

## **WOODLANDOR HOLDINGS BERHAD GROUP CODE OF CONDUCT AND ETHICS**

The Board of Directors (the “Board”) of Woodlandor Holdings Berhad (“the Company”) has adopted the following Code of Conduct and Ethics (the “Code”) for Directors, Management and employees of the Company (collectively referred to as “Officers”) and its subsidiaries (the “Group”).

The Code contains policies relating to the proper business and personal conducts, standards and ethics that all Officers are expected to adhere in the course of their work.

The procedures of the policies referred to in this Code are spelled out in the Group’s Policies and Procedures documents.

### **PROFESSIONAL CONDUCT**

Officers are a reflection of the Group and are judged and appraised by everyone they come in contact with.

All Officers shall observe and adhere to a high standard of professional conduct as follows :

- Conduct themselves with integrity and propriety and must not under any circumstances, commit any act that would damage the Group’s reputation and interests.
- Observe all the policies and procedures of the Group.
- Seek guidance when in doubt.
- Avoid illegal, unethical or improper acts.
- Treat colleagues with courtesy and respect.
- Treat customers, suppliers and stakeholders in a professional manner at all times.
- Work safely at all times.
- Notify the Head of Department, Head of Human Resources Department or the Board of suspected illegal or unethical behaviour immediately or adhere to the Whistleblowing Policy.

The Group does not tolerate any form of abusive and coercive behaviour, physical violence or sexual harassment among its employees.

### **CODE OF ETHICS**

- **Commitment**  
All Officers shall carry out their duties and responsibilities in respect thereof including responsibilities assigned or designated to them, diligently and to the best of their ability. All Officers should commit to good working practices in all areas of operation to ensure safe and quality products and excellent service to our customers.

- Confidentiality  
All information obtained in the course of employment with the Group shall be strictly confidential and shall not be disclosed to any third party unless such information has previously been made public knowledge, required by law or upon express direction or with express approval. This applies to all Officers both during and after the service with the Group.
- Efficiency  
An Officer shall not conduct himself / herself in such a manner as can be reasonably be construed as lack of efficiency.
- Conflict of Interest  
An Officer shall not conduct himself / herself in such a manner as is likely to bring his / her private matters in conflict with his / her duties.
- Act of Disrepute  
An Officer shall not act in such a manner as to bring the Group into disrepute.
- Honesty  
An Officer must be honest and shall not conduct himself / herself in a manner as to lay himself / herself open to suspicion of dishonesty.
- Insubordination  
An Officer shall not conduct himself / herself in such a manner as may be construed as an act of insubordination.
- Gifts  
It is the Group's policy that no Officer accepts any form of gifts from contractors, suppliers, clients / customers or any other party having business dealings with the Group.
- Law Abiding  
An Officer shall not act in such a manner as to contravene the laws and regulations of both local and foreign governments and authorities.

## **HUMAN RIGHTS**

The Group supports and respects human rights and treats its employees including workers with dignity and respect and will not engage in any form of discrimination.

## **HEALTH AND SAFETY**

The Group provides a work environment that is safe, secured and free of danger, harassment, humiliation, intimidation, threats and violence.

The Group does not tolerate any form of abusive and coercive behaviour, physical violence or sexual harassment among its employees.

It is the responsibility of each and every Officer to adhere to the prescribed safety rules and to raise any concerns on potential threat to the Management.

Violation of the Group's safety rules or general or common sense safety practices in the performance of work, which endangers the life of fellow colleagues or damages the Group's properties, is subject to disciplinary action.

#### **ATTENDANCE / PUNCTUALITY**

All employees are required to observe the working hours of the Group.

If an employee is unable to report to work for any reason, he must contact his immediate superior before his working time.

Employees who are unable to meet their employment obligations of regular and reasonable attendance and punctuality are subject to disciplinary action at the discretion of the Human Resource Department.

#### **APPEARANCE**

All officers shall at all times during working hours be neatly and appropriately dressed and groomed.

#### **SMOKING POLICY**

The Group has a non-smoking policy. Smoking is not permitted in the factory premise and office.

Smokers are allowed to smoke on allotted breaks for 5 minutes per break from leaving the workplace to recommencing work. Smoking at the entrance of Woodlandor's offices is not permitted. Excessive smoking breaks are regarded as absenteeism and performance improvement action shall be taken.

#### **ALCOHOL AND DRUG ABUSE**

Officers shall not report to work under the influence of alcohol or drugs.

Officers are not allowed to consume alcohol while on duty, including lunches and during overtime meals on the Group's premises.

#### **GAMBLING IN THE WORKPLACE**

Gambling while at work and using the Group's assets for gambling are prohibited, including during breaks. For purposes of this policy, "gambling" is defined as playing a game for money or property, internet gambling and betting on an uncertain outcome.

## **GROUP ASSETS**

Each Officer is responsible to manage and safeguard the Group's assets, including financial, physical, information and electronic assets under his care or control from loss, theft, waste, misappropriation or infringement. These must be protected and used only in the interests of the Group.

## **RECORDS KEEPING**

All corporate records must be true, accurate and complete and data must be promptly and accurately entered in the books in accordance with applicable accounting standards.

All Officers must not improperly influence, manipulate or mislead any audit, nor interfere with any auditor engaged to perform an independent audit of the books, records, processes or internal controls.

Corporate records shall be stored, managed and disposed of in accordance with specific Company's procedures.

## **ENVIRONMENT**

The Group aims to continuously improve our environmental performance by finding effective ways to minimise impacts of our operations.

Officers are responsible for understanding the Group's environmental policy and applying good environmental practices in the workplace at all times. Our employees are trained to take electricity, water and paper conservation efforts.

## **ABUSE OF POWER**

All employees and workers shall be treated with dignity and respect. Abuse of power / authority and any forms of discrimination are strictly intolerable.

## **BRIBERY AND CORRUPTION**

Officers shall not offer, give, solicit, accept or receive any form of bribe or any other improper payment in order to achieve business or personal advantages or engage in any transactions that are construed as having contravened the anti-corruption laws.

## **PROHIBITION OF INSIDER TRADING**

Officers shall not trade directly or indirectly in securities of the Company or securities of other listed company when in possession of non-public price sensitive information of the Company or other listed company.

## **MONEY LAUNDERING**

Officers are expected to be mindful of the risk of the Group's business being used for money laundering activities and to raise any suspicious transactions to the Management for further investigation.

The reporting Officer must not discuss the matter with any other person.

## **COMMUNICATION**

The Group shall ensure this Code is communicated to all Officers and included in the induction programme of new Officers.

## **DISCIPLINARY ACTIONS**

The Group will take disciplinary action against any Officers who fail to comply / act in accordance with this Code, the Group's Policies and Procedures and applicable laws. In doing so, the Group may impose on an Officer any one or any combination of two or more of the following alternative disciplinary actions :

- Verbal or written warning.
- Suspension with or without pay for a period to be determined by the Group.
- Demotion.
- Dismissal.
- Payment of monetary damages or other remedies.

## **PERIODIC REVIEW**

The Board of the Company will review this Code periodically and modify, if necessary. Modifications shall be communicated to all Officers.

This Code of Conduct and Ethics was updated and approved by the Board of Directors on 5 April 2018.