



CODE OF CONDUCT AND BUSINESS ETHICS

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1.0 OBJECTIVE

Kwantas Corporation Berhad and its Group of Companies (“KWANTAS” or “the Company” or “the Group”) is mindful that a strong business ethics and effective and efficient monitoring system will promote an ethical corporate climate in fostering an excellent culture of corporate governance. The Code of Conduct and Ethics (“Code”) is therefore formulated as a way of articulating the Company’s business ethos and guiding the Company on the manner it should act when deciding unanticipated situations.

The Code will not only promote legal and procedural compliance, but also a moral compass to ensure that individual behavior is in line with the KWANTAS shared values. This Code contains detailed policy statements on the standards of behavior and ethical conduct expected of each individual to whom the Code applies.

The Code is to apply to all employees and Directors [“Employee(s)”] within the Group. KWANTAS also expects that contractors, sub-contractors, consultants and others performing work or services for or on behalf of KWANTAS will comply with the relevant parts of the Code when performing such work or services. In particular, the Code expressly prohibits improper solicitation, bribery and other corrupt activity not only by Employees but also by third parties performing work or services for or on behalf of companies in the Group.

2.0 DEFINITIONS

2.1 For purposes of this Code, the term “Employee” means any person who is in the employment of KWANTAS including but not limited to Group Chief Executive Officer, Executive Directors, Company Secretaries and expatriates.

2.2 For purposes of this Code, the term “family/household” includes Employee’s spouse, children (including step-children and adopted children), parents, step-parents, siblings, step-siblings, grandparents, grandchildren, in-laws, uncles, aunts, nieces,



nephews, and first cousins, as well as other persons who are members of Employee.

3.0 CORPORATE VALUES AND CULTURE

3.1 KWANTAS is committed to the highest standards of integrity, openness and accountability in the conduct of the Group's business and operations. KWANTAS seeks to conduct its affairs in an ethical, responsible and transparent manner.

3.2 Every Employee in KWANTAS has a duty to serve the Company with good faith, fidelity, diligence and integrity. Employees are required to act in the best interests of KWANTAS and to refrain from engaging in conduct or activities which may adversely affect the best interests of KWANTAS. Employees are at all times required to:

- a) Conscientiously maintain the highest degree of **integrity**;
- b) Always exercise **proper care and judgment**;
- c) **Avoid conflicts of interest**; and
- d) **Refrain** from taking advantage of one's position or exercising his/her authority to further his/her own **personal interest** at the expense of the Company.

3.3 Employee may not conduct himself/herself in a manner that might undermine or that is likely to destroy or seriously damage KWANTAS' confidence and trust in him/her.

3.4 KWANTAS expects that all Employees throughout the time of service as KWANTAS Employee, will: -

- a) Strive towards a high standard of professionalism;
- b) Give his/her undivided loyalty and devotion to KWANTAS at all times and on all occasions;



- c) Serve with honesty and integrity, goodwill and courtesy;
- d) Display Group's cohesiveness based on common purpose with caring attitude for the individual;
- e) Uphold the duty of care for the interests and reputation of KWANTAS;
- f) Display a high sense of discipline, cooperativeness and diligence in carrying out one's duties;
- g) Act consistently to maintain KWANTAS' confidence and trust in him/her;
- h) Promote creativity and new approaches in the course of carrying out his/her work;
- i) Comply with applicable laws, regulations and KWANTAS policies and procedures.

4.0 GENERAL CONDUCT

- a) Must act honestly, in good faith and in the best interests of the Company as a whole;
- b) Has a duty to use due care and diligence in fulfilling the functions of office and exercising the powers attached to that office;
- c) Must use the powers of office for a proper purpose, in the best interests of the Company as a whole;
- d) Must recognise that the primary responsibility is to the Company's shareholders as a whole but should, where appropriate, have regard for the interest of all stakeholders of the Company;
- e) Must not make improper use and should maintain complete confidentiality of information;
- f) Must not take improper advantage of the position;
- g) Must not allow personal interests, or the interests of any associated person, to conflict with the interests of the Company;
- h) Has an obligation to be independent in judgement and actions and to take all reasonable steps to satisfy as to the soundness of all decisions;



- i) Confidential information received in the course of exercising of management duties remains the property of the Company and it is improper to disclose it, or allow it to be disclosed, unless that disclosure has been authorised by the Company, or the person from whom the information is provided, or is required by law;
- j) Should not engage in conduct likely to bring discredit upon the Company;
- k) Has an obligation, at all times, to comply with the spirit as well as the principles of this Code; and
- l) Must encourage the reporting and investigating of unlawful or unethical behaviour.

5.0 DUTIES OF GOOD FAITH, FIDELITY, DILIGENCE AND INTEGRITY

5.1 CONFLICT OF INTEREST

5.1.1 A conflict of interest may arise where the interests of an Employee interferes or appears to interfere with the interests of the Company as a whole.

5.1.2 A conflict of interest arises in any situation in which an individual is in a position to take advantage of his/her role at KWANTAS for his/her personal benefit, including the benefit of his/her family and friends.

5.1.3 A conflict of interest can make it difficult for an individual to fulfill his/her duties impartially and correctly. A conflict of interest can exist even if it results in no unethical or improper acts. Even the appearance of improper influence in his/her decision-making may be an issue.

5.1.4 A conflict of interest will undermine the values of good faith, fidelity, diligence and integrity in the performance of an Employee's duties and obligations as expected by KWANTAS.



- 5.1.5** An Employee must therefore avoid conflicts of interest between his/her personal dealings and duties and responsibilities in the conduct of KWANTAS' business. In particular, the use of KWANTAS office position, confidential information, assets and other KWANTAS resources for personal gain, or for the advantage of others with whom he/she is associated, is prohibited.
- 5.1.6** The situations under which conflicts of interest may arise include, but are not limited to:
- a) When an Employee, in the exercise of his/her authority, gives preference to his/her interests or the interests of his/her family/household members, associates or friends rather than to the interests of KWANTAS; and
 - b) When an Employee is in a position to influence decisions that are to be made by KWANTAS with respect to dealings with a business, enterprise or entity owned or partially owned by the Employee, his/her family/household members, associates or friends.
- 5.1.7** In certain instances, a conflict of interest that has been fully disclosed to KWANTAS may be tolerated by KWANTAS (for example, because measures are taken to ensure that it poses no risks to KWANTAS). Any conflict situations should be cleared with Group Human Resource Department ("GHRD"). A failure to disclose fully the nature and scope of the conflict of interest may result in disciplinary action against the Employee.



5.1.8 To avoid such conflicts arising, Employees are obliged to:

- a) Advise their immediate superior of any material interest or proposed material interest that they may have in a customer, supplier or service provider;
- b) Not seek or accept offers of gifts, money or favours which might influence or appear to influence the making of any business decisions; and
- c) Not be involved in any other business or position that may result in them not being able to carry out their duties and responsibilities to the Company.

5.2 FIGHTING CORRUPTION AND UNETHICAL PRACTICES

5.2.1 SOLICITATION, BRIBERY AND CORRUPTION

5.2.1.1 An act of corruption by an Employee has the effect of compromising the due proper performance of his/her duties and the exercise of his/her authority, thereby undermining the integrity of the decision-making process and the decisions of KWANTAS concerning its business and affairs.

5.2.1.2 An Employee is prohibited from, directly or indirectly, soliciting, accepting or obtaining or agreeing to accept or attempting to obtain, from any party for himself/herself or for any other party, any bribe or gratification as an inducement or a reward for doing or forbearing, to do, or for having done or forborne to do, any act in relation to KWANTAS' affairs or business, or for showing favour or forbearing to show disfavour to any party in relation to KWANTAS' affairs or business.



- 5.2.1.3 An Employee may not directly or indirectly offer, promise or give any bribe as an inducement or a reward for doing or forbearing to do, or for having done or forborne to do, any act in relation to KWANTAS' affairs or business, or for showing favour or forbearing to show disfavour to KWANTAS in relation to KWANTAS' affairs or business, whether in the form of a facilitation payment, kickback, donation, fee or any other form.
- 5.2.1.4 An Employee should satisfy himself/herself concerning the status and probity of any contractor, sub-contractor, consultant, or other person who he/she engages to act for or on behalf of KWANTAS or in relation to KWANTAS' affairs of business, and confirm that the relevant party understands and accepts KWANTAS policies prohibiting improper solicitation, bribery and corruption. Contractors, sub-contractors, consultants, representatives and others must comply with such policies when performing work or services for or on behalf of companies in the KWANTAS Group.
- 5.2.1.5 If an Employee receives a request for a bribe or if he/she is offered a bribe, he/she must report it to GHRD.
- 5.2.1.6 A "bribe" or a "gratification" is any gift, payment, benefit or other advantage, pecuniary or otherwise, offered, given, or received in order to secure an undue or improper result, award, decision, benefit or advantage of any kind. A bribe needs not involve cash or another financial asset—it can be any kind of advantage, including the unpaid use of corporate services or property, loan guarantees or the provision of employment to the family or friends of people with whom KWANTAS deals.

5.2.2 COMPETITION AND ANTI-TRUST LAWS

5.2.2.1 All Employees are required to comply with competition and anti-trust laws in the countries in which KWANTAS operates. Non-compliance of such laws can result in civil and criminal liability for both the Employee and KWANTAS.

5.2.2.2 All Employees are prohibited from the use of illegal or unethical methods to compete in the market, such as:

- a) Exchanging competitive information with competitors;
- b) Fixing prices or terms related to pricing;
- c) Dividing up markets, territories or customers;
- d) Rigging a competitive bidding process (including arrangement to submit sham bids; and
- e) Adopting strategies to illegally exclude competitors from the market, such as, without limitation anti-competitive bundling or predatory pricing.

5.2.2.3 Employees must not misappropriate propriety information or possess trade secrets obtained without the owner's consent or by presurring disclosures from employees of other companies.

5.2.3 ANTI-MONEY LAUNDERING AND ANTI-TERRORISM FINANCING

Money laundering is the process of hiding the true nature or source of illegally obtained funds (such as the drug trade or terrorist activities) and passing it surreptitiously through legitimate business channels by means of



bank deposits, investments, or transfers from one place (or person) to another.

5.2.3.1 Anti-money laundering provisions are designed to help prevent legitimate businesses from being used by criminals for the purpose and to assist law enforcement agencies to trace and recover criminal assets and terrorist funding.

5.2.3.2 KWANTAS prohibits Employees involvement in money laundering activities, either directly or indirectly, such as:

- a) Payments made in currencies that differ from invoices;
- b) Attempts to make payment in cash or cash equivalent (out of normal business practice);
- c) Payments made by third parties that are not parties to the contract; and
- d) Payments to or accounts of third parties that are not parties to the contract.

5.2.4 PROHIBITION ON COMMISSIONS, DISCOUNTS AND SECRET PROFITS

5.2.4.1 An Employee must not, directly or indirectly, receive or obtain, in respect of any goods or services sold or purchased or other business transacted (whether or not by him/her) by or on behalf of KWANTAS, any discount, rebate, commission, service, interest, consideration of value or other benefit or payments of any kind (whether in cash or in kind) which is not authorised by KWANTAS rules, policies or guidelines.

5.2.4.2 An Employee subject to this Code who, directly or indirectly, obtains any discount, rebate, commission, service, interest, consideration of value or

other benefit or payments of any kind (whether in cash or in kind and whether as a bribe or otherwise), by virtue of his/ her position or authority with or on behalf of KWANTAS, will immediately disclose such receipt and he/she will be liable to render an account of the same and surrender any benefits and/or payments received to KWANTAS.

5.2.5 RECEIVING GIFTS AND ENTERTAINMENT

- 5.2.5.1 All Employees are reminded that they are not to receive any gifts, pledges, favours or any other benefit in return for any business favours, introductions or otherwise that are as a result of their employment in the Group.
- 5.2.5.2 Situations may arise where it is appropriate to give a corporate gift or goodwill gesture, recognizing a significant occasion (e.g. an overseas delegation). A senior manager's approval is required and in any case the gift should be modest and appropriate for the occasion.
- 5.2.5.3 KWANTAS prohibits the giving of entertainment or gifts using KWANTAS resources that are illegal or unduly dangerous, or indecent, sexually oriented or inconsistent with KWANTAS commitment to mutual respect, or for the purpose of improperly influencing someone to take action in favour of KWANTAS or to refrain from taking action adverse to KWANTAS.
- 5.2.5.4 No gift of cash may be given. An Employee should not pay for entertainment or gift personally in order to avoid having to seek pre-approval or to otherwise circumvent KWANTAS policies.
- 5.2.5.5 Similarly, entertainment may be appropriate where persons outside the Company are involved and the expense is to be borne by the Company.



- 5.2.3.2 An Employee is prohibited from offering gifts and entertainment, including travel-related expenses, to government officials or their family/household members without permission from the Head of Department or the Head of Operating Unit.
- 5.2.3.3 An Employee is prohibited from paying for non-business travel and hospitality for any government official or his/her family/household members without permission from the Head of Department or the Head of Operating Unit.
- 5.2.3.4 An Employee may not offer or provide gift or anything else of value to any person such as an agent, consultant or contractor, if he/she knows or suspects that a government official or his/her family member will be the indirect beneficiary or recipient, other than as approved by the Head of Department or the Head of Operating Unit.

5.3 RESPONSIBILITY FOR ASSETS, FACILITIES, RESOURCES AND RECORDS

- 5.3.1 Insofar as an Employee has possession of or is given access to assets, facilities, resources or records belonging to KWANTAS, that possession or access is provided on the basis of trust and confidence that they are to be used for the furtherance of the interest and of the businesses of KWANTAS. These assets may be tangible—for example, equipment, including computer hardware, or cash—or they may be intangible, such as intellectual property and computer software.



- 5.3.2 An Employee is responsible for the safekeeping of all assets, facilities, resources and records belonging to KWANTAS that are provided to him/her for the performance of his/her duties.
- 5.3.3 An Employee must further take all necessary steps to prevent theft, loss, damage to, or misuse of assets, facilities, resources and records belonging to KWANTAS, the occurrence of which should be reported immediately to KWANTAS. Regardless of condition or value, assets, facilities, resources and records belonging to KWANTAS may not be misused, taken, sold, lent, given away or otherwise disposed of, or used for personal purposes, except with the appropriate specific authorisation of KWANTAS.
- 5.3.4 Subject to applicable laws, an Employee may be liable for any loss of or damage to assets, facilities, resources and records arising from his/her willful misconduct or negligence or careless action or as a result of action taken without KWANTAS' approval, and any financial loss suffered by KWANTAS may be recovered from his/her by way of deduction from his/her salary or other means. Within the limits of applicable law, KWANTAS may at its discretion take any other action against an Employee considered appropriate by KWANTAS, including reporting him/her to the public authorities.

5.4 INTERNAL CONTROLS AND PROCEDURES

- 5.4.1 An Employee must comply with all policies and procedures established from time-to-time to safeguard and support the integrity and accuracy of KWANTAS' books and records and financial reporting. In this regard, he/she must not, for example: -



- a) Conceal, alter, destroy or otherwise modify KWANTAS' records or documents other than in accordance with established, ordinary course procedures (and in no case impede or frustrate an investigation or audit or conceal or misstate information);
- b) Intentionally make a false or misleading entry in a record, report, file or claim (including travel and entertainment expense reports);
- c) Establish accounts, companies or arrangements to circumvent or frustrate KWANTAS' controls, policies or procedures;
- d) Fail to cooperate fully and truthfully with internal and external audits authorised by KWANTAS; and
- e) Engage in any scheme to defraud anyone of money, property or honest services.

5.5 CONFIDENTIALITY OBLIGATIONS/INTELLECTUAL PROPERTY/PUBLIC COMMUNICATION

5.5.1 CONFIDENTIALITY OBLIGATIONS

5.5.1.1 The business affairs and records of KWANTAS comprising business, technical, financial, legal, personnel and contractual records and documents comprising telegrams, e-mails, letters, maps, reports, drawings, calculations, specifications, formulae, forms, licenses, agreements or other documents or computer softwares or files of whatever nature and informations as to formulae, processes and manufacturing methods are all confidential information belonging to KWANTAS. Such confidential information is strictly private and confidential and may not be utilised, discussed with, divulged to or disclosed to persons inside or outside KWANTAS, except by persons authorised to do so. All necessary precautions are to be taken by an Employee with respect to the confidentiality of such confidential information.



- 5.5.1.2 Any confidential information about the Company or its suppliers, customers, contractors or shareholders must not be used improperly.
- 5.5.1.3 Prior to the use of or release of confidential information, written approval must be obtained from the Head of Department or the Head of Operating Unit.
- 5.5.1.4 Employees must maintain the privacy of customers, other employees and shareholders and only use information for the purpose for which it was collected.
- 5.5.1.5 An Employee may not, either during or for a period of four years (48 months) after his/her cessation of the employment or engagement, disclose, divulge or utilise without appropriate authorisation any such confidential information which may have come to his/her knowledge during his/her employment or engagement under any previous contract of service with KWANTAS and he/she must, both during and for a period of four years (48 months) after his/her cessation employment or engagement, take all reasonable precautions to keep all such confidential information secret.
- 5.5.1.6 Except so far as may be necessary for the purpose of performing an Employee's duties, he/she may not, without the consent of KWANTAS, retain or make originals or copies of such confidential information or notices thereof, nor retain samples of specimens in which KWANTAS may be or may have been interested and which have come into his/her possession by reason of his/her employment or engagement. If on termination of an Employee's employment or engagement he/she is in possession of any confidential information or any such samples or specimens as aforesaid, he/she will deliver forthwith the same on or before



the date of cessation of his/her employment/engagement to KWANTAS without being asked, except insofar as consent to retain them has been given to him/her by KWANTAS.

5.5.1.7 In the course of an Employee's relationship with KWANTAS, he/she may have established contacts and relationships with KWANTAS vendors, suppliers, contractors, principals and other business partners. An Employee will not at any time during his/her relationship with KWANTAS, or for a period of four years (48 months) after the cessation of his/her relationship with KWANTAS (or for whatever other period of time as may be specified in the terms of his/her engagement or Country Supplement to this Code applicable to him/her), whether by resignation or otherwise, make use of business opportunities arising from his/her relationship with KWANTAS or cause or attempt to cause the diversion of such business opportunity from being exploited by KWANTAS or cause or attempt to cause the termination of contracts, agencies or other business relationships of KWANTAS without first obtaining the prior consent of KWANTAS.

5.5.1.8 An Employee will not at any time for a period of four years (48 months) after the cessation of his/her tenure with KWANTAS, whether by resignation or otherwise, use KWANTAS' confidential information in breach of his/her post-tenure obligations to maintain the confidence of such confidential information.

5.5.2 MAKING OF PUBLIC STATEMENTS

5.5.2.1 Irrespective of whether in an Employee's personal or official capacity, he/she will not either orally or in writing or in any form (including on social media websites) make or circulate any public statement on the policies or decisions of KWANTAS or discuss publicly any measure taken by



KWANTAS or any official matter taken or carried out by him/her, unless he/she is duly appointed or authorised to make such statement on behalf of KWANTAS.

5.5.2.2 An Employee will not, either orally or in writing or in any other form, make any public statement or comment on any matter relating to the work of the department or organisation in which he/she is or was employed, or relating to any organisation with which KWANTAS has dealings: -

- a) where such statement or comment may reasonably be regarded as indicative of the policy of KWANTAS; or
- b) where such statement or comment may embarrass or is likely to embarrass KWANTAS; or
- c) where such statement or comment may compromise the interests and reputation of KWANTAS.

5.5.2.3 In this Section, “public statement” or “discuss publicly” includes the making of any statement or comment to the press, magazines, periodicals or the public or in the course of any lecture or speech or the broadcasting thereof by sound, vision or electronic means. It also applies to every kind of correspondence including mail, electronic documents, instant messages, websites, social media tools, blogs, paper documents, facsimile, voice and voicemail recordings.

5.5.3 SOCIAL MEDIA/INFORMATION TECHNOLOGY AND SYSTEM

5.5.3.1 An Employee must not upload, download, send or otherwise access or store pornography or other indecent or offensive material using KWANTAS premises, equipment or systems. Sending or forwarding obscene, libellous, defamatory, offensive or racist remarks is strictly prohibited. If an



Employee receives materials of this nature, he/she must promptly notify KWANTAS Management.

- 5.5.3.2 An Employee must not upload, download, send or otherwise access material that is likely to cause annoyance, inconvenience, or offense to his/her colleagues, including inappropriate jokes.
- 5.5.3.3 The KWANTAS IT and communications systems are to be used for KWANTAS work and business purposes only.
- 5.5.3.4 An Employee must not send personal e-mails using KWANTAS e-stationery or displaying KWANTAS headers or footers, or otherwise suggesting that such communications are authorised by KWANTAS.
- 5.5.3.5 An Employee must not use personal e-mail addresses and services to send or receive KWANTAS confidential information. Similarly, he/she must not allow automatic forwarding of electronic mail to external mail addresses.
- 5.5.3.6 When using KWANTAS IT and communications systems conducting KWANTAS' business or acting for KWANTAS' benefit, an Employee must not deliberately conceal or misrepresent his/her identity. An Employee should not send e-mail messages using another person's e-mail account unless he/she has proper authorisation from the owner of the e-mail account.
- 5.5.3.7 An Employee should not send or forward unsolicited e-mail messages.
- 5.5.3.8 An Employee must avoid sending confidential information via electronic messaging (e.g., SMS) or other unsecure messaging channels, and, if this



is unavoidable, the information must be secured (e.g., with encryption, password).

5.5.3.9 The installation of third party software in or connection of hardware to KWANTAS IT systems or equipment without the prior approval of an Employee's Head of Department or Head of Operating Unit is prohibited.

5.5.3.10 An Employee must not employ KWANTAS IT and communications systems to:

- a) Conduct fraud;
- b) Run his/her own business;
- c) View, download, copy, illegally share, process or post information in a way that infringes the relevant content provider's intellectual property rights;
- d) Send chain letters, make solicitations for money or gifts, or make personal offers to sell products, for charitable fundraising campaigns, political advocacy efforts, religious efforts, or private non-KWANTAS commercial purposes;
- e) Commit "cybercrimes," such as spam attacks, hacking, IT sabotage, spying, and creating or sending viruses;
- f) Send malicious rumours or transmit derogatory or indecent materials;
or
- g) Otherwise engage in activities that could damage KWANTAS' business or reputation.

5.5.3.11 If an Employee discovers or suspects any actual or potential incident that could compromise the security, integrity, confidentiality, operation or availability of KWANTAS hardware, systems or data, or any disclosure of confidential information, he/she must immediately contact the IT Service



Desk or other relevant authority. System users are not allowed to attempt to prove a security weakness by engaging in unauthorised activity.

5.5.3.12 An Employee must use KWANTAS IT and communications systems in a responsible and professional manner consistent with this Code and other KWANTAS IT policies and procedures in effect from time-to time, including the KWANTAS Information Security Policy, which sets out more detailed and comprehensive guidelines for the preservation of information security and the use of the systems, and any relevant social media policies.

5.5.3.13 KWANTAS may search and monitor an Employee's e-mails and internet usage conducted through KWANTAS IT or communications systems and equipment, subject to the requirements of local laws and regulations. An Employee should not assume that any use of KWANTAS' communication device or system is private.

5.5.3.14 An Employee must safeguard passwords and other means of shielding KWANTAS' information systems from unauthorised access, including by following the password protection protocols established by KWANTAS from time to-time.

5.6 CONDUCT CONTRARY TO DUTY TO SERVE DILIGENTLY

5.6.1 OUTSIDE EMPLOYMENT OR BUSINESS ACTIVITIES

5.6.1.1 As a KWANTAS Employee, he/she must devote his/her time and attention to the fulfillment of his/her employment obligations to KWANTAS. KWANTAS Employees may not take up other employment or gainful activity, whether part-time or full-time, or be involved in any outside business activities, in whatever capacity (including being involved in the



management, direction or conduct of another enterprise) without the express written permission of KWANTAS. If an Employee is already engaged in any other gainful activity or involved, either directly or indirectly, in the management or business activities of any other company or companies, firms, corporations or other business activities, he/she should come forward and disclose his/her activity to KWANTAS through his/her Head of Department or GHRD.

- 5.6.1.2 The granting of permission will be subject to an Employee satisfying KWANTAS that such activity will not interfere with or compromise the proper performance of his/her duties or the fulfillment of his/her obligations to KWANTAS.
- 5.6.1.3 Any permission granted may be withdrawn at any time at the sole discretion of KWANTAS without the need for assigning any reason thereof. In such an event, KWANTAS will be deemed fully indemnified by an Employee and will not be held liable for any repercussion arising from such decision to withdraw the permission so granted before.

5.6.2 POLITICAL ACTIVITIES

- 5.6.2.1 KWANTAS recognises that Employees, in their capacity as citizens, may wish to involve themselves in legitimate political activities. While KWANTAS does not wish to discourage Employees from doing so, in order that KWANTAS can avoid involvement or identification with any political party, Employees are required to use their off duty time, or annual leave entitlement, subject to prior approval, for such matters. In the event an Employee is appointed an office holder at the Branch, Division, State or National level of a political party, the Employee is to inform KWANTAS of such appointment.



- 5.6.2.2 In order not to compromise the interests of KWANTAS, Employees who wish to stand for State, Federal and/or material elections are required to resign from KWANTAS, subject to the requirements of applicable law.
- 5.6.2.3 An Employee must not use his/her position with KWANTAS to try to influence any other person (whether or not employed by KWANTAS) to make political contributions or to support politicians or their parties in any country without approval from the Head of Department or the Head of Operating Unit.
- 5.6.2.4 An Employee may not make any contribution or incur any expenditure using KWANTAS' resources to benefit any political campaign, party or politician in any country without approval from the Head of Department or the Head of Operating Unit.
- 5.6.2.5 KWANTAS' facilities, equipment and resources may not be used for any political campaigns or party functions without approval from the Head of Department or the Head of Operating Unit.
- 5.6.2.6 Charitable donations may not be used as a substitute for prohibited political payments.
- 5.6.2.7 Employees being involved in political or community activities must ensure that no conflict arises with their position in the Company and no confidential Company information is used in such political activity without prior written approval of the Group Managing Director of the Company.
- 5.6.2.8 Political activity includes being a candidate for Federal, State or local government, being a member, fundraiser or spokesperson for a political



party, cause or lobby group, or being publicly involved in a well-publicised community issue.

5.7 DUTY TO REPORT BREACHES AND VIOLATIONS

- 5.7.1 If an Employee finds or suspects that another person subject to this Code may have committed or may be about to commit any breach of any of his/her terms and conditions of service, of his/her engagement, or of this Code, whether deliberately or through inadvertence, an Employee must forthwith report the same, in writing, to his/her Head of Department or GHRD. Alternatively, an Employee may choose to adopt “whistleblowing channel” to report such breach of the Code.
- 5.7.2 If an Employee makes a report or disclosures as stated above in good faith, belief, without malicious intent, that a breach or violation as aforesaid may have occurred or may be about to occur, he/she will not be penalised or subject to any form of victimisation or retaliatory action notwithstanding that, after investigation, it is shown that an Employee was mistaken.
- 5.7.3 Any form of reprisal by a person subject to this Code against another person who in good faith and without malicious intent has made a report or disclosure as stated above is forbidden and will himself/herself be regarded as serious misconduct rendering the person engaged in the reprisal liable for disciplinary action. This includes blatant actions, such as firing, transferring, demoting or publicly attacking someone, and more subtle retaliation, such as avoiding someone, leaving him or her out of professional or social activities, and so on.



6.0 WORKPLACE CULTURE AND ENVIRONMENT

6.1 UNLAWFUL DISCRIMINATION

6.1.1 KWANTAS will not tolerate unlawful discrimination in the workplace or on the job.

6.2 SEXUAL HARASSMENT

6.2.1 The promotion of the physical, emotional and psychological well-being of Employees is an important objective of KWANTAS. In this regard, KWANTAS is committed to providing a conducive working environment where an Employee's right to protection from all forms of sexual harassment and unsolicited or unwarranted sexual overtures and advances is accorded due recognition.

6.2.2 The act of sexual harassment, unsolicited and unwarranted sexual overtures and advances will be treated as misconduct.

6.2.3 For the purpose of this Section, "sexual harassment" means :-

Any unwelcomed conduct of a sexual nature in the form of verbal, non verbal, visual, psychological or physical harassment: -

- a) that might, on reasonable grounds, be perceived by the recipient as placing a condition of a sexual nature on his/her employment; or
- b) that might, on reasonable grounds, be perceived by the recipient as an offence of humiliation, or a threat to his/her wellbeing.

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

- at work related social functions;
- in the course of work assignments outside the workplace;
- at work related conferences or training sessions;
- during work related travel;
- over the phone; and
- through electronic media.

6.3 NON-BUSINESS WORKPLACE RELATIONSHIPS

6.3.1 When Employees have relationships which go beyond professional relationships and social friendships, such relationships may create conflicts of interest as well as opportunities for exploitation, favouritism or bias. Such relationships can also undermine core values, such as respect and trust amongst staff, and impact upon the reputation and integrity of KWANTAS.

6.3.2 These relationships create a real likelihood of disaffection, disharmony and significant difficulties for the parties concerned as well as for other co-employees of KWANTAS. Under the circumstances, such relationships are discouraged.

6.3.3 There is a basic conflict of interest when an Employee manages someone with whom he/she has a family, romantic or intimate relationship. Even if an Employee acts properly, his/her relationship may be seen as influencing his/her judgment. Accordingly, as a KWANTAS Employee, he/she may not

supervise, directly or indirectly, any Employee with whom he/she has such a relationship without written permission from the GHRD.

6.4 OCCUPATIONAL HEALTH, SAFETY AND ENVIRONMENT (“HSE”)

6.4.1 KWANTAS is committed to providing a safe and healthy workplace for all Employees working at its facilities and minimising the impact of its operations on the environment.

6.4.2 Every KWANTAS Employee must conscientiously and diligently comply with all HSE requirements, measures, work rules and Standard Operating Procedure set out in manuals, handbooks and documents issued by KWANTAS as amended and updated from time-to-time and all applicable laws and regulations.

6.5 SUBSTANCE MISUSE (DRUG AND ALCOHOL ABUSE)

6.5.1 The use of a substance of misuse can impair performance at work and can be a threat to health, safety and the environment. Hence, it is KWANTAS’ policy that the unauthorised consumption, possession, distribution, purchase or sale of any substance of misuse within its premises or while conducting its businesses or being under the influence of any such substance while working is prohibited.

6.5.2 To ensure adherence to this Code, KWANTAS may conduct unannounced testing and searches for substances of misuse in accordance with the Code and subject to the requirements of applicable laws. Any persons covered by this Code who are found to have unauthorised possession of any substance of misuse or who test positive for any substance of misuse are considered to have

committed an act of misconduct which may render them liable for disciplinary action, including termination.

6.5.3 Subject to local laws in the jurisdiction of operation, Employees are required to consent to testing and searches conducted by any persons or laboratory authorised by KWANTAS by signing relevant documents issued by KWANTAS. Further, Employees who undergo such testing must give consent to the release of the results to KWANTAS.

6.5.4 Under this Code, “substance of misuse” includes any illegal drugs, alcoholic beverages containing ethanol, legal psychoactive drugs obtained or used without legal prescription, and legally prescribed psychoactive drugs consumed beyond their therapeutic or prescribed uses.

6.5.5 KWANTAS’ contractors and sub-contractors are required to demonstrate that substance misuse control programmes are part of their HSE management to ensure that substance misuse among their employees is adequately controlled and meets KWANTAS’ standards.

6.6 TREATMENT OF COLLEAGUES

6.6.1 Employees must treat other employees, customers, suppliers, contractors and members of the public with respect and courtesy in a fair, honest and open manner.

6.6.2 Employees must ensure that they do not harm, defame, slander or wrongly discriminate against their colleagues. Discrimination or harassment may occur because of a person’s sex, marital status, pregnancy, age, race, colour, ethno-religious background, descent or national identity, disability, homosexuality and transgender.

7.0 DISCIPLINE



7.1 IMPORTANCE OF GOOD CONDUCT AND DISCIPLINE

7.1.1 The maintenance of discipline, good conduct and decorum amongst the Employees of KWANTAS is critical to the smooth running of the Group's business and is for the common good of KWANTAS and its Employees.

7.1.2 The term "misconduct" means improper behaviour or an act or conduct in relation to duties or work which is inconsistent with the due performance of obligations to KWANTAS and includes a breach of discipline or violation of this Code.

7.1.3 The following acts may be treated as misconduct for which a person covered by this Code may be liable for disciplinary action, subject to the requirements of applicable law: -

- i. Insubordination;
- ii. Tardiness;
- iii. Absenteeism;
- iv. Violent behaviour or threats of violent behaviour (includes assaults and fighting, whether with employees, clients, contractors, or visitors to KWANTAS premises);
- v. Theft, fraud, misappropriation;
- vi. Being dishonest or conducting oneself in such a manner as to lay oneself open to suspicion of dishonesty;
- vii. Encouraging or assisting anyone to steal KWANTAS' property;
- viii. Negligence, neglect or dereliction of duty;
- ix. Sleeping while on duty;
- x. Deliberate damage to KWANTAS' property;



- xi. Leaving the workplace during working hours without appropriate permission;
- xii. Sexual impropriety at the workplace;
- xiii. Drug or alcohol abuse on the job or that affects an Employee's performance;
- xiv. Signing in or signing out attendance for other employees;
- xv. Sexual harassment;
- xvi. Obstructing other employees from performing their duties;
- xvii. Gambling within the premise of KWANTAS;
- xviii. Non-observance of safety precautions or rules, or interfering or tampering with any safety devices installed in or about the premises of KWANTAS;
- xix. Engaging in any illegal or unethical practices such as taking or giving bribes or receiving any illegal gratification whether in monetary terms or otherwise;
- xx. Engaging in other employment/ business whilst in the service of KWANTAS, without the permission of KWANTAS;
- xxi. Any act which could adversely affect the image or reputation of KWANTAS;
- xxii. Misuse of KWANTAS' computer and telecommunications systems (e.g., excessive accessing of non-work related internet sites (such as social networking websites), accessing of pornographic sites and deliberate tampering with or unauthorised use of computer hardware or software);
- xxiii. Violating local laws concerning the protection of the privacy of personal data of KWANTAS Employees;
- xxiv. Taking retaliatory actions against persons in situations where they are protected by KWANTAS Whistleblowing Policy and Procedures;
- xxv. Conducting themselves in a manner that can be reasonably construed as lacking in efficiency;
- xxvi. Watching movie while on duty;
- xxvii. Breaching any policies or prohibitions set out within this Code; and



xxviii. Taking measures in circumvention of the policies and prohibitions set out in this Code.

7.1.4 Without limitation upon the foregoing, a person covered by this Code will strictly:-

- a) Observe all statutory laws and regulations applicable to KWANTAS' business and operations; and
- b) Comply with KWANTAS established rules and procedures, including but not limited to limits of authority.

7.1.5 Subject to the requirements of applicable law, disciplinary action may be taken against any person for misconduct under this Code.

7.2 COMPLIANCE WITH LAWS

7.2.1 KWANTAS is committed to compliance with all relevant legislations and corporate policies. Employees are expected to be aware of all legislations and policies applicable to their position and be sufficiently familiar with such laws and policies that they are able to comply.

7.2.2 All Employees are responsible to ensure that:

- 7.2.2.1 They have access to all relevant laws and policies in their areas of responsibility;
- 7.2.2.2 They are properly instructed on the relevant laws and policies; and
- 7.2.2.3 They maintain their understanding, through continuing education and periodic updates.



8.0 CONCLUSION

This Code shall supersede all other previous Code and is subject to amendments at the discretion of the Board and the Management from time to time.