

CAB CAKARAN CORPORATION BERHAD

(Company No. 583661-W)
(Incorporated in Malaysia)

CODE OF ETHICS AND CONDUCT

This Code of Ethics and Conduct (“the Code”) covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide all the directors and employees of CAB Cakaran Corporation Berhad (“the Company”) and its subsidiary and associate companies (“the CAB Group”) [“the Affected Personnel”]

The standards set out in the Code extend beyond normal working hours and apply to the Affected Personnel fulfilling their roles while on the business of the Group including after home functions, conferences and social activities.

The Affected Personnel are required to display the highest levels of professionalism in all aspects of their work and comply with the Code and all applicable laws, regulations and other policies of the Group. Failure to comply may result in the commencement of disciplinary proceedings that may lead to termination of employment.

The basic principles discussed in the Code are subject to any other policies of the Group covering the same issues.

1. Compliance With Laws, Rules And Regulations

- 1.1 The CAB Group operates in a highly regulated business environment and its activities are subject to numerous laws, regulations and licensing conditions. The Affected Personnel must ensure that they familiarize themselves with the laws, regulations and conditions applicable to their activities.
- 1.2 If in any doubt, the Affected Personnel are to seek advice from superiors or the Manager of the Group Human Resource Department.

2. Fair Dealing and Equality in Employment

- 2.1 The CAB Group will compete effectively and fairly in the markets in which it operates. The Affected Personnel should endeavour to respect the rights of and deal fairly with the Group’s customers, suppliers, competitors and other business partners. The Affected Personnel should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other illegal trade practice.



- 2.2 The Affected Personnel shall not offer to solicit or accept any gift or personal benefit in connection with their work. However, the CAB Group acknowledges that modest gifts and reasonable entertainment which are of socially acceptable nature and value, are acceptable as part of the normal course of business.
- 2.3 The CAB Group is committed to developing and maintaining a diverse workforce and to provide a work environment in which every employee is treated fairly and with respect, has the opportunity to contribute to business success and to realize their potential.

3. Conflict of Interest

- 3.1 The Affected Personnel are to act in the best interests of the CAB Group and must not engage in activities that directly or indirectly, or could appear to involve, a conflict between their private interests and the CAB Group's interests.

Areas where conflicts might arise include:-

- Substantial share ownership in competing organizations.
- Direct or indirect personal interest in contracts.
- Receiving improper personal benefits as a result of his or her position in the Group.
- Loans to or guarantees of obligations to the Affected Personnel and / or their family members by the Group.
- Work for a competitor, customer or supplier

- 3.2 The Affected Personnel shall fully disclose any actual or potential conflicts of interest to the Board of Directors ("the Board") and /or the Management.

4.0 Insider Trading

- 4.1 All non-public information about the CAB Group should be considered confidential information. The Affected personnel who have access to confidential information about the Group or any other entity are not permitted to use or share that information for trading purposes in the Company, the other entity's securities, or for any other purpose except for the conduct of the Group's business.

5.0 Safe and Healthy

- 5.1 The CAB Group strives to provide a safe and healthy working environment for the Affected Personnel, customers, suppliers and contractors to ensure that the CAB



- Group will reduce the environment impacts of its business activities and will seek to do this through continual improvement of environmental performance, protection and safety.
- 5.2 The Affected Personnel are responsible to maintain a safe and healthy workplace by following safety rules and practices and by reporting accidents, injuries and unsafe equipment, practices or conditions.
- 5.3 The Affected Personnel are expected to perform the CAB Group related work in a safe manner, free of the influences of alcohol, illegal drugs or controlled substances.

6.0 Confidentially and Protecting of Company Assets

- 6.1 The Affected Personnel must keep confidential all information that would reasonably be considered to be confidential, including but not limited to terms and conditions of contracts entered into by the CAB Group, the Affected Personnel and customer details, performance and financial details, and policies and procedures of the CAB Group.
- 6.2 The CAB Group will maintain the privacy of confidential information of the Affected Personnel and customers.
- 6.3 The Affected Personnel should be responsible to protect and safeguard the CAB Group's assets and to ensure that they are for the CAB Group's purposes only. Any suspected incident of fraud or theft should be immediately reported for investigation.
- 6.4 The Affected Personnel must maintain the confidentiality of the CAB Group's proprietary information which includes intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information, and any unpublished financial data and reports entrusted to them by the CAB Group or its customers or suppliers except when disclosure is required by laws or regulations.
- 6.5 Unauthorized use or distribution of this information will not be tolerated. Appropriate disciplinary and / or legal action will be taken.

7.0 Prompt Communications



- 7.1 The Affected Personnel must make every effort to achieve complete, accurate, and timely communications by responding promptly and courteously to all proper requests for information and to all complaints.

8.0 Proper Records and Communications

- 8.1 Accurate and reliable records are necessary to meet the CAB Group's legal and financial obligations and to manage the affairs of the Group. The CAB Group's books and records must reflect in an accurate and timely manner for all business transactions.

9.0 Reporting of Non-Compliance

- 9.1 The Affected Personnel are encourage to report to superiors or other appropriate personnel about possibility of non-compliance of the Code.
- 9.2 The CAB Group will keep confidential the identity of the Affected Personnel reporting a possible non-compliance with the Code.

10.0 Administration

- 10.1 The Code may be updated from time to time subject to the Approval by the Board.

The Code of Ethics and Conduct was reviewed and approved by the Board on 22 December 2017.

