

# EVERTS POLICY

**EVERTS (MALAYSIA) SDN. BHD.  
(198701004121)**

**P1 - 103 - 107, Jalan Usaha 6,  
Kawasan MIEL, Phase II,  
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**P2 - Lot 1620, Mukim Sungai Petai,  
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# QUALITY POLICY

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# QUALITY POLICY

At Everts (Malaysia) Sdn. Bhd., an organization specializing in the manufacturing of balloons, we are committed to delivering products that consistently meet and exceed customer requirements and expectations while adhering to the highest quality standards.

It is our aim to:

- Prioritize understanding and meeting our customers' needs and expectations by actively listening to their feedback and requirements.
- Foster culture of continual improvement at all levels of organization to support customers' ever-changing requirements.
- Proactively identify, assess, and mitigate risks that may impact the quality of our product or customer satisfaction through risk-based decision-making, minimizing uncertainty and optimizing opportunities for improvement.
- Set attainable objectives aimed at delivering high-quality products to ensure customer satisfaction
- Comply with all relevant statutory, regulatory, and interested parties' requirements and expectations, as well as internal policies and procedures.

This policy, and the Quality Management System as per ISO 9001:2015 requirements, are communicated and implemented throughout all levels of the organization thus ensuring that all organizational goals are understood and achieved.

Revision date: 27/3/2024

# ENVIRONMENTAL POLICY

**EVERTS (MALAYSIA) SDN. BHD.  
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# ENVIRONMENTAL POLICY

EVERTS (MALAYSIA) SDN. BHD., a company mainly involved in the manufacture of balloons recognizes the critical link between the environment and sustainable economic growth. We are committed to protecting and enhancing the environment and will take the initiative to strive for an effective Environmental Management System. To achieve this, we are committed to:

- a) Protect the environment, prevent pollution, reduce waste and the consumption of natural resources;
- b) Fulfil the organization's compliance obligations that we subscribe to;
- c) Continually improve the Environmental Management System;
- d) Develop, implement and maintain environmental management programs to achieve our environmental objectives;
- e) Ensuring that this policy is communicated to all employees internally and external interested parties.

Revision date: 1/6/2023

# **SAFETY & HEALTH POLICY**

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# SAFETY & HEALTH POLICY

It is the policy of Everts management to provide a safe and healthy work environment for all employees and other people who may be affected by its activities.

The management and staff shall work together to achieve the goals and objectives of this policy through consultation and cooperation.

Our specific policies in this regard are as follows:

- a) To provide and maintain a safe and healthy workplace and work system;
- b) To ensure all employees are given information, instruction, training and supervision on how to carry out work safely and without risk to health;
- c) To investigate all accidents, disease, poisoning, dangerous events and take steps to ensure incidents are not repeated;
- d) To comply with legal requirements and other regulations on the safety and health requirements as governed by Occupational Safety and Health Act 1994 and approved industry codes of practice;
- e) To provide welfare facilities for all employees; and
- a) To review this policy when necessary

We are confident that enhanced safety and health can continue to be integrated into our daily activities and moreover is one of the key factors towards ensuring the success of our organisation.

**Revision date: 14/6/2023**

# **FSC POLICY**

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# FOREST STEWARDSHIP COUNCIL (FSC) POLICY

Everts (Malaysia) Sdn. Bhd. (hereinafter: Everts) is a member of the Forest Stewardship Council <sup>TM</sup> / Association of Organizations (hereinafter: FSC)

In line with this membership and FSC's Policy for the Association of Organizations published under [www.fsc.org](http://www.fsc.org) Everts hereby sets out its position, consistent with that of the FSC, with regards to unacceptable activities by organizations and individuals which already are or would like to be associated with FSC as well as the mechanism for disassociation.

Considering the above, Everts explicitly aims, as long as the relationship with FSC exists, not to be directly or indirectly involved in the following unacceptable activities:

- a) Illegal logging or the trade in illegal wood or forest products;
- b) Violation of traditional and human rights in forestry operations;
- c) Destruction of high conservation values in forestry operations;
- d) Significant conversion of forests to plantations or non-forest use;
- e) Introduction of genetically modified organisms in forestry operations;
- f) Violation of any of the ILO Core Conventions as defined in the ILO

Declaration on Fundamental Principles and Rights at Work.

**Revision date: 1/3/2023**

# CORE LABOUR POLICY

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# RECRUITMENT POLICY

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## **EVERTS (MALAYSIA) SDN. BHD. RECRUITMENT POLICY**

This policy established as a guide for internal reference related to the recruitment, hiring and employment practices in Everts (Malaysia)Sdn. Bhd. and the below policy statements are to be strictly adhered to

### **Employment is freely chosen**

- 1.1. There is no forced, bonded, or involuntary prison labor
- 1.2. Workers are not required to lodge “deposit” or their identity papers with their employer and are free to leave their employer after reasonable notice.

### **Freedom of association and the right to collective bargaining are respected**

- 2.1. Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2. The employer adopts an open attitude towards the activities of trade unions and their organizational activities.
- 2.3. Worker’s representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 2.4. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

### **Working conditions are safe and hygienic**

- 3.1. A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 3.3. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5. The company observing the code shall assign responsibility for health and safety to a senior management representative.

### **Child labor shall not be used**

- 4.1. There shall be no recruitment of child labor.
- 4.2. Companies shall develop or participate in and contribute to policies and programs which provide for the transition of any child found to be performing child labor to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labor" being defined in the appendices.
- 4.3. Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 4.4. These policies and procedures shall conform to the provisions of the relevant ILO standards.

### **Living wages are paid**

- 5.1. Wages and benefits paid for a standard working week meet, at a minimum, national legal standards, or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2. All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 5.3. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

### **Working hours are not excessive**

- 6.1. Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labor standards.
- 6.2. Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- 6.3. All overtime shall be voluntary. Overtime shall be used responsibly, considering all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 6.4. The total hours worked in any seven-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5. Working hours may exceed 60 hours in any seven-day period only in exceptional circumstances where all of the following are met

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organization representing a significant portion of the workforce.
- appropriate safeguards are taken to protect the workers' health and safety; and
- the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents, or emergencies.

6.6. Workers shall be provided with at least one day off in every seven-day period or, where allowed by national law, two days off in every 14-day period.

#### **No discrimination is practiced**

7.1. There is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

#### **Regular employment is provided**

8.1. To every extent possible work performed must be on the basis of recognized employment relationship established through national law and practice.

8.2. Obligations to employees under labor or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labor-only contracting, sub- contracting, or home working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

#### **No harsh or inhumane treatment is allowed**

9.1. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

**Revision date: 7/1/2022**

# **FOREIGN WORKERS RECRUITMENT GUIDELINE AND PROCEDURE**

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## **EVERTS MALAYSIA FOREIGN WORKERS RECRUITMENT GUIDELINE & PROCEDURE**

### **1. INTRODUCTION**

Everts (Malaysia) Sdn Bhd (EM) shall follow responsible recruitment practices including not charging recruitment related fees at any stage in the recruitment process, whether by us, our contractors, our agents or their sub-agents in receiving and sending countries. This document, “Foreign Workers Recruitment Guideline and Procedure” shall provide and serve as a framework to ensure our adherence to this commitment.

### **2. OBJECTIVE**

This guideline and procedure shall provide clarity and transparency on the processes of hiring or legalizing foreign workers as well as to ensure that all our recruitment activities in the facility are in accordance with International best practice as per section 4 below.

### **3. SCOPE**

All parties should ensure compliance of this recruitment guideline and procedure. This guideline and procedure of recruiting foreign workers includes foreign workers requisition, recruitment or legalization processes, and roles of the Human Resource Department (HRD).

### **4. REFERENCES**

- (i) Amfori BSCI Code of Conduct.
- (ii) ILO General Principles and Operational Guidelines for Fair Recruitment - Definition of Recruitment Fees and Related Cost.
- (iii) Responsible Recruitment Addendum: Supplier Requirements, Guidance and Remediation Protocols by Woolworths Group.

### **5. “No Recruitment Fee” POLICY**

EM management practices a “No Recruitment Fee” policy in recruiting its foreign workers. Only costs stated in the Employment contract shall be chargeable to employees with their consent therein.

Recruitment agencies are responsible for monitoring their possible sub-agencies to ensure they follow these guidelines. If fees are found to be charged to the workers, EM shall require the agency to repay the workers. Failure to do so will result in EM suspending or terminating the agency relationship



## **6. FOREIGN WORKERS EMPLOYMENT STAGES**

- (i) Pre-employment
- (ii) Employment
- (iii) Post-employment

## **7. PRE-EMPLOYMENT**

### **7.1 Confirmation of hiring new workers:**

Departments request HRD for foreign workers → HRD seeks approval from MD → Proceed with requisition.

### **7.2 Recruitment agencies:**

EM shall conduct due diligence, maintain records, review non-compliance history, monitor performance, and sign formal agreements. Employment contracts must be in native language. Worker biodata and letters of undertaking are to be submitted to HRD.

### **7.3 Human Resource Department (HRD) roles:**

HRD sends EM representative to source country or ensures documentation if not present. Immigration will issue VDR. HRD will inform agency of approved workers and receive flight details.

## **8. EMPLOYMENT**

### **8.1 Arrival of workers:**

Workers picked up by HRD. Travel cost from origin to Malaysia paid by EM.

### **8.2 Orientation and induction training:**

Includes contract, wages, leave, overtime, rules, immigration law, and EM policies (e.g., sexual harassment, grievance, etc.)

### **8.3 Health screening:**

Workers registered with FOMEMA. Screenings at panel clinics. Costs borne by EM unless failed. Notification to Labour Department for new hires. Failed cases refer to 9.1.

### **8.4 Provision of basic items:**

Includes mattress, pillow, water container, safety shoes, and PPE.

### **8.5 Passport handling:**

Workers may:

- Keep passports themselves, or
- Store in a centralized locker (with consent letter and log file).

### **8.6 Renewal of passport, work permit or visa:**

EM to request passports 90 days prior to expiration. Workers sign acknowledgement form. Emergency requests considered case-by-case.

### **8.7 Opening of savings account:**

HRD to open bank account after workers pass health screening and obtain work permits.

### **8.8 Access to grievance mechanism:**

HRD introduces EM's grievance platform. Feedback used to improve workplace.

## **9. POST-EMPLOYMENT**

### **9.1 Unfit workers:**

- New recruits who fail FOMEMA: repatriation cost borne by agency.
- Existing workers unfit due to job: company bears cost.
- Self-negligence (e.g., drug abuse): company not liable.

### **9.2 Contract renewal:**

Workers may extend up to 10 years. Subject to department recommendation and MD approval.

### **9.3 Early termination:**

HRD investigates reason for resignation. If unresolved, no penalty; worker bears repatriation cost. No fees if resignation is due to abuse or threats.

**This guideline shall be effective on the date of publication.**

**Revision date: 8/9/2023**

# **ANTI-HARASSMENT POLICY**

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## **EVERTS (MALAYSIA) SDN. BHD.**

### **ANTI-HARASSMENT POLICY**

#### **Explanation of Policy**

The Company prohibits harassment of any employee based on race, color, national origin, sex, religion, age, sexual orientation, gender identity, physical or mental disability or any other personal attribute protected by federal, state or local law.

Harassment of an employee may be grounds for immediate discharge. While it is not easy to define what harassment is, examples include verbal (including improper joking or teasing) or physical conduct that denigrates or shows hostility or aversion towards an employee because of his or her race, color, national origin, sex, religion, age, physical or mental disability or any other personal attribute protected by federal, state or local law.

**Caution.** Because it is sometimes difficult to predict what conduct or comments may be “unwelcome”, employees must avoid all such conduct and comments and behave at all times in a professional manner.

#### **Sexual Harassment**

Sexual harassment is one form of harassment that violates the Company’s policy. Sexual harassment of any kind will not be tolerated and may be grounds for immediate dismissal. While it is not easy to define precisely what types of conduct could constitute sexual harassment, examples of prohibited behavior include unwelcome sexual advances, requests for sexual favors, obscene gestures, displaying sexually graphic magazines, calendars or posters, accessing inappropriate websites from the workplace, sending sexually explicit email or voice mail, and other verbal or physical conduct of a sexual nature, such as uninvited touching of a sexual nature or sexually related comments. Depending upon the circumstances, the conduct can also include sexual joking, vulgar or offensive conversation or jokes, commenting about employee’s physical appearance, conversations about your own or someone else’s sex life, teasing or other conduct directed toward a person because of his or her gender, repeated requests for dates, which is sufficiently severe or pervasive to create an unprofessional and hostile work environment.

Issues arise in many workplaces because of romantic relationships. This is especially true where employees who are romantically involved are in a supervisory relationship. Because of this, managers and their subordinates may not enter into a romantic or sexual relationship. If employees who are in a supervisory relationship enter into a personal romantic relationship, that personal relationship must be immediately disclosed to the Company. In such cases, one or more of the employees may be moved to a different position so that there is no longer a supervisory relationship.

### **How to Report a Violation of Policy**

If an employee believes that someone has violated this policy (whether or not that person is a co-worker, superior, customer, visitor or vendor), the employee should bring the matter to the immediate attention of his or her supervisor or, where this is inappropriate or not practical, to the attention of the Human Resources Manager ([azmi.ibrahim@everts.com.my](mailto:azmi.ibrahim@everts.com.my)) or HR (06-2513888) . The Company will promptly investigate the facts and circumstances of any claim of harassment. To the extent possible, the Company will endeavor to keep the employees' concerns confidential.

### **Conduct During an Investigation**

The Company will do its best to maintain the confidentiality of the investigation. In order to ensure a thorough and fair investigation, witnesses may be interviewed and documents reviewed. All employees are required to cooperate truthfully and not withhold any information with any investigation of a complaint of harassment. Employees who are interviewed as part of the investigation are expected to keep the investigation confidential.

### **Consequences of Violating Policy**

Upon completion of the investigation, the Company will take corrective measures against any person who has engaged in conduct which violates this policy, if the Company determines that such measures are necessary. These measures may include, but are not limited to, counseling, suspension, or immediate dismissal. Anyone, regardless of position or title, whom the Company determines has engaged in improper harassment, will be subject to discipline up to and including discharge. If, upon completion of the investigation, it appears that a supervisor was aware of the harassing conduct and did not report it, the supervisor may also be disciplined, up to and including termination.

### **No Retaliation for Reporting Violation of Policy**

No employee will be subject to, and the Company prohibits, any form of discipline or retaliation for reporting the incidents of harassment in violation of this policy, pursuing any such claim or cooperating in the investigation of such reports.

**Revision date: 1/12/2024**

# **SEXUAL-HARASSMENT POLICY AND PROCEDURES**

**EVERTS (MALAYSIA) SDN. BHD.  
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# Sexual Harassment Policy and Procedures

## 1. Introduction

Everts (Malaysia) Sdn. Bhd. is committed to providing a workplace free from sexual harassment. Every manager, supervisor and employee have a responsibility to maintain a working environment free from this kind of behavior.

Everts (Malaysia) Sdn. Bhd. will investigate all complaints of harassment and will take remedial action where necessary.

## 2. Purpose

This policy provides guidance to promote prompt reporting of sexual harassment allegations and to ensure that appropriate corrective action is taken regarding allegations of sexual harassment that are brought to the attention of Management.

## 3. Scope

This policy applies to all EM employees. However, in creating an environment free from sexual harassment, customers, suppliers, contractors, and applicants for employment shall also be protected from sexual harassment.

## 4. Policy

It is the policy of the Company to ensure that its offices and activities are conducted in an environment free of sexual harassment.

This policy extends to all forms of communication, physical contact, and/or other gestures of a sexual nature that are unwanted and are explicitly or implicitly exploitative, intimidating, demeaning, and/or derogatory. Sexual harassment is an exercise of power expressed by forcing someone to grant or tolerate familiarity or intimacy they otherwise would not. Personality conflicts should not be misconstrued as sexual harassment and should be reported to the immediate supervisor for resolution.

No supervisor, co-worker, or other person shall cause an employee to be in jeopardy of losing a job or promotion, be subject to adverse action or retaliation, or otherwise be placed in an intimidating, hostile, or offensive working environment, as the result of being subjected to rejecting, or reporting sexual harassment.

No person shall promise or grant favored treatment in hiring, promotion, discipline, or other employment decision, to an individual on the condition that such individual participates in or tolerates otherwise unwelcome sexual behavior. The Company will take preventative, corrective and disciplinary action for any behavior that violates this policy. Disciplinary action up to and including termination will be imposed for unlawful behavior.

## **5. Definitions of Sexual Harassment**

Sexual harassment is unwanted or unwelcome conduct that can be verbal or non-verbal and may consist of sexual advances, requests for sexual favors or physical conduct of a sexual nature. Sexual harassment also mean that unwelcome behavior directed at the same or opposite sex that is deliberate or repeated, not asked for or returned and which affects the terms and conditions of employment. Sexual harassment can take any or all of the following three forms:

### **i. Verbal Harassment**

Derogatory jokes or comments, slurs, or unwanted sexual talk. It also includes verbal abuse of a sexual nature such as graphic verbal commentaries about a person's body, sexually degrading words used to describe an individual, propositioning, suggestive or sexually graphic letters, notes, invitations, and emails.

### **ii. Physical Harassment**

Assault, battery, impeding or blocking normal movement or interfering with work, and unwanted touching such as, pinching, grabbing, patting.



### iii. Visual Harassment

Derogatory posters, notices, cards, calendars, bulletins, cartoons, graffiti, photographs, signs, drawings, protracted staring, or gestures.

#### **Examples of Inappropriate Conduct:**

##### **Verbal Conduct:**

- (a) Sexual jokes or suggestive verbal communication.
- (b) Unwelcome telephone calls of a sexual nature.
- (c) Degrading or demeaning remarks of a sexual nature.
- (d) Using threats of punishment to attempt to force sexual activity or other sexual conduct.
- (e) Sexual propositions that, either overtly or by implication, promise rewards.
- (f) Whistling or calling out to someone in a sexual way.

##### **Non-verbal Conduct:**

- (a) Distribution or display of materials of a sexual nature, this includes but is not limited to posters, calendars, screen savers or similar items.
- (b) Suggestive body language such as ogling, staring, leering, lewd licking of lips, or suggestive touching of oneself.
- (c) Unwelcome letters, notes, or e-mails of a sexual nature.

If you are not sure whether certain behavior constitutes sexual harassment, you should discuss this with your Superior or Human Resource Personnel.

## **6. Responsibilities of Department Head and HR**

It is the responsibility of every supervisor and department head to take any sexual harassment complaint seriously and to respond immediately. The department head is responsible for verbally notifying the Human Resource Personnel immediately upon receipt of a sexual harassment allegation.

The department head shall notify Human Resource Department on all sexual harassment complaints reported to department supervisors or management personnel.

The Human Resource Personnel shall follow up with the department head on the progress of the investigation and resolution. All information regarding the incident shall be kept confidential and will remain in the Human Resource Department.

## **7. Responsibility of co-workers**

All employees are expected to respect the rights of others and never encourage harassment. If any staff member becomes aware that a co-worker is being harassed, they can help prevent it by offering support to the person being harassed. This can be done by:

- Offering to act as a witness if the person being harassed decides to report the incident.
- Refusing to join in with any harassing activity; and
- Backing them up or supporting them to say no.

It is not a co-worker's responsibility to say anything to the alleged harasser or to spread rumors about someone. If a staff member takes part in spreading rumors, they may be subject to defamation action.

## **8. Sexual harassment complaints procedure**

### **A. Informal complaints**

Informal ways of dealing with sexual harassment can include the following action:

- You may wish to deal with the situation yourself but may also wish to seek advice on possible solution direct from a Supervisor, Manager or Human Resource Personnel

- You may directly contact:

**Human Resources Department  
06-5554377**

**Lot 1620, Mukim Sungai Petai,  
Kawasan Perindustrian Rembia,  
78000 Alor Gajah, Melaka**

- You may ask your Supervisor to speak to the alleged harasser on your behalf.
- The supervisor will privately convey your concerns and reiterate sexual harassment policy without assessing the merits of the case
- A complaint is made, the harasser admits the behavior, and the complaint is resolved through conciliation or counselling of the harasser.
- A Supervisor or Manager observes unacceptable conduct occurring and takes independent action even though no complaint has been made.

Anyone whom is aware on any breaches any of the above policy must immediately notify the Human Resource Department of **EM** for further action.

**Revision date: 5/3/2024**



# CHILD LABOUR POLICY

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# CHILD LABOUR POLICY

## Definition

In Peninsular Malaysia, under the Children and Young Persons (Act 350 - Employment Act 1996),

‘Child’ is a person who has not enter his/her 16<sup>th</sup> year of age (before age of 16<sup>th</sup>) AND

‘Young Person’ is a person who is not being a child but has yet to reach his/her 18<sup>th</sup> year of age (age between 16<sup>th</sup> and before 18<sup>th</sup>).

## Policy Statement

In the conduct of its business, Everts (Malaysia) Sdn. Bhd. (EM):

- Is committed not to engage any child or any form of Young Labor.
- Is committed to ensure proper screening process for recruitment in place to avoid any recruitment of a child or young labor through verification of personal identification and/or candidate’s other documentation (if necessary).
- It is the responsibility of local management and Human Resource Department to implement and ensure compliance with this policy at Everts (Malaysia) Sdn. Bhd.
- Proper dismissal action and process shall be made if any Child Labour is/are found to be working in the company (based on local regulation and requirement

## Remediation Policy

For Child Labour.

If EM suspect that there is/are workers in the facility may be underaged, their identification documentation (ID) will be rechecked and if it is necessary, all documents should be checked to confirm the worker(s) (child) is/are underage and/or if ID checks are inconclusive, EM shall act according to procedures.

- To remove the child from all work immediately
- To ensure child is in a safe place
- Clarify the true identity and age of the child. Review the documents of the child and verify that they are genuine. If the documentary evidence is inconclusive, checking the age of the child may entail.
  1. by contacting local authorities to validate information
  2. by doing medical screening checks to assess the age
  3. obtain contact details of child or parents/guardian and every detail possible.
- Arrange payment of a stipend to the child during the exploratory phase and exercise proper termination procedures. The stipend should be equivalent to the amount the child was earning whilst employed.
- Upon legal age, the child will share the same opportunity as any other candidates applying for employment here in **EM**.
- If deem necessary, **EM** fully understands that they are able to source help from other parties such as NGOs and other stakeholders to protect the child.

### **For Young Labour.**

In the case that young workers are used or found working within **EM**, the Company is to ensure appropriate measures are applied for the concerns workers:

- Employed only after school hours (where they are subject to compulsory schooling).
- Do not carry out heavy duty work.
- Work in safe condition and not exposed to situations that are dangerous, risky, or hazardous for either physical, mental health or for their development.
- Do not come into contact with dangerous equipment.
- Do not work for longer than 8 hours per day.
- Young workers should not be employed during school hours; in addition, the time spent at school, work and travelling should not exceed 10 hours and
- Young workers may not work at nights.

Anyone whom is aware on any breaches any of the above policy must immediately notify the Human Resource Department of **EM** for further remediation action

**Revision date: 14/2/2024**

# GRIEVANCE POLICY

**EVERTS (MALAYSIA) SDN. BHD.  
(198701004121)**

**P1 - 103 - 107, Jalan Usaha 6,  
Kawasan MIEL, Phase II,  
Ayer Keroh Industrial Estate,  
75450 Melaka, Malaysia.**

**P2 - Lot 1620, Mukim Sungai Petai,  
Kawasan Perindustrian Rembia,  
78000 Alor Gajah, Melaka**

# GRIEVANCE POLICY

EVERTS (MALAYSIA) SDN. BHD., a company mainly involved in the manufacture of balloons is committed to providing a positive working environment where employees are treated fairly and with dignity and respect. This policy is underpinned by the following principles:

- b) Workers shall feel safe to talk to management about reporting concerns they have & shall receive a timely investigation to their report without fear of retaliation;
- c) EM shall gather and respond to complaints about the reported issues, which may be based on law, contract, policies or customary practices;
- d) EM shall allow for reporting all issues, which may include harassment, discrimination, abuse, bribery and potential conflict of interest, working conditions, accidents or safety issues;
- e) EM shall allow for suggestions to be provided on ways in which could improve the standard practices in order to be more effective within the workplace;
- f) Grievance method shall be available to allow for confidential and anonymous reports.

**Revision date: 22/5/2022**



# WHISTLEBLOWER POLICY

**EVERTS (MALAYSIA) SDN. BHD.  
(198701004121)**

**P1 - 103 - 107, Jalan Usaha 6,  
Kawasan MIEL, Phase II,  
Ayer Keroh Industrial Estate,  
75450 Melaka, Malaysia.**

**P2 - Lot 1620, Mukim Sungai Petai,  
Kawasan Perindustrian Rembia,  
78000 Alor Gajah, Melaka  
EVERTS (MALAYSIA) SDN. BHD.**

## **Whistleblower Policy**

### **1. Purpose**

This policy encourages employees and stakeholders of Everts (Malaysia) Sdn. Bhd. to report any unethical, illegal, or improper conduct while ensuring that they are protected against retaliation for raising such concerns.

### **2. Scope**

This policy applies to all employees, contractors, suppliers, and stakeholders of Everts (Malaysia) Sdn. Bhd.

### **3. Definition of a Whistleblower**

A whistleblower is any individual who reports suspected misconduct, violations of law, or company policies in good faith.

### **4. Reportable Conduct**

Examples of reportable issues include:

- Fraud, corruption, or financial irregularities.
- Breach of laws, regulations, or company policies.
- Health and safety risks.
- Harassment or discrimination.

## **5. Reporting Mechanism**

Reports can be made through the following channels:

- a) For any fraud, corruption, financial irregularities, breach of laws, regulations or company policies may email to;
  - **Email:** [matthew.busst@everts.com.my](mailto:matthew.busst@everts.com.my)
- b) For health & safety risks, harassment or discrimination may contact to;
  - **HR office:** 06-5554377

Reports can be made anonymously if preferred.

## **6. Protection Against Retaliation**

Whistleblowers acting in good faith are protected against retaliation, including termination, harassment, or demotion. Any retaliatory action will result in disciplinary measures.

## **7. Confidentiality**

All reports will be handled confidentially. The identity of the whistleblower will not be disclosed without their consent, unless required by law.

## **8. Investigation Process**

Upon receiving a report, an impartial investigation will be conducted. Appropriate action will be taken if the report is substantiated.

## **9. Responsibilities**

Management must ensure that:

- All concerns are addressed promptly and fairly.
- Whistleblowers are protected from retaliation.

**Revision date: 1/12/2024**

# TRANSPORTATION SAFETY POLICY

**EVERTS (MALAYSIA) SDN. BHD.  
(198701004121)**

**P1 - 103 - 107, Jalan Usaha 6,  
Kawasan MIEL, Phase II,  
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75450 Melaka, Malaysia.**

**P2 - Lot 1620, Mukim Sungai Petai,  
Kawasan Perindustrian Rembia,  
78000 Alor Gajah, Melaka  
EVERTS (MALAYSIA) SDN. BHD.**

## TRANSPORTATION SAFETY POLICY

It is the policy of Everts management to reduce the risk of vehicle incidents from our business, including injuries to staff and other people who may be affected by its activities. Management and staff will work together to achieve the goals and objectives of this policy through consultation and cooperation.

Our specific policies in this regard are as follows:

- a) To provide properly maintained and safe vehicles.
- b) To ensure only competence, licensed, trained, fit, and authorized personnel operate the vehicles.
- c) To assess the risks relating to the used of vehicle and implementing suitable control measure.
- d) To ensure all related employees are given information, instruction, training, and supervision on do and don't s for bus passengers and how to operate vehicles.
- e) To ensure all transportation activities comply with National legal requirements on Road Transport Act 1987, Commercial Vehicles Licensing Board Act 1987 and other applicable regulations.
- f) To ensure all reporting system are accessible via QR code or direct contact with HR personnel.

**\*\*Vehicles include Buses/Truck/Lorry/Van/ MPV etc.**

**Revision date: 19/12/2024**

# **CORPORATE CODE OF BUSINESS CONDUCT AND ETHICS**

**EVERTS (MALAYSIA) SDN. BHD.  
(198701004121)**

**P1 - 103 - 107, Jalan Usaha 6,  
Kawasan MIEL, Phase II,  
Ayer Keroh Industrial Estate,  
75450 Melaka, Malaysia.**

**P2 - Lot 1620, Mukim Sungai Petai,  
Kawasan Perindustrian Rembia,  
78000 Alor Gajah, Melaka  
EVERTS (MALAYSIA) SDN. BHD.**

## **Corporate Code of Business Conduct and Ethics**

### **1. General Policy**

This Code of Business Conduct and Ethics (the “Code”) is applicable to (i) all employees, directors and officers of Everts (Malaysia) Sdn. Bhd. (the “Company”) (ii) individuals performing the function of principal executive officer and principal financial officer of the Company (iii) certain other individuals that may be designated from time to time by the Company (each a “Designated Person”) (those individuals identified in (i) through (iii), are collectively referred to herein as a “Company Associate”). The purpose of this Code is to ensure that all Company Associates adhere to the highest standards of ethical business conduct. Because of the complex and changing nature of legal requirements, each member of the Company and its subsidiaries must be vigilant to ensure that his or her conduct complies with the Code.

Violations of the Code will result in disciplinary action. Such action may include an oral or written warning, disciplinary probation, suspension, or dismissal from employment. These disciplinary actions may apply to an employee’s supervisor who directs or approves of the employee’s improper actions, who knowing of those actions does not act appropriately to correct them or fails to exercise appropriate supervision. For all Company Associates, the failure to report known or suspected wrongdoing may, by itself, subject that person to disciplinary action. In addition to imposing its own discipline, the Company may also bring violations of law or suspected violations of law to the attention of appropriate law enforcement personnel.

When faced with a questionable situation, employees should do the following:

- Have all the facts.
- Ask yourself: “What specifically am I asked to do?” and “does it seem unethical or improper?”
- Discuss the situation with your supervisor.
- If necessary, seek guidance from someone other than your supervisor.

#### **a. Questions About the Code and Reporting Violations**

To ask a question about this Code, contact your supervisor, Human Resources Department or Compliance Section.

If an employee knows of or suspects a violation of this Code, he or she must promptly report the conduct to (i) the Company’s contact or (ii) his or her supervisor via the channels below. Failure to report any violations of the Code may result in disciplinary action against those who fail to report.





#### Company Contact

Everts (Malaysia) Sdn. Bhd.:

06-5554377

#### Supervisor Reporting

Supervisors who receive a report of a violation of this Code must escalate that report to the Human Resources or Compliance department.

All reports of known or suspected violations of the law or this Code will be handled in a manner to protect each employee's confidentiality to the extent possible, consistent with the law and the Company's need to investigate the matter. Company employees, officers, and directors are expected to cooperate in the investigation of potential violations of this Code.

#### **b. Non-Retaliation**

All employees, officers and directors of the Company will be protected from retaliation as a result of their good-faith reporting of potential information regarding, or their participation in investigations involving, alleged violations of the law, business ethics, the Code or other misconduct. However, the Company reserves the right to discipline anyone who knowingly makes a false accusation, provides false information to the Company or has acted improperly. For more information, please refer to the Company's "Whistleblower Policy."

If a reporting individual was involved in improper activities, the individual may be appropriately disciplined even if he or she was the one who disclosed the matter to the Company. In these circumstances, we may consider the conduct of the reporting individual in reporting the information as a mitigating factor in any disciplinary decision.

## **2. Compliance with the Law**

The Company seeks to comply with all applicable government laws, rules and regulations. Some of the regulatory programs that employees may deal with in the course of their duties include, but are not limited to, the following:

- Control of Supplies Act
- Employment Act
- ETI base Code
- Environmental Quality Act
- Occupational safety and health Act
- Fire Services Act
- Employment discrimination or harassment;
- Import and export laws, Customs Act (1967)
- Laws related to bribery and kickbacks; and
- Relevant securities laws.

Employees are not expected to know all the details of all applicable laws, but it is important to know when they may apply and to seek clarification as appropriate. The Human Resources department, Compliance Team or relevant personnel can provide employees with information on these laws, rules and regulations or direct an employee's questions and concerns to the proper person.

The Code generally highlights some of the more important legal principles with which Company Associates are expected to become familiar. The fact that the Code does not specifically reference other applicable laws (some of which may be covered in other Company documents) does not diminish their importance or application.

### **3. Trading in Company Securities**

As our securities are traded publicly in Malaysia, certain activities of the Company are subject to Malaysian securities laws, including the Capital Markets and Services Act 2007 (CMSA). These laws regulate the dissemination or use of information about the affairs of the Company, or affiliates, as well as other information that might influence investment decisions regarding the purchase or sale of the securities. Violations of these laws can result in severe criminal and civil penalties for both individuals and the Company. Therefore, the Company strictly prohibits any conduct that may lead to a violation of these regulations.

#### **a. Disclosure of Transactions in Company Securities**

Under the requirements of the Securities Commission Malaysia (SC) and Bursa Malaysia, the Company, along with its directors, officers, major shareholders, and other affiliated persons, must provide ongoing disclosures regarding transactions in the Company's securities.

#### **b. Insider Trading**

It is unlawful for any person, either personally or on behalf of others, to:

(i) buy or sell securities while in possession of material non-public information;  
or

(ii) disclose ("tip") material non-public information to another person who trades based on the information or who passes it to someone else for trading.

All employees, directors, and temporary insiders, such as consultants, auditors, or lawyers, are required to comply with these insider trading prohibitions.

All information that an investor might consider important in deciding whether to buy, sell or hold securities is considered "material." Information that is likely to or may affect the price of securities is almost always material. Examples of some types of material information include:

- o financial and operating results for the month, quarter or year;
- o financial forecasts, including proposed or approved budgets;
- o possible mergers, acquisitions, joint ventures and other purchases and sales of products, businesses, companies and investments in companies;
- o obtaining or losing important contracts;
- o significant cybersecurity incidents and risks;
- o major personnel changes; and
- o major litigation developments.



All information about the Company or its business plans is potentially “insider” information until publicly disclosed or made available by the Company. Thus, Company Associates may not disclose it to others. This prohibition includes disclosure to relatives, friends, and business or social acquaintances. Information is considered to be nonpublic unless it has been effectively disclosed to the public (e.g., by a press release). In addition to public disclosure, there must also be adequate time for the market as a whole to digest the information. A delay of two full trading days is generally considered a sufficient period for routine information to be absorbed by the market. Nevertheless, a longer period of delay may be considered appropriate in more complex disclosures.

When a Company Associate knows material nonpublic information about the Company, he or she is prohibited from three activities:

- o trading in Company securities for his or her own account or for the account of another (including any trust or other entity that buys or sells securities, such as a mutual fund, of which the Company Associate is a trustee);
- o directing anyone else to trade for the Company Associate or recommending that another person trade Company securities; and
- o disclosing the information to anyone outside of the Company unless such disclosure has been approved by the Legal Department.

Neither the Company Associate nor anyone acting on the Company Associate’s behalf, nor anyone who learns the information from the Company Associate, may trade for as long as the information continues to be material and non-public.

If a Company Associate is considering buying or selling stocks or bonds and is unsure whether the transaction might involve the improper use of material nonpublic information, the individual should obtain specific prior approval from Managing Director. The individual is also strongly encouraged to consult with his or her personal attorney.

On a related point, no one should discuss the Company’s material nonpublic information in public areas, such as corridors, elevators and restaurants, and care should be taken in the handling and disposal of papers containing material nonpublic information. Any questions or concerns about disclosure of non-public information should be brought to the Managing Director.

#### 4. Confidential Information

You may be entrusted with the Company's confidential business information. You are required to safeguard and use such information only for Company purposes, unless disclosure of such information is properly authorized by the Managing Director. Confidential information includes all non-public information that might be of use to competitors or harmful to the Company or its customers, if disclosed. You are expected to maintain the confidentiality of any and all such information entrusted to you by the Company or our customers. Examples of confidential business information include but are not limited to: the Company's trade secrets, business trends, detailed sales, cost and profit figures, new product or marketing plans, research and development ideas or information, manufacturing processes, and information about potential acquisitions, divestitures and investments. Failure to observe this duty of confidentiality may compromise our competitive advantage and may additionally result in a violation of securities, antitrust or employment contracts. It may also violate agreements providing for the protection of such confidential information. You should not discuss confidential Company information outside the Company with anyone, including your family.

You may also possess sensitive, privileged information about our customers. These customers properly expect that this information will be kept confidential. The Company takes very seriously any violation of a customer's confidentiality and will not tolerate such conduct. Discussing a customer or providing any information about customers to anyone other than Company authorized personnel or Company employees who need the information will have serious consequences. As with all confidential information, employees should not discuss customer information outside the Company.

Nothing in this Code, any of the Company's policies, or contractual agreements prohibits anyone from reporting possible violations of Malaysian law or regulations to any governmental agency or entity. This includes, but is not limited to, the Malaysian Anti-Corruption Commission (MACC), the Securities Commission Malaysia (SC), the Royal Malaysia Police (PDRM), and any other relevant authorities, or making other disclosures that are protected under the whistleblower protections provided by the Whistleblower Protection Act 2010 or other applicable laws. Employees do not need prior authorization from the Managing Director to make such reports or disclosures and are not required to notify the Company that they have done so.

## 5. Ethical Obligations of Financial Reporting

As a public company, we are also committed to carrying out all continuing disclosure obligations in a full, fair, accurate, timely and understandable manner. Depending on their position with the Company, Company Associates may be called upon to provide information to assure that the Company's financial reports are complete, fair and understandable. The Company expects all of its personnel to take this responsibility very seriously and to provide prompt and accurate answers to inquiries related to the Company's financial reporting. To this end, each Company Associate agrees, as applicable, that he or she will:

- o act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships;
- o provides information that is accurate, complete, objective, relevant, timely and understandable to ensure full, fair, accurate, timely, and understandable disclosure in reports and documents that the Company files with, or submits to, government agencies and in other public communications.
- o complies with rules and regulations of federal, state, provincial and local governments, and other appropriate private and public regulatory agencies.
- o act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing one's independent judgment to be subordinated;
- o respects the confidentiality of information acquired in the course of one's work except when authorized or otherwise legally obligated to disclose. Confidential information acquired in the course of one's work will not be used for personal advantage;
- o share knowledge and maintain skills important and relevant to the Company's needs;
- o proactively promotes and be an example of ethical behavior as a responsible partner among peers, in the work environment and the community; and
- o achieves responsible use of and control over all assets and resources employed or entrusted.



## **6. Continuing Disclosure Obligations and Accuracy of Business Records**

In order to support our disclosure obligations, it is the Company's policy to record and report factual information honestly and accurately. Failure to do so is a grave offense and will subject an individual to severe discipline by the Company, as well as possible criminal and civil penalties.

Investors count on the Company to provide accurate information about its business and to make responsible business decisions based on reliable records. Every individual involved in creating, transmitting or entering information into the Company's financial and operational records is responsible for doing so fully, fairly, accurately and timely, and with appropriate supporting documentation. No Company Associate may make any entry that intentionally hides or disguises the true nature of any transaction. For example, no individual may understate or overstate known liabilities or assets, record false sales or record them early, defer or accelerate the proper period for recording items that should be expensed, falsify quality or safety results, or process and submit false or inaccurate invoices.

Compliance with established accounting procedures, the Company's system of internal controls, and generally accepted accounting principles is necessary at all times. In order to achieve such compliance, the Company's records, books and documents must accurately reflect the transactions and provide a full account of the Company's assets, liabilities, revenues and expenses. Knowingly entering inaccurate or fraudulent information into the Company's accounting system is unacceptable and may be illegal. No Company document may be falsified for any reason, and no undisclosed or unrecorded accounts may be established or maintained. Any individual who has knowledge that an entry or process is false, and material must promptly inform the Managing Director. In addition, it is the responsibility of each Company Associate to cooperate with the Company's authorized external auditors.

When billing others for the Company's goods or services, the Company has an obligation to exercise diligence, care and integrity. The Company is committed to maintaining the accuracy of every invoice it processes and submits. Each employee who is involved in submitting charges, preparing claims, billing and documenting services is expected to monitor compliance with applicable rules and maintain the highest standards of personal, professional and institutional responsibility. By the same token, each employee who is involved with processing and documenting claims for payment made to the Company by outside vendors or contractors is expected to



maintain the highest standards of professionalism and ethics. Any false, inaccurate, or questionable practices relating to billing others or to processing claims made by others for payment should be promptly reported as a violation of this Code.

Every individual should be aware that the Company's business records may become subject to public disclosure in the course of litigation or governmental investigation. Records are also often obtained by outside parties or the media. Employees should therefore attempt to be as clear, concise, truthful and accurate as possible when recording any information. Employees must refrain from making legal conclusions or commenting on legal positions taken by the Company or others except in coordination with the Managing Director. Employees must also avoid exaggeration, colorful language and derogatory characterizations of people and their motives. The Company will not tolerate any conduct that creates an inaccurate impression of the Company's business operations.

## **7. Protection and Proper Use of Company Assets**

Company Associates should protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability. All Company assets shall be used for legitimate business purposes.

Everyone who works with the Company's computer-based resources is responsible for their appropriate use and protection from theft, damage or loss and must take care to protect and ensure that the security features of the computer-based resources are not compromised. Information created, transmitted or accessed on Company networks is Company property and the Company reserves the right to monitor or restrict access to it. Supervisors are responsible for ensuring Company resources are used productively.

Computer software used in connection with the Company's business must be properly licensed and used only in accordance with that license. Using unlicensed software could constitute copyright infringement. If an employee has any questions as to whether a particular use of computer software is licensed, the employee should consult with the IT department.

The same level of care should be taken when using the Company's e-mail, Internet and voice mail systems as is used in written documents. For example, confidential information about the Company should not be disclosed on departmental boards, in chat rooms or posted on an Internet website including social media's. The Company's e-mail, Internet and voice mail systems should not be used for messages that are defamatory, obscene, profane, sexually oriented,





threatening, racially offensive or otherwise in violation of Company policy. In addition, when using e-mail you should keep in mind that e-mail can be forwarded to additional and unintended recipients without the knowledge of the original sender and that e-mails can be easily altered and forwarded to others in their modified form. Where permitted by law, employees have no expectation of privacy as to the use of Company communication tools and information systems (such as email, voicemail, internet use, and personal documents or files stored on Company equipment). All e-mail and Internet use and creation of personal documents or files on Company equipment is subject to monitoring in accordance with applicable law.

The Company respects the rights of employees to use social networking sites and does not discourage employees from self-publishing or self-expression. However, it is the right and duty of the Company to protect itself and its employees from inappropriate social media use. as a result, employees of the Company should adhere to the following guidelines:

- o Unless authorized, social media sites for personal use are prohibited on Company equipment. In regard to Company equipment and work hours, the Company reserves the right to use tools to monitor, review and block access to social networking sites.
- o Employees must refrain from disclosing information of a confidential nature including but not limited to clients, products, financial information, trade secrets, business plans, etc.
- o Publishing information that creates a harassing or hostile work environment and posting defamatory comments about the Company or its employees is prohibited.

## **8. Employee Privacy**

The Company is firmly committed to respecting employee privacy. It is the Company's policy to acquire and retain only employee personal information that is required for effective operation of the Company or that is required by law in the jurisdictions in which it operates. Access to such information will be restricted internally to those employees with a recognized need to know such information. The Company will comply with all applicable laws regulating the disclosure of personal information about employees.



## **9. Corporate Opportunities**

Except as otherwise set forth in the Company's amended and restated certificate of incorporation and applicable law, Company Associates are prohibited from (a) taking opportunities for themselves that are discovered through the use of Company property, information or position, (b) using Company property, information or position for personal gain, and (c) competing with the Company. Each Company Associate owes a duty to the Company to advance the Company's legitimate interests when the opportunity to do so arises.

## **10. Fair Dealing**

Company Associates should endeavor to deal fairly with the Company's customers, suppliers, competitors and employees. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practices. Company Associates, including all employees of the Company, may not engage in activities that:

- o Are designed to reach an understanding with competitors concerning prices, production methods or division of customers
- o Are designed to reach an understanding with vendors regarding reciprocal buying and selling
- o Result in other prohibited activity such as illegal price discrimination or trade restraints

Additionally, Company Associates should not talk to the Company's competitors about prices, marketing practices, other competitors, vendors, geographic regions or market allocation.

## 11. Antitrust Compliance

The Company requires compliance with the competition laws of every jurisdiction in which the Company operates. Every employee of the Company is responsible for adhering to applicable competition laws, including Malaysia's Competition Act 2010. The Competition Act 2010 prohibits the Company, its directors, officers, employees, agents, and representatives from engaging in any activity that involves:

- **Anti-Competitive Agreements:** Reaching agreements or understandings with competitors concerning selling prices of the Company's products, terms of sales, production or distribution methods, or division of markets or customers.
- **Abuse of Dominant Position:** Exploiting market power in a manner that restricts competition, such as price discrimination or creating trade restraints.
- **Other Prohibited Practices:** Engaging in practices that restrict or distort competition, such as bid rigging or collusion.

Violations of the Competition Act 2010 or similar regulatory restrictions in other jurisdictions where the Company conducts business can severely damage the Company's reputation and business interests, as well as employees' careers. Such violations can lead to significant criminal and civil penalties, including fines for corporations and individuals, and potential imprisonment for individuals involved.

## 12. Conflicts of Interest

Company Associates must avoid all potential conflicts of interest or situations that give the appearance of a conflict of interest. A conflict of interest occurs when the private interest of a Company employee, officer or director (or an immediate family or household member of a Company Associate or someone with whom a Company Associate has an intimate relationship) interferes, or even appears to interfere, in any way, with the duties performed by the Company employee, officer or director or with the interests of the Company as a whole. A conflict can arise when a Company Associate takes actions or has interests that may make it difficult to perform his or her work objectively and effectively. Conflicts of interest also arise when an individual, or a member of his or her family, receives improper personal benefits as a result of his or her position in the Company. Loans to, or guarantees of obligations of, Company Associates are of special concern.



To this end, Company Associates may not be employed by, act as a consultant to, or have an independent business relationship with any of the Company's customers, competitors or suppliers. Company Associates should not have outside employment or business interests that place them in the position of (i) appearing to represent the Company, (ii) providing goods or services substantially similar to those the Company provides or is considering providing or (iii) lessening their efficiency, productivity, or dedication to the Company in performing their everyday duties. Company Associates may not have an interest in or speculate in anything of value which may be affected by the Company's business. Company Associates may not divulge or use the Company's confidential information, such as financial data, customer information, and computer programs, for their own personal or business purposes.

Any personal or business activities performed by a Company Associate that may raise concerns along these lines must be disclosed to Managing Director. In addition, any Related Person Transactions involving a director or officer must be approved in advance in accordance with the Company's Policy with Respect to Related Person Transactions. All directors and officers should read and become familiar with such policy to ensure compliance therewith.

### **13. Company Disclosures**

It is the Company's practice to ensure full, fair, accurate, timely, and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities Commission Malaysia (SC), Bursa Malaysia, and in all other public communications made by the Company. All Company employees and representatives are expected to comply with applicable laws and regulations, such as the Listing Requirements of Bursa Malaysia and the Capital Markets and Services Act 2007 (CMSA).

### **14. Discrimination and Harassment**

Workplace discrimination and harassment are strictly prohibited as set forth in the Company's written Anti-Harassment policy. Those who violate this policy are subject to disciplinary action, up to and including possible termination of employment. An employee who believes that he or she or a fellow employee has been discriminated against, harassed or treated unfairly should immediately notify a supervisor or report such behavior. Examples of workplace discrimination and



harassment include derogatory comments based on sex, national origin, disability, racial or ethnic characteristics, and any form of unsolicited, unwarranted and/or unwelcome verbal or physical abuse of another person, verbal or physical behavior that creates a hostile environment and unwelcome sexual advances.

## **15. Health and Safety**

Violence and threatening behavior are not permitted. Employees should report to work in condition to perform their duties, free from the influence of illegal drugs or alcohol. The use of illegal drugs and alcohol in the workplace will not be tolerated.

## **16. Environmental Compliance**

The Company endeavors to be an environmentally responsible corporate citizen and to operate its facilities in compliance with applicable environmental, health and safety regulations and in a manner that has the highest regard for the safety and well being of its employees and the general public. Necessary permits, approvals and controls are maintained at all Company facilities.

Employees are responsible for complying with all applicable environmental laws and regulations and Company policies and for following diligently the proper procedures with respect to the handling and disposal of hazardous materials. The Company insists that its suppliers and contractors also follow appropriate environmental laws and guidelines. If an employee has any questions or concerns, they should contact the compliance team or Environmental Competence personnel.

## 17. Anti-Corruption Compliance

It is the unwavering practice of the Company to comply with the provisions of the **Malaysian Anti-Corruption Commission Act 2009 (MACC Act)** and other applicable anti-corruption laws, including those of the jurisdictions in which the Company operates. Corruption undermines public trust, hampers national and international economic and social development, and disrupts fair trade. The Company is committed to conducting business ethically, honestly, and with integrity, and expects the same from its business partners.

Accordingly, the Company has established an **Anti-Corruption Policy** that provides employees and business partners with detailed guidance on the Company's anti-corruption program, an overview of applicable anti-corruption laws, advice on identifying corruption "red flags," and resources for addressing and reporting any anti-corruption concerns.

The Company strictly prohibits anyone acting on its behalf from soliciting, accepting, offering, promising, or giving a bribe, or anything of value, to any person, including public officials, to improperly influence their actions or decisions or to gain an improper advantage for the Company. The Company also prohibits so-called "facilitation" or "grease" payments—small payments intended to expedite routine governmental actions. Although such payments are sometimes customary, they are illegal under the MACC Act and conflict with the Company's commitment to ethical business practices.

## 18. Gifts, Meals and Entertainment

All gifts and hospitality (including meals, entertainment and travel expenses) offered or received on behalf of the Company must be directly related to a legitimate business purpose. Gifts and hospitality in all cases must be reasonable in amount, offered or received in good faith, and in compliance with applicable law. In no event may any gift or hospitality be offered, provided or received in return for any improper favor or benefit to the Company, and no gifts or hospitality should be provided that creates even the appearance of impropriety or otherwise is unduly lavish. Company Associates should review the Anti-Corruption Policy for more detail.



Company Associates must not accept or permit any member of his or her immediate family to accept, any gifts, gratuities or other favors from any customer, supplier or other person doing or seeking to do business with the Company, other than items of insignificant value. Any gifts that are not of insignificant value should be returned immediately and reported to the employee's supervisor. If immediate return is not practical, they should be given to the Company for charitable disposition or such other disposition as the Company, in its sole discretion, believes appropriate. Below are illustrative examples of an acceptable and unacceptable gift.

Example 1:

A consultant sends an employee a fruit basket as a thank you for business. Retaining this gift would be acceptable since it is of reasonable value and does not create an appearance of impropriety.

Example 2:

An employee receives tickets to a Broadway show from a consultant as a thank you for business. The employee should not accept this gift as this could be considered unduly lavish, should promptly send it back to the consultant, and should report the gift to his or her supervisor.

Common sense and moderation should prevail in business meals and entertainment engaged in on behalf of the Company. Company Associate should provide, or accept, business meals or entertainment to or from anyone doing business with the Company only if the meal or entertainment is infrequent, modest, intended to serve legitimate business goals and in compliance with applicable law.

Please refer to the Anti-Corruption Policy for more information and specific requirements regarding the Company's gifts and hospitality procedures.

## **19. Response to Media Inquiries**

In order to ensure that the Company complies with its obligations, employees receiving any media inquiries regarding the Company should refer the request to the HR manager or Managing Director. Company employees may not speak publicly for the Company unless specifically authorized by senior management.



## **20. Political Activities; Lobbying**

Political activities must be conducted on employee's own time and using their own resources. The law does not permit the Company to compensate or reimburse its employees for political contributions which they have made or intend to make. This is a highly regulated and complex area. If an employee has any question or concerns, they should contact the Human Resources Department.

No funds or assets of the Company may be used for political contributions without obtaining prior approval from the Managing Director. These prohibitions cover not only direct contributions, but also indirect assistance or support of candidates or political parties through the purchase of tickets to special dinners or other fund-raising events, or the furnishing of any other Company goods or services to political parties or committees.

## **21. Government Investigations and Record Retention**

The Company requires compliance with the law, transparency and cooperation in all interactions with regulators, government agencies, outside legal counsel and similar third parties. Company Personnel should be professional when interacting with regulators, government agencies or other supervisory authorities conducting formal investigations. It is unlawful and a violation of Company policy and this Code to retaliate against any person for providing truthful information. Appropriate handling of government investigations is very important. Therefore, Company employees must never do any of the following:

- o Destroy any Company documents in anticipation of, or after receiving, a request for those documents from any government agency or court;
- o Alter any Company documents or records in an attempt to defraud or mislead;
- o Lie or make any misleading statements to any governmental investigator; or
- o Attempt to get anyone else to engage in these prohibited activities.



## 22. Administration of the Code

All Company Personnel must comply with the Code. The Company reserves the right to monitor continuing compliance with the provisions of the Code and to investigate any suspected violations. If substantiated, these violations could result in disciplinary action.

This code may be revised, changed or amended at any time by the Company's Board of Directors. Following any material revisions or updates, an updated version of this Code will be distributed, will supersede the prior version of this Code, and will be promptly disclosed to stockholders and posted on the Company's website.

Any waiver of this Code for an executive officer or directors may only be made by the Board of Directors under certain circumstances, the law requires that the Company disclose to stockholders the nature of such waiver, the name of the executive officer or director, as the case may be, and the relevant date of the waiver.

The Code reflects general principles to guide employees in making ethical decisions. It cannot and is not intended to address every specific situation in which the Company may find it appropriate to take disciplinary action. The Code is not intended to create any contract (express or implied) with you, including without limitation any employment contract, or to constitute any promise that your employment will be not terminated except for cause.

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