

Code of Conduct

SUPERLON HOLDINGS BERHAD (“SUPERLON” OR “THE COMPANY”)

This Code of Conduct is to provide the employees of Superlon with guidance on the standards of behaviour expected of them in performing their duties of employment and in their dealings with fellow employees, clients, suppliers and member of the community.

1. Anti-corruption and bribery

We are committed to doing business ethically and believe that bribery and other corrupt practices are wrong and not acceptable. When acting in connection with Superlon employment, all employees shall not offer, provide, authorize, request or receive a bribe or anything that may be construed as a bribe.

2. Confidentiality of information

We are committed to maintain appropriate confidentiality about all dealings with potential, current and past customers, suppliers and associates, both in terms of normal commercial confidentiality as well as the protection of all personal/confidential information received in the course of providing the business services concerned.

3. Conflict of interest

3.1 We required employee to disclose, and take reasonable steps to avoid, any conflict of interest (real or apparent) in connection with Superlon employment, if possible. Where there is a conflict of interest or potential conflict of interest, to declare the same to the immediate supervisor/manager/director. The conflict of interest shall be assessed by the said supervisor/manager and reported to a Director for consideration on due steps to undertake to mitigate the conflicts;

3.2 Employees should not make improper use of:

- i) insider information, or
- ii) the employee's status, power or authority, in order to gain, or seek to gain, a benefit or advantage for any party.

4. Duty of care

Employees should act with care and diligence in connection with employment in Superlon; When acting in connection with Superlon employment, comply with all applicable laws and regulations; Employees should comply with any lawful and reasonable direction given by the management in the Company who has authority to give the direction; Employees should use Superlon's resources in a proper manner.

5. Ethics and honesty

We conduct business honestly and honourably and expect our clients and suppliers to do the same. Employees should not provide false or misleading information in response to a request for information that is made for official purposes in connection with the employee's employment in Superlon. Employees should at all times behave in a way that upholds the integrity and good reputation of Superlon. Employees should comply with any other requirement that is prescribed by the laws and regulations.

6. Harassment and discrimination

We expect that all employees, when acting in connection with Superlon employment, will treat everyone equally, with respect and courtesy. Employees should avoid behaviour that could reasonably be perceived as harassment or discrimination on the basis of race, sex, age, religion, physical or mental disability, marital status or social origin, etc.

7. Health and safety

We seek to provide a clean, safe and healthy place to work. All employees are expected to observe all safety rules and practices and to follow instructions concerning safe work practices.

8. Quality Products

Quality Products that meet our quality standards are essential to our success. The employees of Superlon are responsible for product quality and must be committed to ensuring the effectiveness of the Quality Management System. For more information on Superlon's Quality Principles, please see your supervisor.

9. Feedback Channel

9.1 Procedures

The feedback procedure is intended to be used for serious and sensitive issues. Such concerns, including those relating to financial reporting, unethical or illegal conduct, may be reported to the immediate supervisor of the offender, the Managing Director, the Senior Independent Director or the Audit Committee (regarding accounting and auditing), whom the complaint deems to be appropriate.

The recipient of the reported complaints and allegations shall undertake or commission investigations and consultations within the recipient's authority and, at his/her discretion, shall advise the Managing Director and/or the Audit Committee. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

9.2 Safeguards

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| No retaliation | - | No employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who reported a violation in good faith is subject to discipline up to and including termination of employment. This feedback channel is intended to encourage and enable employees and others to raise serious concerns within Superlon prior to seeking resolution outside the organisation. |
| Confidentiality | - | Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports or violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. |
| Acting in good faith | - | Anyone filing a complaint concerning a violation or suspect violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense. |