



**PMB TECHNOLOGY BERHAD**  
**Registration No. 200201016594 (584257-X)**

**Code of Conduct**

**1. Introduction**

PMB Technology Berhad (the “**Company**”) has adopted the following Code of Conduct (the “**Code**”) for Directors, management and employees of the Company and its subsidiaries (the “**Group**”). This Code is established to promote the corporate culture which engenders ethical conduct that permeates throughout the Company. All Directors, management and employees of the Group shall be referred to as “**Officers**” hereon.

**2. Principle**

The principle of this Code is based on principles in relation to trust, integrity, responsibility, excellence, loyalty, commitment, dedication, discipline, diligence and professionalism.

**3. Purpose**

This Code is formulated with the intention of achieving the following aims:

- 3.1. To emphasise the Company’s commitment to ethics and compliance with the applicable laws and regulations;
- 3.2. To set forth basic standards of ethical and legal behaviour within the Company;
- 3.3. To include noble characteristics in performing duties so as to improve work quality and productivity;
- 3.4. To improve self-discipline in order to provide the Company with good and quality service; and
- 3.5. To enhance skills in the implementation of duties and to be able to adapt to the work environment.

**4. Code of Conduct**

Every Officer is responsible to ensure compliance with the Code:

- Know and comply with the Code and the Company Policies and Procedures.
- Seek guidance when in doubt.
- Avoid illegal, unethical or otherwise improper acts.
- Report any suspected violation of policies, laws and regulations.
- Assist authorised teammates with investigations.
- Take responsibility and accountability for own actions.
- Notify your department head (“**HOD**”) or the Board immediately if you suspect any irregularities.

The Company will take disciplinary action against any personnel who fails to act in accordance with applicable statutory laws, Company Policies and Procedures and this Code.

In the performance of his or her duties, each Officer must comply with the letter and spirit of the following codes:-

#### **4.1. Human Rights**

The Company supports and respects human rights. The Company treats officers with dignity and respect in the workplace, provides equal employment opportunities, creates a safe and harmonious work environment, and will not engage in any form of discrimination. Officers should respect the personal dignity, privacy and rights of each individual they interact with during the course of work and shall not in any way cause or contribute to the violation or circumvention of human rights.

#### **4.2. Health and Safety**

The Company provides a work environment that is safe, secure and free of danger, harassment, intimidation, threats and violence. The Company takes appropriate precautions to prevent injuries or adverse working conditions for each and every Officer. It is the responsibility of each and every Officer to adhere to the prescribed safety rules and acts as well as to raise any concerns which may represent a potential threat to health and safety. Officers are responsible for reporting injuries and unsafe work practices or conditions as soon as they being discovered or become known.

#### **4.3. Environment**

The Company conducts operations in a manner that safeguards health, protects the environment and conserves valuable materials. The Company is committed to protecting the environment by minimising and mitigating environmental impacts throughout the life cycle of operations. Officers should contribute to minimizing the use of finite resources, including energy, water and raw materials. Officers should minimise harmful emissions to environment, including waste, air emissions and discharges to water.

#### **4.4. Gifts, Entertainment, Hospitality, Travel, Donation and Sponsorship**

Each and every Officer must not accept entertainment, gifts, or personal favors that could, in any way, influence, or appear to influence, business decisions in favor of any person or organisation

with whom or with which the Company has, or is likely to have, business dealings.

The Officers must not accept any other preferential treatment under these circumstances because their positions with the Company might be inclined to, or be perceived to, place them under obligation to return the preferential treatment.

Similarly, the Officers must not corruptly give, agree to give, promise or offer to any person any gratification (as defined under Malaysia Anti-Corruption Commission Act 2009 and any statutory modification, amendment or re-enactment thereof for the time being in force) whether for the benefit of that person or another person with intent to obtain or retain business for the Group or to obtain or retain an advantage in the conduct of business for the Group.

#### **4.5. Anti-Bribery and Anti-Corruption**

Officers shall never offer, give, receive or solicit any form of bribe. A bribe occurs when someone attempts to influence a decisions or actions by offering some form of undue or improper advantage, incentive or favour. Officer should not participate in any corrupt or unethical activity such as but not limited to extortion, abuse of power, trading under influence fraud and/or money laundering.

#### **4.6. Company Records and Internal Controls**

The Company's records must be prepared accurately, timely and honestly, both by accountants who prepare financial statements and by officers who contribute to the creation of business records, for example, by submitting expense records, time sheets, order and invoice records. The Company takes obligation to maintain business records for operational, legal, financial, historical and other purposes seriously and takes appropriate steps to ensure that the content, context and structure of the records are reliable and authentic.

Reliable internal controls are critical for proper, complete and accurate accounting and financial reporting. Officers must understand the internal controls relevant to their positions and comply with the policies and procedures related to those controls to ensuring that effective and reliable business processes are in place.

#### **4.7. Company Assets**

The Company's properties and assets should be managed and safeguarded in a manner which protects their values. Officers are accountable both for safeguarding all assets entrusted to them, including information resources, records, materials, facilities and

equipment under their care or control, from loss, theft, waste, misappropriation or infringement and for using the assets to advance the interests of the Company. All officers have an affirmative duty to immediately report the theft, loss or misappropriation of any Company assets, including financial assets, physical assets, information assets and electronic assets to the management as stipulated under Violations of Code of Conduct below.

#### **4.8. Exclusive Service**

The Company expects each and every officer to give their fullest attention, dedication and efforts to their duties and the Company. Officers must avoid any personal, financial or other interest which may be in conflict with their duties and responsibilities to the Company. In this respect, an officer is not permitted to be gainfully employed by any other organisation, company or business concern other than the Company without prior written consent of the Chief Executive Officer. Such permission will not be unreasonably withheld unless it has an impact on the executive ability to perform his/her normal duties or his/her performance at work or for an organisation which is in direct competition with the Company.

#### **4.9. Integrity and Professionalism**

Officers should remember that they are a reflection on the Company and are constantly being judged and otherwise appraised by everyone they come in contact with. All officers should conduct themselves with the highest degree of integrity and professionalism in the workplace or any other location while on Company's business.

#### **4.10. Personal Appearance**

An Officer who is provided with uniforms by the Company shall wear them in full at all times while he is at work.

An Officer is expected to be suitably and neatly dressed so as to maintain an appropriate appearance that is business like, neat and clean, as determined by the requirements of the work area. Dress and appearance should not be offensive to customers or other officers.

Dress, grooming and personal cleanliness standards are important and contribute to the morale of all officers and affect the business image to the Company's customers and visitors.

#### **4.11. Confidential Information**

All information obtained in the course of engagement and/or employment with the Company shall be deemed to be strictly confidential and shall not be disclosed to any third party. This measure applies to all officers both during and after the service with the Company.

Except with the permission of the Company, an Officer shall not make any unauthorised public statement, circulate, divulge or communicate with any customer, member of the public, media or government or statutory bodies on the policies or decision of the Company on any issue, or any other information or details in respect of the Company's business. This applies to disclosures by any medium, including the internet, especially via social media sites (e.g. Facebook, Twitter, YouTube), internet message boards and/ or blogs. An Officer must take precautionary steps to prevent the unauthorised disclosure of proprietary or confidential information, including protecting and securing documents containing this information.

Personal records and remuneration including the Officer's own remuneration are classified as Private and Confidential information and shall not be divulged. Officers who possess and/or has control over or authorises the processing of personal data must ensure that all personal data handled are protected thereby safeguarding the interests of each individual involved. The Company and Officers involved in processing personal data must comply with any relevant rules, regulations and legislations and controls that are put in place to protect the privacy of the personal information.

#### **4.12. Compliance Obligations**

The Group will comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions which the Group operates. Officers are expected to understand and comply with the laws, rules and regulations that are applicable to their positions and/or work activities, including the Anti-Money Laundering and Anti-Terrorism Financing Act 2001 and the Malaysian Anti-Corruption Commission Act 2009. The Group reserves the right to report any actions or activities suspected of being criminal in nature to the police or other relevant authorities.

#### **4.13. Conflict of Interest**

The Company expects that the Officers will perform their duties conscientiously, honestly, and in accordance with the best interests of the Group.

Officers must take care to separate their personal roles from their Company positions when communicating on matters not involving the Company's business.

When Officers are faced with a conflict-of-interest situation, they are required to disclose their interest to their immediate superior and submit the necessary form.

#### **4.14. Fair Dealing**

All officers, customers, suppliers and any others who are related and have dealings with the Company shall be treated fairly and equally. Any ground of discrimination is strictly not allowed. The Company will compete effectively and fairly in the market which it operates. Moreover, the Company is obliged to ensure its operating activities and its relationship with any business partner is fair, transparent and honest. This includes any form of transaction or termination of relationship. All commercial transactions shall be recorded and documented. Corrupted practices are not allowed either directly or indirectly.

#### **4.15. Anti-Money Laundering**

Money laundering is the process of concealing, converting and transferring proceeds from unlawful activities to a legitimate source of income or asset. Money laundering is an offence under the Anti-Money Laundering and Anti-Terrorism Financing Act 2001 in Malaysia.

Officers shall be aware of the applicable anti-money laundering laws and shall seek to ensure they are appropriately and adequately informed of developments in the laws relating to this area in order to actively pursue the prevention of money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities. Officers are expected to be mindful of the risk of the Company's business being used for money laundering activities and to raise any suspicious transactions to their immediate superior and the Board to undertake further investigation.

No disclosure should be made to others that would indicate suspicions of money laundering. Any officer reporting should not discuss the matter with any other person.

#### **4.16. Insider Dealing**

No Officers who are in the possession of non-public price sensitive information of the Company or other listed company gained in the course of employment with the Company may deal or advise any other

person to deal in any securities of the Company or any securities of another listed company.

No Officers shall disclose non-public price sensitive information to any person (including family members) where such information may be used by such person to his or her profit by trading or in recommending or advising others to trade in any securities of company.

Officers must ensure that all transactions in the Company securities comply with the procedures set out in the Bursa Malaysia Listing Requirements and the law on trading.

In the context of Malaysian law, insider trading is an offence defined under the Capital Market and Services Act 2007. The laws of other country on insider trading may be applicable in the context of inside information concerning company listed outside of Malaysia.

## **5. Communication and Compliance**

The Company should ensure this Code is being communicated to all levels of officers through staff handbook, notice board, intranet, or corporate website. The Company should include the briefing of this Code to new officers in the induction programme.

The Board should ensure this Code permeates throughout the Company and is complied by all levels of officers within the Group.

## **6. Violations of Code of Conduct**

The Company's Officer should report to supervisors, managers, HODs or Head of Human Resource about the known or suspected illegal or unethical behaviour. The Company's Executive Directors and senior management shall promptly report any known or suspected violations of this Code to the Board.

The Company has also established a Whistle-Blowing Policy that provides an anonymous, secure and confidential communication channel for employees to raise genuine concerns or report any misconduct or wrongdoings. The provision, protection and procedure of the Whistle-Blowing Policy for reporting of the violation of the Code are available on the Company's portal.

## **7. Non-retaliation**

The Company makes every effort to maintain the confidentiality of any individual who reports concerns and possible misconduct. Officers who retaliate or encourage others to do so will be subjected to disciplinary

actions, up to and including termination of employment or engagement. The Company does not tolerate any form of retaliation against anyone who makes a report in good faith.

#### **8. Investigations**

The Company shall investigate reported concerns promptly and confidentially with the highest level of professionalism and transparency. All internal investigations and audits are conducted impartially and without predetermined conclusions. Each and every Officer shall be expected to cooperate fully with audits, investigations and any corrective action plans, which may include areas for continued monitoring and assessment.

Where external investigations are required, every officer shall appropriately respond to, cooperate and shall not interfere with, any lawful government inquiry, audit or investigation.

#### **9. Periodic Review**

This Code should be reviewed periodically by the Board in accordance with the needs of the Company and be communicated to all levels of officers on the new changes. This Code is available on the Company's website.

This Code is reviewed and approved by the Board on 27 May 2022.