF CONTENT

CONTENT	PAGE
INTRODUCTION A. PURPOSE OF THE CODE B. POLICY APPLICABILITY C. RESPONSIBILITY AND ACCOUNTABILITY	3
PART I: PERSONAL CONDUCT 1. PROPER CONDUCT WITHIN AND OUTSIDE OF WORKPLACE 2. AVOID CONFLICT OF INTEREST 3. AVOID SUBSTANCE MISUSE 4. PROPER PERSONAL DEALINGS WITH BUSINESS ASSOCIATES 5. PROHIBITION AGAINST BULLYING AND HARASSMENT 6. PROFESSIONAL WORKING RELATIONSHIP 7. BANKRUPTCY 8. PARTICIPATION IN ACTIVITIES OUTSIDE WORKPLACE 9. DRESS PROFESSIONALLY	6
PART II: CORPORATE CARE 1. RESPONSIBLE HANDLING OF COMPANY'S ASSETS 2. CONFIDENTIALITY & SECRECY 3. PROPER DOCUMENTATION 4. MISUSE OF POSITION OR INFORMATION 5. WORKPLACE SAFETY & HARMONY 6. WHISTLEBLOWING	9
APPENDIX I – EMPLOYEE UNDERTAKING AND ACKNOWLEDGEMENT	12

INTRODUCTION

A. PURPOSE OF THE CODE

- i. This Code of Conduct (“Code”) has been developed to guide and support the SK Kaken (M) Sdn Bhd’s business operations and governance policies which include the SKKC Handbook, and Anti-Bribery & Corruption Policy and Handbook, Whistleblowing Policy and Procedures and other relevant internal policies and procedures.
- i. To ensure, in all areas of SK Kaken (M) Sdn Bhd business operations;
 - a) business practices that are ethical and uphold integrity.
 - b) safe and conducive working environment.
 - c) fair treatment of interests of all relevant stakeholders.
 - d) compliance with all applicable laws and regulations.
- ii. This Code is neither exhaustive nor addresses every conceivable situation may occur. Hence, every Employee is advised to familiarise himself/herself with the relevant policies, procedures and manuals of the Company.
- ii. This Code is neither legal advice nor identifies every law, policy or procedure that may apply to the Employees in performing their roles. Should there be a conflict between the Code and the policies and procedures of the Company with the law, the stricter provision shall apply.

B. APPLICABILITY OF THE CODE

- i. The Code is applicable to all members of the Board and employees. Business associates of SK Kaken (M) Sdn Bhd are expected to observe the relevant parts of this Code.
- ii. Employees are expected to exercise sound judgment in making any decision and shall not conduct themselves in any manner which could adversely affect the Company.
- iii. The Code should be read together with the Anti-Bribery & Corruption Policy and Handbook, Whistleblowing Policy and Procedures, SKKC Handbook, Compliance Manual and other relevant internal policies that forms a holistic framework on integrity and ethics for SK Kaken (M) Sdn Bhd. Provisions in this Policy shall be reviewed and amended whenever necessary to ensure its effective implementation.

C. RESPONSIBILITY AND ACCOUNTABILITY

- i. All parties are responsible to ensure their actions abide by the Code, rules and regulations set by the Company.
- ii. It is the responsibility of the Board and Management to set the right “Ethical Climate” and for all managers to adopt and practice said ethical climate and lead based on its principles.
- iii. In case of known or suspected illegal/ unethical actions in violation of the Code, all parties must report it to the Management or to the Integrity and Governance Unit as required by the Company’s Whistleblowing Policy and Procedures. Full cooperation is expected in the event of an investigation, inquiry, audit or litigation relating to the Company.
- iv. All employees are governed by the Code as part of the terms and conditions of employment and any violation of the Code will lead to disciplinary actions deemed necessary, and may result in suspensions or termination of employment or contract.
- v. All parties must strive to demonstrate behaviour and conduct which reflect high ethical standards and professionalism at all times, during or outside working hours. Employees are not to conduct themselves in a manner that causes disrepute, embarrassment, discredit to SK Kaken (M) Sdn Bhd.

PART I: PERSONAL CONDUCT

1. ETHICAL CONDUCT

- 1.1. SK Kaken (M) Sdn Bhd expects all parties to maintain the highest standards in everything they do which entails:
 - a) All parties are responsible to make ethical decisions and comply with all applicable rules, regulations and laws (e.g., fraud, corruption, bribery, money laundering, insider trading, workplace safety, etc.)
 - b) Protecting confidentiality and trust. Any breach of confidentiality either through abuse, misuse or negligence when dealing with confidential information is highly unacceptable and punishable.
 - c) All parties are required to report any known or suspected violations of the Code, ABC Policy and Handbook, Whistleblowing Policy and Procedures, Compliance Manual, as well as other internal policies and procedures, laws or regulations to the Management or Audit Committee.

2. CONFLICT OF INTEREST

- 2.1. Conflicts of interest situations arise when the interest of the Employee and/or their family members or related stakeholders' conflict with the interest of the Company and should be avoided.
- 2.2. If unavoidable situations of conflict of interest should arise, declaration of such conflict needs to be made and resolved in accordance with the Company's policies and procedures governing such an issue. Failure to avoid or declare and resolve issues of conflicts of interest may subject the affected Employee to disciplinary action.
- 2.3. Employees/ Board Members are prohibited from engaging in any business activity that conflicts with or is prejudicial to the interests of SK Kaken (M) Sdn Bhd.

3. SUBSTANCE MISUSE

- 3.1. Substance misuse is not permitted. This includes any illegal drugs, medication or alcohol abuse that is against the law, and may compromise work performance or safety.
- 3.2. Contractors and sub-contractors are required to demonstrate that they have implemented substance misuse prevention and control policies and programs.

- 3.3. Employees with unauthorised possession of any substance of misuse or who test positive for any substance of misuse shall be subject to appropriate disciplinary action.

4. PROPER PERSONAL DEALINGS WITH BUSINESS ASSOCIATES

- 4.1. Employees shall ensure that their personal business dealings with the Company's business associates are on an arm's-length basis and comply with specific guidelines and rules on such dealings.
- 4.2. Employees are expected to abide with the Company's **Zero Tolerance Policy** on all forms of Bribery and Corruption as well as the **No Gifts Policy** (save for certain exceptions) as guided in the ABC Policy and Handbook.

5. PROHIBITION AGAINST BULLYING AND HARASSMENT

- 5.1. The Company takes a strong stance against any form of bullying as well as personal and sexual harassment, regardless of whether it is inside or outside the Company. Violators of this Code will face severe disciplinary action.
- 5.2. Any party who files a genuine complaint will be treated fairly and discretely and SK Kaken (M) Sdn Bhd does not condone/ tolerate any form of retaliation against those who file the complaint.

6. PROFESSIONAL WORKING RELATIONSHIP

- 6.1. The Company encourages the development of professional and social networking as they are part of organisational culture development and promotes teamwork and effectiveness. Such relations however, should not lead to situations of conflict of interest, biasness, favouritism and exploitation in staff relationships and work management.
- 6.2. Employees are discouraged under any circumstance, from borrowing money from their superiors, subordinates, clients, business associates, contractors and vendors.
- 6.3. An Employee should not place himself/herself under any serious financial obligation to any person who is directly or indirectly subject to his/her official authority or with whom he/she is likely to have official dealings.

7. BANKRUPTCY

- 7.1. An employee who is declared a bankrupt by a court of competent jurisdiction shall immediately notify Human Resources Department who shall then consult with the Operation Director ("OD") to decide on the next course of action.

8. PARTICIPATION IN ACTIVITIES OUTSIDE WORKPLACE

- 8.1. Unless prior consent in writing has been granted by the OD, employees are not allowed to engage in the following activities while under the employment of SK Kaken (M) Sdn Bhd, regardless of whether such activities take place during or outside office hours, as such activities may directly or indirectly prejudice the interests of the Company or adversely affect the job performance of the employee concerned:
- a) Be directly or indirectly involved in any other external employment, whether at executive or non-executive level, whether full-time or part-time, with any organisation or entity or on an individual basis or in partnership.
 - b) Carry out any part time or full-time business activities (e.g., direct selling, sale of food, etc.) during office hours.
 - c) Accept reward for any work done for any institution, company, firm or an individual.
 - d) Be involved in or own any business entity.
 - e) Accept a directorship in any corporation.
 - f) Make use of any of SK Kaken (M) Sdn Bhd's properties or facilities such as equipment or entertainment allowance, in order to conduct business, activities or for personal use not related to the employee's official duties.
- 8.2. To obtain such approval, the employee needs to formally request OD's consent in writing and provide the nature of activity in question, possible conflict with SK Kaken (M) Sdn Bhd, and any other information considered as material to OD's decision-making.
- 8.3. Additionally, employees are generally not allowed to be involved in the following political activities:
- a) Take an active part in any activities of any political party.
 - b) Engage in canvassing support for any candidate to an office in any political party.
 - c) Stand for / accept an office in any political party.
 - d) Act as an election agent, a polling agent or in any capacity, for or on behalf of a candidate at an election to the Dewan Rakyat or any State Legislative Assembly.
 - e) Contest any election in State Legislative Assembly or any local authority and/or Dewan Rakyat or accept an appointment/nomination to the Dewan Negara.
- 8.4. Notwithstanding, the Company encourages employees to participate in the political election process by voting.

9. DRESS PROFESSIONALLY

- 9.1. Employees should dress appropriately in relation to their work requirements during working hours for the purposes of maintaining a professional image, safety or health

reasons. As such, specific rules for attire may be established by specific workplaces for their respective requirements.

PART II: CORPORATE CARE

1. RESPONSIBLE HANDLING OF COMPANY ASSETS

- 1.1. All Employees are expected to safeguard, manage and use appropriately the Company's assets, facilities, systems, records and other resources according to the relevant manuals outlining policies and procedures for such requirements.
- 1.2. All Employees are responsible in protecting the Company's assets from loss, damage, misuse or theft. This includes company's reputation, its people, proprietary information, funds, properties, fixtures and fittings, equipment etc.
- 1.3. All financial books, records and accounts must accurately reflect transactions and events. They must meet required accounting standards and satisfy the company's system of internal controls. They must be properly documented, using appropriate language, bearing in mind that they might end up in the public domain. Records must be retained and destroyed in accordance with local statutory and regulatory requirements.
- 1.4. All parties must never sign any document or otherwise represent SK Kaken (M) Sdn Bhd, or authorise any action on its behalf, unless specifically authorised to do so. Any delegation of authority, where permitted, should be limited in scope and closely managed to prevent abuse.
- 1.5. All communications regarding SK Kaken (M) Sdn Bhd and its business must be accurate and reflective of the Company's views and only can be communicated through the authorised spokesperson. All parties may not comment on or provide information related to SK Kaken (M) Sdn Bhd's business or any subject matter related to their job responsibilities or expertise in public forums unless they are specifically authorised to do so.

2. CONFIDENTIALITY AND SECRECY

- 2.1. Personal privacy, including the protection of personal data shall be respected. All applicable laws (e.g., Computers Crime Act 1997, Personal Data Protection Act 2010, etc) and Company policies and procedures on data privacy and protection must be complied with.
- 2.2. All parties must exercise due care in handling information/data (including safekeeping/destruction thereof) obtained in the course of their duties, especially those that are considered confidential.

- 2.3. Confidential information may be in written, oral or electronic (both voice and data) from and may originate from various sources (e.g., client lists, personnel information, application and software, business plans and strategies, internal financial reports etc.). It is best to assume all information relating to SK Kaken (M) Sdn Bhd is confidential, unless clearly stated otherwise.
- 2.4. An Employee shall obtain prior approval or authorisation from his/her Head of Department (or, in the case of Directors, from the relevant full Board of Directors) before disclosing to an external party any confidential information that may benefit the third party and/or impact the Company's performance.

3. PRACTICE PROPER DOCUMENTATION

- 3.1. The integrity and accuracy of the Company's financial records and reporting are paramount to the proper operation and control of its businesses. Therefore, all Employees shall safeguard the preparation, maintenance and disposal of the Company's legal, contractual, financial and operational records.

4. MISUSE OF POSITION OR INFORMATION

- 4.1. The use of position to obtain preferential treatment, such as in purchasing goods or any other benefits, is strictly prohibited. All parties must refrain from using SK Kaken (M) Sdn Bhd for personal advantage in any form.
- 4.2. All parties are also strictly prohibited from using/abusing any information obtained in their official capacity other than the intended purpose.

5. WORKPLACE SAFETY & HARMONY

- 5.1. All Employees are responsible in providing a safe, conducive and healthy workplace and minimising the negative impact of the Company's operations on the environment.
- 5.2. Treat everyone with respect and fairness. Discrimination/ bias against any nationality, race, colour, ethnicity, religion, gender or age will not be tolerated.
- 5.3. Ensure a safe workplace by abiding with quality, health, safety and environment rules and practices. Employees must report any accidents/injuries, unsafe practices/conditions, discrimination/harassment to Management. Any threats of violence, retaliation and intimidation will not be condoned.
- 5.4. All parties are responsible to maintain are a drug/alcohol free environment in SK Kaken (M) Sdn Bhd's premises.

6. WHISTLEBLOWING

- 6.1. If any party is a witness to or has evidence that an unlawful/unethical act has been or is about to be committed by another Employee, he/she shall disclose or report such to the Integrity and Governance Unit, as per the Whistleblowing Policy and Procedures.
- 6.2. An Employee shall be protected from any form of retaliation for reporting or disclosing an alleged Improper Conduct by another Employee in good faith and without malicious intent.

APPENDIX I – EMPLOYEE UNDERTAKING AND ACKNOWLEDGEMENT

1. I am an employee of SK Kaken (M) Sdn Bhd.
2. I hereby declare that I have read and understood SK Kaken (M) Sdn Bhd’s Code of Conduct, Anti-Bribery & Corruption Policy and Handbook, Whistleblowing Policy and Procedures, SKKC Handbook, Compliance Manual and will adhere to the aforementioned.
3. I further acknowledge that this undertaking will form part of the terms and conditions of my employment and/or contract of service.

SIGNATURE :

NAME :

POSITION/DESIGNATION :

DIVISION/DEPARTMENT :

DATE :