

# **PMCK BERHAD**

**(FORMERLY KNOWN AS UNIQUE LUXURY HOLDINGS SDN. BHD.)**

[Registration No. 200001029676 (532283-M)]

(Incorporated in Malaysia)

## **POLICIES & PROCEDURES**

## **CODE OF CONDUCT & ETHICS**

**Approved by Board: 29<sup>th</sup> September 2025**



**CODE OF CONDUCT & ETHICS**  
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<b>REVISION HISTORY</b>		

<b>Rev. No</b>	<b>DCN No</b>	<b>Section</b>	<b>Page No.</b>	<b>Description of changes</b>	<b>Prepared by</b>	<b>Verified by</b>	<b>Approved by</b>	<b>Eff. Date</b>
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<b>SECTION 1 : OVERVIEW</b>		

## 1.0 Overview

PMCK Berhad and its subsidiaries is committed to establish the guiding principles, values, and expectations for behavior within our organization (PMCK). It reflects our commitment to fostering a culture of integrity, respect, and accountability in all aspects of our work.

This Code is designed to guide employees, contractors, and stakeholders in making ethical decisions and maintaining professional conduct that upholds the organization's reputation and values. Each of the above mentioned person is responsible for fully understanding and complying with the Code.

This Code serves not only as a policy but as a promise to uphold the highest standards of professionalism and ethics in everything we do. Any failure to comply with the Code or the Group policies will be treated very seriously by the company of employment (for employees) or termination of relationship with the Company (for contractors and others).

### 1.1 Purpose of the Code

The purpose of the Code of Conduct & Ethics is to:

- a) Provide clear guidelines for acceptable and unacceptable behavior.
- b) Promote ethical decision-making and compliance with laws and policies.
- c) Foster a respectful and safe environment for all individuals.
- d) Protect the integrity and reputation of the organization.

### 1.2 Who must follow the Code?

The Code applies to:

- a) All employees, contractors, and volunteers associated with the organization.
- b) Vendors, suppliers, and partners in their interactions with the organization.
- c) Any individual acting on behalf of the organization in all work-related settings.

### 1.3 Commitment to Excellence

By adhering to the Code of Conduct & Ethics, we are commitment to:

- a) Conducting business ethically and responsibly.
- b) Building a work environment where everyone feels valued and respected.
- c) Acting in the best interests of the organization and its stakeholders.

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## 2.0 Introduction

Our organization is committed to conducting business ethically and with integrity. All employees are expected to comply with the principles outlined in this policy to maintain trust and safeguard the reputation of the organization. Our organization is also committed to upholding the highest standards of ethical behaviour, professionalism, and respect in all activities. All members are expected to act in the best interest of the organization, comply with applicable laws, and maintain the trust placed in them.

The provision of our Code may be amended, varied, deleted, substituted or updated from time to time.

### 2.1 Our Vision

To provide affordable quality healthcare with passion for the people.

### 2.2 Our Mission

PMCK is committed to deliver affordable quality healthcare comprehensively and consistently through continuous human development, methodology updates and technological upgrades.

### 2.3 Our Values

PMCK is committed and practice its work on the principles of Professionalism, Meticulous, Caring and Kind.

- a) Professionalism
  - ✓ Maintain a high standard of conduct in all professional activities and interactions.
- b) Meticulous
  - ✓ Following up to confirm satisfaction and resolve concerns completely.
- c) Caring
  - ✓ Supporting employees' professional growth and personal well-being
- d) Kind
  - ✓ Showing a gentle and considerate behaviour toward society.

### 2.4 Reporting and Review

Employees is to report any breach of compliance with our Code.

The reporting of non-compliance with our Code may either be made to:

- a) The Supervisor and Manager; or
- b) Any Head of Department or Unit head; and
- c) General Manager or Director

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### **3.0 Responsibilities Regarding Code of Conducts and Ethics**

Adherence to a code of conduct and ethics is essential to ensure professionalism, integrity, and a respectful environment. By fulfilling these responsibilities, individuals and organizations contribute to a trustworthy, ethical, and fair environment for all stakeholders.

#### **3.1 Responsibilities of Directors**

In the performance of his duties, all Directors should at all times observe the principles as provided in the Terms of Reference for the Board of Directors and the Code.

These principles are not limited to the following:

- i. To do the conduct of the business of the Company and to evaluate whether the business is being properly managed;
- ii. To exercise reasonable care, skill, diligence and apply good judgment when discharging his duty and to act in the best interest of the Company;
- iii. To identify principal risks and ensure the implementation of appropriate systems to manage these risks;
- iv. To review the adequacy and integrity of the Company's internal control and management information systems;
- v. To adhere and comply with all rules, principles and guidelines (i, ii and iii) of Bursa Malaysia Securities Berhad ACE Market Listing Requirements, Malaysian Code on Corporate Governance, Code of Ethics for Company Directors and all other applicable laws, regulations, rules, directives and guidelines, where relevant;
- vi. To establish an internal audit function in order to obtain assurance of regular review and/or appraisal of the effectiveness of the system of internal controls within the Company; and
- vii. To manage the interest and expectation of shareholders, employees, creditors and customers of the Company.

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### **3.2 Responsibilities of Management**

The Management should at all times observe the principles as provided in the Code and these principles are not limited to the following:

- i. To ensure that all employees under their supervision receive and execute an acknowledgement of receipt of a copy of the Code during their course of employment or when the new employee reports for duty;
- ii. To ensure that all employees are conversant with the Code by providing guidance through conducting orientation program for new employees and for other employees by providing training on business ethics behavior and legal compliance relevant to the employee responsibilities from time to time;
- iii. To ensure that the Code forms part of the Company's orientation program;
- iv. To ensure that all standards, policies and procedures comply with the Code and are communicated to all Employees under their control;
- v. To report any violations of the Code up through the chain of command;
- vi. To ensure that all ethical matters that cannot immediately be decided on are properly escalated to appropriate level;
- vii. To protect employees or business partner against any form of retribution and retaliation who in good faith and with a reasonable basis reported possible violation of the Code;
- viii. Any members of the Management, who in the course of performance of his/her duties has reasonable belief of any matter which may not or will constitute a breach of non-compliance or observance of any requirement, is being or is likely to be.

### **3.3 Responsibilities of Employees**

Employees should at all times observe the principles as provided in the Code. These principles are not limited to the following:

- i. To be knowledgeable and conversant with the Code and ensure that the Company's business is conducted with honesty and integrity and in an professional manner;
- ii. To abide by the behavior embodied in the Code and comply with all legal requirements and the Company's policies and procedures;
- iii. To keep a copy of the Code for personal reference;
- iv. To seek advice and information from their supervisors when needed;
- v. To report any violation of the Code up through the chain of command; and
- vi. Ignorance of the Code will not be an excuse.

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#### **4.1 External Parties**

This business conduct is designed to dealing with external parties such as

- a) Vendors and business partners
- b) Government
- c) Investor, media, analyst and others
- d) Competitors

#### **4.2 Ethical and Fair Treatment**

Treat all vendors (**a person, company, or entity that sells goods or services to others. The term is often used in business to describe suppliers that provide materials, products, or services to another business or directly to consumers.**) fairly, ensuring equal opportunity during vendor selection, bidding, and negotiations. Avoid bias or favouritism based on race, gender, nationality, or other protected characteristics. Clearly communicate expectations, requirements, and selection criteria.

#### **4.3 Compliance with Laws and Policies**

Ensure that all dealings comply with applicable laws, regulations, and industry standards. Follow the organization's procurement and conflict of interest policies when engaging with vendors.

#### **4.4 Integrity and Honesty**

Provide vendors with truthful and complete information regarding agreements, timelines, and expectations. Prohibit accepting or offering bribes, kickbacks, or other forms of undue influence in vendor relations. Disclose any relationships or personal interests with vendors that may affect impartial decision-making.

#### **4.5 Confidentiality and Data Protection**

Respect and safeguard sensitive information shared by vendors, including pricing, trade secrets, and proprietary data. Ensure compliance with data protection laws when handling vendor information.

#### **4.6 Quality and Accountability**

Hold vendors accountable to agreed-upon standards, including quality, timelines, and compliance requirements. Regularly review vendor performance and provide constructive feedback to ensure alignment with expectations.

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#### **4.7 Resolution of Disputes**

Address disputes or misunderstandings with vendors through open and respectful communication. Resolve conflicts in a manner that is fair, consistent, and compliant with contractual obligations.

#### **4.8 Sustainability and Corporate Responsibility**

Prioritize vendors that demonstrate commitment to sustainable and environmentally friendly practices. Partner with vendors who uphold ethical labour practices, including fair wages and safe working conditions.

#### **4.9 Consequences for Non-Compliance**

Vendors failing to comply with the organization's standards or Code of Conduct may face the following actions:

- a) Warnings and opportunities to rectify issues;
- b) Termination of contracts or relationships;
- c) Reporting violations to relevant authorities if required by law;
- d) Commitment to Ethical Vendor Relationships.

Our organization is committed to building strong, ethical, and mutually beneficial relationships with vendors. We expect all parties to act with integrity, professionalism, and respect for the principles outlined in this Code of Conduct.

#### **4.10 Money Laundering**

Money laundering is the process of concealing, converting and transferring proceeds from unlawful activities to a legitimate source of income and asset. Money laundering is an offence under the Anti-Money Laundering and Anti-Terrorism Financing Act 2001 in Malaysia.

Employees shall be aware of the applicable anti-money laundering laws and shall seek to ensure they are appropriately and adequately informed of development in the laws relating to this area in order to actively pursue the prevention of money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities. Employees are expected to be mindful of the risk of the Company's business being used for money laundering activities and to raise any suspicious transactions to their immediate superior and the Board to undertake further investigation.

No disclosure should be made to others that would indicate suspicions of money laundering. Any employee reporting should not discuss the matter with any other person.

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#### **4.11 Anti-Bribery and Corruption Policy**

Any form of bribery and corruption is prohibited. Employees and any third party acting on PMCK's behalf must not provide, offer or accept bribes, kickbacks, corrupt payments, facilitation payments, or inappropriate gifts, to Government official or any commercial person or entity, regardless of local practice or customs.

All employees and any third party acting on behalf must comply with all applicable anti-bribery laws and regulations, including but not limited to, the Malaysian Anti-Corruption Commission Act (MACC Act),

**a) The MACC Act covers the following conduct:**

- i. The giving and accepting gratification
- ii. Code of Conduct and Ethics
- iii. The giving or accepting gratification by an agent
- iv. Corruptly procuring the withdrawal of a tender
- v. Bribery of an officer of a public body
- vi. Bribery of foreign public body;
- vii. Using an office or position for gratification; and
- viii. Dealing with, using, holding, receiving or concealing gratification or advantage in relation of any offence under the MACC Act.

**b) The expression "gratification" under the MACC Act includes:**

- i. Money, donation, gift, loan, property, financial benefit or other similar advantage;
- ii. Any office, dignity, employment, contract of service;
- iii. Any payment, release or discharge of any loan, obligation or other liability;
- iv. Any discount, commission, rebate, bonus or percentage;
- v. Any forbearance to demand any money or money's worth of valuable thing;
- vi. Any favour of any description, including protection from any penalty or proceedings of a disciplinary or criminal nature or forbearance from the exercise of any right, power or duty; and
- vii. Any offer or promise of any gratification within the meaning of any of the preceding items.

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#### **4.12 Gifts and Entertainment**

##### **a) Gifts**

As a general rule, employees should not accept presents or gifts. However, under certain circumstances, token gifts (not cash) in line with local custom and practice, are acceptable.

The following guidelines apply:

- All gifts received by the employee from external parties must be declared to the Managing Director. A file note will be kept on the action taken, i.e. whether the gifts are retained or donated to charity.
- As a general rule, festive-related gifts and promotional gifts are acceptable provided that the cost is reasonable. However, it is advised that prior to the distribution of the gifts, the following recommendation should be fulfilled.
  - ✓ Equality in terms of value of all festive gifts given to external parties.
  - ✓ The recipient of the gift should not be to a selected group.
  - ✓ No preferential treatments to any parties receiving the gifts.
  - ✓ Not an inducement expecting any future favours that can be deemed as a form of corruption.

##### **b) Entertainment**

Employee is also encouraged to ensure that entertaining by or of third parties is reasonable in its extent and appropriate to the particular business circumstances. The Managing Director will determine appropriate standards.

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## **5.0 Employee Conduct**

Employee Conduct refers to the behavior, actions, and attitudes exhibited by employees in the workplace. It encompasses the way employees interact with colleagues, supervisors, clients, and external stakeholders, as well as how they adhere to the organization's policies, rules, and values.

### **5.1 Equal Opportunity and Non-discrimination**

PMCK holds the principle of diversity of workforce, equal opportunity, non-discrimination and fair treatment in all aspects of employment, including recruitment and hiring, compensation and benefits, working conditions, training, rewards and recognition, career development and retirement. Employees must strive to create a workplace where everyone is treated fairly and equally.

### **5.2 Workplace Health and Safety**

PMCK is committed to providing a safe and healthy work environment to all employees. Health and safety support and training will be provided to Employees so that they understand their occupational health and safety obligations and diligently comply with all health and safety requirements, policies and procedures set out by the Company. Safety is everyone's responsibility.

### **5.3 Harassment, Threat and Violence**

PMCK seeks to provide a work environment where Employees are treated with respect and free from any form of harassment, threat, intimidation, violence or any other inappropriate behaviour. Employees are responsible to report any harassment, intimidation, offensive or inappropriate behaviour. All complaints or grievances will be investigated and appropriate action will be taken to stop such conduct and prevent future occurrences.

### **5.4 Drugs, Alcohol and Prohibited Substances**

Employees are expected to perform their job duties free from the influence of any substance that could impair job performance or pose unacceptable safety risk to the Employee or others. PMCK and its subsidiaries Group therefore prohibits working under the influence of alcohol, illegal drugs or controlled substances. In addition, the use, possession, distribution or sale of alcohol, illegal drugs or other controlled substances in the workplace (other than for approved medicinal purposes) is strictly prohibited. There may be company-sponsored events or functions where the serving of alcoholic beverages is permitted. In these cases, all appropriate liquor laws must be followed.

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### **5.5 Data Integrity and Data Protection**

PMCK has put in place the Personal Data Protection Policy. Employees shall record, manage, store and transfer all data and records in compliance with applicable legal, tax, regulatory and accounting requirements.

### **5.6 Protection and Use of Company Assets and Resources**

PMCK provides its Employees a variety of resources and assets including licensed software for Employees to deliver their work. Employees shall safeguard and make proper and efficient use of the assets and resources in compliance with all applicable laws, company policies and licensing agreements, and take all necessary steps to prevent loss, damage, misuse, theft, fraud or destruction of assets and resources. Company properties, its equipment, facilities and resources are to be maintained and used in economical and efficient manner.

#### **a) Uniforms/Appearance**

Uniforms or any other attire bearing the Company's name and/or logo are a reflection of the Company's image. Therefore, all employees must be suitably attired and groomed at all times at the work place. They are expected to maintain a dignified appearance and be neat, presentable, clean tidy. Uniformed staffs are expected to wear their respective uniforms at all time in the work place during working hours. Casual attire including t-shirts, sport shoes, slippers and sandals are not allowed in the work place.

#### **b) Office Equipment and Facilities**

Office furniture and fittings, work areas, restrooms, pantries and praying areas are to be used by Employees with proper care and maintenance. Lights and electrical appliances should be switched off after use and at the end of the day.

#### **c) ID/Access Card**

Employees shall not tamper with or deface their ID/Access card. If your ID/Access card is lost, it can be replaced at a cost determined by the Company.

### **5.7 Employee's Use of Social Media**

Employees must always be aware that all Group personnel are always viewed as ambassadors of the Group, credible spokespersons of the Group and technical/industry experts.

Thus, at all times no member of the Group shall approve or support any action or activity that in any way brings the Company into ill repute or create negative publicity for the Group. As an ambassador of the Group, employees must consistently act with honesty and integrity and be mindful of the implications of their action or activity on the Group.

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Employees are expected to maintain the same high standards of conduct and behaviour online as would be expected elsewhere and/or outlined in the Code. This includes but not limited to:

- a) Being apolitical and professional
- b) Behaving with respect and courtesy, and without harassment
- c) Dealing appropriately with information, recognizing that some information needs to remain confidential
- d) Being sensitive to the diversity of Malaysia
- e) Taking reasonable steps to avoid conflict of interest
- f) Must be on appropriate cultural and freedom of expressions,

#### **5.8 Insider Trading**

Employees who are in possession of market sensitive information are not allowed to trade in securities of the Company or another listed company if that information has not been made public. Employees are also prohibited from disclosing any non-public price sensitive information to any third party.

#### **5.9 Sexual Harassment**

It is the policy of the Company to promote a safe and healthy working environment that fosters mutual respect where individual employees irrespective of status or position are treated with dignity and free from sexual harassment

Sexual harassment in the workplace includes any employment-related sexual harassment occurring outside the workplace as a result of employment or employment-related responsibilities. Sexual harassment may take place include, but are not limited to the following:

- i. At work-related social functions;
- ii. In the course of work assignment outside the workplace;
- iii. At work-related conferences or training sessions;
- iv. During work-related travel;
- v. Over the phone; and
- vi. Through electronic media

##### **a) Form of Sexual Harassment**

Sexual harassment encompasses various conducts of a sexual nature which can manifest themselves in five possible forms, namely:

- i. Verbal harassment – e.g. offensive or suggestive remarks, comments, jokes, kidding, teasing, sounds, inquiries or discussions about sexual activities or other verbal abuse.

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- ii. Non-verbal / gesture harassment - e.g. leering or ogling with suggestive overtones, licking lips, holding or eating food provocatively, hand signal or sign language denoting sexual activity, persistent flirting.
- iii. Visual harassment - e.g. showing pornographic materials, writing sexually suggestive letters or other written materials, sexual exposure.
- iv. Psychological harassment - e.g. repeated unwanted social invitations, proposals for dates or physical intimacy.
- v. Physical harassment - e.g. inappropriate touching, patting, pinching, stroking, grabbing, hugging, kissing, fondling, brushing up against the body, or coerced sexual intercourse sexual assault.
- vi. Emotional harassment refers to behavior intended to manipulate, intimidate, demean, or belittle someone, causing psychological distress. It often occurs in personal, professional, or social relationships and can have serious emotional and mental health consequences for the victim.
- vii. Retaliatory Harassment - Harassment that occurs after someone resists, reports, or files a complaint about sexual harassment.
- viii. Cyber Sexual Harassment - Harassment conducted through digital platforms, such as social media, email, or messaging apps.
- ix. Quid Pro Quo Harassment occurs when a person in demands sexual favors in exchange for a benefit or to avoid punishment.

#### **5.10 Family and Relative of Employees**

- a) Employees shall disclose to the Company if any family and relative (for this Code, "family and relative" comprises employee's spouse, parents, children, brothers, sisters and spouse of child, brother or sister) provides any form of goods or services direct or indirect to the Group, or is a competitor, vendor, business partner, contractor or consultant to the Group. Employees shall avoid or abstain from participating in or making decisions on any deal involving employee's relative.
- b) If employee's family and relative is a competitor or supplier of the Group or is employed by one, employees are expected to exercise extra caution in their communication and conduct to ensure the security and confidentiality of information important to the Group and to avoid and/or create a conflict of interest situation.

All employees shall conduct themselves responsibly, ethically, honestly and with integrity and respect for one another. The Company does not condone any act of misconduct that is deemed to be detrimental to the interest of the Company.

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## 6.0 General Conduct

The following examples of acts of misconduct are not exhaustive and may be revised from time to time.

### 6.1 Act of Dishonesty and Fraud

- i. Provision of false or misleading information or withholding of information from the Group when applying for employment and/or to secure employment with the Company.
- ii. Provision of false or misleading information or withholding information from the Company for own personal gain/benefit and/or to the detriment of the Company.
- iii. Falsification of information, documents and/or records.
- iv. Forging or falsification of medical certificates.
- v. Visiting a medical practitioner under false pretext for the purpose of getting medical leave.
- vi. Theft, pilferage, fraud or dishonesty including any attempt of such involving the Company's business, funds and/or properties.
- vii. Misappropriation and unauthorized use of the Company's funds and properties.
- viii. Stealing of other employee's belongings and/or properties within the Company's premises.

### 6.2 Acts of Disrespect and Insubordination

- i. Showing disrespect to an Employee of the Company, including a colleague, subordinate and/or superior.
- ii. Insubordination, disobedience and/or refusal or failure to follow any lawful or reasonable order/directive of a superior of the Company.
- iii. Striking at work or inciting others to strike in contravention of any law or rule enforced.
- iv. Obstructing other employees from work and/or performing at work.
- v. Participation in illegal and/or unauthorized gatherings within the Company's premises.
- vi. Removing or altering any matter on bulletin or notice boards without the permission of the Company.
- vii. Removing from the Company premises, any of the Company's properties without prior approval or proper reasoning.
- viii. Tampering, defacing or damaging the Company's properties.
- ix. Entering into prohibited area without prior approval from the Company.
- x. Unreasonable refusal to carry out overtime work as required by the Company.
- xi. Deliberate bypassing of the Company's usual channel of communication.
- xii. Challenging the Company to dismissal.

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### **6.3 Acts of Violence, Inappropriate Behaviours and Criminal Offence**

- i. Rioting or participation in disorderly behaviour within the Company's premises or within its vicinity at any time.
- ii. Fighting within the Company's premises or within its vicinity at any time.
- iii. Harassing another employee, including staking another employee.
- iv. Serious pecuniary indebtedness such as incurring excessive debt with the Company, other employees and/or outsiders.
- v. Using insulting, Demeaning and/or vulgar works or gestures against another employee or outsiders, within the Company's premises or its vicinity at any time.
- vi. Defaming, degrading, discrediting or dishonouring the Company and/or any of its employees.
- vii. Spreading of malicious rumours about the Company and/or any of its employees.
- viii. Any form of violence, abuse, assault (including threatening to assault or injure) against another employee and/or outsiders.
- ix. Possession of unauthorized firearms or other dangerous weapons within the Company's premises.
- x. Committing any indecent and/or immoral act on the Company's premises.
- xi. Criminal conduct or the employee's failure to report to the Company is criminal conduct that would adversely affect the employee's work performance or cause major discredit or embarrassment to the Company.
- xii. Conviction and imprisonment for any criminal offence.
- xiii. Money laundering.
- xiv. Pimping whether acting as an agent for prostitution or being engaged in any form of vice.
- xv. Involved in or aid any activity where the relevant authorities require the employee to be placed under any legal order or restricted residence or banishment.
- xvi. Any other acts that could cause fear, stress and distress to other employees.

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#### **6.4 Alcohol, Drug and Gambling**

Prohibited substances may not be brought, kept, consumed, sold, purchases or dealt with in any way on the Company's premises.

- i. Employees shall not report for work or carry out their duties in the course of their employment under the influence of alcohol or drugs of all or any of the above substances.
- ii. If an employee is taking medication which renders him unable to carry out his duties in a manner that will jeopardize the safety of himself and/or the other employees, he must inform his supervisor or the HR Manager accordingly.
- iii. If an employee knows or suspects that an employee is using, taking, consuming or dealing with any prohibited substances, he must inform his immediate supervisor or the HR Manager immediately. The Company also encourages employees to bring their personal drinking or drug problem to the attention of their supervisor (who shall inform the HR Manager accordingly without delay) or the HR Manager directly.
- iv. The Company may from time to time at its sole discretion require employees to be randomly tested for the use of illegal drugs and substances. Positive test results or refusal by the employee to undergo such a test may warrant appropriate disciplinary action to be taken by the Company as it deems fit.
- v. Gambling of any form, including making or taking bets, card playing, whether for money or otherwise, is not allowed within the Company's premises at any time. Online gambling using the Company's computer and/or on the Company's premises is prohibited at any time.
- vi. The HR Department may, if it considers appropriate in the circumstances, submit a report of such misconduct to the Management together with its recommendation of the appropriate disciplinary action to be taken against the said employee.

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#### **6.5 Insubordination and Inefficiency**

An employee shall not commit any act of wilful refusal, insubordination or disobedience of a lawful and reasonable instruction of his supervisor/manager including refusal to perform assigned work, being inefficient and deliberately slowing down causing the quality of work and/or the quantity of work to be adversely affected.

#### **6.6 Lateness, Absenteeism and Attendance**

All employees are required to observe the stipulated working hours of the Company. The following are unacceptable practices.

- i. Habitually late for work.
- ii. Absence without leave/obtaining prior approval from the Company and/or without valid reason.
- iii. Absence from the workplace during working hours and/or leaving the workplace before the end of working hours for unofficial reasons, without obtaining prior approval from the Computer.
- iv. Exceeding the time limit grant for lunch break or any other breaks granted by the Company.
- v. Malingering and loitering during working hours.
- vi. Failure or refusal to record attendance time (time in, time out and any movements in between, where applicable).
- vii. Unauthorized use or abuse of ID/access cards, time attendance cards (or any other form of attendance records used by the Company), including punching another employee's time card or recording the attendance of another employee

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<b>SECTION 7 : CONFLICTS OF INTERESTS</b>		

## 7.0 Conflicts of Interests

Each of us has a responsibility to the Company, and to each other. Although this duty does not prevent us from engaging in personal transaction and investments, it does demand that we avoid situations where a conflict of interest might occur or appear to occur. The Company is subject to scrutiny from many different individuals and organizations.

We should always strive to avoid even the appearance of impropriety. A conflict of interest may make difficult for an employee to perform his or her work objectively and effectively. An employee shall recuse himself or herself as soon as he is aware of the conflicts of interest, and must fully disclose such conflict or interest to his or her manager prior to engaging in any business or related activity that lead to a conflict of interest. A conflict of interest exists where the interests or benefits of one person or entity conflict with the interests or benefits of the Company. Example include: Code of Conduct and Ethics

## 7.1 Employment/Outside Employment

In consideration of your employment with the Company, you are expected to devote your full attention to the business interest of the Company. You are prohibited from engaging in any activity that interferes with your performance or responsibilities to the Company or is otherwise in conflict with or prejudicial to the Company. Our policies prohibit any employee from accepting simultaneous employment with a Company supplier, customer, and competitor or from taking part in any activity that enhances or supports a competitor's position. Additionally, you must disclose to the Company any interest that you have that may conflict with the business of the Company. If you have any questions on this requirement, you should contact your supervisor or the Human Resources Department.

## 7.2 Business Interest

If you are considering investing in a Company customer, supplier or competitor, you must first take great care to ensure that these investments do not compromise your responsibilities to the Company. Many factors should be considered in determining whether a conflict exists, including the size and nature of the investment; your ability to influence the Company's decisions; your access to confidential information of the Company or of the other company; and the nature of the relationship between the Company and the other company.

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### **7.3 Related Parties**

As a general rule, you should avoid conducting Company business with a relative or significant other, or with a business in which a relative or significant other is associated in any significant role. Relatives include spouse, sister, brother, daughter, son, mother, father, grandparents, aunts, uncles, nieces, nephews, step relationships, and in-laws. Significant others include persons living in a spousal-type (including same sex) or familial fashion with an employee.

If such a related party transaction is unavoidable, you must fully disclose the nature of the related party transaction to the Human Resources Department, the Company's Audit & Risk Management Committee must review and approve in writing in advance such related party transaction. The most significant related party transactions, particularly those involving the Company's directors or executive officers, must be reviewed and approved in writing in advance by the Company's Board of Directors. Code of Conduct and Ethics.

### **7.4 Other Situations**

Because other conflicts of interest may arise, it would be impractical to attempt to list all possible situations. If a proposed transaction or situation raises any questions or doubts in your mind you should consult with the Human Resources Department.

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## **8.0 Code of Conduct and Ethics for Directors**

The Board of Directors ("the Board") of PMCK Berhad, together with its subsidiaries ("the Group") are committed to adhere to the best practices in corporate governance and in observing the highest standards of integrity and behaviour in all activities conducted by the Group. The Group has adopted the following Code of Conduct and Ethics for Directors ("the Code"). Each Director has to comply with the spirit of this Code that serves as a guiding principles for Directors in exercising their duties and responsibilities as Directors which are critical to the success and well-being of the Group.

### **8.1 Objectives**

The objective of the Code is to provide some ethical guides on the standards of behaviour expected from the Directors of the Group, during the conduct of business for the Group. For all intents and purposes, all Directors shall always observe and ensure compliance with all applicable laws and regulations to which they are bound to observe in discharging their duties and responsibilities. However, the Code is not intended to be exhaustive, thus the Executive Directors are required to observe and comply with another set of code i.e. "Code of Conduct for Workplace" as set up by the Group Human Resources Department.

Guidelines in performing their duties, the Directors of the Group shall at all times abide and conform to the following guidelines:

#### **a) Compliance with Laws and Regulations**

Ensuring compliance with the applicable laws and regulations, the Directors must be familiar with the relevant legislations and regulations that apply to the Group. Each Director is responsible for taking appropriate actions to understand and comply with the relevant laws, rules and regulations that are applicable to their positions and works, and not to engage in any illegal or improper conduct that is in violation of any laws or regulations. As the leader of the Management team, each Director shall comply with the internal policies and procedures of the Group. The Directors shall not only aware of the significant internal policies and procedures of the Group, but must ensure compliance with it.

#### **b) Conflicts of Interest and Disclosure**

The Directors must not engage in activities that could appear to be in conflict between their personal interests and the interests of the Group, whether directly or indirectly. Areas where conflicts might arise include substantial share ownership in competing organisations, direct or indirect personal interest in contracts, full time dual employment with outside organisations or seeking or accepting gifts, favours or entertainment beyond the levels considered reasonable in the business environment of the Group.

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Any actual or potential conflicts of interest are to be fully disclosed to appropriate Management, Audit Committee and/or the Board and where such circumstances are permitted by Management, the Audit Committee and/or the Board to continue, it shall not be deemed a violation of the Code.

Timely disclosure of essential. The Directors must immediately disclose all contractual interests whether directly or indirectly with the Group. Details of involvement, potential involvement, either directly or indirectly must be disclosed to the Audit Committee and/or Board with transparency and accuracy.

**c) Confidentiality and Protection of Group's assets**

All Directors must exercise caution and due care to safeguard any information of 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 party, unless the disclosure is duly authorised or legally mandated. In the event that a Director is aware of some material information affecting the Group which has yet to be publicly released, the material information must be held in strict confidential by the Director involved until it is publicly released. In this situation, the Directors concerned must refrain themselves from involving in any insider dealing.

The Group's assets and confidential information are owned by the Group and are valuable to the Group. Thus, it should be fully protected and must not be used by the Directors for personal gain or for any other reason that is not in the best interests of the Group. Misappropriation of properties owned by the Group will not be tolerated. Any misappropriation should be immediately reported and properly investigated.

The Directors should also refrain from any public discussion in the media or otherwise, regarding the Group's business, affairs, policies and organisations, unless he is the designated spokesperson for the Group.

**d) Stewardship Responsibilities**

The Directors should have a clear understanding of the aims and purposes, capabilities and capacities of the Group and devote sufficient time and effort to attend meetings of the Group and stay abreast and keep informed on all matters of importance to the Group. In addition, the Board has to ensure that the Group is properly managed and controlled at all times.

In line with Bursa Malaysia Securities Berhad ACE Market Listing Requirements, the Directors of PMCK Berhad should limit their directorships in other public listed companies to a number in which the Directors could best devote their time and effectiveness. Each Director should use his/her best efforts to regularly participate in professional development activities and to perform his/her assigned duties in a professional and timely manner in accordance with the Board's direction and oversight.

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**e) Duty to act in the best interest of the Group in all aspects**

As the guidelines of the Code are not exhaustive, it is a mandatory conduct for each Director to act in the best interest of the Group with honesty, integrity and in good faith in all aspects of dealings and transactions. Each Director should act responsibly in the exercise of his/her powers when discharging his/her duties. In addition, he/she is to exercise independent judgement, and if necessary, openly oppose if the vital interest of the Group is at stake. Other considerations involve the duty of being conscious of the interest of shareholders, employees, creditors and customers, promote professionalism and improve the competency of Management and employees.

Corrupt Practices are Strictly Prohibited. Corrupt practices are operationally defined as the misuse of entrusted power for private gain. Directors must adhere strictly all provisions of the Malaysian Anti-Corruption Commission Act (MACC) 2009 accordingly.

**f) Compliance of the Code**

All Directors shall be accountable for full compliance of the Code. In the event of any violation of the Code, the Board shall take necessary actions to ratify on the non-compliance or violation.

**g) Review of the Code**

The Board will monitor the compliance with the Code and review the Code regularly to ensure it remains relevant and appropriate from time to time. The Directors will be required to comply with the Code as updated from time to time. All amendments to the Code must be approved by the Board and be communicated to all the Directors.

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<b>SECTION 9 : BREACH OF THE CODE AND EMPLOYMENT RULES AND REGULATIONS</b>		

### **9.1 Breach of the code**

Reporting a breach of a code of conduct is an essential step in maintaining an ethical and professional environment. It ensures accountability and helps address issues that could harm the organization, employees, or stakeholders.

### **9.2 Reporting Channels**

Employees have several options for reporting Code of Conduct violations, and they are encouraged to choose the method they are most comfortable with:

**a) Direct Supervisor or Manager**

Employees are encouraged to first approach their direct supervisor or manager if they feel comfortable doing so. This often allows for quick resolution of issues at the earliest stage. If the supervisor is involved in the violation or if the employee is uncomfortable reporting to them, they should choose another method.

**b) Human Resources (HR)**

Employees can report violations directly to the HR department. HR is responsible for investigating any allegations of misconduct and ensuring that proper procedures are followed. HR can also provide guidance on the best way to address grievances or misconduct within the organization.

**c) Whistleblower Hotline or Email**

A confidential and anonymous hotline or email system may be available for employees to report violations without fear of retaliation. This option ensures that employees can report misconduct safely and privately, especially in cases where they are concerned about potential retaliation or negative consequences. Ethics Committee or Compliance Officer. In some organizations, an Ethics Committee or a designated Compliance Officer may oversee investigations into ethical violations and ensure that all reports are addressed impartially and transparently.

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### 9.3 Investigation Process

a) **Acknowledgment:**

Upon receiving a report, the organization will acknowledge receipt and begin an investigation as soon as possible, typically within 7 business days.

b) **Objective Investigation**

An impartial investigation will be conducted to review all relevant facts, evidence, and parties involved.

c) **Confidential Interviews**

HR, legal, or management will conduct interviews with witnesses and those accused of misconduct to gather more information and determine the validity of the report.

d) **Timely Resolution**

Investigations will be conducted as efficiently as possible, with a goal to resolve the matter within 30 days unless extenuating circumstances require more time.

### 9.4 Violations and Breach of the Code and Employment Rules and Regulations

- i. Any employee who commits violation of the Code, criminal wrongdoings, misconduct, breach of the established rules and regulations or employment contract shall be dealt with in accordance with the Human Resource Department's disciplinary policies and procedures and/or be liable in the court of law.
- ii. Human Resource Department will conduct an investigation and perform a fair domestic inquiry exercise to determine if the employee is guilty or otherwise of the conduct alleged.
- iii. Depending on the level of the offense or misconduct committed, the employee may be subject to any of the following punishments:
  - Dismissal without notice
  - Downgrade / Demotion
  - Suspension without pay
  - Withholding of promotion / increment/ bonus
  - Written warning
- iv. All employees caught with criminal wrongdoings will be dismissed immediately and a report shall be lodged to the police authority for further actions.
- v. Employees shall report to his/her immediate superior any violations or misconduct committed by other employees or to the ARC in accordance to the Whistle Blower Policy.