

Code Of Conduct for Directors

1. **Fiduciary Duty**

Description: The fiduciary duties of a director is to act bona fide in the interest of a company (i.e: to act with good faith for the benefit of the company) and stakeholders.

: A director is under a duty to ensure that any act he undertakes is with a view to enhancing the interest of the company either by enhancing profits, reducing costs or even positive publicity of the company, and etc.

| DO | DON'T |
|--|---|
| <ul style="list-style-type: none">• Any information concerning the Company's business, its customers, suppliers, etc. to which the Directors have access or which is possessed by the Directors, must be considered privileged and confidential, and should be kept strictly confidential at all times.• Directors have a duty to act honestly and declare any private interests relating to public duties and take steps to resolve any conflicts arising in a way that protects the interests of the Company. | <ul style="list-style-type: none">• Compete with the Company by providing services to a competitor; whether as an employee, officer or director.• Improperly influence or attempt to influence any business transaction between the Company and another entity, in which a director has a direct or indirect financial interest or acts as an employee, officer or director; or• Take unfair advantage from any customer, supplier, competitor or other person through manipulation, concealment, misrepresentation of material facts and/or other unfair practice. |

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2. Conflict Of Interest

Description: Every director has a duty to avoid business, financial or other direct or indirect interests or relationships which conflict with the interests of the Company, or which divides his/her loyalty to the Company

| DO | DON'T |
|---|-------|
| <ul style="list-style-type: none">• Company respects the right of any Director to participate in outside financial business, provided that those activities are legal and do not conflict with the Director's duties• Director will disclose to the board, any conflict or any appearance of a conflict of interest on his/her part.• Any activity which even appears to present such a conflict must be avoided or terminated unless, after such disclosure to the Board, it is determined that the activity is not harmful to the Company or otherwise improper• Actual conflicts must be avoided and potential conflicts must be declared, recorded and resolved.• Where any transactions that involve the interest directly or indirectly, he/she shall abstain from voting/deciding on the matter. | |

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3. Dealing in Securities

Description: Dealing in securities means an act of buying, selling or otherwise dealing in any security or agreeing to buy, sell or otherwise deal in any security by any person either as principal or as agent.

: It is illegal to be involved in 'market abuse'. Market abuse involves spreading false information or engaging in activities designed to manipulate the price of publicly listed securities.

| DO | DON'T |
|--|--|
| <ul style="list-style-type: none">• A Director must neither disclose to a third party, any information, nor make any forward looking statements, which are price sensitive in nature, except where the disclosure is:<ul style="list-style-type: none">(a) authorised by the Board; or(b) the same is part of the public domain at the time of disclosure; or(c) required by law or any regulatory body, including Bursa Malaysia Securities Berhad or Securities Commission.• Disclosure on dealing in the securities of the Company must be made to company secretary for announcement to Bursa Securities. | <ul style="list-style-type: none">• Profit, or assist others to profit, from confidential information or business opportunities that he/she gains by virtue of his/her directorship of the Company.• Trading in the securities of the Company during closed period unless proper announcement on his/her intention to deal the securities is first announced to Bursa before trading.• Insider trading activities are strictly prohibited. |

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4. Privacy & Confidentiality of Information

Description: Any information concerning the Company's business, its customers, suppliers, etc. to which the Directors have access or which is possessed by the Directors, must be considered privileged and confidential, and should be kept strictly confidential at all times.

| DO | DON'T |
|---|---|
| <ul style="list-style-type: none">• Disclosure is:<ul style="list-style-type: none">(a) authorised by the Board; or(b) the same is part of the public domain at the time of disclosure; or(c) Required by law or any regulatory body, including Bursa Malaysia Securities Berhad or Securities Commission.• Important information about the Company that has not been disclosed to the public, must keep such information confidential• Maintain the confidentiality of any non-public information obtained in the course of the performance of their duties on behalf of the Company, except when disclosure is authorized or legally mandated.• Maintain the privacy of confidential information• Assets and confidential information should be fully protected | <ul style="list-style-type: none">• Neither disclose to a third party, any information, nor make any forward looking statements• Not permitted to use or share that information for the purposes of trading in the securities of the Company, the securities of the other entity, or for any purpose other than the conduct of the Company's business.• Do not share, copy, reproduce, transmit, divulge or otherwise disclose any confidential information• Refrain from any public discussion in the media |

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5. Valuable Gifts & Hospitality

Description: Valuable gifts or hospitality never influence business decision-making processes or cause others to perceive an influence.

: Directors shall not solicit or receive a valuable gift or favour from any person, company, or organization, or from any intermediary interest

| DO | DON'T |
|---|---|
| <ul style="list-style-type: none">• To protect reputation, but also to protect themselves against unfounded allegations of improper behaviour.• Business relationships are permissible in the usual forms of entertainment such as lunches or dinners. | <ul style="list-style-type: none">• Receive or offer, directly or indirectly, any valuable gifts, remuneration, hospitality, donations, illegal payments and comparable benefits (which shall include but not be limited to cash, preferred loans, securities or secret commissions.• Accepting or paying bribes.• Accepting valuable gifts or hospitality from a business partner. |