



MATANGBERHAD
Registration No: 201501017043 (1142377-X)
(Incorporated in Malaysia)

CODE OF CONDUCT AND ETHICS FOR EMPLOYEES

1. INTRODUCTION

This Code of Conduct and Ethics ("Code") applies to all employees of Matang Berhad ("Matang") group of companies ("Matang Group" or "Group") and aims to provide guidance on the standards of behaviours expected of all employees of the Group.

This Code is non-exhaustive and does not include every instance of expected behaviour by an employee throughout his/ her tenure at the Group. Should there be ethical circumstance which is not covered by this Code, employee is expected to seek guidance and clarification from his/ her Head of Department, or the Human Resources Department.

2. CODE OF ETHICS

An employee of the Company should at all times observe the following conduct in the performance of his/ her duties:

A. General Standards of Conduct

An employee should exercise integrity and a high standard of professionalism in discharging his/ her duties and responsibilities. In this respect, an employee should do his/ her utmost to preserve and enhance Matang Group's good reputation and to act in the best interest of the Group at all times.

An employee shall at all times treat his/ her colleagues and business associates with upmost respect as to create a pleasant and inclusive work environment. An employee shall not harass, intimidate, threaten, abuse or act inappropriately towards their peers and business associates. An employee is responsible to report all occurrences of these incidents upwards to management of the Group. The Group shall act swiftly to investigate and take the appropriate actions to prevent future recurrence if the incidents are proven to be genuine.

An employee is expected to perform his/ her responsibilities and duties free from the influence of any substance which may impair the work performance of himself/ herself, other employees and business associates of the Group. The use, possession of illegal substances, such as illegal drugs, or the consumption of alcohol during working hours is strictly prohibited. An employee will be subjected to disciplinary actions

if they are found to be non-compliant.

B. Conflict of Interest

An employee has an obligation to act within the best interests of the Group. He/ she has a duty in which to avoid any monetary, business-related direct or indirect interests which may cause a conflict with the Group.

An employee is prohibited from any involvement in the following activities:

- a. Providing/ receiving gifts to/ from persons or entities which are establishing business relationship with the Group or to retain business within the Group; and
- b. Initiating/ accepting bribes, kickbacks or other unlawful benefits for services related to the business of the Group.

C. Confidential Information

An employee must at all times maintain and protect the confidentiality of all non-public information which is obtained due to its positions as an employee in the Group. Such information shall not be used for any personal gain or in any manner during or after the cessation of his/ her tenure at the Group.

Confidential information would include but not limited to physical and non-physical data, technical documents, patents, business plan and budget, customer information, and any other financial and non-financial information which are not publicly available.

An employee is not to disclose any confidential information, or endorse their peers to do so. The Group reserves the right to enforce disciplinary actions towards the offender. Violations may induce the termination of employment and/ or legal action, depending on severity of the infraction.

D. Use of Corporate Assets and Company Funds

An employee who has received company assets in the form of laptops, licensed software, and other resource is required to take the necessary precautions to prevent damages, loss, or misuse of the asset or resource. An employee is expected to safeguard and make proper use of the assets provided to him/ her. In the instance that an employee has been discovered to have damaged, lost, misused or otherwise used the asset in an illegal manner, the Group reserves the right to impose monetary fines, initiate disciplinary and/ or legal actions toward the offender where it deems appropriate.

E. Compliance with Laws, Rules and Regulations

The Board of Directors of Matang ("Board") requires all employees of the Group to strictly comply with the applicable Group or the Company's policies and procedures, including but not limited to Anti-Bribery and Corruption Policy and Whistle-Blowing Policy, and all other applicable laws, regulations and guidelines.

F. Corporate Social Responsibility

An employee of any companies within the Group shall always ensure that all activities and operations carried out within the Group do not harm the interest and well-being of the society at large.

G. Reporting Illegal or Unethical Behaviour

An employee is encouraged to raise question or issue of particular circumstance that may implicate the provisions of this Code to the attention of either the Management team of the Group or the Audit and Risk Management Committee of the Company for resolution.

An employee should communicate any suspected violation of this Code promptly to the Chairman of the Audit and Risk Management Committee of the Company. Suspected violation will then be investigated by the Audit and Risk Management Committee or by any person designated by the Audit and Risk Management Committee or the Board. Appropriate remedial or disciplinary actions will be taken in the event of any violation of the Code.

H. Non-Retaliation

The Company prohibits retaliation of any kind taken against individual who has made good faith report or complaint of violation of this Code, the Company's business conducts or any other known or suspected illegal or unethical conduct.

AMENDMENTS AND MODIFICATIONS

This Code may, from time to time, be amended or modified by the Board so as to provide sound practices towards human capital excellence, duties and responsibilities.