



W T K HOLDINGS BERHAD

197001000863 (10141-M)

Incorporated in Malaysia

CODE OF CONDUCT AND ETHICS

1. INTRODUCTION

W T K Holdings Berhad (“the Company” or “WTK”) has adopted the following Code of Conduct and Ethics (“the Code”) for Directors and employees of the Company and its subsidiaries (the “Group”). The Code is established to promote the corporate culture which engenders ethical conduct that permeates throughout the Company and the Group. All Directors and employees of the Group shall be referred to as “Officers” hereon.

2. PRINCIPLE

The principle of the Code is based on principles in relation to trust, integrity, responsibility, excellence, loyalty, commitment, dedication, discipline, diligence and professionalism.

3. OBJECTIVE

The Code is intended to achieve the following: -

- a) To emphasise the Group’s commitment to ethics and compliance with applicable laws and regulations to which each Officer is bound to observe in the performance of his/her duties;
- b) To set forth basic standards of ethical and behaviour within the Group;
- c) To include noble characteristics in performing duties so as to improve work quality and productivity; and
- d) To improve self-discipline in order to provide the Group with good and quality service.

4. APPLICABILITY

Every Officer has a duty to read the Code and:-

- a) Know and comply with the Code.
- b) Seek guidance when in doubt.
- c) Avoid illegal, unethical or otherwise improper acts.

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- d) Report any suspected violation of policies, laws and regulations.
- e) Assist authorised teammates with investigations.
- f) Take responsibility and accountability for his/her actions.
- g) For an employee, the employee may refer or highlight any concerns to his/her immediate superior or Head of Department.
- h) For Director, the Director may refer or highlight any concerns to the Chairman, Managing Director or Senior Independent Director.

The Company may take disciplinary actions against any Officer who fails to act in accordance with the Code.

5. CORE AREAS OF CONDUCT

Each Officer must comply with the following spirit of the Code in performing his/her duties:-

a) 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. Officers should respect the personal dignity, privacy and rights of each individual they interact with during the course of work and shall not in any way cause or contribute to the violation or circumvention of human rights.

b) Health And Safety

The Group provides a work environment that is safe, 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. It is the responsibility of each and every Officer to adhere to the prescribed safety rules and acts as well as to raise any concerns which may represent a potential threat to health and safety. Officers are responsible for reporting injuries and unsafe work practices or conditions as soon as they being discovered or become known.

c) 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. Officers should contribute to minimizing the use of finite resources, including energy, water and raw materials. Officers should minimize harmful emissions to environment, including waste, air emissions and discharges to water.

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d) Gifts And Business Courtesies

Officers should not accept gifts or other form of remuneration if there is reason to believe that its purpose is to improperly influence business decisions. The gifts, favours, entertainment or services that are deemed as not given to influence the Directors' or Employees' performance of duties include normal business courtesies (meals or entertainment), token gifts which are occasional, gifts during festive or special occasions and gifts from social functions attended by Directors or Employees on behalf of the Group, are permissible.

e) Business Records And Controls

Accurate, timely and reliable records are necessary to meet the Group's legal and financial obligations and to manage the affairs of the Group. All books, records and accounts should conform to generally accepted and applicable accounting principles and to all applicable laws and regulations. The preparation and maintenance of accurate and adequate business records are the responsibility of each Officer. No unauthorised, false, improper or misleading records or entries shall be made in the books and records of the Group, under any circumstances.

f) 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 the 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 assets, including financial assets, physical assets, information assets and electronic assets.

g) Exclusive Service

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

h) Integrity And Professionalism

Officers should remember that they are a reflection on the Group and are constantly being judged and otherwise appraised by everyone they come in contact with. All Officers should conduct themselves with the highest degree of integrity and professionalism in the workplace or any other location while working or representing the Group.

i) Confidential Information

It is pertinent that all Officers exercise caution and due care to safeguard any information of a confidential and sensitive nature relating to the Group which is acquired in the course of their employment, and are strictly prohibited to disclose to any person, unless the disclosure is duly authorized or legally mandated.

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In the event that an Officer knows of material information affecting the Group which has not yet publicly released, the material information must be held in the strictest confidence by the Officers involved until it is publicly released.

j) Compliance to the Law

The Group will comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions within which the Group operates. All Officers are expected to understand and comply with the laws, rules and regulations that are applicable to their positions and/or work, including the Anti-Money Laundering and Anti-Terrorism Financing Act 2001, Malaysian Anti-Corruption Commission Act 2009, Personal Data Protection Act 2010 and Competition Act 2010. The Group reserves the right to report any actions or activities suspected of being criminal in nature to the police or other relevant authorities.

6. REPORTING OF VIOLATIONS OF THE CODE

Any Officer who knows of, or suspects, a violation of the Code, is encouraged to whistle blow or report the concerns through the Whistleblowing Policy. The Whistleblowing Policy for reporting of the violations of the Code is available in the Group's Work Manual for employees. No individual will be discriminated against or suffer any act of retaliation for reporting in good faith on violations or suspected violations of the Code.

7. REVIEW OF THE CODE

The Code of Conduct and Ethics is to be regularly reviewed by the Board of the Company as and when required.

The Company reserves its right to amend or modify the Code in whole or in part, at any time without assigning any reason whatsoever.