



SAPURA INDUSTRIAL BERHAD
(Company No. 17547-W)

**CODE OF ETHICS
AND
BUSINESS CONDUCT**

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Introduction

This Code of Ethics and Business Conduct emphasises and advances the principle of discipline, good conduct, professionalism, loyalty, integrity and cohesiveness that are critical to the success and well-being of the SAPURA INDUSTRIAL BERHAD Group (“SIB”).

It reflects the need to act ethically and remain above board at all times, and SIB’s Shared Values. SIB Group’s Code of Ethics and Business Conduct also includes appropriate communication and feedback channels which facilitate whistle-blowing.

Our Mission and Commitment

To be Technology Competent and Distinctive in our Area of Business by Providing Solutions that Exceed Customers’ Expectations through Professional Leadership and Consistently Deliver improved Performance.

Our Values

- Honourable
- Professional
- Resourceful
- Resilient
- Agile

Doing Business the Right Way

At SIB, we believe acting ethically and responsibly is not only the right thing to do, but also the right thing to do for our business. Our SIB Code of Ethics and Business Conduct (our “Code”) is our roadmap for doing business the right way.

Each of us is expected to embrace the principles set out in our Code and:

- A. Show respect in the workplace
- B. Act with integrity in the marketplace
- C. Ensure ethics in our business relationships
- D. Perform work responsibly for our shareholders

Responsibility for Our Code

Our Code applies to every employee, and it governs every business decision we make.

Our Code governs all our decisions and actions, whether in our offices, plants or warehouses or in the manufacturing and selling of our products to customers.

SIB’s Group Human Resource Department is accountable for promoting, monitoring and enforcing our Code. However, the ultimate responsibility for following our Code and for maintaining SIB’s culture rests with each of us individually.

Our Personal Responsibilities

1. Follow Our Code

All of our work must comply with our Code, our policies, and the law.

Our Code, together with SIB’s policies, gives us the information we need to perform our job ethically. It is our responsibility to know and comply with the policies that apply to the work we do and the decisions we make.

2. Lead by Example

Each of us, especially leaders and managers, must act with integrity and inspire trust.

While all employees are expected to act ethically, each manager and leader at SIB has the increased responsibility of leading by example. We expect our leaders and managers to serve as positive role models and inspire others to embrace our Code by:

- Rewarding integrity
- Encouraging ethical decision-making
- Creating an open work environment where team members feel comfortable raising concerns
- Preventing retaliation against those who speak up
- Seeking help in resolving and escalating issues as they arise

We rely on our leaders and managers to reinforce the principles of our Code and Values throughout all levels of our workforce.

3. Seek Guidance and Report Concerns

It is our responsibility to ask questions and raise concerns when compliance issues arise.

The Code, by its very nature, cannot provide for every possible situation that we might encounter in our daily work. If we cannot find an answer in the Code, or if we have questions on how to interpret the Code, seek guidance. Likewise, if we are aware of something that may contradict our Values, or violate our Code, our policies or the law, we should speak up and report it so it can be addressed.

We have several channels to seek guidance or make a report:

- Our immediate manager, next level manager or Human Resource Manager:
Our managers are excellent resources for guidance or concerns related to many policies and processes, work responsibilities, co-worker issues, discipline disputes, promotion opportunities, and issues related to the work environment.
- Group Legal Department:
For issues involving actual or potential Code or legal violations, we are encouraged to seek guidance or raise concerns to Legal Department. Some examples of these issues include:
 - Accounting or auditing irregularities or misrepresentations
 - Fraud, theft, bribery and other corrupt business practices
 - Antitrust or insider trading violations
 - Significant environmental, safety or product quality issues
 - Illegal discrimination or harassment
 - Actual or potential conflicts of interest
 - Guidance on any national, state or municipal legal requirements that apply to SIB or to our job

You may also refer to SIB's Whistle-blowing Policy for further information.

4. Speak Up

We can raise concerns through e-mail or by phone.

Concerns may also be raised via the whistle-blowing channel to SIB's Integrity Officer at whistleblower@sapuraindustrial.com.my.

This channel is available to all SIB employees, suppliers, contractors, subcontractors and agents to ask questions or to raise concerns about compliance or business ethics.

To assist SIB in investigating our report, we are encouraged to communicate as much information we are comfortable with providing. The information provided, and our identity and the identity of persons referred to in our report will be kept confidential, except as needed to conduct a full, fair investigation. We may remain anonymous if we so choose, except where restricted by local law. Our identity will not be recorded or included in any report that is provided to SIB without our consent. What matters is what is being reported, not who reports it.

5. Non-Retaliation

We will not be retaliated against for raising concerns.

SIB is committed to protecting the rights of those individuals who report issues in good faith or with reasonable belief, either through one of the reporting means described in our Code or to government authorities. SIB will not retaliate or permit retaliation against a person who has in good faith or with reasonable belief:

- Reported what he or she believes is a violation of our Values, our Code, our policies, or the law
- Raised a compliance question or seeks advice about a particular business practice, decision or action

- Cooperated in an investigation regarding a potential violation

Retaliation against an employee for reporting an issue in good faith or with reasonable belief is itself a violation of our Code. If we know or suspect that retaliation has occurred or is occurring, we should report it.

(Guidelines as stipulated under SIB's "WHISTLE-BLOWING POLICY")

Part A. Show respect in Our Workplace

One of the guiding principles of our Code is to respect others and succeed together. Our success can be achieved only when we treat everyone, both within and outside SIB, with respect. Respect in the workplace, along with individual excellence and collaborative teamwork is how we will accomplish our goals.

a. Diversity and Inclusion

Each of us must respect the diversity, talents and abilities of others.

At SIB, we define "diversity" as all the unique characteristics that make up each of us: personalities, lifestyles, thought processes, work experiences, ethnicity, race, colour, religion, gender, marital status, age, national origin, disability, or other differences. We strive to ensure an inclusive work environment that embraces the strength of our differences.

We play an important role in creating a work environment in which employees and business partners feel valued and respected for their contributions. We promote diversity and inclusion when we:

- Respect the diversity of each other's talents, abilities and experiences
- Value the input of others
- Foster an atmosphere of trust and openness

We will better understand the needs of our customers and foster innovation if each of us embrace diversity and inclusion in all aspects of our business.

b. Human Rights

Always be alert to possible human rights violations.

SIB recognises the importance of maintaining and promoting fundamental human rights in all of our operations and throughout our supply chain. We operate under programs and policies that:

- Provide fair and equitable wages, benefits and other conditions of employment in accordance with local laws
- Recognise employees' right to freedom of association
- Provide humane and safe working conditions
- Prohibit forced or child labour
- Promote a workplace free of discrimination and harassment

c. Anti-Discrimination

We should never discriminate or deny equal opportunity.

Each of us should have the opportunity to reach our full potential and contribute to SIB's success. To accomplish this, we should never discriminate or treat employees or job applicants unfairly in matters

that involve recruiting, hiring, training, promoting, compensation or any other term or condition of employment.

Our employment decisions regarding employees and applicants must always be based on merit, qualifications and job-related performance, without regard to non-job-related characteristics such as:

- Race, colour, ethnicity, or national origin
- Gender
- Age
- Religion
- Disability
- Any other legally protected status

Making employment decisions based on any of these personal characteristics is always against our policies. We must always act fairly and give qualified individuals the chance to develop their abilities and advance within SIB.

d. Anti-Harassment

We must not harass others in our workplace.

SIB seeks to provide a work environment that is free from harassment of any kind and/or any other offensive or disrespectful conduct. SIB complies with all local laws that prohibits harassment, and our Code prohibits harassment in the workplace.

Harassment includes unwelcome verbal, visual, physical, sexual or other conduct of any kind that creates an intimidating, offensive or hostile work environment. The following non-exhaustive list is unacceptable behaviour:

- Sexual harassment
- Offensive language or jokes
- Racial, ethnic, gender or religious slurs
- Degrading comments
- Intimidating or threatening behaviour
- Showing hostility towards others because of individual characteristics

We should never act in a harassing manner or otherwise cause our co-workers to feel uncomfortable in their work environment. It is important to remember that harassment, sexual or otherwise, is determined by our actions and how they impact others, regardless of our intentions.

e. Safety and Health

No matter where we work or what we do for SIB, we are expected to put safety first.

We are committed to safeguarding the health and safety of our employees, visitors, contractors, customers and communities. Our health and safety policies and procedures are designed to help us to work safely, whether at our facilities, in the marketplace or roadways.

We should always speak up and raise our concerns if we:

- Are asked to do a task we consider unsafe
- Are asked to do a job we think we are not properly trained to perform and that may result in harm to us or to others
- See someone performing a task that we think is unsafe or that the person is not adequately trained to do

- Suspect that a vehicle or piece of equipment is not operating properly and may be unsafe
 - Observe or are made aware of an unsafe condition or a potential danger to ourselves or others
- Safety is everyone’s responsibility – we must insist that work is performed safely, regardless of our role.

f. Substance Abuse

We should not work under the influence of alcohol or drugs.

If we work under the influence of drugs or alcohol, we pose an unacceptable safety risk to ourselves and to others. Drugs may include illegal drugs, controlled substances or misused prescription medication. We are expected to work free from the influence of any substance that could impair our performance at work. We therefore prohibit:

- Working under the influence of alcohol, illegal drugs or controlled substances on or off SIB premises
- Possessing, selling, using, transferring or distributing illegal drugs or controlled substances
- Working while being impaired by a lawful prescription medication or over-the-counter drug

g. Anti-Violence

We must never threaten anyone or display violent behaviour at our workplace.

SIB has a zero-tolerance policy for workplace violence. We are prohibited from engaging in any act that could cause another individual to feel threatened or unsafe. This includes verbal assaults, threats or any expressions of hostility, intimidation, aggression or bullying.

SIB also prohibits the possession of weapons in the workplace. This prohibition extends to SIB’s parking lots as well as any of our facilities. Our zero-tolerance policy for workplace violence applies to behaviour on SIB’s premises, as well as to the behaviour of our employees engaged in SIB business anywhere outside of our premises.

Part B. Act with Integrity in Our Marketplace

We should treat all those in the marketplace with whom we have contact, with fairness and integrity. This includes our customers who purchase our products, our agents who sell our products, the communities we serve, as well as our competitors and our suppliers.

a. Product Quality

We should never compromise product quality.

We are committed to producing high quality products. We maintain customer trust by manufacturing superior products, starting with the purchase of our raw materials and continuing until the finished product reaches the customers’ hands.

If we are involved in any aspect of manufacturing, handling, packaging or storing of our products, we are expected to:

- Know the product quality standards, policies, and procedures that apply to the products produced at our location
- Follow good manufacturing practices and testing protocols
- Comply with all applicable safety laws and regulations

It is important to always be alert for situations that could compromise our products.

b. Responsible Marketing

If we are involved in marketing, always market our products responsibly.

Our product marketing must reflect SIB's high ethical standards, and be truthful, understandable and in compliance with all laws. If we are involved in marketing, we should never:

- Overstate or misrepresent the quality of our products
- Use misleading or untruthful statements in our advertising or labels
- Make unsubstantiated or unverified claims about our products

We must ensure our marketing programs conform to applicable laws and regulations as well as SIB's internal policies and procedures.

c. Our Customers

We must treat our customers fairly.

Integrity in the marketplace requires each of us to treat our customers ethically, fairly, and in compliance with all applicable laws. When dealing with our customers, we should always:

- Earn their business on the basis of our superior products, customer service and competitive prices
- Present our services and products in an honest and forthright manner
- Avoid unfair or deceptive trade practices
- Communicate our sales programs clearly
- Deliver on our promises

Our contracts with customers must always reflect the importance and value we place on their business. All customer sales and trade spending agreements should be in writing and conform to our policies.

d. Our Suppliers

All interactions with our suppliers must meet our high ethical standards.

We hold our suppliers to the same standards of integrity to which we hold ourselves. An unethical or illegal act of a supplier may hurt SIB's reputation and cause a loss of goodwill. Therefore, all suppliers must comply with our Code of Ethics and Business Conduct as a condition of doing business with us. Our suppliers include any third-party vendor, consultant, contractor, service provider or supplier of raw materials or packaging components.

If we are responsible for selecting a supplier, we should base our decision on merit, quality of service and reputation.

e. Our Competitors

Always compete with integrity and follow applicable antitrust and laws.

SIB is committed to outperforming our competitors legally and ethically within the framework of a free enterprise system. Therefore, we should:

- Never comment on competitors' products or services in an inaccurate or untruthful manner
- Only use legitimate means to obtain competitive information

- Respect the confidential information and intellectual property rights of our competitors and of other third parties
- Always comply with antitrust and competition laws

When dealing with competitors, we should never enter into any agreement, whether formal or informal, written or verbal, to set prices or other terms of sale, coordinate bids, allocate customers, sales territories, or product lines, or engage in any other activity that violates applicable antitrust or competition laws. We should never discuss such topics with a competitor, even in an informal setting such as a trade show or customer event.

Part C. Ensure Ethics in Our Business Activities

Our Code requires each of us to make ethical business decisions and to avoid conflicts of interest. Permitting corruption in our business activities is completely inconsistent with SIB's focus on doing business the right way. Our commitment to integrity extends to all of our business relationships and to all interactions with external officials.

External officials include, but not limited to:

- government officials
- local authority officials
- employees of internal and external companies or public charities
- representative of public organisations
- member of law enforcement

a. Conflicts of Interest

We should avoid a conflict, or an appearance of a conflict, between our personal interests and SIB's interests.

SIB's conflicts of interest policy is straightforward – we all have an obligation to act in the best interest of SIB at all times. Conflicts of interest may arise when we, a family member or a friend:

- Engage in activities that compete with, or appear to compete with, SIB's interests
- Let our business decisions be influenced, or appear to be influenced, by personal or family interests or friendships
- Use SIB's property, information or resources for personal benefit or the benefit of others
- Hire, supervise or have a direct or indirect line of reporting to a family member or someone with whom we have a relationship
- Have outside employment and/or activities that negatively affects our job performance or interferes with our responsibilities in SIB
- Work for, provide services to, have a financial interest in or receive any personal benefit from a supplier, customer, competitor or a company that does business or seeks to do business with SIB if such relationship or interest could influence, or appear to influence, our business decisions

We must disclose potential conflicts of interest to SIB. Remember, having a conflict of interest is not necessarily a Code violation, but failing to disclose it is.

If at any time during our employment we think that we may have a potential or actual conflict of interest, we have an obligation to disclose the conflict promptly to SIB so that a determination can be made as to the existence and seriousness of an actual conflict. Many times, conflicts can be resolved by an open and honest discussion. Certain material conflicts may require the acknowledgement of our confidentiality obligations, reassignment of roles, or recusal from certain business decisions.

We must disclose any actual or potential conflict to SIB's Board of Directors OR Chief Executive Officer OR Company Secretary OR Integrity Officer.

b. Anti-Corruption

Our business decisions should never be influenced by corruption.

Corrupt arrangements with customers, suppliers, government officials, or other third parties are strictly prohibited. "Corruption" generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means.

Corruption may involve payments or the exchange of anything of value and includes the following activities:

- Bribery (bribery of a government official or bribery in the private sector)
- Extortion
- Kickbacks

Corrupt activities are not only a Code violation, they can also be a serious violation of anti-bribery and corruption laws in our country. Should we suspect or become aware of any potential, attempted or actual corrupt arrangement or agreement, speak up and report it to SIB's Integrity Officer or email at integrity@sapuraindustrial.com.my.

c. Anti-Bribery

We must comply with all anti-bribery laws.

No matter where we work, there will be an anti-bribery law or policy that applies to us. Under the country's laws, offering a bribe or receiving a bribe is a crime.

To comply with anti-bribery laws, no employee should ever offer, directly or indirectly, any form of gift, entertainment or anything of value to any party with the intention to:

- Obtain or retain business,
- Influence business decisions, or
- Secure an unfair advantage

These prohibitions apply to our business operations and to anyone acting on our behalf, including our Business Associates such as our agents, consultants, suppliers and contractors.

All payments, gifts and entertainment provided to government officials or their family members must be pre-approved in writing by the Chief Executive Officer, Senior General Manager, Group Financial Controller or Board of Directors. Gifts and both direct and indirect that are made to government officials can only be made in official circumstances and must be transparently and accurately recorded in our books and records.

Monetary gifts are strictly prohibited.

(Guidelines as stipulated under SIB's "ANTI BRIBERY POLICY")

d. Anti-Money Laundering

If we suspect our customer or supplier is engaged in an illegal activity, report it.

SIB complies with all laws that prohibit money laundering or financing of illegal or illegitimate purposes. "Money laundering," is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate.

We should always ensure that we are conducting business with reputable customers, for legitimate business purposes, with legitimate funds. Check for “red flags” such as requests from a potential customer or supplier for cash payments or other unusual payment terms. If we suspect money laundering, speak up and report it to SIB’s Integrity Officer or email at integrity@sapuraindustrial.com.my.

e. Political Activities

We are prohibited from using SIB’s resources for personal political activities.

SIB encourages its associates to participate in their communities, and this may include participation in political activities. However, we may not use SIB’s funds or resources, or receive any reimbursement from SIB, for personal political activities, including contributions to political candidates or parties. We should avoid even the appearance of doing so.

f. Business Gifts

No employee may accept any gift in connection with their service to the customer or supplier.

We are prohibited from receiving any gift that serves to, or appears to, inappropriately influence business decisions or gain an unfair advantage.

(Guidelines as stipulated under SIB’s “NO GIFT POLICY”)

Part D. Responsibility to Our Shareholders

Acting with responsibility and transparency goes hand-in-hand with protecting shareholder value. Each employee creates value for our shareholders by putting SIB’s interests first, maintaining accurate business records, and protecting and properly using SIB’s resources, information and property.

a. Accurate Business Records

Our business records must be accurate and complete.

SIB’s focus on speaking with truth and openness underscores our commitment to accuracy in SIB’s books and records. Business records, including our financial statements, contracts and agreements, must always be accurate and reflect a forthright presentation of the facts. No matter what type of document or how insignificant it might seem, the information contained in a business record must always be truthful and complete. Financial records must reflect all components of the financial transactions and events. Likewise, all of our transactions, no matter what the monetary amount, must be properly authorised, executed and recorded.

We are accountable for the accuracy of the business records that we handle in the normal course of business. We should never:

- Falsify, omit, misstate, alter or conceal any information or otherwise misrepresent the facts on SIB’s records
- Encourage or allow anyone else to compromise the accuracy and integrity of our records

b. Public Disclosures

Our financial reporting obligations rely on SIB’s accurate business records.

Our investors and the general public rely on SIB, and the law obligates us, to report our business, our earnings and our financial condition accurately. The disclosures we make in our public communications, regulatory disclosures and reports submitted to Bursa Malaysia Securities, to the Securities Commission

Malaysia and to other governmental agencies must always be full, fair, accurate, timely and understandable.

If we are involved in preparing SIB's financial statements, or in preparing the certifications which are relied upon to prepare the statements, we must always follow SIB's financial policies, SIB's system of internal controls and generally accepted accounting principles.

c. Records Management

We should maintain business records in accordance with SIB's existing Policies and Procedures.

The business records that we work with must be maintained, retained and destroyed in accordance with all legal and regulatory recordkeeping requirements. To manage our business records properly, we should:

- Comply with our records management policies for all documents, files, electronic records and emails
- Follow the retention periods specified in internal and external requirements
- Follow the instructions in a "legal hold" record retention notification

d. Audits and Investigations

Our auditors and investigators require our full cooperation.

During our employment with SIB, we may be asked to participate in an audit or internal investigation conducted by our outsourced internal auditors, external auditors, Legal Department or any panel set up for the investigation. We are expected to cooperate fully and communicate honestly.

We may also receive a request for documents or a request to meet with regulators or lawyers in connection with a legal proceeding or investigation. If we receive such a request, we should immediately contact the Legal Department for assistance.

e. Company Resources

We have an obligation to protect SIB's resources.

We should use SIB's resources honestly and efficiently. Resources include physical property, such as facilities, supplies, equipment, machinery, spare parts, raw materials, finished products, vehicles and SIB's funds. Resources also include intangible assets, such as time, confidential information, intellectual property and information systems. We should use SIB's resources only for legitimate business purposes and protect them from theft, loss, damage, or misuse.

The obligation to protect SIB's funds is particularly important if we have spending authority, if we are able to approve travel and entertainment expenses, or manage budgets and accounts. We must always:

- Ensure the funds are properly used for their established purpose
- Obtain required approval before incurring an expense
- Accurately record all expenditures
- Verify that expenses submitted for reimbursement are business-related, properly documented and comply with our policies

f. Fraud

We should never compromise honesty and integrity by committing fraud.

We misuse SIB's resources, and commit fraud when we intentionally conceal, alter, falsify or omit information for our benefit or the benefit of others. Fraud may be motivated by the opportunity to gain something of value (such as meeting a performance goal or obtaining a payment) or to avoid negative consequences (such as discipline). Examples of fraud include:

- Altering manufacturing numbers to meet productivity goals
- Presenting false medical information to obtain disability benefits
- Falsely reporting time worked to earn more pay or to avoid discipline for being late or absent from work
- Misstating financial information in SIB's books and records

We should also avoid the appearance of fraud. For example, never spend SIB's funds without proper approval. Similarly, never enter into an agreement on behalf of SIB unless authorised to do so.

g. Confidential Information

We must protect the confidential information of SIB and our business partners.

During our employment, we may acquire certain information about SIB, its customers, suppliers or business partners or another third party that is confidential, competitively sensitive and/or proprietary. We should assume that this information is confidential or competitively sensitive unless we have clear indication that SIB or the other parties have publicly released the information.

Always take reasonable and necessary precautions to protect any confidential information relating to SIB or another party to which we have access. We should not disclose any confidential business information to anyone outside SIB, even to members of our own family, unless the disclosure is:

- Properly authorised
- In connection with a clearly defined, legitimate business need
- Subject to a written confidentiality agreement approved by the Legal Department

Even within SIB and among our co-workers, we must only share confidential information on a need-to-know basis.

This obligation of confidentiality does not prohibit us from raising concerns about potential Code or legal violations either internally or to government authorities. Our ability to report legal violations internally or to a government authority, either during or after our employment, is not prohibited by any other SIB policy or agreement.

h. Insider Trading and Transactions in SIB Securities

We may violate the law if we trade stock on "insider information."

In the course of performing our job, we may learn of certain confidential information that qualifies as "material non-public information" about SIB, its customers, suppliers or business partners or any other third party. Information is "material non-public information" when it:

- has not been widely disseminated to the public, and
- is information that a reasonable investor would consider important in making a decision to buy or sell a particular security.

We should not disclose material non-public information to anyone outside SIB, including family members and friends. Examples of confidential “material non-public information,” are SIB’s financial records and business strategies.

We should not transact in SIB securities or the securities of another company involved with SIB based on material, non-public information we have obtained about SIB or that company. This prohibition on trading applies to all transactions in SIB securities, including purchasing or selling SIB securities, exercising options and increasing or decreasing our investment in SIB.

i. Privacy

If we access personal information, keep it secure and use it only as authorised.

Personal information broadly refers to any information that identifies or relates to an identifiable person. If we have access to this type of information or to the systems that maintain it, we must comply with all applicable policies and laws regarding the processing of such information. We must:

- Only access, collect and use personal information that we need and are authorised to see for legitimate business reasons;
- Disclose personal information only to authorised persons who have a legitimate business reason to know the information and who are obliged to protect it;
- Securely store, transmit and destroy personal information in accordance with applicable policies and laws; and
- Promptly report any actual or suspected violations of our policies or other risks to personal information to our Legal Department.

j. External Communications

We are not authorised to speak on behalf of SIB.

If we are contacted and asked to discuss SIB’s business with any members of the press, investors or market analysts, do not provide any information. Instead, politely advise the party that we are not authorised to discuss the subject, and refer them to the spokespeople designated in our Human Resource Department or Company Secretary.

Similarly, when using social media we should be clear that we do not speak on behalf of SIB. We should always:

- State that the materials and opinions we are posting are ours and not SIB’s
- Take every possible precaution to ensure that we are not disclosing any confidential information about SIB
- Refrain from using any SIB or third party logos or trademarks without prior written permission

k. Intellectual Property

Always use our trademarks and other intellectual property properly.

Our intellectual property is an invaluable asset that must be protected at all times. Intellectual property includes our trademarks, brands, package designs, logos, copyrights, inventions, patents and trade secrets. We should never allow a third party to use our trademarks or other intellectual property without proper authorisation and a license agreement that has been approved by the Legal Department. Furthermore, our trademarks should never be used in a degrading, defamatory or otherwise offensive manner.

Our intellectual property also includes employees' work product. As an employee of SIB, any work we create, in whole or in part, in connection with our duties, and/or using SIB's time, resources or information, belongs to SIB. For example, inventions, ideas, discoveries, improvements, artwork, processes, designs, software or any other materials we may help to create or author in connection with our work for SIB belongs to SIB. We should promptly disclose any invention related to our business, so that it may receive the same protection as other intellectual property of SIB.

h. Email, Internet and Information Systems

We must use SIB email and internet accounts responsibly and protect the security of our information systems.

Our information technology systems are a key component of our business operation and are provided for authorised business purposes. Our use of these systems must comply with our Information Technology Policy, Code of Practice and Procedure Manual. We may engage in reasonable incidental personal use of phone, email and the internet as long as such usage does not:

- Consume a large amount of time or resources
- Interfere with our work performance or that of others
- Involve illegal, sexually explicit, discriminatory or otherwise inappropriate material
- Relate to outside business interests
- Violate our Code or any Company policy

While it is generally not our practice to monitor employees' use of our information systems, SIB reserves the right to monitor, record, disclose, audit, and delete without prior notice the nature and content of an employee's activity using SIB's email, phone, voicemail, internet and other systems, to the extent permitted by local law.

Administering Our Code

- Group Legal Department
- Group Human Resource Department

We may contact the above departments with questions at any time.

- For general inquiries, contact sib_enquiries@sapuraindustrial.com.my
- For questions on the training programs, contact training@sapuraindustrial.com.my
- For questions and disclosures concerning conflicts of interest, contact integrity@sapuraindustrial.com.my
- We can send a postal mail letter to :
Integrity Officer
Sapura Industrial Berhad
Lot 2 & 4 Jalan P/11, Seksyen 10
Kawasan Perindustrian Bangi
43650 Bandar Baru Bangi, Selangor
- We can contact them by telephone : 603-8925 6011

a. Investigating Misconduct

SIB takes seriously all reports of misconduct.

All reports of suspected violations of our Code or the law will be taken seriously and promptly reviewed. As appropriate, SIB's Integrity Officer will assign investigator(s) to review all reported instances of alleged Code violations. The investigator(s) will:

- Act objectively in determining facts through interviews or a review of documents
- Contact employees who may have knowledge about the alleged incident(s)
- Recommend corrective actions and/or disciplinary measures where appropriate in accordance with applicable law

SIB strives to:

- Protect the confidentiality of the individuals involved, to the extent practical
- Inform an employee of the accusations reported against him/her at a time when such a disclosure will not jeopardize the investigation
- Where permissible, allow employees to review and correct information reported

If asked, we must cooperate fully with an inquiry or investigation.

b. Disciplinary Actions

If we violate our Code, SIB will take appropriate disciplinary action.

We are expected to follow the Code, and comply with our policies and the law while conducting business on behalf of SIB as a condition of employment. Violating the Code, our policies or the law may result in: Disciplinary action, leading to termination of employment, depending on the nature and severity of the Code violation

In the case of a violation of law, civil and/or criminal penalties may be imposed by a governmental agency or a court.

c. Our Code is Not a Contract

Our Code is not a contract. It does not convey any specific employment rights or guarantee employment for any specific period of time. Employees are however bound by all applicable obligations set out in this Code.

d. Disclosure of Waivers

Any waiver of our Code requires the prior written approval of the Chief Executive Officer or, in certain circumstances, the Board of Directors or Audit Committee thereof. If required by applicable law, waivers will be promptly disclosed as required by applicable law.

e. Issuance of and Amendments to Our Code

SIB's Board Audit Committee is responsible for approving and issuing the Code. Our Code is reviewed periodically by Group Legal Department to determine whether revisions may be required due to changes in the law or regulations, or changes in our business or the business environment.

The latest revisions were made, reviewed and approved on 12 September 2023 by the Board.