

# FARLIM GROUP (MALAYSIA) BERHAD

## Corporate Code of Conduct and Ethics

### 1. Objective and Application

The Corporate Code of Conduct and Ethics aims to articulate the Group's specific principles against insider trading, money laundering, bribery and corruption, conflicts of interest, abuse of power and anti-competition only. Therefore, all directors, officers, senior management, and employees shall continue to familiarise themselves and observe the provisions in the existing employee handbook, the Company's policies and regulations for other aspects of proper conduct, self-discipline and compliance.

In addition, it shall be noted that this Code shall apply to and be observed by our contractors, sub-contractors, consultants, agents, business associates, representatives and others performing work or services for or on behalf of Farlim Group of companies.

### 2. Principles

At Farlim, all directors, officers, senior management, and employees shall not:

- (a) Enter into any transaction in the securities of the Company while in possess of non-public information about that Company or recommend others to transact in the securities of the Company based on insider information;
- (b) Participate and assist in money laundering activities which may include accepting an unusual amount of payment or making payments to third parties or in currencies that are not in the ordinary course of business and contract;
- (c) Solicit or accept bribes;
- (d) Provide or promise to offer gratifications to obtain or retain business or secure an unfair advantage in any business transaction;
- (e) Take part in deciding transaction, contract or proposed contract or arrangement in which they are interested, directly or indirectly;
- (f) Abuse power conferred to their position for personal gain and benefits; and
- (g) Arrange or enter into an anti-competitive scheme in price-fixing, bid-rigging, sharing market, and abuse of dominant position in any market, creating unhealthy and unfair competition.

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### 3. Board's Responsibilities

The Board shall ensure that the objectives of this Code are met by:

- Setting a role model in practising the provisions of this Code;
- Committing and ensuring the implementation of appropriate system and framework to support, promote and strengthen awareness and compliance with this Code;
- Implementing a whistleblowing reporting channel to facilitate communication and feedback;
- Integrating the philosophy of this Code into the Group's decisions, practices and procedures; and
- Monitoring the management performance against the principles of this Code.

### 4. Management's Responsibilities

Management shall:

- Observe and promote the principles of this Code;
- Ensure that their decision, judgment, actions and interaction with all stakeholders are consistent and not conflicting with this Code;
- Ensure that all staff reporting to them understand and comply with this Code; and
- Communicate this Code to other stakeholders and gain their acknowledgement and compliance with it.

### 5. Reporting of Non-Observance

Stakeholders who know of or suspect a violation of this Code are encouraged to report the incident according to the Group's whistleblowing policy and procedure.