

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

### **1. Introduction**

We, Sin-Kung Logistics Berhad. (“SKL”), conduct our business and operations to the highest standards of ethical conduct, health & safety, social and environmental responsibility. SKL requires its employees and contractors to operate in accordance with the principles in this Code of Conduct and Business Ethics (“Code”) and in full compliance with all applicable laws and regulations.

This Code outlines SKL’s expectations for its employees’ and contractors’ conduct in relation to labour and human rights, health and safety, environmental protection, ethics and management practices.

### **2. Law, Including Regulations and Other Legal requirements**

SKL employees and contractors shall comply with all applicable laws & regulations in all locations and jurisdiction during the term of employment. Where the requirements of such applicable laws and this Code differ, or are in conflict, the employees and contractors shall comply with the highest standard consistent with applicable laws.

SKL employees and contractors are also expected to ensure it has obtained all necessary regulatory approvals (if applicable) to perform its services to the company during the term of employment. This includes any licenses, permits, approvals, and/or permissions granted by local regulators and federal authorities.

### **3. Business Integrity**

SKL employees and contractors shall not engage in any and all forms of bribery, corruption, extortion, embezzlement and other unethical and illegal conduct. All business dealings should be transparently performed and reported to the Management.

### **4. Avoiding Conflicts of Interest**

Decisions made by SKL employees and contractors must be based on factual considerations, rather than being improperly influenced and/or motivated by personal interests. If any employees and contractors become aware of a potential conflict of interest, this fact must be communicated to SKL management immediately. SKL’s position on conflicts of interest can be found at SKL’s ANTI-BRIBERY AND ANTI-CORRUPTION POLICY which must be read together with this Code.

### **5. Disclosure of Information**

SKL employees and contractors shall disclose information which are required by applicable laws and regulations. Falsification of records or misrepresentations of conditions or practices are unacceptable.

### **6. Confidentiality and Intellectual Property**

SKL employees and contractors shall respect the principles of confidentiality and shall ensure that it will not disclose to anyone outside of SKL, any confidential information which came to their knowledge and/or possession during their employment with SKL, or use such confidential information for their own purpose or to benefit anyone outside SKL, where confidential information is being defined as information or material that is commercially valuable to SKL and not generally known or readily ascertainable in the industry. SKL employees and contractors shall also respect SKL and all third party’s intellectual property rights, and shall ensure that there are no infringements on its part.

### **7. Anti- Bribery and Corruption Practices**

SKL’s Anti-Bribery and Corruption Practices can be found at SKL’s ANTI-BRIBERY AND ANTI-CORRUPTION POLICY, which must be read together with this Code. Employees and contractors are expected to conduct their jobs given in accordance with the highest ethical standards. The offering or acceptance of any form of bribe or corruption such as, without limitation, facilitation payment, kickbacks, reward, gifts, blackmail, gratification or behaviour involving improper advantages, benefits or incentives, are strictly prohibited.

### **8. Gifts and Entertainment**

Any gifts offered, given or received shall be in compliance with the law and SKL’s ANTI-BRIBERY AND ANTI-CORRUPTION POLICY, which must be read together with this Code.

### **9. Labour and Human Rights**

SKL's Management uphold the human rights of workers and to treat them with fairness, dignity and respect, and provide a working environment that is free from discrimination and harassment. Additionally, the adherence to applicable wage and labour laws and standards is required.

### **10. Environment, Health and Safety**

We recognize our social responsibility to protect the environment and SKL expects all employees and contractors to share our commitment in this aspect. As part of this commitment, employees and contractors must adhere to all relevant environmental laws, regulation, rules and practices and all recognized standards.

Worker health, safety, and well-being are also important to SKL. SKL employees and contractors are expected to provide and maintain a safe and healthy work environment and fully comply with all applicable safety and health laws, regulations, and practices. Adequate steps must be taken to minimize the causes of hazards inherent in the working environment, prevent workplace accidents and injuries, and promote safe and healthy workplaces.

### **11. Data Privacy and Security**

SKL employees and contractors shall comply with applicable privacy and data protection laws and ensure the protection, security and lawful use of personal data.

### **12. Non-Compliance**

A Breach of the Code and/or other policies which are specifically mentioned here to be read together with this Code may result in actions being taken against SKL employees and contractors, in addition to any contractual or legal remedies available to SKL. The actions applied will depend on the nature and seriousness of the breach. The actions available to SKL on employees and contractors who breach the Code and/or other policies which are specifically mentioned here to be read together with this Code include but is not restricted to the following:

- Formal warnings – that the continued non-compliance will lead to more severe actions; or
- Immediate termination of contract, without recourse.

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## **Employee Declaration Form**

I, \_\_\_\_\_ (Full name as per NRIC),  
\_\_\_\_\_ (NRIC) hereby agree to the terms of the SKL Code of Conduct and business ethics,  
undertake and represent to be bound by its terms.

\_\_\_\_\_  
Date :