

CODE OF BUSINESS CONDUCT

1. INTRODUCTION

- a) This Code of Business Conduct (“**Code**”) serves as a general reference for Pertama Digital Berhad and its group of companies (“**Group**”) and their directors and employees on the core values, principles of discipline, good conduct, corporate governance commitment, integrity, professionalism and business ethics embraced by the Group.
- b) This Code also carries the objective to enhance confidence of shareholders, other stakeholders and the public towards the Group’s commitment of maintaining integrity, objectivity and fairness in conducting business.

2. BUSINESS CONDUCT

a) *Core Values*

- i) The Group emphasises integrity and professionalism in all aspects of business dealings and with stakeholders such as shareholders, employees, government agencies, regulatory bodies and banks.
- ii) The Group believes strongly in trust and integrity and therefore aims at achieving a high degree of awareness of these values among its directors and employees. All directors and employees are expected to serve with good faith, fidelity, diligence and act in the best interest of the Group.
- iii) The Group encourages team work and open communication between directors, management staff and all levels of employees with a view to encourage the cultivation of positive corporate culture across the Group.
- iv) The Group promotes creativity, openness and procedure enhancement with the aim of achieving part or the entire process flow of operations which brings about higher level of efficiency.

b) *Related Parties (“RP”) and Related Parties Transactions (“RPT”)*

- i) The Group diligently identifies RP as defined in the Bursa Malaysia Securities Berhad Main Market Listing Requirements (“**LR**”) in the course of conducting business activities.
- ii) The Group complies with the LR on RPT.

3. COMPLIANCE WITH APPLICABLE LAW, RULES AND REGULATIONS

- a) The Group is committed to comply with all applicable law, rules and regulations governing all aspects of its operations in all jurisdictions in which it operates.

4. CONFIDENTIALITY OF INFORMATION

- a) All directors and employees of the Group are required to preserve the confidentiality of information he/she acquires during the course of performing official duties.

- b) Leaking of business-sensitive information or any kind of similar confidential information to third parties or persons who are not authorised will be construed as breaching the Group's confidentiality policy.
- c) Breaching of the Group's confidentiality policy may lead to dismissal or other disciplinary actions.

5. ENVIRONMENT, HEALTH AND SAFETY

- a) The Group places high priority in creating and maintaining a safe working environment for its employees.
- b) All operational facilities of the Group adhere strictly to the health, fire and safety standards imposed by the authorities.
- c) The Group's textile operations in China are in strict compliance with the applicable environmental protection laws and regulations. This includes a significant milestone in banning the use of Polyvinyl Alcohol (PVA) that causes water pollution.
- d) The Group promotes environment-friendly practices and encourages the recycling of papers and office stationeries to preserve a green environment.
- e) All employees, particularly those at the textile production lines, are trained with mandatory safety measures to ensure the working environment is safe for everyone.

6. ENTERTAINMENT EXPENSES

- a) The Group recognizes the fact that in the course of soliciting business, there are needs to entertain customers/clients and business associates.
- b) The Group's corporate expenses claims policy restricts claims submitted by authorised employees, managers and executive directors to those strictly incurred for official and business-related purposes.
- c) 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 organized for purposes that are bona fide in the best interest of the Group. The Group encourages authorised staff to exercise careful discretion when incurring entertainment expenses. Such entertainment expenses shall be incurred solely for the purpose of soliciting business for the Group in a legal manner and not for personal purposes.

7. DISCRIMINATION AND HARASSMENT

- a) The Group recognizes the importance of cultivating a healthy culture of respecting the dignity of others. The Group appreciates the importance of maintaining a harmonious working environment. Hence, any form of harassment, whether verbal and/or physical, is strictly prohibited.
- b) All levels of employees of the Group must not act to discriminate or harass fellow employees or business associates and other stakeholders by their race, religion, origin, gender, nationality, age or sexual orientation. Harassment includes verbal and physical actions.
- c) All cases or harassment must be immediately reported to the respective line manager and must be escalated to the Human Resource Manager.

- d) Engaging in harassment of any kind may result in stern disciplinary actions, including dismissal from employment.

8. GROUP ASSETS

- a) 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.
- b) The Group's assets must not be removed or relocated without the prior authorisation of management or line manager.
- c) Disposal of the Group's assets (other than those requiring the board of directors' approval) must be approved by the management staff or delegated authorised employees.

9. RESIGNATION/TERMINATION OF EMPLOYMENT

- a) Upon resignation tendered by director/employee or termination of employment initiated by the Group, the employee concerned is still bound by the Group's policies until the effective date of resignation or termination of employment.
- b) Before leaving the Group, the director/employee concerned is required to surrender all information regarding the business and operations of the Group, stored in electronic data storage devices such as external hard disk, pendrive or printed copies.
- c) After leaving the Group, former directors and employees are continually bound by the obligation to maintain confidentiality of information acquired during the tenure of his/her service in the Group.

10. COMMUNICATION AND IMPLEMENTATION OF THIS CODE

Heads of department are responsible for the communication and implementation of this Code of to all staff under his/her administration.