



**ECONPILE HOLDINGS BERHAD
(1017164-M)**

CODE OF CONDUCT

1. INTRODUCTION

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

2. PRINCIPLE

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

3. PURPOSE

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

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

4. CODE OF CONDUCT

Every Officer is responsible to ensure compliance with the Code:

- Know and comply with the Code and the Company Policies and Procedures.
- Seek guidance when in doubt.
- Avoid illegal, unethical or otherwise improper acts.
- Report any suspected violation of policies, laws and regulations.

- Assist authorised teammates with investigations.
- Take responsibility and accountability for own actions.

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

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

4.1. Human Rights

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

4.2. Health and Safety

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

4.3. Environment

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

4.4. Gifts, Gratuities and Entertainment

Each and every Officer must not accept entertainment, gifts, or personal favors that could, in any way, influence, or appear to influence, business decisions in favor of any person or organisation with whom or with which the Company has, or is likely to have, business dealings.

Similarly, the Officers must not accept any other preferential treatment under these circumstances because their positions with the Company

might be inclined to, or be perceived to, place them under obligation to return the preferential treatment.

4.5. Anti-Bribery

Officers shall never offer, give, ask for, accept or receive any form of bribe. A bribe occurs when someone attempts to influence a decision by offering some form of undue or improper advantage, incentive or favour.

4.6. Company Records and Internal Controls

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

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

4.7. Company Assets

The Company's properties and assets should be managed and safeguarded in a manner which protects their values. Officers are accountable both for safeguarding all assets entrusted to them, including information resources, records, materials, facilities and equipment under their care or control, from loss, theft, waste, misappropriation or infringement and for using the assets to advance the interests of the Company. All officers have an affirmative duty to immediately report the theft, loss or misappropriation of any Company assets, including financial assets, physical assets, information assets and electronic assets to the management as stipulated under Violations of Code of Conduct below.

4.8. Exclusive Service

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

4.9. Integrity and Professionalism

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

4.10. Personal Appearance

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

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

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

4.11. Confidential Information

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

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

Personal records and remuneration including the Officer's own remuneration are classified as Private and Confidential information and shall not be divulged.

4.12. Compliance Obligations

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

suspected of being criminal in nature to the police or other relevant authorities.

4.13. Conflict of Interest

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

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

4.14. Fair Dealing

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

4.15. Anti-Money Laundering

"Money Laundering" is the process 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.

The Group will to the best of its ability and knowledge conduct businesses with reputable customers with legitimate funds, for legitimate business purposes.

4.16. Insider Dealing

Officers are prohibited to trade in the Company's securities affected by or on behalf of a person with knowledge of relevant but non-public material information regarding the Group.

Any person who commits insider trading, he/she may be subjected to certain criminal and civil actions under Malaysian Law which includes Capital Markets and Services Act 2007.

5. COMMUNICATION AND COMPLIANCE

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

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

6. VIOLATIONS OF CODE OF CONDUCT

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

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

7. NON-RETALIATION

The Company makes every effort to maintain the confidentiality of any individual who reports concerns and possible misconduct. Officers who retaliate or encourage others to do so will be subjected to disciplinary actions, up to and including termination of employment or engagement. The Company does not tolerate any form of retaliation against anyone who makes a report in good faith.

8. INVESTIGATIONS

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

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

9. PERIODIC REVIEW

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

This Code of Conduct was adopted by the Board on 29 August 2018 and is published on the Company's website at www.econpile.com.