

CORPORATE SOCIAL RESPONSIBILITY POLICY EMBRACING THE VISION OF BEING A GOOD CORPORATE CITIZEN

INTRODUCTION

Pertama Digital Berhad and its subsidiaries (“**Group**”) strive to be good corporate citizens in all aspects of business operations and activities. We have detailed a series of guiding principles under the broad subject of corporate social responsibility for all employees across the Group to observe.

A) ETHICAL BUSINESS CONDUCT

We value the importance of cultivating a corporate culture that upholds integrity, honesty and accountability in all aspects and when dealing with all parties. We have since established the Code of Business Conduct as well as the Group Anti-corruption Policy as comprehensive guidelines pertaining to acceptable code of conduct for our employees (including directors) to observe while serving the Group and carrying out their duties. These can all be accessed by all on our corporate website www.pertamadigital.com.

The Board views adherence and adoption of best practices endorsed in the Code of Business Conduct seriously. Sustainable corporate success needs the support from employees who are honest and accountable for the responsibilities they are assigned with. The Code of Business Conduct will be reviewed periodically to incorporate changes in the macro operating environment, as the Board always believes being responsive is one of the key factors in attaining sustainable corporate success.

Our Code of Business Conduct is divided into several sections, a brief outline of each section is detailed below:

(I) INTRODUCTION OF CORPORATE CULTURE AND CORE VALUES

Pertama Digital upholds the spirit of integrity, trust and professionalism in all aspect of dealings, with an emphasis on integrity, honesty, professionalism, service with good faith, fidelity, diligence and always acting in the best interest of the Group.

(II) ACCEPTABLE CONDUCT WHEN DEALING WITH CONFLICT OF INTEREST SITUATIONS

Avoid dealing in situations of conflict of interest and channels of reporting and resolving matters relating to conflict of interests between employees/directors and the Group.

(III) RELATED PARTY TRANSACTION

In this section, the definition of related parties and related party transactions are detailed for directors and employees to pay attention and identify dealings that might fall into the ambit of related parties transactions. In the event of a related parties transaction being identified, courses of actions that must be adhered to by directors and employees.

(IV) COMPLIANCE TO APPLICABLE LAWS, RULES AND REGULATIONS

The Group places indisputable emphasis on strict adherence to applicable laws, regulations and rules in countries where the Group operates.

(V) PRESERVING CONFIDENTIALITY OF INFORMATION

All directors and employees shall always bear in mind the ethical duty of preserving confidential information obtained in the course of carrying out their duties either during times of their valid employment with the Group or after resignation as staff or director.

(VI) ENVIRONMENTAL, HEALTH AND SAFETY MEASURES

The Group places priority in creating and maintaining a safe working environment by conforming to health and safety guidelines. Besides, the Group has discontinued the use of harmful materials which is detrimental to the environment in the production process in its textile business.

(VII) EXERCISE OF CAREFUL DISCRETION WITH ENTERTAINMENT EXPENSES

The Group encourages exercise of careful discretion in incurring entertainment expenses. Whilst the Group recognizes the need to entertain clients/customers/business associates in soliciting business, authorised staff shall initiate entertainment activities solely for the purpose of generating business for the Group, and not for personal purposes, compliant with law.

Only Executive Directors and line managers responsible for securing/soliciting businesses for the group are entitled to claim entertainment expenses. Corporate entertainment activities shall only be organised for purposes that are bona fide in the best interest of the Group and compliant with law.

(VIII) DISCRIMINATION AND HARASSMENT

The Group emphasises the importance of cultivating a healthy culture of respecting the dignity of others. We reckon the importance of maintaining a harmonious working environment. Hence, any form of harassment, whether verbal and/or physical, is strictly prohibited.

All levels of employees of the Group must not act to discriminate or harass fellow employees and/or business associates, stakeholders by their race, religion, origin, gender, nationality, age and lastly any sexual orientation. Harassment includes engaging in verbal and/or physical actions based on the earlier-mentioned basis.

(IX) GROUP ASSETS

All employees are entrusted and share the responsibilities of looking after the assets of the Group, especially those assets under the direct control or use by specific employees.

(X) RESIGNATION AND TERMINATION OF EMPLOYMENT

Upon resignation tendered by staff or termination of employment initiated by the Group, the staff concerned is still bound by the Group's policies until the effective date of resignation or termination of employment.

B) FAIR EMPLOYMENT POLICY

The Group practices fair employment opportunity policy to all job applicants and employees. There shall not be any form of discrimination or subordination of treatment on the grounds of sex, age, race, educational background, marital status, religion, nationality or national origin.

The Group will not treat any employee less favorably than others whether the employee is a confirmed staff or staff on probation and fulltime or part-time workers. All employees are given equal

chances to undergo training with the view to improve their technical skills, which will in turn make them more employable in the workforce market.

C) FORCED AND CHILD LABOUR

The Group adheres strictly to enforceable labour laws and regulations. There shall be no forced labour and/or child labour being engaged in our workforce.

D) RESPONSIBLE EMPLOYEES

The Group strongly encourages employees to act responsibly to promote fair treatment among all staff of the Group. Discrimination of any form that may exist among the Group staff is strictly prohibited. In the event such discrimination occurs, the parties in grievances are urged to report to their respective line managers for resolution.

The Group will not tolerate any form of discrimination that causes disharmony at work places. Our management team (“**Management**”) shall take stern disciplinary actions against parties who initiate or attempt to provoke discrimination. Such disciplinary actions include termination of employment, in extreme cases.

E) EMPLOYEE BENEFITS

The Group provides various employee benefits to encourage employees to remain with the Group. Bonus and salary increments are given to staff to acknowledge their contribution towards driving corporate success. In addition, the Group also provides all employees, especially those originating from rural areas, with accommodation and meal catering at nominal rates to ease their living costs burden. The Group truly appreciates contribution of our strong team of workforce from production lines and other units towards the overall successful business operations.

F) COMMUNICATION WITH STAKEHOLDERS

The Group views loyal shareholders as one of the most valuable assets. With the support from our shareholders, the Group remains positive and committed to attain higher corporate success. Various channels serve as a platform of two-way communication between Board and Management of the Group, one of which is the corporate website. Our corporate website is uploaded with the latest financial results and reports which the Group releases periodically.

Furthermore, the Group also discloses our Board Charter and other governance documents for access by all stakeholders and the general investing public. Other channels of communication with stakeholders would be annual reports which contain updates on the Group’s business operations and financial results. At Annual General Meetings, the Board, Management and shareholders are able to interact either physically or virtually.

G) COMMUNITY SERVICE

The Group has been very supportive of helping the small and medium enterprises to remain successful.