



ASIA FILE CORPORATION BHD

(313192-P)

(Incorporated in Malaysia)

CODE OF ETHICS AND CONDUCT

Introduction

This Code of Ethics and Conduct (“Code”) sets out the principles and standards of business ethics and conduct of the Group. This Code applies to all employees (including full time, probationary, contract and temporary staff) and Directors of the Group. Directors and employees of the Group shall not depart from the guiding principles contained herein in conducting the day-to-day duties and operations of the Group.

The basic principles discussed in this Code are subject to any other policies of the Group covering the same issues such as Business Integrity Policy, Health & Safety Policy, MIS Security Policy and Employee Handbook.

Objective

The objective of this Code is to provide guidance to the Directors and employees in defining ethical standards and conduct at work when he / she deals with third party (including customers, competitors, suppliers, government and public bodies, shareholders). This Code is not intended to be exhaustive and there may be additional obligations that the Directors and employees are expected to behave or conduct when performing their duties. In any situation which is not covered by this Code or in case of any doubt, employees shall refer to his / her direct superior or Head of Human Resources Department for clarification or guidance.

Responsibility and Compliance with the Code

All Directors and employees shall always observe and ensure compliance with all applicable laws, rules and regulations to which they are bound to observe in the performance of their duties. Violation of any of the Code’s provisions can result in disciplinary action, including termination of employment for serious breaches.

Workplace Culture and Environment

a) Equal Opportunity and Non-Discrimination

The Group upholds the principle of diversity of workforce, equal opportunity, non-discrimination and fair treatment in all aspects of employment, including recruitment and hiring, compensation and benefits, working conditions, training, rewards and recognition, career development and retirement. All employees are to treat their fellow employees fairly and courteously without regard to race, religion, gender, nationality, age or disability and shall not create any form of discrimination or prejudice in the workplace.

b) Workplace Health and Safety

The Group will use its best endeavours to ensure a safe workplace and maintain proper occupational health and safety practices to commensurate with the nature of the Group’s business and activities. Such a commitment in return requires all Directors and employees understand and abide by the

Group's health and safety requirements, policies and procedures.

c) Harassment, Threat and Violence

The Group will not tolerate any form of harassment, threat, intimidation, violence or any other inappropriate behaviour by any Director or employee in the workplace. Any questions concerning issues of such should be directed either to the employees' superior or the Human Recourse Department. All such reports and complaints shall be treated with the strictest confidence.

Any person suspected to have committed criminal harassment will be handed over to the relevant authorities.

d) Misconduct

No Director or employee is to be involved in or abet any activity that is deemed by the Group to be an act of misconduct. All Directors and employees are prohibited working under the influence of alcohol, illegal drugs or controlled substances that could impair his / her job performance or pose unacceptable safety risk to the employees and others.

Company Information, Records and Assets

a) Data Integrity

The Group will not tolerate any form of false record in its operation of business whether it is false expenses, attendance, production output, or financial reports. Directors and employees shall record and report all information accurately and with integrity.

b) Protection and Use of Group Assets and Resources

Directors and employees must protect the assets and resources of the Group to ensure availability for legitimate business purposes and that no property, information or resources belonging to the Group or opportunity arising from these be used for personal gain.

c) Proprietary and Confidential Information

All Directors and employees are required to exercise caution and due care to safeguard any information of a confidential and sensitive nature relating to the Group which is acquired in the course of their employment and are strictly prohibited to disclose to any person, unless the disclosure is duly authorized or legally mandated.

In the event that a Director or employee knows of material information affecting the Group which has not yet been publicly released, the material information must be held in the strictest confidence by the Director or employee involved until it is publicly released.

Duties of Good Faith, Diligence and Integrity

a) Conflict of Interest

The Directors and employees should avoid involving themselves in circumstances where there is real or apparent conflict of interest between them as individuals and the interest of the Group. Directors and employees must not use their positions or knowledge gained directly or indirectly in the course of their duties or employment for private or personal advantage, directly or indirectly.

A Director or an employee shall also avoid any situation in which they have an interest in any entity or matter that may influence their judgment in the discharge of responsibilities.

b) Accepting and Providing Gifts and other Benefits

No personal gifts, favours, entertainment or services, in cash or kind, that will or will appear to influence objective and fair business decisions, will be accepted or provided.

The gifts, favours, entertainment or services that are deemed as not given to influence the Directors' or employees' performance of duties include normal business courtesies (meals or entertainment), token gifts which are occasional, gifts during festive or special occasions and gifts from social functions attended by the Directors or employees on behalf of the Group, are permissible.

c) Bribery and Corruption

The Group is committed to act professionally, fairly and with integrity in all its business operations and implementing and enforcing effective systems to counter bribery and corruption and any other fraudulent or corrupt activity.

Directors and employees are prohibited to offer, give, solicit or accept any bribes in order to achieve any business or personal advantages for themselves or others or engage in any activities that contravene any applicable anti-bribery or anti-corruption laws.

d) Insider Trading

No Director or employee shall use price sensitive non-public information, which can affect the stock price of the Company when it becomes publicly known ("Insider Information") for personal benefit. Directors and employees are prohibited to trade in securities or to provide information to others to trade in the Company's security until the Insider Information is publicly released. Directors or employees shall also not trade in securities in any other companies where they have Insider Information which they obtain in the performance of their duties.

e) Money Laundering

Directors and employees shall always observe and ensure that they are conducting business with reputable customers, for legitimate business purposes and with legitimate funds. If any money laundering activities have been suspected, Directors and employees shall report it to relevant person designated by the Group.

f) Compliance with Laws

The Group is subject to local, state and federal laws and all Directors and employees have a duty to act within these laws.

No Director or employee can be directed to carry out an illegal act, and no Director or employee can justify an illegal act by claiming to be acting under the order of a superior / upper management, or to be simply complying with a certain policy or instruction.

g) Whistleblower

The Group has put in place the Whistleblowing Policy to provide a secured channel for all employees and its stakeholders to report in good faith any issue or concerns about potential unethical, unlawful, illegal, or other improper conduct in its business practices. The policy sets out procedures for managing disclosure received from whistleblower, and also protection provided to the whistleblower.

Review of the Code

The Board will monitor compliance with the Code and review the Code regularly to ensure that it continues to remain relevant and appropriate.

This Code was adopted by the Board on 2 July 2018.