

WESTPORTS HOLDINGS BERHAD
(Company No. 262761-A)

CODE OF CONDUCT

1. Purpose and Scope

The purpose of this Code of Conduct (the “Code”) is to set standards for the Directors, management and employees within Westports Holdings Berhad (“the Company”) and all subsidiary companies within the Westports Group (“the Group”) to promote honest and ethical conduct, including the ethical handling of actual or apparent conflict of interest between personal and professional relationships workplace and to observe applicable rules, regulations and local laws (“the Laws”). In the performance of duties, the employees are expected to carry out the mandate and responsibility to the best of their ability and judgement and maintain highest standard of integrity and conduct outside.

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

- To emphasize the Group’s commitment to ethics and compliance with the applicable laws and regulations;
- To set forth basic standards of ethical and legal behaviour within the Group;
- To include noble characteristics in performing duties so as to improve work quality and productivity;
- To improve self-discipline in order to provide the Group with good and quality service; and
- To enhance skills in the implementation of duties and to be able to adapt to the work environment.

2. Compliance with Laws

All employees must conduct themselves in compliance with all applicable laws, rules, codes and regulations, wherever the Group conducts business and this Code shall apply subject to the Laws.

3. Code of Conduct

Every employee is responsible to ensure compliance with the Code:

- Know and comply with the Code and the Company policies and procedures.
- Seek guidance when in doubt.
- Avoid illegal, unethical or otherwise improper acts.
- Report any suspected violation of policies, laws and regulations.
- Assist authorised teammates with investigations.
- Take responsibility and accountability for own actions.

The Company will take appropriate action against any personnel who fails to act in accordance with applicable statutory laws, Company policies and procedures and this Code.

4. Fair Dealing and Integrity

Employees should endeavour to deal fairly with customers, suppliers, competitors, governmental authorities, employees of the Group and the general public. Employees should not take unfair advantage of or mislead anyone through manipulation, concealment, abuse of privileged or confidential information, misrepresentation of material facts, fraudulent

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behaviour, any other unfair dealing practice, abuse dominant position, engage in concerted practises or any anti competitive behaviour which prevents, restricts or distorts competition.

Employees shall comply with competition law and strictly observe the prohibition of anti-competitive agreements, concerted practises and abuse of a dominant position or of substantial market power in all business transactions as breaches of competition law will not be tolerated.

Employees must perform their duties and responsibilities for the Group with the highest degree of integrity. Integrity requires employees to perform their work with honesty, diligence, responsibility and in accordance with applicable laws. In the performance of their work, employees must not knowingly be party to any illegal activity or engage in acts that are discreditable to the Group. Integrity requires employees to observe both the form and the spirit of the ethical principles contained in this Code.

5. No Discrimination or Harassment

The Group is committed to providing a work environment that is free from all forms of discrimination on the basis of race, ethnicity, gender, creed, religion, age, disability or sexual preference.

We are also committed to providing a positive work environment that values the wide-ranging perspectives inherent in our diverse workforce and fosters individual growth and achievement of business goals. The values we encourage in our employees are: candor, courtesy, an ability to deal with change and respect to humanity, personal dignity and privacy.

Harassment is any inappropriate conduct which has the purpose or effect of:

- i. Creating an intimidating, hostile, or offensive work environment; or
- ii. Unreasonably interfering with an individual's work performance.

Forms of harassment include, but are not limited to, behaviour toward another person based on that person's race, ethnicity, gender, creed, religion, age, disability or sexual preference which is unwelcome and personally offensive to its recipient. Individuals who believe they have been subjected to discrimination or harassment should immediately report the incident to their supervisors and their Human Resources Department.

Upon receipt of any complaints or concerns on acts of harassment, the Human Resources Department should notify management so that appropriate corrective steps can be taken.

Any act of discrimination or harassment when dealing with employees, customers and /or suppliers will not be tolerated and the offender will be subject to severe disciplinary action, including possible termination of employment.

6. Health and Safety

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

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Employees are responsible for reporting injuries and unsafe work practices or conditions as soon as they being discovered or become known.

7. Environment

The Company conducts operations in a manner that safeguards health, protects the environment and conserves valuable materials. The Company is committed to protecting the environment by minimising and mitigating environmental impacts throughout the life cycle of operations. Employees should contribute to minimizing the use of finite resources, including energy, water and raw materials. Employees should minimise harmful emissions to environment, including waste, air emissions and discharges to water.

8. Equal Employment Opportunity

The Group is committed in providing equal employment opportunities to all individuals regardless of race, colour, religion, sex, national origin, age, disability, marital status, sexual orientation, or any other characteristics protected by law. It is the Group policy to provide equal opportunity to all employees with regard to hiring, pay rates, training and development, promotions and other terms of employment.

The Group will accommodate reasonable request for qualified individuals with known disabilities unless doing so would results in an undue hardship. An employee with a disability for which reasonable request is needed should contact the Human Resource Department to discuss possible arrangements.

Employees with questions or concerns about any type of discrimination in the work place are encouraged to bring these issues to the attention of the Human Resources Department. Employees can raise legitimate concerns and make good faith reports without fear of reprisal.

9. Sexual Harassment in the Workplace

Sexual harassment is defined as any unwanted conduct of a sexual nature that takes the form of verbal, non-verbal, visual, psychological or physical harassment:

- a. that might, on reasonable grounds, be perceived by the recipient as placing a condition of a sexual nature on her/his employment; or
- b. that might, on reasonable grounds, be perceived by the recipient as an offence or humiliation, or a threat to her/his well-being.

This also includes e-mail or letters illustrating sexual content or harassment that is unsolicited.

It is essential to emphasize that sexual harassment refers to sexual conduct, which is unwanted and unwelcomed to the recipient. It is also a sexual conduct which is imposed on and unsolicited or unreciprocated by the recipient.

Sexual harassment constitutes a breach of the Groups policy and will incur disciplinary action, including possible dismissal.

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10. Whistle Blower

The policy is designed to enable employees of the Group to raise concerns internally and to disclose information which the individual believes shows malpractice or misconduct is being committed. This is also to cover concerns which are in the public interest and may at least initially be investigated, so that appropriate remedial action can be taken.

Employees should report the conduct or action by any employees that does not comply with the law or with this Code. Reports will be treated as confidential to the extent possible as allowed by law. The identity of whistle blowers who provide information related to a reasonable belief that an improper activity has occurred would be protected with appropriate regard for confidentiality and no employee will be disciplined for reporting a concern in good faith. However, the Group will take disciplinary action against any employee who intentionally provides false or malicious information in connection with an alleged violation of the Law or with the Code.

Separate investigation also might lead to the other approach of procedures (e.g. disciplinary process). Conduct becomes reportable when it happens or when it is reasonably likely to occur which may cause harm to the Group if it is not addressed. Harm is not only measured in terms of lost of revenue or damage, but damage done or caused to the integrity and reputation of the Group.

There is no restriction on what is reportable and it may include the following:

- a. any concerns on any aspects of the Group operations;
- b. criminal offence;
- c. disciplinary offence;
- d. damage to environment;
- e. breach of legal obligation;
- f. damage to health, safety of any individual;
- g. financial malpractice;
- h. improper conduct, immoral or unethical behaviour;
- i. bribery;
- j. any act which breaching any parts of Malaysian laws;
- k. attempt to conceal any information or cover up any of these types of actions;
- l. any other suspicious act which there is a reasonable belief that may cause harm to the Group or others.

The employee who has concern over any issues which he/she thinks appropriate to make the management aware, report can be made to the Chairman of Audit and Risk Management Committee, the Group Managing Director or the Head of Human Resource.

11. Anti-Bribery

All forms of bribery are prohibited and the Group will not tolerate such activities. Any employees found have been committed bribery will be subject to disciplinary action and could result in termination.

Every Head of Department and Heads of Sections are required to ensure that all employees adhere to this Anti Bribery Policy. All employees have the responsibility to prevent and report instances not only of bribery, but also other suspicious activity or wrong doing which may lead to bribery. If any employee suspects or observes anything which is in contravention with this policy, it must be reported under the "Whistle Blower Policy" the earliest possible. All

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reports will be treated as highly confidential and the Group will ensure that anyone who reports will not be in detrimental position as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

Bribes can take many forms, for example:

- Money (or cash equivalent such as shares)
- Unreasonable gifts, entertainment or hospitality;
- Kickbacks;
- Unwarranted rebates or excessive commissions (e.g.: sales or marketing);
- Unwarranted allowances or expenses;
- “Facilitation” payments/payment made to perform their normal job more quickly and/or priorities a particular customer;
- Political /charitable contributions;
- Uncompensated use of Group services or facilities; or
- Anything else of value.

Any reports on bribery can be made through the procedure as indicated in Whistle Blower Policy. The Group will comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions which the Group operates. Employees are expected to understand and comply with the laws, rules and regulations that are applicable to their positions and/or work activities, including the Anti-Money Laundering and Anti-Terrorism Financing Act 2001 and the Malaysian Anti-Corruption Commission Act 2009 and Amendment 2018. The Group reserves the right to report any actions or activities suspected of being criminal in nature to the police or other relevant authorities.

12. Anti-Money Laundering

“Money Laundering” is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate.

The Group will to the best of its ability and knowledge conduct businesses with reputable customers with legitimate funds, for legitimate business purposes.

13. Confidential Information

It is a condition of employment that any employee shall not during and after his employment with the Group, except with the prior written consent of the Group, utilize or disclose to any persons or organizations any confidential information he may have acquired as a result of his employment with the Group.

14. Personal Data Protection

The Group shall treat all personal data with private and confidential and handled in a fair, accurate and secure manner. All employees who possess and/or has control over or authorizes the processing of personal data must ensure that all personal data handled are protected thereby safeguarding the interests of each individual involved. The Group and employees involved in processing personal data must comply with any relevant rules, regulations, legislations and controls that are put in place to protect the privacy of the personal information and shall adhere to the seven (7) enforceable data protection principles of good practice as follows:

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- I. General Principle - personal data are obtained and processed fairly with consent of the data subject and kept only for the specified and lawful purpose
- II. Notice and Choice Principle – data subject is told the purpose for which the personal data is to be processed
- III. Disclosure Principle - personal data used and disclosed in ways compatible with the purpose for which it was collected
- IV. Security Principle - personal data are kept safe and secure with security measures taken
- V. Retention Principle – personal data not kept longer than is necessary for the purposes for which it was collected
- VI. Data Integrity Principle – to ensure the personal data are accurate complete and updated
- VII. Access Principle – upon request the data subject is given access to his personal data and to be able to update and correct that personal data

15. Making Public Statement

An employee shall not either orally or in writing or in any other form make any public statement on the policies, decisions, measures or work undertaken by the Group on any issue, nor shall he cause any such statement made by him or anyone else to be circulated.

All public statements would need to be done in accordance to the Corporate Disclosure Policies and Procedures of the Group.

16. Efficiency

The Group may take disciplinary action in the event of inefficiency, misconduct or indiscipline. Should the Group find that an employee has failed to carry out his duties efficiently, disciplinary action will be taken against the person.

17. Protection and Proper Use of Group Assets

Assets of the Group shall be used by employees for legitimate business purposes and not for personal use. Assets of the Group include, among other things, information, resources, materials, supplies, money, property (including intellectual property, software, hardware and facilities) and the time and talent of employees.

Employees should protect the assets of the Group by avoiding carelessness and waste and by using such assets prudently and efficiently to conduct the business of the Group.

The personal use (including theft) of assets of the Group without permission from the Group is prohibited.

18. Group Books and Records

Employees are responsible for providing honest, accurate information in the course of their work with the Group. Accounts, financial reports, research report, marketing, information, sales reports, tax returns and information, expense accounts, time reports, claims and all other books, records and document of the Group must be kept in such a way as to accurately and completely reflect all Group transactions.

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Knowingly providing false, incomplete or inaccurate information is improper and, in some situations, illegal. Certain types of information and documents must be updated or amended if changes become known. Employees must not withhold or fail to provide information to their supervisors or management.

19. Abuse of Power

The abuse of authority/power is the improper use of a position of influence, power or authority by an individual towards others. This is particularly serious when the alleged offender misuses his or her influence, power or authority to negatively influence the career or employment conditions (including, but not limited to, appointment, assignment, contract renewal, performance evaluation or promotion) of other individuals. Abuse of authority can include a one-time incident or a series of incidents. It may also consist of conduct that creates a hostile or abusive work environment, which includes, but is not limited to, the use of intimidation, threats, blackmail or coercion. Decisions made through the proper use of managerial and supervisory responsibilities are not considered as abuse of authority.

Employees shall be aware of everyone in the Company is treated with dignity, is valued as a contributor and that abuse of power and gender discrimination are not tolerated. Officer shall report incidents of abusing of power, or has reason to believe abusing of power is occurring, to their immediate superior or adhere to the Whistle Blower Policy.

20. Personal Appearance

An employees who is provided with uniforms by the Company shall wear them in full at all times while he is at work.

An employee 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 employee.

Dress, grooming and personal cleanliness standards are important and contribute to the morale of all employee and affect the business image to the Company's customers and visitors.

21. Conflict of Interest

All employees must maintain high standard of commitment and observe impartiality towards the Company. This is including being free from conflict of interest and avoid personal gain and advantages. Employees must not participate in activity and relationship that would constitute a conflict of interest.

Whether conflict of interest arises will very much depends on the situation of each case which may directly or indirectly affect the faithful discharge of employee's duties.

22. Restrictions and Limitations

Our Group takes a strict stand on employees having any outside business interests that pose or potentially pose a conflict of interest. The Group does not discourage an employee to have a business but will always look into this matter seriously and a very classic example is doing part time business or engaged in a full time business during the course of employment.

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The employee involved in any part time business must ensure that any transaction should not interfere the work performance, any related business activities should only be made during non-working hours.

Any employee with full time or part time business also must ensure that the business does not bring disrepute to the Group image in which he/she is originally employed for. This includes any business which might misrepresent or misleading the public on the status of the employee concern in the Group or disputing the position and the ability of the Group as an employer.

In this regard, all employees of the company are prohibited from :

- a) Having any outside business interests and/or full/part-time employment with any company that may be deemed a current or anticipated competitor, supplier, customer, partner or affiliate of our Group. This prohibition extends to the employees immediate family members and will include his/her spouse, brother, sister, father, mother and/or any close relatives.
- b) Where employees find that there exists a potential conflict of interest, it is his/her duty to inform the Group's management of such a situation in writing at the earliest possible notice and failure to do so will be deemed a major misconduct, warranting a dismissal.

The following examples are identified where conflict of interest may arise, and should be heeded strictly:

- i. An employee who is employed by the Group on a full-time paid basis shall not be employed by other employer or involved in any full-time business.
- ii. An employee who is employed by the Group on a full-time paid basis and employed by other company on part time basis which inconsistent with the faithful discharge if his duties.
- iii. An employee, who is engaged with other organizations, doing any part-time business and/or involved in activities which may affect his performance in the Group and unless that he/she could ensure consistency in commitments and performance and may only continue to do so after declaring in writing, such engagement to the Group management.
- iv. An employee, who has been invited to serve as a Director of any company outside the Group, may only do so after declaring such invitation and thereupon on obtaining written permission from the management.
- v. Any employee who has an interest over an outside company within the same industry as ours in terms of ownership of shares, securities and other personal advantages provided always that the employee must inform and declare in writing to the Group.

Whoever interested to have any business dealing with the Group must register themselves with Engineering Department, Tower Block and it should go through the normal process of tender and bidding as what is in practice by other registered Group vendors or contractors.

It is necessary that the employee inform and declare to the Group whether or not he feels that his act or activities as above would or would not constitute conflict of interest, failing

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which will lead to termination if the Group feels that it is serious and in breach of the Group policy.

23. Periodic Review

This policy will be reviewed by the Nomination, Remuneration and Corporate Governance Committee annually.

This Policy is approved by the Board on 26 February 2019.