

CODE OF CONDUCT

1.0 Introduction

The Directors and employees of Choo Bee Metal Industries Berhad and subsidiaries (“Choo Bee Group”) are committed to adhering to the best practice in corporate governance and observing the highest standards of integrity and behaviour in activities which they are involved, including interaction with its customers, suppliers, shareholders, employees and business partners, and within the community and environment in which Choo Bee Group operates.

Choo Bee Group envisages itself as an equal opportunity employer and is committed to:

- (i) make human resource decisions on the basis of merit with the information available to it, including the possession of skills, experience, qualifications and characteristics relevant to the performance of work;
- (ii) ensure unlawful discrimination does not occur in the workplace or in circumstances arising out of the employment relationship;
- (iii) maintain a workplace free from sexual harassment, unfair discrimination or other offensive conduct; and
- (iv) promote a work environment in which individuals have the opportunity to develop and realise their full potential.

2.0 Objective

2.1 Purpose of the Code

- a) This Code provides ethical and legal guidance to all Personnel in their respective roles in establishing, maintaining and enhancing the reputation and image of Choo Bee Group and ensuring adherence to the standards of integrity and behaviour that Choo Bee Group is committed to.
- b) This Code reflects Choo Bee Group’s values and sets standards for behaviour for all Personnel, irrespective of their job scope or location. This Code is to be read and applied in conjunction with the policies which Choo Bee Group has adopted.

2.2 Applicability of the Code

- a) This Code applies to all Directors and employees of Choo Bee Group (“Personnel”)
- b) The standards set out in this Code extend beyond normal working hours and apply to all Personnel fulfilling their roles in business engagements of Choo Bee Group, including after normal working hours function and representing official company’s social activities.
- c) All Personnel will be informed that they are obliged to comply with this Code upon their employment with Choo Bee Group.

3.0 Principles

3.1 Fair Dealing

- a) Choo Bee Group is committed to provide an environment in which all Personnel, customers, suppliers and other business partners are treated fairly and equitably.
- b) In appreciation of the continued support from customer, supplier and other business partners, Choo Bee Group acknowledges that modest souvenirs and entertainment are acceptable as part of the normal course of business.

3.2 Confidentiality and Protection of Company Matters and Documents

- a) It is the obligation of all Personnel to take safe custody to protect Choo Bee Group’s confidential matters and documents.

3.3 Conflicts of Interest

- a) All Personnel are to act in the best interests of Choo Bee Group, and must not engage in activities that directly or indirectly involve, or could appear to involve, a conflict between their personal interests and the interests of Choo Bee Group.
- b) Any actual or potential conflicts of interest are to be fully disclosed to appropriate management and/or Board of Directors and where such circumstances are permitted by management and/or the Board of Directors to continue, shall not be deemed a breach of this Code.

3.4 Reporting Non-Compliance

- a) In instances of any non-compliance to this Code arising from the suspicion of misbehaviour, malpractices or crime committed, the Personnel are to report either to their Head of Department and if for any reason, it is believed that this is not possible or appropriate, the concern shall be reported to Chief Executive Officer. In case where reporting to the management is a concern, then the report shall be made to the Chairman of Audit Committee.
- b) Reporting of any non-compliance to this Code may also be made by stakeholders other than the Personnel.

- c) Choo Bee Group views any deterrence in any form or manner against genuine whistle blowing seriously and action will be taken accordingly by management.
- d) Choo Bee Group has put in place a Whistle Blowing Policy with details of the reporting channels' contacts. This policy is made known to public via Choo Bee's website.

3.5 Compliance with Laws and Regulations

- a) Choo Bee Group's activities, business environment and products are subject to certain laws, regulations and licensing conditions. Personnel must ensure that they are updated with these laws, regulations and license conditions applicable to their activities and comply with them accordingly.
- b) Choo Bee Group is committed to provide a safe working environment for all Personnel and visitors within our premises in accordance to the Occupational Safety and Health Act 2010. Choo Bee Group has put in place a Safety and Health Policy with list of applicable Occupational Safety Rules and Regulations set out.
- c) Choo Bee Group is committed to provide a work environment which is conducive, safe and free from sexual harassment. Choo Bee Group has put in place a Sexual Harassment Policy in accordance to the Employment (Amendment) Act 2011 and its Employment (Procedure To Inquire Into Complaints of Sexual Harassment) Regulations 2014 in accordance to the Employment Act 1955 (Act 265) and Regulations (Amendment as at 1st April 2012).

3.6 Breach of Contract

The following non-compliance of the Code shall be deemed a breach of contract of employment:

- Fail to faithfully and diligently perform such duties or accept such responsibilities as may from time to time be assigned to the Personnel by Choo Bee Group.
- Fail to attempt to the utmost of the Personnel's ability to promote and advance the interests of Choo Bee Group.
- Fail to obey and comply with all orders and directions given to the Personnel by Choo Bee Group.
- Fail to faithfully observe all the orders, regulations, procedures and practices and arrangements for the time being in force for the management of the Choo Bee Group's properties, work and business.
- Divulge either directly or indirectly to any person or Choo Bee Group's confidential information which may be acquired during the course of or incidental to the Personnel's employment in Choo Bee Group concerning the affairs or properties of Choo Bee Group.

- Carry on private trade or business personally or in association with other persons in competition with Choo Bee Group, the nature of business or trade being identical, similar or allied to the business or trade of Choo Bee Group in which the Personnel is employed.
- Be guilty of any act of misconduct or indiscipline.
- Fail to conduct his/her private affairs in a manner befitting the Personnel's status within Choo Bee Group.
- Absent from work for two consecutive working days or more without the prior approval from Choo Bee Group.
- Any breach of contract of employment on the above mentioned grounds shall render the Personnel liable for dismissal by Choo Bee Group without notice.

4.0 Administration

4.1 Publication

This Code shall be available at all appropriate locations within Choo Bee Group.

4.2 Continual Improvement

The appropriateness and effectiveness of this Code will be continuously monitored and appropriate agreed improvements will be adopted where necessary.

4.3 Amendments and Updates

- a) This Code shall be revised as and when the need arise for any amendment or update.
- b) Amendments to this Code must be approved by the Board of Directors.
- c) All amendments and updates must be communicated to the Personnel and complied with accordingly.

Approved by : The Board of Directors

Dated : 13 February 2015