

EXCEL FORCE MSC BERHAD
[Registration No. 200201003114 (570777-X)]

CODE OF CONDUCT

1. Introduction

Excel Force MSC 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 Group. All Directors, management and employees of the Group shall be referred to as “Officers” hereon.

2. Purpose

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

- 2.1 To emphasize the Group’s commitment to ethics and compliance with the applicable laws and regulations;
- 2.2 To improve the employee’s self-discipline in order to meet the Group’s commitment to ethics and compliance to laws and regulations and to meet the Group’s objective of providing good and quality service; and
- 2.3 To enhance skills in the implementation of duties and to be able to adapt to the work environment.

3. Code of Conduct

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

3.1 Human Rights

The Group supports and respects human rights. The Group 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.

3.2 Health and Safety

The Group provides a work environment that is safe, conducive, secure and free of danger, harassment, intimidation, threats and violence. The Group takes appropriate precautions to prevent injuries or adverse working conditions for each and every officer.

3.3 Environment

The Group conducts operations in a manner that safeguards health, protects the environment and conserves valuable materials. The Group is committed to protecting the environment by minimizing and mitigating environmental impacts throughout the life cycle of operations.

3.4 Corruption and Bribery

The Group has a zero-tolerance approach towards any form of bribery or corruption and Officers shall not give or receive any bribes, especially in the conduct of activities relating to the Group. Officers shall read, understand, and comply with the Group's Anti-Bribery and Anti-Corruption Policy and the Group's other relevant policies and procedures for combatting corruption.

3.5 Gifts, Entertainment and Hospitality

Officers must exercise caution in relation to offering or accepting gifts, entertainment, and hospitality, other business courtesies.

Officers should refer to the Group's Policy on Gift, Entertainment, Hospitality, and Third-Party Travel for the giving and accepting of gifts and business courtesies.

3.6 Conflict of Interest

Officers shall avoid situations where there could be an actual, potential, or perceived conflict of interest situations which may compromise or potentially compromise the Officer's ability to act in the best interest of the Group. Officers shall disclose any actual, potential, or perceived conflict of interest situations for the Group's assessment and necessary mitigative actions.

3.7 Company Records and Internal Controls

The Group's business records must be prepared accurately and honestly, by any of the Group's Officers who contribute to the creation of this business records. The Group is obligated to maintain business records for operational, legal, financial, historical and other purposes and must take 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, financial and operational 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.

3.8 Company Assets

The Group'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 group. All Officers have an affirmative duty to immediately report the theft, loss or misappropriation of any the Group's assets, including financial assets, physical assets, information assets and electronic assets to the management as stipulated under Violations of Code of Conduct below.

3.9 Commitment

The Group expects each and every Officer to give their fullest attention, dedication and efforts to their duties. Officers must avoid any personal, financial or other interest which may be in conflict with their duties and responsibilities to the Group.

3.10 Integrity and Professionalism

All Officers should conduct themselves with the highest degree of integrity and professionalism in the workplace or any other location while representing the Group in any business matters.

3.11 Personal Appearance

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.

3.12 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.

3.13 Compliance Obligations

Officers are responsible for knowing and complying with the requirements applicable to their work activities, including those described in Rules of Conduct and Disciplinary Procedure in the Employee Handbook and those described in the Company's guidance documents (Company's standards, policies and procedures and manuals).

4. Communication and Compliance

The Board 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 Group and is complied by all levels of Officers.

5. Acknowledgment and Declaration

All Officers (permanent, temporary, contract, and intern) are required to complete the Acknowledgement and Declaration Form (Appendix I of this Code).

Exceptions to this requirement shall be approved by the Managing Director.

6. Violations of Code of Conduct

All Officers should report to their supervisors, managers, Head of Departments or Head of Human Resource about any 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.

All Officers shall also refer to and adhere to the Whistle Blower Policy.

7. 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.

8. Periodic Review

The Board and Senior Management of the Company will review the Code on an annual basis and communicate the new changes to all levels of Officers.

This Code is dated 24 November 2020.

Acknowledgement and Declaration Form

1. I have read and fully understood Excel Force MSC Berhad ("EForce")'s and its subsidiaries' (**"the Group"**) Code of Conduct and the Group's policies referred to in the Code of Conduct;
2. I agree to comply with the Group's Anti-Bribery and Anti-Corruption Policy and will not give or receive bribes in any form to and from anyone, especially relating to the Group's businesses and activities;
3. I declare that, to the best of my knowledge:
 - ☐ I am not aware of any conflicts that I have with the Group, its personnel, or its businesses.
 - ☐ apart from the conflicts declared below, I am not aware of any other conflicts that I have with the Group, its personnel, or its businesses.

(tick whichever is applicable)

	Name of Conflicted Party (actual, potential, and perceived)	Relationship with Conflicted Party	Nature of Conflict of Interest Situation with the Group and Detailed Description (e.g. shareholdings, directorships, close family member relationship, etc.)
(i)			
(ii)			
(iii)			
(iv)			

I agree to notify EForce Group as soon as practicable on any emerging or new actual, potential or perceived conflict of interest situations arising.

4. I declare that:
 - ☐ I have never been convicted of any crimes or offences whether within or outside Malaysia, other than traffic offenses.
 - ☐ I have been convicted of the following crimes or offences whether within or outside Malaysia, other than traffic offenses.

(tick whichever is applicable)

EXCEL FORCE MSC BERHAD

I declare that all information provided in this form is to the best of my knowledge and belief, true, complete, and accurate. I understand that if any information provided above is untrue, incomplete, or inaccurate, the EForce Group reserves the right to review my directorship or employment with the Group, as well as to impose penalty or disciplinary actions consistent with the Group's policies.

Name: _____

Identity Card/ Passport
Number: _____

Signature: _____

Date: _____