

## UZMA BERHAD

Registration No. 200701011861 (769866-V)  
(Incorporated in Malaysia)

### CODE OF CONDUCT AND BUSINESS ETHICS

#### **Duties and Responsibilities**

1. The Company is dedicated in maintaining high standards of integrity in executing its business activities within the organization and with external parties. The Company's approach to sustainability is premised on the Company's unified code of corporate values, the uzmaWAY.
2. For that reason, the Company is committed to observe ethical business practices in conducting its business and its relationships with all stakeholders including its directors, employees, clients, shareholders and the community. As the core pillars of the company's corporate identify and aspirations, the uzmaWAY demonstrates the company's approach in creating sustainable value for its stakeholders.
3. All employees are expected by the Company to:
  - (i) Conduct themselves with propriety and decorum at all times to reflect the good standing of the Company;
  - (ii) Support the policies, procedures and practices of the Company.
  - (iii) Discharge their responsibilities assigned to them by the Company or its related companies under the Group and that they will always promote and advance the interests of the Company; and
  - (iv) Devote their career to the Company and not engage directly or indirectly in other forms of employment or service.

#### **uzmaWAY**

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2. As the core pillars of the company's corporate identify and aspirations, the uzmaWAY demonstrates the company's approach in creating sustainable value for its stakeholders.
3. The five (5) main pillars of uzmaWAY are as follows;
  - (i) Health & Safety**

Uzma believes in providing a healthy, safe and secure working environment in all of our operations and activities regardless of where we are. A positive health and safety culture shall be embedded into our organization. Our stakeholders and all of their loved ones shall have a peace of mind knowing that they are in good hands all the time.
  - (ii) People**

Uzma aspires to be the employer of choice and encourages its employees to have a work-life balance. We recognize the diversity of our people and respect our differences. In Uzma, we nurture leadership, teamwork and innovation in achieving our common goals. Our people shall always stay humble and exhibit positive characteristics in communicating with our stakeholders.
  - (iii) Quality**

Uzma embraces proactivity and cost effectiveness in planning, executing and continually improving our deliverables to exceed every expectation of our stakeholders. We ensure that our people are efficient and effective in executing their responsibilities. We possess the agility to quickly adapt to our stakeholder's expectations and we strive to be the best in everything we do.
  - (iv) Integrity**

Uzma adopts the highest standard of personal and professional integrity in executing its business activities, internally and externally. We are committed to ethical business practices and good corporate governance in order to be an exemplary corporate citizen.
  - (v) Environment**

Uzma believes in coexisting with nature and preserving the environment. Our stakeholders can rest assured that we shall try to do our best in ensuring that we leave minimal footprints in every activity that we do on this precious planet.

### **Uzma Code**

1. Uzma Code is a policy document that sets out the principles to guide Uzma employees and its directors in carrying out their duties and responsibilities at the highest standards of personal and corporate integrity when dealing within the Group and with all of its stakeholders.
2. It is designed to ensure that all employees and the directors conduct their businesses within the framework of applicable laws and regulations and the Company's policies and procedures.
3. The Uzma Code is not only promoting legal and procedural compliance, but also intent to provide moral compass to ensure that our individual behavior is in line with Uzma's corporate values, the uzmaWAY.
4. The People Division is the owner and custodian of Uzma Code and responsible for the maintenance, update, and distribution of the policy.
5. Further details or clarification on this policy document can be referred to the People Division.

### **Anti-Bribery**

1. "Bribery" refers to the act of corruptly giving, agreeing to give, authorizing, promising, offering, soliciting, receiving, or agreeing to receive any gratification as an inducement or a reward for an improper performance of a party. Gratification can take various forms, including monetary, non-monetary, services, favors, or any form of benefit or advantage.
2. Uzma Group has established an Anti-Bribery Policy which is central to the Group's Anti-Bribery Framework and the relevant policies and procedures supporting the Framework. The Anti-Bribery Policy is generally applicable to:
  - (i) all the Group's businesses regardless of country of operations; and
  - (ii) internal and external stakeholders who conduct business with, for or on behalf of the Group, including the Directors, Employees, and Business Associates.
3. The Group Legal Division is the owner and custodian of the Anti-Bribery Policy and responsible for the maintenance, update, and distribution of the policy.
4. Further details or clarification on this policy document can be referred to the Group Legal Division.

### **Whistleblowing**

1. All stakeholders, including employees, distributors, the public, etc., are encouraged to disclose any information or raise a genuine concern about serious wrongdoings, misconduct, illegal acts, or unethical business conduct including but not limited to fraud, corruption, malpractice, financial irregularities, dishonesty, criminal activities, personal misconduct, and serious breach of the Group's internal policies, procedures, or applicable codes (e.g. code of conduct and ethics) (generally summarized as the "Wrongdoing") in relation to Uzma Group's businesses or activities.
2. The Whistleblowing Policy were established by the Board of Directors of Uzma Berhad to facilitate the Company in achieving its aim to prevent bribery and uphold the highest level of business ethics in relation to the businesses and operations of Uzma and its subsidiaries.
3. The Whistleblowing Policy excludes grievances, complaints or concerns about:
  - (i) General complaints about the Group's products or services;
  - (ii) Matters which are trivial or frivolous or malicious or vexatious in nature or motivated by personal agenda or ill will; and
  - (iii) Matters pending or determined through any tribunal or authority or court, arbitration, or other similar proceedings.
4. The Group Legal Division is the owner and custodian of the Whistleblowing Policy and responsible for the maintenance, update, and distribution of the policy.
5. Further details or clarification on this policy document can be referred to the Group Legal Division.

### **Ownership to Confidentiality of Company Information**

1. Non-disclosure of Information.

Any information that may concern other employees, the Company's operations, company forms and documents, customer lists, corporate affairs, product development, trade secrets, business models or other organizations with whom the Company do business with is confidential. An employee is obligated to ensure that this information remains confidential and is not disclosed in any available ways, such as in verbal, writing, print out, publication, email, images, electronic message, web posting, blog, online forum, etc.

2. An employee is not allowed, whether during or after termination of his employment with the Company, to discuss or disclose confidential information relating or pertaining to the Company, directly or indirectly to any person or company. An employee should not discuss with other employees or outsiders, within the office premise or outside, any confidential information regarding the Company, its business partners, its customers or clients, its employees or any other confidential information except in the course of carrying out his duty on the Company's business and upon approval from the Company. Any information pertaining to the Company that is not available to the public shall be treated as confidential. It must not be shared or used by any employees, whether directly or indirectly, to influence an investment decision in connection with the purchase or sale of the Company's shares, when it is made available.
3. If an employee receives any request to disclose confidential information related to the Company, the employee is required to inform his superior immediately for further guidance and approval from the Company.
4. Any employees who disclosed such sensitive information, is deemed to have made a serious offence and misconduct and will subject to disciplinary action, including immediate termination of employment from the Company.
5. If the employee is no longer with the Company (for reasons whatsoever), legal action will be taken against the individual.

### **Drug, Alcohol and other Illegal and Prohibited Substances**

1. The Company's policy on drug, alcohol and other illegal and prohibited substances was established for all personnel, regardless of level and position. It is to ensure that all employees adhere to the policy during working hours on the Company's premises or elsewhere, while on official business.
2. Employees are strictly prohibited from;
  - (i) Working or reporting to work, conducting company business or being on the Company's property whilst under the influence of an illegal drug, alcohol and other illegal and prohibited substances and/or in an impaired condition; and
  - (ii) Using, selling, buying, trafficking, transferring, manufacturing, storing or in possession of any illegal drug or illegal drug paraphernalia, or attempting to or assisting another to do so.

The above actions constitute a violation of the Company's policy on drugs and may subject the employee to disciplinary action, up to and including immediate termination.

3. The Company reserves the right to conduct unannounced or random drug tests on employees as deemed necessary from time to time.
4. An employee entering a work location may be subjected to medical examination and the Company reserves the right to conduct a search within its work premises and on the employee. Refusal to cooperate may subject to a disciplinary action.
5. An employee is also prohibited from working while under the influence of prescription drugs that may impair his performance.
6. The Group QHSE Division is the owner and custodian of the Drug, Alcohol and other Illegal and Prohibited Substances Policy and responsible for the maintenance, update, and distribution of the policy maintenance, update, and distribution of the policy.
7. Further details or clarification on this policy document can be referred to the Group QHSE Division.

### **Gross Misconduct**

1. Gross misconduct means improper behavior or deliberate violation of a rule of standard behavior.
2. Acts of gross misconduct include but are not confined to the following:
  - Breach of any policy and rules established by the Company;
  - Gross negligence and neglect of duty;
  - Theft, pilferage, misappropriation or attempt of the same nature of the Company's money or property or other employee's money or property;
  - Abuse of drugs and other illegal and prohibited substances;
  - Habitual late attendance and absenteeism;
  - Habitual negligence;
  - Riotous, disorderly, or indecent behavior on the Company's premises;
  - Fighting with or assaulting, abusing or being violent towards another employee or authorized visitor on the Company's premises or threatening the same;
  - Quarrelling or fighting or committing nuisance at the workplace;
  - Commission of any subversive act to the discipline of the Company or general behavior;
  - Soliciting or accepting bribes or any illegal gratification;
  - Fraud, dishonesty, falsification or attempt of the same in relation to the Company's business, money or property;
  - Carelessness or willfully causing damage or loss to the Company's property or goods;
  - Possession of illegal weapon or lethal weapon on the Company's premises;
  - Gambling whether involving money or otherwise, in the Company's premises;
  - Committing an immoral act within the Company's premises;
  - All forms of harassment including but not confined to unwelcome verbal or physical advances and sexually, racially, or otherwise derogatory or discriminatory statements or remarks;
  - Gender bias remark or any form of gender bias harassment;
  - Infringement of safety regulation;
  - Failure to follow safety procedures or tampering with safety devices to the detriment of the Company or its employees;
  - Abuse or unauthorized use of the Company's property, utilities, equipment, or facilities;
  - Conduct which is likely to cause injury or endanger the life or safety of another person within the Company premises;
  - Smoking in prohibited/restricted areas;
  - Deliberate damage to the Company's assets, material, or equipment;
  - Habitual or substantial negligence in the care of tools, equipment and apparatus of the Company;
  - Willful insubordination or disobedience whether alone or in combination with other to any lawful and reasonable order of a superior;
  - Inciting other employees to participate in illegal strikes in contravention of the provisions of any lawful and reasonable order of a superior;
  - Instigating industrial action among employees against the Company;
  - Participation in illegal gatherings or activities in the Company's premises or abetting, inciting or instigating the same;
  - Disclosing company confidential information;
  - Disclosing commercial or trade secrets, calculation or designs;
  - Forging documents or signatures;
  - Falsification, defacement, or destruction of any Company record;
  - Misrepresentation of the Company to others;
  - Spreading malicious rumors about the Company;
  - Making public statement against the interest of the Company;
  - Commission of any private act that brings disrepute, embarrassment or affects the legitimate interest of the Company or ruins the image of the Company.

The above examples of gross misconducts are not exhaustive, as the Company reserves the right to determine what constitutes as acts of misconduct and gross misconducts that warrant disciplinary actions including immediate termination of employment.

### **Grievance**

1. The grievance is not however a platform for staff to express their discontent without justifiable reason. Therefore, a grievance without clear reasons or facts will not be treated as such.
2. All grievances/complaints will be handled promptly and with transparency. The following principles must be adhered to in the grievance resolution process:
3. All employees are expected by the Company to:
  - (i) **Confidentiality**  
No person should have access to information on the grievance, other than those directly involved or those handling the grievance.
  - (ii) **Impartiality**  
All parties must be given the opportunity to present information directly related to the grievance, and no decisions or judgements will be made until all information has been carefully and impartially considered by those responsible for resolving the grievance.
  - (iii) **Compassion and respect**  
All people handling the grievance must be sensitive to the needs of those directly involved, and to others who may be indirectly affected by the grievance.
  - (iv) **Prompt action**  
All grievances must be dealt with promptly, and time limits should be formally agreed to at all stages of the process.