



# BUSINESS CODE OF CONDUCT AND ETHICS v2.0

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V.S. INDUSTRY BERHAD AND GROUP  
OF COMPANIES

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# Overview

V.S. Industry Berhad and its subsidiaries (collectively, “**VS**”) are committed to conduct their business professionally, ethically and with the highest standard of integrity focusing on **cultivating responsible corporate governance culture within VS** by incorporating integrity and strong ethical values in its day – to – day business practices.

# Our Core Values

## Ethical Business

Focus on **complying with statutory regulations**

## Create Shared Value

Focus on **understanding and addressing significant societal expectations** along the entire value chain

## A Good Business Partner

Focus on **partnering with stakeholders** in building and leveraging core competencies to address company’s challenges

# Message from our Managing Director

At VS, we have prioritized maximizing positive impacts to our customers, shareholders, and our stakeholders by doing business responsibly that creates shared value through a strong foundation in integrity of action and compliance with all applicable laws, regulations, and standards.

In support of this goal, a **Business Code of Conduct and Ethics** (the “Code”) outlining the visions, rules, values, and ethical principles is established. The Code is adopted and endorsed by the Board of Directors evincing our commitment to upholding the highest standards of integrity in our business practices. The Code summarizes the guidance provided in VS’s principles, policies, standards, and procedures, which acts as a definitive guide to all levels of employees on how they should work and act while performing their task every day.

As business partners play an important role as enablers of our sustainable growth and overall success, the Code is also extended to business partners requiring them to explicitly acknowledge and adhere to the principles embodied in the Code and to ensure that any sub – contractors engaged by the Business Partners will also comply with these principles.

We would like to stress that every one of us is responsible for the prevention, detection, and reporting of irresponsible business practices and have the responsibility in voicing out when we become aware of any conduct that might violate the law, regulations, or our Code. Those who report or assist with investigations will be supported, and any retaliation against those who voice out will not be tolerated.

Thank you all for your support and commitment.



**Datuk Gan Sem Yam**  
Managing Director

# Definition

The definitions of the key terms used in this Code are as follows:

<b><i>Anti – Corruption laws</i></b>	Any applicable Laws, including Malaysian Anti-Corruption Commission Act 2009 (MACCA) pertaining to the prohibition of offering, giving, receiving, or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person a position of trust within an organization, including acts of extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud, or money laundering.
<b><i>Applicable Laws</i></b>	All national, supra national, federal, state, local, rules, regulations, including case law and any orders, writs, injunctions, awards, judgments and decrees applicable to V.S. Industry Berhad and its subsidiaries, counterparties and Business Partners, as well as any guidance, guidelines and requirements of any relevant regulatory authorities and any industry codes of practice in effect from time to time applicable to the activities performed under this Code and includes anti-corruption laws.
<b><i>Board of Directors</i></b>	Executive and Non – Executive Directors of VS
<b><i>Business Partners</i></b>	Business associates, partners, vendors, suppliers, agents, contractors, external consultants, third party intermediaries and any other person associated with VS.
<b><i>Data Protection Laws</i></b>	Any Applicable Laws pertaining to data protection or the processing of Personal Data, including the Malaysian Personal Data and Protection Act 2010 and any associated regulations, instruments, standards, guidelines, and any industry codes of practice in effect from time to time applicable to the activities performed under this Code
<b><i>Employees</i></b>	Directors, managers, full-time and part-time employees, agency employees, seconded employees, volunteers, and interns of VS
<b><i>Subsidiaries</i></b>	Company controlled by V.S. Industry Berhad by <ol style="list-style-type: none"> <li>i. the acquisition of more than half (50%) of the voting shares or voting rights;</li> <li>ii. the holding of more than half (50%) of voting rights by virtue of an agreement with other investors;</li> <li>iii. the governing of the financial and operating policies of the company under a statute or an agreement;</li> <li>iv. the right to appoint or remove the majority of the members of the Board of Directors of the company; and</li> <li>v. the right to cast the majority of votes at a meeting of the Board of Directors of the company</li> </ol>

# Purpose of the Code

The Code provides guidance on the standards of behavior expected of all Directors and Employees of VS, and where applicable, Business Partners. The standards of behavior are derived from VS Core Values, Vision, Mission, and Business Principles.

# Scope of the Code

This Code applies to V.S. Industry Berhad and its subsidiaries (collectively, "**VS**") and applies to all:

- (a) Board of Directors;
- (b) Employees; and
- (c) Business Partners.

# General Principles of the Code

We pride ourselves on our reputation for managing our business affairs fairly, honestly, and ethically, and our collective commitment to uphold integrity throughout VS.

The Code is not an exhaustive document and may not address every possible situation. You are obliged to familiarize yourself with and adhere to all applicable laws, policies, procedures, regulations, and standards of the countries in which your Company operates. The recognized standards, as set out in the **Reference** section, were used in preparing the Code and may be useful sources of additional information.

When there is a conflict between the provisions of this Code, VS Policies and Procedures, the stricter provisions shall apply. However, if the Code conflicts with the applicable law, we should always obey the law. If the Code sets a higher standard for ethics and integrity than the law, we should follow the Code.

If you find yourself in a situation or are uncertain of the answer, you may seek advice or ask for help from your Head of Department, Human Resource Manager or Risk and Compliance Manager. For more information, please refer to the **Ethical Decision – Making Process** section found in this Code.

Above all else, you must exercise sound judgement in making good decisions every day.

# Responsibility and Compliance to the Code

## VS Employees

This Code acts as a definitive guide on how VS's employees should work and act ethically while performing their task every day. All employees shall adhere to the Code and must be committed to

1. Read and follow the guidance set forth in the Code.
2. Foster a positive, inclusive work environment and a strong culture of ethics.
3. Report of any conduct that might violate the law, regulations, or our Code unless prohibited from doing so by the law.
4. Do not engage in workplace retaliation.
5. Report any known or suspected retaliation.
6. Cooperate with investigations.

We expect managers and supervisors to demonstrate high – integrity leadership. If you are a manager or supervisor, you have additional responsibilities, including:

1. Set the tone and act as an ethical role model for everyone around you.
2. Create an environment that encourages asking questions and raising concerns.
3. Listen and report concerns appropriately, escalating them as needed.
4. Do your part to create a fair and respectful workplace.

Employees are subject to disciplinary action, up to and including termination of employment or dismissal, for violating the Code. Violation of the Code that is related to criminal acts may result in prosecution after referral to the appropriate authorities.

## VS Business Partner

All business partners are obliged to ensure that the standards set out in this Code are observed in their own facilities and operations. In addition to the implementation of these standards in business partners' own operations, they are obliged to take a proactive approach in ensuring these standards are cascaded and implemented in their supply chain's operations.

Violation of the Code may result in blacklisting by VS.

# Ethical Decision – Making Process

If you find yourself in a situation where the right course of action is not clear or if the answer is not in the Code, you should strive to act with integrity and consider each of the following questions:

1. Does the action follow your Company's Core Value, Code, Policies, and applicable laws?
2. Does the action uphold your Company's reputation for conducting business ethically?
3. Would you feel comfortable if your action was reported in the media?

If your answer is

## **NO**

Do not proceed.

## **NOT SURE**

If you are uncertain, you may seek advice or ask for help from your Head of Department, Human Resource Manager or Risk and Compliance Manager.

## **YES**

If the answer to each of these questions is "Yes", then the decision to proceed with your action is probably okay.

# A. Responsible Employment

As a **responsible employer**, VS is committed to ensuring an inclusive and non – discriminatory work environment that provides equal opportunities for all. VS will continue to seek opportunities to consult and align with the interests of local communities and strive to create the ideal workplace where people from diverse ethnicities, cultures, religion, and socio – economic standing with multiple talents and differences in skills and abilities, irrespective of age or gender, come together to work successfully as a team.

VS is also committed to upholding the human rights of employees and treating them with dignity and respect in accordance with applicable laws, regulations and standards as described in our **Human Rights Policy**. This applies to all employees including temporary, migrant, student, contract, direct employees, and any other type of employees.

The labor standards are:

## 1) Prohibition of Forced Labor

Forced Labor in any form, including but not limited to, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or trafficking of persons is not permitted. This includes:

- a. Transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.
- b. All work must be voluntary, and employees shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given, which shall be clearly stated in per employees' contracts. Documentation on all leaving workers shall be maintained by the employer.
- c. Employers, agents, and sub-agents may not hold or otherwise destroy, conceal, or confiscate identity or

immigration documents, such as government-issued identification, passports, or work permits.

- d. Employees shall not be required to pay employers' agents' or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by employees, such fees shall be repaid to the employee.
- e. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

## 2) Young Workers

Child Labor and employees under the age of 18 (Young Workers) is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.



### 3) Working Hours

Working hours are not to exceed the maximum set by applicable law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Employees shall be allowed at least one day off every seven days.

### 4) Freedom of Movement

Employees shall not be unreasonably restricted in their movements. This includes:

- a. There shall be no unreasonable restrictions on employees' freedom of movement inside any company – provided facilities including employees' dormitories or accommodations.
- b. Employees are allowed to move freely within their designated work areas during working hours, including being allowed access to drinking water and toilets.
- c. Employees are allowed to leave the facility during meal breaks or after working hours.

### 5) Wages and Benefits

- a. Employees shall be provided with a living wage and compensation paid to employees shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. All employees shall receive equal pay for equal

work and qualifications. Employees shall be compensated for overtime at pay rates greater than regular hourly rates.

- b. Deductions from wages as a disciplinary measure are not permitted.
- c. For each pay period, employees shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed.

### 6) Prevention and mitigation of precarious employment

As part of the hiring process, all employees must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment. Foreign migrant employees must receive the employment agreement prior to the employee departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet applicable law and provide equal or better terms.

### 7) Non – Discrimination / Non – Harassment / Humane Treatment

VS is committed to a workplace free of harassment and unlawful discrimination. This includes:

- a. Harsh and inhumane treatment will not be tolerated including both

threats and acts of violence (gender – based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, and public shaming), as well as intimidation, use of abusive language, threatening conduct, and attempts to instill fear in others.

- b. All employees shall be treated fairly and equally regardless of race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, or marital status, or family responsibilities in hiring and employment practices such as wages, promotions, rewards, and access to training.
- c. Employees shall be provided with reasonable accommodation for religious practices, disability, and family responsibilities (such as nursing rooms)
- d. Employees or potential employees shall not be forced to undergo medical tests, including pregnancy or virginity tests, or physical exams that could be mismanaged in any discriminatory way whatsoever.
- e. Disciplinary policies and procedures shall be clearly defined and communicated to the employee.
- f. Any reported inhumane or disrespectful behavior shall be investigated in accordance with the **Disciplinary policies and procedures**.

## 8) Freedom of Association and Collective Bargaining

VS believes open communication and direct engagement between employees and management are the most effective ways to resolve workplace and compensation issues.

In conformance with applicable law, in alignment with these principles, VS respect the right of all employees to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of employees to refrain from such activities.

Employees and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, employees shall be allowed to elect and join alternate lawful forms of worker representations.

## B. Healthy and Safe Working Environment

VS recognizes that a safe and healthy work environment enhances the quality of products and services, consistency of production and employee retention and morale hence is committed to providing a healthy and safe working environment and is actively driving accident prevention efforts across all its operations.

The health and safety standards are:

### 1) Occupational Health and Safety

- a. Employee potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) are to be identified and assessed, mitigated using the Hierarchy of Controls, which includes eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and providing ongoing occupational health and safety training.
- b. Where hazards cannot be adequately controlled by these means, employees are to be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards.
- c. Gender – responsive measures are taken, such as not having pregnant women and nursing mothers in working conditions with high hazards which could be hazardous

to them or their child and reasonable accommodations for nursing mothers are provided for example, providing a breastfeeding room in the workplace.

- d. Any workplace health and safety risks to pregnant women and nursing mothers, including those associated with their work assignments are to be removed or reduced.

### 2) Emergency Preparedness

- a. Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills.
- b. Emergency plans should include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and

procedures shall focus on minimizing harm to life, the environment, and property.

- c. Annual execution of Emergency drills or as required by applicable law, whichever is more stringent.

### 3) Occupational Injury and Illness

- a. Procedures and systems are to be in place to prevent, manage, track, and report occupational injury and illness, including provisions to encourage employee reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases, and implement corrective actions to eliminate their causes, and facilitate the return of employees to work.
- b. Employees are allowed to remove themselves from imminent harm, and not return until the situation is mitigated, without fear of retaliation. The employees are required to inform their immediate superior in regard to this.

### 4) Industrial Hygiene

- a. Employees exposed to chemical, biological, and physical agents are to be identified, evaluated, and controlled according to the Hierarchy of Controls.
- b. Identified potential hazards shall be eliminated and/or reduced.
- c. If elimination or reduction of the hazards is not feasible, the potential hazards are to be controlled through proper design, engineering, and administrative controls. When

hazards cannot be adequately controlled by such means, employees will be provided with and use appropriate, well-maintained, personal protective equipment free of charge.

- d. Employees shall be provided with ongoing protective programs, including educational materials about the risks associated with these hazards.

### 5) Physically Demanding Work

Employees exposed to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks are to be identified, evaluated, and controlled.

### 6) Machine Safeguarding

- a. Production and other machinery shall be evaluated for safety hazards.
- b. Physical guards, interlocks, and barriers are to be provided and properly maintained where machinery presents an injury hazard to employees.

### 7) Sanitation, Food and Housing

- a. Employees are provided with readily accessible clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities both at the

workplace and their accommodation.

- b. All dormitories or accommodation provided shall be maintained, cleaned regularly, and kept safe.
- c. All dormitories or accommodation provided are provided with appropriate emergency egress, water for bathing and showering, adequate lighting and ventilation, and reasonable personal space along with reasonable entry and exit privileges.

## 8) Health and Safety Communication

- a. Employees will be provided with appropriate workplace health and safety information and training in the language of the employee or in a language that the employee can understand for all identified workplace hazards that employees are exposed to, including but not

limited to mechanical, electrical, chemical, fire, and physical hazards.

- b. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers.
- c. Health information and training shall include content on specific risks to relevant demographics, such as gender and age, if applicable. Training is provided to all employees prior to the beginning of work and regularly thereafter. Employees are encouraged to raise any health and safety concerns without retaliation.

Employees shall raise concern via the Grievance Channel.

All matters related to accidents, dangerous occurrences, occupational poisoning, and disease shall be reported to local authorities as required by the applicable laws.

# C. Protecting the Environment

VS recognized that environmental responsibility is integral to producing world class products. In VS manufacturing operations, adverse effects on the community, environment and natural resources are minimized through standard operating procedures that are constantly updated and improved while safeguarding the health and safety of the public.

The Environmental Standards are:

## 1) Environmental Permits and Reporting

All required environmental permits (e.g., discharge monitoring), approvals, and registrations are obtained, maintained, and kept current, and their operational and reporting requirements are duly reported.

## 2) Pollution Prevention and Resource Conservation

- a. Emissions and discharges of pollutants and generation of waste are minimized or eliminated at the source or minimized by adding pollution control equipment, modifying production, maintenance, and facility processes, materials substitution or by other means.
- b. Wherever possible, appropriate measures are taken to reduce, reuse, recycle and dispose of the use of natural resources, including water, fossil fuels, minerals, and virgin forest products in an environmentally responsible way.

## 3) Hazardous Substances

Chemicals, waste, and other materials posing a hazard to humans, or the environment are to be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Hazardous waste data shall be tracked and documented.

## 4) Solid Waste

A systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous) is implemented. Waste data shall be tracked and documented.

## 5) Air Emissions

- a. Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are to be characterized, routinely monitored, controlled, and treated as required prior to discharge.
- b. Ozone depleting substances are to be effectively managed in accordance with the Montreal Protocol and applicable regulations.

- c. Routine monitoring of the performance of the air emission control systems shall be conducted.

## 6) Materials Restriction

All applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal must be adhered to.

## 7) Water Management

- a. A water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination are implemented.
- b. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal.

- c. A routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance shall be conducted.

## 8) Energy Consumption and Greenhouse Gas Emissions

- a. A corporate-wide greenhouse gas reduction goal is established.
- b. Energy consumption and all relevant Scopes 1 and 2 and significant categories of Scope 3 greenhouse gas emissions are tracked, documented, and publicly reported against the greenhouse gas reduction goal.
- c. Initiatives in line with applicable laws to reduce and minimize its energy consumption and greenhouse gas emissions are actively pursued.



# D. Fair and ethical Business Practices

VS is committed to implementing and maintaining high standards of ethical business practice throughout VS as a fundamental part of its responsibilities in managing its business affairs to protect the interests of all stakeholders.

The ethical standards are:

## 1) Business Integrity

- a. The highest standards of integrity shall be upheld in all business interactions.
- b. A zero-tolerance policy prohibiting all forms of bribery, corruption, extortion, and embezzlement is adopted.
- c. All business dealings should be transparently performed and are accurately reflected in business books and records.
- d. Adequate procedures have been implemented to monitor and ensure compliance with Anti – Corruption Laws.

## 2) No Improper Advantage

- a. Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any

person, or otherwise gain an improper advantage.

- b. Adequate procedures have been implemented to monitor and ensure compliance with Anti – Corruption Laws.

For more information, please refer to the **Anti – Corruption Framework Policy** published in our Corporate Website [www.vs-i.com](http://www.vs-i.com).

## 3) Disclosure of Information

- a. All business dealings should be transparently performed and accurately reflected in business books and records.
- b. Information regarding labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable laws, regulations, and prevailing industry practices.
- c. Falsification of records or misrepresentation of conditions or practices are unacceptable.



#### 4) Intellectual Property Rights

- a. Intellectual property rights are to be respected and transfer of technology and know-how is to be done in a manner that protects intellectual property rights.
- b. Customer and Business Partner information is to be safeguarded.

#### 5) Fair Advertising and Business, and Competition

Standards of fair business, advertising, and competition are to be upheld.

For more information, please refer to ***VS Fair Business Practices Policy***.

#### 6) Protection of Identity and Non-Retaliation

- a. Retaliation for asking a question, making a report in good faith, or participating in an investigation will not be tolerated.
- b. The confidentiality, anonymity, and protection of any whistleblowers are to be maintained, unless prohibited by law.

For more information, please refer to the following policies published in our Corporate Website [www.vs-i.com](http://www.vs-i.com)

- 1. ***Whistleblowing Policy***
- 2. ***Non – Retaliation Policy***

#### 7) Responsible Sourcing of Minerals

- a. Working with business partners that extract minerals that directly or indirectly fund conflicts shall be avoided.
- b. The source and chain of tantalum, tin, tungsten, gold, and cobalt are traced to reasonably assure that they are sourced in a way consistent with the Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- c. In consistent with the industry standard for Supply Chain Transparency provided in the Conflict Mineral Reporting Template (CMRT) or Cobalt Reporting Template (CRT) as developed by RMI, information on the presence of requested minerals, including 3TGs and cobalt in products and data on the smelters and refiners of respective supply chains shall be provided.
- d. Suspend or discontinue engagement with up-stream suppliers after failed attempts at mitigation, remediation, or non-conformance with the Code.

#### 8) Privacy

- a. The principles as prescribed in Data Privacy Laws for collected, stored, processed, transmitted, and shared personal information will be complied.
- b. The personal information of employees, customers, Business

Partners, and other individuals will be protected and shall ensure that the purposed of collecting, processing, and storing of Personal Data is to facilitate the identification, authorization, credential and approval of the commercial transaction and services to be undertaken, contemplated or being

undertaken between VS and the Data Subject or the Company that the Data Subject is representing.

For more information, please refer to the ***Personal Data Protection Policy*** published in our Corporate Website [www.vs-i.com](http://www.vs-i.com)

# Administration of the Code

## Where to Get Guidance

The administration of the Code shall be the responsibility of the Head of Risk and Compliance Function.

You can seek advice from the following personnel if you are uncertain as to the interpretation or application of this Code.

**Labor Related Code:** Human Resource Team

**Health and Safety Related:** Health and Safety Team

**Environmental Related:** Environment Team

**Business Ethics Related:** Risk and Compliance Team

## Raising a Concern or Reporting a Violation

You are encouraged and urged to report an improper conduct as soon as you discover the commission or an intended commission of an improper conduct or if you are being instructed to participate in an improper conduct. The report may be made anonymous or named basis by email or in writing properly sealed and marked “**Private and Confidential**” to:

### Whistleblowing Unit (WBU)

V.S. Industry Berhad

No. 88, Jalan I-Park SAC 5, Taman Perindustrian I-Park SAC, 81400 Senai, Johor

DID: +607-552 8900 / +607-552 8901 Gen: +607-552 8888

Email: [whistleblow@vs-i.com](mailto:whistleblow@vs-i.com)

## Investigations

The reported misconduct will be thoroughly review and investigations will be conducted if required. Your personal information will not be disclosed throughout the investigation.

## No Retaliation

VS does not tolerate retaliation for asking a question, making a report in good faith, or for participating in an investigation.

If you think you have experienced or witnessed retaliation, you may consult or report to our Audit Committee Chairman at [bcwee@vs-i.com](mailto:bcwee@vs-i.com).

For more information, please refer to the following policies published in our Corporate Website [www.vs-i.com](http://www.vs-i.com)

1. **Whistleblowing Policy**
2. **Non – Retaliation Policy**

# Reference

The Code is established by referencing to applicable laws, regulations, and industry standards, which include but not limited to the following:

1. Malaysian Employment Act 1955
2. Malaysian Anti-Corruption Commission Act 2009
3. Personal Data and Protection Act 2010
4. Occupational Health and Safety Act 1994
5. Environmental Quality Act 1974
6. Responsible Business Alliance Code of Conduct
7. OECD Guidelines for Multinational Enterprises
8. Un Guiding Principles on Business and Human Rights
9. ILO Declaration on Fundamental Principles and Rights at Work
10. ILO Fundamental Conventions
11. UN Universal Declaration of Human Rights

# Declaration of Employee's acknowledgement and acceptance of the Business Code of Conduct and Ethics v2.0

I hereby acknowledge that I have read and understand the Business Code of Conduct and Ethics, Whistleblowing Policy, non – retaliation Policy, Anti – Corruption Framework Policy and Personal Data Protection Policy as published in VS Corporate Website.

I agree to comply with all policies, practices, rules, and regulations contained in the Code and company policies during my employment term.

I understand that if I fail to comply with the Code and other policies, I may be subject to disciplinary action, up to and including dismissal from employment.

**Employee Name** :

**Signature(s):** :

**Employee ID** :

**Date** :

# Declaration of Business Partner's acknowledgement and acceptance of the Business Code of Conduct and Ethics v2.0

On behalf of the Business Partner, it is herewith confirmed that:

- i. the Business Partner has received and read a copy of the Business Code of Conduct and Ethics (the "Code");
- ii. the Business Partner undertakes to comply with the Code and agrees that it shall form the basis of present and future business with VS;
- iii. this Code shall form part of any agreement entered into between the Business Partner and any VS company, regardless of whether it is expressly incorporated into the contract by reference or not;
- iv. the Business Partner may be asked again to reconfirm his compliance with this Code when entering into a contract with VS;
- v. the Business Partner shall be held responsible for ensuring compliance with the Code by his employees, company representatives, as well as subcontractors and any business partners that the Business Partner is using to supply products and/or services when doing business with VS.

The signatories hereby acknowledge that (a) they are authorized representative(s) of the Business Partner, and (b) they are permitted to make these undertakings on behalf of the Business Partner.

**Name(s) (in BLOCK CAPITALS),** :  
**Function(s)/Position(s) (in BLOCK CAPITALS)** :

**Signature(s):** :

**Company Stamp** :

**Date** :