



**SASBADI**

**SASBADI HOLDINGS BERHAD**

(Company No. 1022660-T)

## **CODE OF CONDUCT**

### **1. INTRODUCTION**

The Board of Directors (“the Board”) of Sasbadi Holdings Berhad (“Sasbadi Holdings” or “the Company”) is committed to implementing and maintaining principles and practices of good corporate governance within Sasbadi Holdings and its subsidiaries (“the Group”) in order to safeguard stakeholders’ investments and the Group’s assets. In this regard, the Board has formalised and adopted a Code of Conduct which spells out certain values, principles and standards of good conduct expected of the Directors and Employees of the Company or any of the subsidiaries (“Subsidiary”) at work, as set out in the ensuing sections.

### **2. CORE AREAS OF CONDUCT**

#### **2.1 Compliance with Relevant Laws and Regulations**

The Director or Employee of the Company/Subsidiary shall familiarise himself/herself with the relevant laws and regulations pertaining to his/her area of work and carry out his/her duties and responsibilities in compliance with the said laws and regulations.

#### **2.2 Conflict of Interest**

Except with the Company’s/Subsidiary’s consent in writing, the Director or Employee shall not during the continuance of his/her appointment or employment with the Company/Subsidiary, carry on any business or enter the service of or be employed in any capacity for any purpose in relation to any part of his/her time (by any person or firm) which is in conflict with the Company/Subsidiary, and the Director or Employee shall not be engaged or interested in any undertaking or carry on any business or profession of a similar nature or competing with the Company’s/Subsidiary’s practice and shall at all times use his/her best endeavours to promote the interest and good reputation of the Company/Subsidiary and its practice.

#### **2.3 Punctuality and Diligence**

The Director or Employee shall attend punctually at the office as his/her duties may require and shall devote his/her time and attention to and, diligently and to the best of his/her skill, perform his/her duties.

## **2.4 Confidentiality**

All information obtained in the course of work with the Company/Subsidiary either obtained in the office or out of the office shall be deemed to be strictly confidential. During the appointment or employment of the Director or Employee with the Company/Subsidiary, he/she shall not at any time divulge such confidential matters directly or indirectly to any employees or to anyone whomsoever or whatsoever having dealings with the Company/Subsidiary and which come to his/her knowledge during or in the course of his/her employment (except strictly in the proper course of his/her duties and only in accordance with the instructions he/she may receive from time to time from the officer in a superior position of the Company/Subsidiary or with the expressed consent or approval of the Company/Subsidiary).

The Director or Employee shall not, even after the termination of his/her appointment or employment, divulge confidential information either directly or indirectly to any person or company, except with the expressed consent or approval of the Company/Subsidiary.

All records or documents made or held by the Director or Employee relating to the Company/Subsidiary shall remain the property of the Company/Subsidiary.

## **2.5 Intellectual Property**

All intellectual property produced by the Director or Employee during the course of his/her appointment/employment with the Company/Subsidiary shall vest in the Company/Subsidiary and he/she is prevented from using it for other purposes. Thus, the Director or Employee shall not lay any claim to copyrights or royalties on such work unless specifically provided.

## **2.6 Protection of Assets and Resources**

The Director or Employee shall strive to preserve and protect the Company's/Subsidiary's assets and resources, and to promote their efficient use and usage for the right purposes.

## **2.7 Business Records and Internal Control System**

The Director or Employee shall maintain and keep proper records of the business transactions that he/she undertakes for the Company/Subsidiary. In addition, the Director or Employee shall perform his/her duties and responsibilities in accordance with the internal control system implemented by the Group.

## **2.8 Insider Information and Securities Trading**

In performing his/her duties, the Director or Employee may have obtained insider information (i.e. non-public information) which can affect the price of the securities of the Company. In this regard, the Director or Employee who is in possession of the insider information shall be prohibited from trading in securities or providing insider information to others to trade in the securities of the Company unless such information has been publicly released.

## **2.9 Fair Dealing**

The Group shall practise fair treatment of its Directors and Employees and shall deal with its customers, suppliers and other stakeholders with honesty and integrity.

The Group values the diversity of its Directors and Employees and is committed to providing equal opportunity to any individual whether for appointment as a director or employment within the Group, or for career development opportunities, irrespective of gender, age, religion or race.

## **2.10 Promote Sustainability**

The Board shall ensure that its short-term and long-term strategies promote sustainability to the environment, social and governance aspects of the Group's business, and the Director or Employee shall carry out his/her roles and responsibilities in accordance with that.

## **2.11 Sexual Harassment**

The Group is committed to ensure that its Directors and Employees are free from sexual harassment at the workplace. The Group's aim is to provide a safe and conducive working environment. Sexual harassment of any nature at the workplace is prohibited and will not be tolerated or condoned by the Group.

Sexual harassment at the workplace shall include any employment related sexual harassment occurring outside the workplace as a result of employment responsibilities or employment relationships.

## **3. REPORTING OF VIOLATIONS OF THE CODE OF CONDUCT**

Any Director or Employee who knows of, or suspects, a violation of the Code of Conduct, is encouraged to whistle-blow or report the violation or suspected violation through the Whistle-Blowing Policy of the Company, a copy of which can be viewed at the Company's website, [www.sasbadiholdings.com](http://www.sasbadiholdings.com). Details on the policies and procedures of whistle-blowing as well as the protection accorded to the whistle-blower are set out in the Whistle-Blowing Policy.

## **4. REVIEW OF THE CODE OF CONDUCT / WAIVER FROM COMPLIANCE**

The Board shall review the Code of Conduct from time to time for changes and new developments in the external and internal environment, and the latest copy of the Code of Conduct shall be made available at the Company's website, [www.sasbadiholdings.com](http://www.sasbadiholdings.com).

The Board or the relevant Committee of the Board may grant waiver from compliance with the Code of Conduct on a case-to-case basis, after evaluating the circumstances of the case.