



INFOMINA BERHAD

Registration No. 200701018579 (776590-U)

CODE OF CONDUCT AND ETHICS

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Code of Conduct and Ethics

Executive Summary

Infomina Code of Conduct and Ethics outlines principles, policies to which our employees must adhere. All employees of Infomina Berhad are required to read and follow the Code of Conduct and Ethics. This Code offers guidance for professional conduct which includes the following key areas:

- Employees' Responsibility to the Company
- Employees' Responsibilities to Workplace
- Commitment to the Environment
- Privacy and Confidentiality
- Use of Infomina's Name, Facilities and Relationship
- Conflict of Interest
- Misuse of Position
- Misuse of Information
- Completeness and Accuracy of Relevant Records
- Fair and Equitable Treatment
- Utmost Good Faith and Integrity
- Misconduct

Infomina Berhad expects all of its employees to act in accordance with highest standards of personal and professional integrity in all aspects of their activities and to comply with applicable laws, regulations and company policies. We must not compromise integrity, either for personal benefit or for Infomina / purported benefit.

This Code of Conduct and Ethics applies to all Infomina employees. All employees are required to act in full compliance with policies set forth in this Code and in a manner consistent with the highest ethical standards. Failure to observe these policies may result in disciplinary action.

The Code of Conduct & Ethics shall be read in line with the related policies such as Anti-Bribery and Anti-Corruption ("ABAC") and Whistleblowing Policies & Guidelines, etc.

Infomina reserves the right to revise or amend any Code as contained in this handbook as deemed necessary from time to time. Such amendments shall notify to all employees in writing for inclusion in this handbook.

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Any doubt, uncertainty or ambiguity on the interpretation of the contents of the handbook can be forwarded to the Human Resources Dept. This handbook is a strictly Confidential and proprietary document of Infomina, and should be returned to Human Resources Dept upon employees' cessation of employment or as requested by the Company.

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Introduction

The objective of this handbook is to provide a clear guideline and understanding of employees' actions in accordance with the Company's standards of ethics, conduct, and prudent business practices. Such a code of ethics and conduct should not, however, restrict or replace the matured judgment of employees conducting his/her day-to-day business.

Where there is any doubt over matters relating to the Code of Ethics and Conduct, employees are to seek guidance from their respective Heads of Company, who may, if necessary, seek guidance from Human Resources Dept.

To ensure adhere to these guidelines the Company assign the responsibility to the Head of Company to ensure compliance with these guidelines on a day-to-day basis and to handle general enquiries from employees in matters relating to the code of conduct.

Breaches observed should be reported and all records will be maintained by the Human Resources Dept.

All employees are required to complete and sign the Declaration as an acknowledgement of receipt of this handbook and the document is to be retained in the Employees' Personal File by the Human Resources Dept.

This Code of Conduct and Ethics was adopted by the Board of Directors.

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Definition of Terms

In this Handbook, unless there is something in the subject matter or context inconsistent therewith, the following definitions are made:

a. The Company

Shall mean Infomina Berhad (HQ) and all entities of Infomina companies globally where the employees are employed and/or seconded to.

b. Employees

Shall mean all employees under the Infomina Berhad (HQ) and all entities of Infomina companies globally.

c. Head of Company

Shall mean the Head of Infomina Berhad (HQ) and all entities of Infomina companies globally, and/or each subsidiary under it, who is fully responsible for the entity.

d. Relative

Shall include:

- i) A spouse of the employee;
- ii) A brother or sister of the employee;
- iii) A brother or sister of a spouse of the employee;
- iv) A lineal ascendant or descendant of the employee;
- v) A lineal ascendant or descendant of a spouse of the employee;
- vi) A spouse of any person referred to in (ii), (iii), (iv) or (v);
- vii) A lineal descendant of person referred to in (ii), (iii) or (vi);
- viii) An uncle, aunt or cousin of the employee, or spouse of the person or
- ix) A spouse, or lineal ascendant or descendant, of the person referred to in (viii).

e. Ethical Standard

Principle that when followed, promote value such as trust, good behavior, fairness and/or empathic

f. Communication Channels

A medium through which a message is transmitted to its intended audience, such as print media, telecommunications, computer networking or broadcast (electronic) media.

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Part 1 – Employees’ Responsibility to the Company

a. Raising Ethical Issues

- i) Employees are responsible for maintaining ethical standards in all operational activities and business conduct.
- ii) Maintaining ethical standards, in all operational activities and business conducts is the responsibility of every employees of the Company. Early identification and resolution of ethical issues that may arise are critical to maintaining of the Company’s status as an icon of Malaysian steel industry.
- iii) All employees are expected to treat compliance with ethical standards as a critical element of their responsibilities.
- iv) In any situation, the employees are unsure of what to do, he/she should seek additional guidance and information before acting.
- v) Any queries regarding the best course of action in a particular situation, or if the employee suspect or become aware of a possible violation of law, regulations or the Company ethical standard, he/she should promptly contact any of the followings:-
 - HR Representative at the respective unit;
 - Head of Human Resources
 - Head of Company;

b. Protection of the Company's Assets

- i) All employees are responsible for safeguarding the tangible and intangible assets of the Company that are under your control.
- ii) The Company's assets may be used only for the Company's purposes.
- iii) Misappropriation of the Company assets is a breach of employees' duty to the Company and may be construed as an act of fraud against the Company. Similarly, carelessness or waste in regard to the Company's assets is also a breach of employees' duty to the Company.
- iv) The Company's telephone, e-mail, computer systems are primarily for business purposes. All employees shall not abuse these in a manner that could be harmful or embarrassing to the Company. Similarly, personal communication must be kept at minimum.

c. Accuracy of Records and Reporting

- i) All records, data and information owned, collected, used and managed by the Company must be accurate and complete. Employees are personally responsible for the integrity of the information, reports and records under your control.
- ii) All employees must exercise good judgment with regard to contents and languages when creating business records and other documents via various communication channels.
- iii) Employees should keep in mind that at a future date, the Company or a third party may rely on or interpret the document.

Part 2 – Employees' Responsibility to Workplace

a. Fair Employment Practices and Diversity

- i) The Company believes that diversity in each of employee is critical to the Company continuous success. Nevertheless, the Company seeks to recruit, develop and retain the most talented people.
- ii) The Company is fully committed to equal employment opportunity and fair employment practices.

b. Discrimination and Harassment

- i) The Company values a work environment where diversity is embraced, and where employees' differences are valued and respected.
- ii) The Company prohibits sexual or any other kind of discrimination, harassment or intimidation whether committed by or against a superior, co-worker, client, vendor, etc.
- iii) Discrimination and harassment whether based on a person's race, gender, religion, age, disabilities, marital status etc. are repugnant and completely inconsistent with our tradition of providing a respectful, professional and dignified workplace.

c. Workplace Free from Drug

- i) All employees must maintain a healthy and productive work environment. Misusing or being under the influence of illegal drugs on the job is prohibited.

d. Employee's Attendance & Whereabout

- i) All employees are required to comply with the working hours imposed to them, whether in their letter of offer, employee handbook and/or any official communications from the Company.
- ii) All employees are also required to be at their workstation during their working hours, except with the permission of their immediate superior and/or the management of the Company.

e. Safety in the Workplace

- i) The safety of employees in the workplace is a primary concern of the Company to maintain secure and healthy work surroundings.
- ii) Each of employees must comply with all applicable Health, Safety and Environment (SHE) policies.

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Part 3 – Commitment to the Environment

a. Employees’ Responsibilities

- i) All employees should take care of himself/herself and other persons at work, cooperate with his/her employer or other person and wear all personal protective equipment provided.
- ii) Employees must comply with all instruction or measure on Occupational, Safety and Health Act 1994.
- iii) Under Section 24 of Occupational Safety and Health Act 1994, penalty for failure to comply is:

Fine RM 1,000.00 or not exceeding 3 months imprisonment or both.

b. Pollutant and Waste

- i) All employees shall not emit or discharge any pollutant or waste into *Atmosphere, Soil, Inland Water, and Noise*.
- ii) Under the Section 22-25 of Environment Quality Act 1974, penalty for failure to comply is:

<i>Atmosphere Soil Inland Water</i>	<i>Fine RM 100,000.00 or not exceeding 2 years imprisonment or both</i>
<i>Noise</i>	<i>Fine RM 100,000.00 or not exceeding 1 year imprisonment or both</i>
<i>Further fine for every day if that offence is continued after notice.</i>	

c. Open Burning

- i) All employees shall not allow or cause open burning.
- ii) Under Section 29A of Environment Quality Act 1974, penalty for failure to comply is:

*Fine not exceeding RM 500,000.00 or not exceeding 5 years
imprisonment or both*

Part 4 – Privacy and Confidentiality

- a. All employees must not disclose proprietary or confidential information about the Company or its employees to anyone who is not authorized to receive it nor has no need to know the information.
 - i) *Examples of confidential information include, but not limited to information about the Company's operations, results, earnings projections, strategies, clients or client relationships, proprietary products, or employees' records.*
- b. All Employees must take precautionary measures to prevent unauthorized disclosure of proprietary and confidential information. Accordingly, he/she should also take steps to ensure that business-related paperwork and documents are produced, copied, faxed, filed, stored and discarded appropriately.
- c. Employees who are provided with the Company's network, server and/or email, account should also ensure that access his/her computers are properly controlled.
 - i) *Store of any personal data (e.g. video, music, etc.), sending offensive, slanderous, obscene, mass email or email that is harmful to the Company, installation of illegal, pirated or non-licensed software, video/audio streaming, pornography, violent, offensive, malicious, social networking, file sharing, P2P, messaging/chatting or any contents that are harmful to the Company's computer network or generates heavy traffic, is prohibited*
- d. Employees should not discuss sensitive matters or confidential information in public places.
- e. No employee shall during, or after cessation of his/her employment with the Company (except in the proper course of his/her duties or within the Company's written consent) divulge or make use of any secrets, copyright material, or any correspondence, account or dealings of the Company or clients.

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- f. No employee shall in any way use information to obtained for personal financial gain.
- g. Business and financial information about the Company or client may be used or made available to third parties only when disclosure is required by law or in accordance with any agreed information exchanged program within the industry.

Part 5 – Use of the Company’s Name, Facilities and Relationship

- a. All employees should not use the Company’s name including on corporate letterhead, facilities or relationship for personal benefit or for outside work.
- b. Use of the Company’s name, facilities or relationships for charitable purposes must be made with prior approval from the senior management.

Part 6 – Conflict of Interest

- a. Employees must not engage directly or indirectly in any business activity that competes or conflicts with the interest of the Company. These activities include, but are not limited to, the following:

i) Outside Financial Interest

Where employees have a financial interest in a client, supplier, creditor or debtor, such an interest must be disclosed, immediately to the employees’ immediate Superior. Thereafter, he/she should not be directly involved in the Company dealings with the client, supplier, creditor or debtor so long as the interest continues to exist.

ii) Other Business Interest

It is considered a conflict of interest if an employee’s conduct business other that the Company’s business during official work hours. Where the acquisition of any business or participation in any business activity outside the Company and the official work hours demands excessive time and attention from the employees, thereby depriving the Company of his/her best efforts on the job, a conflict of interest also arises.

iii) Other Employment

Before making any commitment, employees are to discuss possible part-time employment or other business activities outside the Company's official work hours with his/her immediate superior and/or the Head of Company. The written approval of the Head of Company should be obtained before the employees embark on part-time employment or other business activities. Approval should be granted only where the interests of the Company will not be prejudiced.

iv) Entertainment and Gifts

Employees must not accept entertainment from client, supplier, creditor or debtor unless they are able to reciprocate, either personally or obtaining reimbursement from the Company through a proper expense voucher.

However, employees may accept token gifts of no commercial value during festive seasons if the acceptance of such gifts should not place the employees in a compromising position and if refusing the gifts would jeopardize client relations.

Under no circumstances should gifts in the form of cash, bonds, negotiable securities, personal loans or airline ticket be accepted. Employees should note that acceptance of any gift of high monetary value for their own or their relatives' personal benefits or advantage from any person, other than the Company, as consideration for the procurement of favorable terms for any person, agreements or other transaction, is prohibited.

All gifts should be declared to the MD and Human Resources Department.

Reference shall be made to Infomina's ABAC Policy & Guidelines pertaining to the guidelines of on gifts, entertainment, donation and any other forms of gratuities.

Part 7 – Misuse of Position

- a. Employees must not use the Company's name or his/her position in the Company for personal advantage in political, investment or retail purchasing transaction, or in similar types of activities. Employees and their relatives must not use their connection with the Company to borrow from or become indebted to clients. The use of position to obtain preferential treatment such as in purchasing goods, shares and other securities is prohibited.

Part 8 – Misuse of Information

- a. All Employees of the Company shall not utilize any information gained through the company's operation either for personal gain or for any purpose other than that intended by the Company.

Part 9 – Completeness and Accuracy of Relevant Records

- a. Accounting records and report must be complete and accurate. Employees shall not make entries or allow entries to be made for any account, record or document of the Company that are false or would obscure the true nature of the transaction, as well as to mislead the true authorization limits or approval by the relevant authority of such transaction.
- b. All records and computer files or programs of the Company, including personnel files, financial statements and client information, must be accessed and used only for the management approved purposes.

Part 10 – Fair and Equitable Treatment

- a. All business dealings on behalf of the Company with current and potential clients and with all those who may have caused to rely upon the Company should be conducted fairly and equitably.
- b. Employees must not be influenced by friendship or association in carrying out dealings. Such decision must be made on a strictly arms-length business basis.

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- c. All preferential transactions with insiders or related interests should be avoided. If transacted, such dealings should be on normal business criteria basis and fully documented and duly authorized by the Company's management.

Part 11 – Utmost Good Faith and Integrity

- a. All employees must show the good faith in its dealing with current and future clients by ensuring that the terms of the contract are fair and equitable.

Part 12 – Workplace Intimate Relationships

- a. Employees who engage in personal relationships (including romantic and sexual relationships) should be aware of their professional responsibilities and will be responsible for assuring that the relationship does not raise concerns about favoritism, bias, ethics and conflict of interest.
- b. All kind of romantic and/or sexual relationship should be disclosed to the Human Resources Department. In cases of doubt, advice and counsel should be sought from Human Resources Department.
- c. All Infomina personnel that is working with a private and confidential information, knowledge and documents of the Company (eg: HR, Finance, Sales & Presales, Project Management, etc) are not allowed to practice all kind of romantic and/or sexual relationship to avoid conflict of interest and/or breach of confidentiality.
- d. If any personnel of the above-mentioned departments and/or working with a private and confidential information of the Company involved in romantic and/or sexual relationship, it is considered as breach of Company's COCE.

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Part 13 – Misconduct

- a. It is important that all employees read and ensure that they do not commit offences of misconduct inconsistent with the fulfillment of the employees' expressed and implied conditions of service.
- b. The company may take disciplinary action against any employee in the event of misconduct, inefficiency, poor performance, breach of the Company's rules and regulations or established practices and/or breach or inconsistent with the expressed or implied condition of service.

Part 14 – Business Continuity Plan

- a. All employees are required to understand the pandemic preparedness and response plan is a guiding principle to communicate facts as quickly as possible, updating information regularly as circumstances change to ensure the safety of the Infomina Berhad.
- b. In a pandemic, Infomina play a key role in protecting its employees' health and safety. Infomina will help limit any negative impact on the economy and society as well.