



ComfortRubberGloves  
**COMFORT GLOVES BERHAD**  
Registration No. 193701000006 (852-D)  
(Incorporated in Malaysia)

## **CODE OF CONDUCT AND BUSINESS ETHICS**

### **Introduction**

In line with good corporate governance practices, the Board, the Management and employees of Comfort Gloves Berhad (“**CGB**”) and its subsidiaries (collectively referred to as the “**Group**”) have made a commitment to create a corporate culture within the Group to operate the businesses of the Group in an ethical manner and to uphold the highest standards of professionalism and exemplary corporate conduct. This Code of Ethics and Conduct (the “**Code**”) sets out the principles and standards of business ethics and conduct of the Group.

### **Purpose of the Code**

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

- 1) to encourage high standards of honesty, integrity, ethical and law-abiding behaviour expected of Directors;
- 2) to foster standards to protect and promote the interests of shareholders and all stakeholders; and
- 3) to provide guidance to the Board to maintain the confidence of shareholders and other stakeholders in the Company’s integrity.

### **Code of Conduct**

#### **Section A: Workplace Culture and Environment**

##### **Equal Opportunity and Non-Discrimination**

CGB and the Group upholds 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.

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

CGB and the Group 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.



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

CGB Group supports and respects human rights and 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.

CGB Group views sexual harassment as a serious offence and appropriate action will be taken against any Employee found guilty of committing the offence.

Examples of sexual harassment:

- Jokes of a sexual nature;
- Touching or any bodily contact;
- Repeated requests for dates;
- Transmitting e-mails or pictures of a sexual nature; and
- Displaying picture, objects of a sexual nature.

Employees are responsible to report any harassment, intimidation, offensive or inappropriate behaviour to CGB Group's Head of Human Resource Department. All complaints or grievances will be investigated, and appropriate action will be taken to stop such conduct and prevent future occurrences.

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

CGB prohibit illegal use, sale, purchase, manufacture, possession or consumption of drugs, other than medically prescribed drugs. Employees are strictly prohibited working under the influence of alcohol, illegal drugs or controlled substances.

### **Environment**

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



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### **Section B: Company Assets and Information**

#### **Appropriate Use of Company Assets and Equipment**

CGB's assets are to be used by employees for legitimate business purposes only.

All Directors and employees are responsible to safeguard the Company's assets, including its physical premises, equipment and facilities as well as the records of information from theft and loss and to ensure their efficient use. If any Employees becomes aware of theft, waste or misuse of CGB's assets, the Employee should report this to his or her manager or through the appropriate whistleblowing channels.

#### **Managing Documents**

Company records are important corporate assets. Prompt, accurate record keeping and filing helps the integration of work processes. All employees are responsible for creating, using, storing, preserving, and where appropriate, disposing of records according to Company policies and practices, as well as current laws and regulations.

#### **Proprietary and Confidential Information**

Employees are required to protect CGB and Group's confidential information and guard them against unauthorised disclosure or use. Employees are also required to protect confidential information of third party which Employees have access to in the course of their work. Confidential information includes, but not limited to, data, business plan, customer information, information on current and future projects and work processes, and any non-published financial or other data. In the event that a Director or an Employee knows of material information affecting the Group which has not yet been publicly released, the material information must be held in the strictest confidence by the Director or Employee involved until it is publicly released.

### **Section C: Duties of Good Faith, Diligence and Integrity**

#### **Conflict of Interest**

A Director or an Employee shall avoid any situation in which the Director or Employee has an interest in any entity or matter that may influence the Director or Employee's judgment in the discharge of responsibilities.



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Employees have an obligation to act in the best interest of CGB and the Group at all times. Employees are prohibited from using their position or knowledge gained directly or indirectly in the course of their duties and responsibilities or employment for private or personal advantage. If Employee at any time thinks that they have a potential or actual conflict of interest, Employee has an obligation to disclose the conflict promptly to the Chairman of the Board (in the case of any Director) or the Company's Head of Human Resources Department or Employee's Head of Department (in all other cases) so that a determination can be made as to the existence and seriousness of an actual conflict. When in doubt, Employees shall adopt the highest standard of conduct.

### **Gifts, Benefits or Entertainment**

Employees are discouraged from giving or accepting gifts, benefits or entertainment from a third party containing excessive value that would constitute a violation of laws or that could affect, or appear to affect, the professional judgement or create the impression of improperly influencing the respective business relationship.

### **Bribes or Kickbacks**

As a general rule, Employees are discouraged from giving or accepting gifts, entertainment or other benefits to or from its Business Associate who have business dealing with as it may compromise the integrities or affect professional judgement in discharging the full responsibilities to act in the best interest of the Company. Under no circumstances it is acceptable to offer, give, solicit, or receive any forms of bribe, kickback, facilitation payment or gratuities. Employees must not accept gifts if there is reason to believe that its purpose is to improperly influence business decisions or will conflict with the Company's interest and compliance with laws.

Notwithstanding this, CGB Group recognises that the occasional acceptance or offer of modest gifts and entertainment may be a legitimate custom or practice in business relationships. The exception of the abovementioned no-gift rule applies to:-

- (a) Occasional and modest entertainment in normal course of business; and
- (b) Occasional and appropriate level of corporate hospitality.

The following guidelines shall be observed:

- Employees should not give or accept gifts or any other benefit or privilege that would in any way influence or appear to influence any business decision or gain an unfair advantage.
- The situation in which the GEHT is received or given should not be connected with contractual negotiations, tender awards or similar circumstances.



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### **Insider Trading**

Directors who possess inside information shall not:-

- a) deal in securities; or
- b) communicate such information to any unauthorised persons, for the benefit of himself or any other persons.

When dealing in the securities, a Director shall comply with the relevant laws on trading in securities and observe the processes and procedures in the Bursa Securities MMLR.

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.

### **Bribery and Corruption**

CGB Group is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates and in implementing and enforcing effective systems to counter bribery and corruption.

Employees shall familiarise themselves with the contents of the Anti-Bribery and Anti-Corruption Policy ("**ABAC Policy**") and shall not offer, give, solicit or accept bribes or any other improper payment in order to achieve any business or personal advantage or engage in any transaction that can be construed as having contravened any applicable anti-bribery or anti-corruption laws. Any suspicions on violations of the ABAC Policy are to be raised through the available reporting channel under the Whistleblowing Policy and Procedures.

Employees shall also be cognisant of the fact that bribes may be in any form, monetary or otherwise including but are not limited to unauthorised remuneration such as referral fee, commission or other similar compensation, material goods, services, gifts, business amenities, premiums or discounts of an inappropriate value or of an unreasonable level or that are not generally offered to others or that are prohibited by law or may reasonably be viewed as having crossed the boundaries of ethical and lawful business practice.

Prior to giving or accepting any business amenity or other gifts (in whatever form or value), Employees shall assess the appropriateness of their actions by assessing if the action could influence or could reasonably give the appearance of influencing the business relationship of the Company with that organization or individual or any business decision arising out of that business relationship.



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### **Compliance with Laws, Rules and Regulations**

CGB and the Group is committed to doing business the right way, by acting ethically and consistently with this Code, its policies and all related laws, rules and regulations. Employees have a continuing obligation to familiarise themselves with applicable laws relating to their job responsibilities and CGB policies. The Group will comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions within which the Group operates.

### **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. Abuse of authority can include a one-time incident or a series of incidents.

Everyone in the Company should be treated with dignity and abuse of power and any form discrimination are strictly not tolerated. Employee 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 Whistleblowing Policy and Procedures.

### **Money Laundering**

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

Employees are expected to be mindful of the risk of the Company's business being use 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.

### **Communication and Compliance**

The Company and the Board should ensure this Code is being communicated to all levels of Employees through staff handbook, notice board, intranet, or corporate website. The Company should include the briefing of this Code to new Employees in the induction programme. The Board should ensure this Code permeates throughout the Company and is complied by all levels of Employees.



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### **Whistle Blower**

CGB Group has put in place a Whistleblowing Policy and Procedure to uphold the highest standards of professionalism, integrity and ethical behaviour in the conduct of its business and operations. The policy sets out procedures which enables Employees and members of the public to raise genuine concerns regarding actual or suspected unethical, unlawful, illegal, wrongful or other improper conduct and also sets out the process for managing any action, intimidation or harassment against a whistle blower.

### **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.

Where external investigations are required, every officer shall appropriately respond to, cooperate and shall not interfere with, any lawful government inquiry, audit or investigation.

### **Periodic Review**

This Code should be reviewed periodically by the Board in accordance with the needs of the Company and be communicated to all levels of officers on the new changes. This Code is available on the Company's website.

This Code of Conduct and Ethics has been revised and adopted by the Board on 18 February 2022.