



CODE OF CONDUCT

1. INTRODUCTION

The Directors and Management of the Group are committed to observing the highest standards of integrity and professionalism in all its activities. All employees play an important role in maintaining and enhancing the reputation, image and brand of the Group.

This Code of Conduct (the “Code”) sets out the principles and standards of business ethics and conduct of the Group.

2. PURPOSE OF THE CODE

This Code provides ethical and legal guidance to all the Directors and employees. The Code is not intended to be exhaustive i.e. there may be areas in which the Group has developed or will develop specific policies. This Code is to be read and applied in conjunction with such policies.

3. APPLICABILITY

This Code is applicable to all Directors and employees of the Group. Each employee has a duty to comply with this Code and failure to comply may result in disciplinary action that may ultimately lead to termination of employment.

4. CORE AREAS OF CONDUCT

4.1 Compliance with Applicable Laws and Regulations

The Group must not conduct its business activities in the manner that will violate any relevant laws and regulations.

The relevant personnel must ensure that they familiarise themselves with the laws, regulations and licensing requirements applicable to their activities.

The Group reserves the right to report any activities of a criminal nature to the relevant authorities.

4.2 Confidentiality

Any Director or employee who has access to certain privileged information including trade secrets and other confidential information concerning the business of the Group howsoever the information may be acquired, shall not without express authorisation make use of, divulge or communicate to any person

4.3 Conflict of Interest

None of the Directors and employees shall engage directly or indirectly in business activities that compete or are in conflict with the interest of the Group. These activities include, but are not limited to the following: -

4.3.1 shall not conduct business other than the business of the Group during office hours;

4.3.2 shall not carry out additional gainful employment outside of the Group;

4.3.3 shall not, without prior written consent of the Board, accept lavish entertainment, commission, service, emolument, gratuity, money, property or any pecuniary benefit or gift for personal benefit or advantage from any person/agent or representative having direct or indirect business dealing with the Group, particularly if this is given with intent to influence the conduct in relation to the Group's affairs.

4.4 Protection of Assets & Funds

All Directors and employees must protect the assets and funds of the Group to ensure availability for legitimate business purposes and that no property, information or position belonging to the Group or opportunity arising from these be used for personal gain.

Misappropriation of property owned by the Group will not be tolerated. Any misappropriation should be immediately reported and properly investigated. Appropriate disciplinary and/or legal action will be taken.

4.5 Occupational Health & Safety

The Group will use its best endeavours to ensure a safe workplace and maintain proper occupational health and safety practices to commensurate with the nature of the Group's business.

The Group is committed to provide effective support and training for the employees to assist them in discharging their responsibilities to ensure a safe workplace.

5. REPORTING OF VIOLATIONS OF THE CODE OF CONDUCT AND ANY SERIOUS CONCERNS THAT MAY HAVE AN IMPACT ON THE GROUP

Any employee who knows of, or suspects, a violation of the Code or any serious concerns that may have an impact on the Group, is encouraged to whistle blow or report the concerns. No individual will be discriminated against or suffer any act of retaliation for reporting in good faith on violations or suspected violations or serious concerns.

6. REVIEW OF THE CODE

The content of this Code will be continuously monitored and reviewed to ensure its relevance.

The Code of Conduct is published and available for reference on the Group's corporate website at www.alpha-tiles.com.my.