

ZHULIAN®

ZHULIAN CORPORATION BERHAD

Company No. 199701000031 (415527-P)

(Incorporated in Malaysia)

CODE OF CONDUCT

1. Introduction

Zhulian Corporation Berhad (“Zhulian” or “the Company”) has adopted the following Code of Conduct (the “Code”) for Directors, Management and Officers of the Company and its subsidiaries (“Zhulian Group”).

This Code is established to promote the corporate culture which engenders ethical conduct that permeates throughout the Company. All Directors, Management and employees of the Zhulian 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 Company’s commitment to ethics and compliance with the applicable laws and regulations;
- 2.2. To improve self-discipline in order to provide the Company with 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 Company supports and respects human rights. The Company 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 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 Officers.

3.3. 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 minimizing and mitigating environmental impacts throughout the life cycle of operations.

3.4. Gifts And Business Courtesies

Officers must exercise caution in relation to offering or accepting gifts and business courtesies. Officers should only accept non-cash gifts in relation to cultural celebrations only. Any other gifts received by Officers shall be declared to Chief Executive Officer. Further guidance can be found under ‘Gifts & Hospitality’ of Anti-Bribery and Corruption Policy. The Company practices zero tolerance for bribes and corruption and adheres strictly to Section 17A(5) of the Malaysian Anti-Corruption Commission(Amendment) Act 2018.

3.5. Company Records And Internal Controls

The Company's records must be prepared accurately and honestly, both by the accounts team who prepares financial statements and by Officers who contribute to the creation of business records. The Company takes obligation to maintain business records for operational, legal, financial, historical and other purposes seriously and takes 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 and financial reporting. Officers must understand the internal controls relevant to their positions and comply with the policies and procedures related to those controls to ensure that effective and reliable business processes are in place.

3.6. Company Assets

The Company'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 Company.

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

3.7. Exclusive Service

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

3.8. Integrity And Professionalism

All Officers should conduct themselves with the highest degree of integrity and professionalism in the workplace or any other location while on Company's business.

3.9. 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.

3.10. 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.

3.11. 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 Company and 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 Company and is complied by all levels of Officers.

5. Violations of Code of Conduct

The Company's Officers should report to Supervisors, Managers, Head of Departments or Head of Human Resource about the 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 Chairman of the Audit Committee.

6. 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.

7. Periodic Review

The Board and Senior Management of the Company will review the Code from time to time when deemed necessary and communicate the new changes to all levels of Officers.