



**ANN JOO**

# **CODE** **OF** **CONDUCT** **AND ETHICS**

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## Message From The Group Managing Director

From humble beginnings as a metal scrap dealer to presently the nation's largest steel stockist, Ann Joo Group of Companies ("Group") stood the test of time largely due to its visionary and entrepreneurial founder, Mr Lim Kah Seng, who left behind a legacy of a customer-centric winning culture. It is this very culture that boosts our productivity despite tough economic environments and enable us to remain competitive in this Volatile, Uncertain, Complex and Ambiguous ("VUCA") world. Therefore, all employees of the Group are expected to embrace and practice the principles and values of our customer-centric winning culture as set out in this Code of Conduct & Ethics ("Code") to maintain the highest standards of professionalism, ethics and integrity in the conduct of our business and professional activities.

At Ann Joo, we regard our people as more than just regular employees, but as the ambassadors of the Group brand who represent the Ann Joo brand through our interactions and services at the workplace both within the business ecosystem and community. Thus, it is imperative that we conduct ourselves in accordance with the Code. I strongly believe that if everyone contributes to this purpose by playing our parts, together we will propel the Group to new heights.

**Dato' Lim Hong Thye**  
**Group Managing Director**

## Message From The Deputy Group Managing Director

The purpose behind the introduction of this Code is to ensure that, beyond compliance to all applicable laws, rules and regulations, individuals that work for or perform work within / on behalf of the Group do not forget the fundamental moral values that makes us functioning and responsible members of society.

The set of guidelines, policies and procedures contained within the Code governs our daily business conduct as well as our interactions among employees and aim to promote a positive and ethical work environment. As such, we take violations of the Code seriously and shall not hesitate to take stern corrective measures, including disciplinary and legal actions, against the violators in order to protect industrial harmony.

I hereby urge all of us to take a stand against unethical work behaviours and conduct that may adversely affect our work environment by reading, understanding and complying with the Code.

**Dato' Lawrence Lim**  
**Deputy Group Managing Director**

## Definition Of Terms

In this Code, unless otherwise specified, the following definitions are made:

### *“Group” or “Ann Joo Group”*

Shall mean Ann Joo Resources Berhad and its subsidiaries where the employees are seconded for a specific period under contractual or fixed term employment. Individual subsidiaries will be referred to as “subsidiary” or specifically referred to according to their respective names.

### *“Employees”*

Shall mean all employees under the Group on permanent service, secondment, contract, probation or temporary employment irrespective of whether he is on duty, leave, attachment or training.

### *“Business Associates”*

Shall mean an external party with whom the Group has, or plans to establish, some form of business relationship. This may include clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries, investors and financiers.

### *“Top Management”*

Shall mean Group Executive Chairman, Group Managing Director and / or Group Executive Director.

### *“Relative”*

Shall include:

- i. A spouse of the employee;
- ii. A brother or sister of the employee;
- iii. A brother or sister of a spouse of the employee;
- iv. A lineal ascendant or descendant of the employee;
- v. A lineal ascendant or descendant of a spouse of the employee;
- vi. A spouse of any person referred to in (ii), (iii), (iv) or (v);
- vii. A lineal descendant of person referred to in (ii), (iii) or (vi);
- viii. An uncle, aunt or cousin of the employee, or spouse of the person; or
- ix. A spouse, or lineal ascendant or descendant, of the person referred to in (viii).

### *“Ethical Standard”*

A set of principles that when followed, promote values such as trust, good behaviour, fairness and / or empathy.

### *“Communication Channels”*

A medium through which a message is transmitted to its intended audience, such as print media, telecommunications, computer networking, social media or broadcast (electronic) media.

### *“Gender”*

Any reference to the masculine gender shall include the feminine gender unless otherwise stated while any reference to the singular shall include the plural and vice versa.

## Part 1 – Mutual Responsibility

### EMPLOYEE'S RESPONSIBILITY TO THE GROUP & WORKPLACE

#### Compliance with the Code

Maintaining ethical standards of all involved operational activities and business conduct shall be a critical element of your responsibilities, including:

- i. Identifying, preventing and resolving possible ethical issues before and when undertaking any course of action.
- ii. Seeking guidance and consultation from a more informed person(s) when faced with uncertainty or doubt in any matter.
- iii. Highlighting any violations or suspicions of violations of the law or rules and regulations of the Group to any of the following:
  - Human Resources Business Partner / Representative
  - Superior / Head of Department

### EMPLOYER'S RESPONSIBILITY TO WELFARE OF THE EMPLOYEES

#### Maintaining Harmony in a Diverse Workplace

The Group values diversity as more than just a blend of demographics, but rather a congregation of talented people with varied perspectives whose collaboration will contribute to the Group's continuous success. Hence, it is the Group's commitment to create a respectful, professional and dignified environment where diversity is embraced and appreciated through:

- i. Fair employment practices that provides an equal employment opportunity to candidates and recruits based on performance and suitability. Hiring parties shall not be allowed to recruit based on biases that include, but is not limited to race, gender, religion, age, disabilities and marital status.
- ii. Strict prohibition of any forms of discrimination, harassment or intimidation by an employee against another person, who may or may not be an employee, within the same business ecosystem. Forms of biasedness include, but is not limited to race, gender, religion, age, disabilities and marital status.

#### Ensuring Safety at the Workplace

The safety of employees and visitors are the upmost priority of the Group, hence strict safety measures are put in place and are constantly regulated and reviewed in accordance with all Safety, Health and Environment policies and such other applicable guidelines and regulations.

## Part 2 –

# General Code Of Conduct & Ethics

### PROPRIETARY AND CONFIDENTIAL COMPANY INFORMATION

Company information that is regarded as proprietary and confidential includes but is not limited to information regarding the Group's operations, technical know-how, performance, earnings projections, business strategies, clients or client relationships, proprietary products, employees' records and any document with private and confidential remarks. Employees of the Group shall adhere to the following guidelines:

- i. You shall not disclose proprietary or confidential company information to anyone who is not authorised to receive it or has no need to know the information, even upon cessation (for whatever reason) of your employment with the Group.
- ii. You shall take precautionary measures and refrain from performing any acts that may lead to the unintentional disclosure of proprietary or confidential company information, including discussing sensitive matters of the Group in a public place and allowing unprotected access to your company laptops and other work tools.
- iii. You shall not in any way use company information so obtained for personal gain financially or non-financially. Business and financial information about the Group or client may be used or made available to third parties only when disclosure is required by law or in accordance with any agreed information exchanged program within the industry or with written consent by top management.

### INTEGRITY OF COMPANY INFORMATION

In ensuring business sustainability, all information, including personnel files, financial statements and client information owned, collected, used and managed by the Group must be accurate, complete and stored in a safe and systematic manner where it is accessible when required for management approved purposes:

- i. You shall be responsible for maintaining the integrity of the data, reports, records, and other similar information under your jurisdiction, including ensuring their accuracy, comprehensibility (in terms of content and language) and safekeeping.
- ii. You shall not make entries or allow entries to be made for any account, record or document of the Group that are false or would obscure the true nature of the transactions, as well as to mislead the true authorisation limits or approval by the relevant authorities of such transactions.
- iii. Employees holding positions with access to data, reports, records, and other similar information owned, collected, used and managed by the Group shall be responsible for their safekeeping within a centralized depository.

### CONFLICTS OF INTEREST

The Group expects from its employees the full devotion of their attention, energy and skills towards their work during the entire period of their employment. Any associations within or out of the workplace that may cause an employee to perform at decreased levels of devotion or, worse still, act out of interests that are divergent from those of the Group constitutes a conflict of interest. These associations include, but are not limited to:

- i. Employment of any form (e.g. Part-time, temporary, contractual, etc.), regardless of whether payment of wages is made, by another employer whose business activities is in direct competition with the Group or may cause a conflict of interest to arise.
- ii. Owning or having pecuniary interest in any businesses whose business activities is in direct competition with the Group or may cause a conflict of interest to arise.
- iii. Having, yet failing to inform the Group, close relationships with another person from a business whose business activities is in direct competition with the Group or may cause a conflict of interest to arise.
- iv. Having, yet failing to inform the Group, close relationships with another person who has business dealings of either a financial or non-financial nature with the Group (e.g. An employee on the Hiring team is a relative of a candidate applying for a position within the Group).

You shall not engage in any such associations, unless approval or consent has been obtained from the Head of Department. At all times, you shall conduct all work-related decisions in a fair manner, without allowing any conflict of interest, bias or undue influence of others to override professional judgement.

## **BRIBERY AND CORRUPTION**

The Group operates in strict compliance with the Ann Joo Resources Berhad's Anti-Bribery and Corruption Policy and Procedures ("ABAC Policy") and the Malaysian Anti-Corruption Commission Act 2009 ("MACC Act"). As such, you shall strictly observe the MACC Act, the ABAC Policy and any such other policy similar in nature, as well as all applicable acts, laws, rules and regulations in the performance of your duties.

The Group is committed to high standards of ethical, moral and legal business conduct. Hence, the Group has set up appropriate controls and contingency measures to combat corruption as further detailed in the ABAC Policy. For the avoidance of doubt, the ABAC Policy should be read together with this Code.

### **Abuse of Position**

You must not use the Group's name or your position within the Group to gain any personal advantage in work, politics, investments, retail purchasing transactions, or other similar activities. You must not use your connection with the Group to borrow from or become indebted to clients. The use of position to obtain preferential treatment such as in purchasing goods, shares and other securities is prohibited.

## **INSIDER TRADING**

You shall not deal, influence any other person(s) to deal, or engage any other person(s) to deal on your behalf should you are not allowed to deal in the securities of the Group, whether listed or pending listing on a stock exchange, by using or disclosing to any third party market-sensitive information that has not been made available to the public and may result in favourable trading gains, obtained as a result of your employment or connections within the Group.

## REPRESENTATION OF THE GROUP TO THE PUBLIC

All representations of the Group, either verbally or in writing, to the public, including the media, stakeholders or other such parties, shall be referred to the authorised spokespersons for Ann Joo Group, namely the Group Executive Chairman and the Group Managing Director. No other individual is authorised to speak on behalf of or engage in discussions about the Group with any third parties without prior authorisation from the authorised spokespersons to ensure that the information disseminated is non-confidential and accurate, and the Group image and reputation is protected and not harmed in any way. Employees of the Group shall adhere to the following guidelines:

- i. You shall not disclose proprietary or confidential company information as per stated in the section on Proprietary and Confidential Company Information.
- ii. If you are approached by a third party to disclose any information pertaining to the Group, you shall refer them to the authorised spokespersons. Such situations may include, but not limited to the following:
  - Request from a member of the media to comment on sensitive or controversial issues related to the Group.
  - Request to participate as a guest speaker in talks, seminars, conferences and other congregations of a similar nature.
  - General inquiries on Group performance, business order, program or decision of the Group on any issue.
- iii. You shall obtain approval from the Group's authorised spokespersons by fully disclosing the purpose of the inquiries and the contents of your responses, including commentaries, speeches, reviews or other forms of responses before responding.

## USE OF SOCIAL MEDIA

While the Group respects the employees' freedom of speech, employees shall exercise the right responsibly as ambassadors of the Group and brand, especially on social media. The Group shall not condone any action or activity by an employee that may bring ill repute or negative publicity to the Group. Employees of the Group shall adhere to the following guidelines:

- i. You shall not disclose proprietary or confidential company information on social media as per stated in the section on Proprietary and Confidential Company Information.
- ii. You shall not channel your grievances against the Group or person(s) affiliated with the Group on social media. Any grievances should be directed to the proper channels as per our Grievance Procedures.
- iii. You shall not make false, inaccurate, misleading and other inappropriate posts in regard to the Group on social media.
- iv. You are highly discouraged from making bigoted, slanderous, obscene and other inappropriate posts on sensitive issues that may disrupt the harmony of the Country and society on social media.
- v. You shall not engage in any activity related to social media during working hours, unless required by the job.
- vi. You shall not allow the use of social media to overly affect your work performance (e.g. Staying up late on social media causing sleep-deprivation during work).

## **GOOD FAITH AND FAIR DEALING**

You must show good faith in dealing with current and future clients, customers, vendors, suppliers, partners, agents, contractors, and all service providers by ensuring that the terms of the contract are fair and equitable for all parties.

## **PERSONAL FINANCIAL MANAGEMENT**

The Group forbids its employees from entering a state of pecuniary embarrassment, including engaging the services of loan sharks or other illegal financial service providers that may expose the Group and its employees to dangerous circumstances.

Where you fail to fulfil your financial obligations as and when you fall due or have been the subject of a judgement debt which is unsatisfied, either in whole or in part, the Group may take appropriate actions, including:

- i. Removal from positions or roles which is at risk of exposing the Group and its employees to danger, including but not limited to positions with executive authority and roles involving cash handling for the Group;
- ii. Revocation of any opportunities of career advancement, including promotion; or
- iii. Termination of employment if you are declared bankrupt and is no longer suitable to be employed by the Group.

## **USE OF COMPANY ASSETS**

Company assets are made available to employees in support of the performance of duties. Hence, employees are entrusted to make use of these resources appropriately and responsibly:

- i. The use of the Group's tangible (e.g. company facilities and corporate letterheads) and intangible assets (e.g. work relationships), whether shared among all employees or entrusted solely to you by the Group, shall be your responsibility and only used for the Group's intended purpose.
- ii. Communication tools provided to you by the Group, including, but not limited to mobile phone, email and computer systems, are primarily for business purposes. Personal communication using such tools must be kept at a minimum.
- iii. The theft / misappropriation / misuse / abuse / wasteful use of company assets and other irresponsible behaviour when managing company assets shall constitute a breach of your duty to the Group and may lead to disciplinary or legal actions being taken against you.

## **WORKPLACE FREE FROM ILLEGAL DRUGS AND DRUG ABUSE**

The Group intends to provide a safe and drug-free work environment for our employees. Hence, all employees are expected to strive towards the same goal by maintaining a healthy, conducive and productive work environment. Any act of possessing, owning, distributing, selling, buying, misusing or being under the influence of illegal drugs, whether on the job, off duty or outside the factory compound including within hostel quarters, are strictly prohibited. Drugs consumed without a prescription from doctors or authorised personnel will be considered as illegal drug abuse regardless of the amount or method of administration.

## Part 3 –

# Sustainability Through Ethical Business Practices

The Group is committed to ensuring that all our business activities and practices are sustainable, as we believe that through maintaining the highest standards of professionalism, ethics and integrity in all our business conducts, whether in the context of the environment, social, or governance, we shall then move towards becoming a truly sustainable organisation.

## GOVERNANCE

Under the context of governance, the Group believes that the key to business sustainability is through integrity in handling business and good information management.

### Integrity

The Group values high levels of integrity, and thus expects all employees and other parties acting for or on behalf of the Group to not engage in any attempts or acts of corruption, including bribery, money laundering, fraud, breach of trust or insider trading, which will contravene the ABAC Policy. Reporting channels that assure anonymity and non-retaliation, as well as clearly defined investigation structures are established to encourage impartial reports. The Group is also committed to giving its utmost cooperation to the authorities, including but not limited to the Malaysia Anti-Corruption Commission (“MACC”), Royal Malaysia Police (“RMP”), Securities Commission and Bursa Malaysia, in the event of any investigation to be conducted.

### Information Management

Accurate and complete information allows informed decisions to be made, and systematic and secure information storage allows past records to be accessed to produce accurate data in anticipating future market trends at national or international levels. Simply put, information, when managed efficiently, allows the Group to set clear strategies and accomplish business objectives. Hence, it is the joint responsibility of the Group and employees in ensuring that all information is properly maintained.

## ENVIRONMENTAL

The Group understands and endeavours to minimise the impacts of its business activities on the environment, including ensuring compliance to all national and industrial environmental regulations and establishing internal control measures in daily activities. Activities that result in adverse environmental impacts are strictly prohibited, such as the disposal or discharge of any pollutant or waste via atmosphere, soil, land, water or noise, or open burning, to name a few. At an individual level, employees are expected to comply to the Occupational, Safety and Health acts, regulations, and related orders. This includes maintaining a vigilant mindset while at work and donning their personal protective equipment when required to ensure the safety of both themselves and the people around them.

## SOCIAL

The Group emphasises the respect for human rights, particularly in consideration of the diversity of its employees. Thus, the Group shall embrace these differences by upholding its commitment towards the following:

i. **Freedom of opinion and zero tolerance on retaliation**

You are at liberty to express your opinions towards the betterment of the Group or to inform any non-compliance issues that occur at the workplace without fearing retaliation.

ii. **Prohibition of any forced labour and human trafficking**

We prohibit any kind of forced labour and human trafficking and are committed to compensating everyone competitively according to industry standards. Beyond addressing hygiene factors, the wellbeing of our employees is also a priority of the Group to ensure job satisfaction and ultimately, high performance.

iii. **Workplace security**

We are committed to maintaining a workplace that is free from any forms of harassment, threat, violence, intimidation for everyone.

iv. **Safe and healthy workplace**

Our policies and procedures on safety are based on the standard guidelines in maintaining a safe and healthy workplace. These safety measures are constantly regulated and reviewed, and it is the joint responsibility of both the Group and its employees to uphold these safety measures.

## Part 4 – Disciplinary

Although it is the intention of the Group to provide continuous employment to all employees, the Group may be entitled to take prompt disciplinary actions against an employee should he lacks the ability to perform his job at a satisfactory level or is guilty of a misconduct. Such disciplinary actions are intended to be corrective and not punitive, and are carried out in accordance with all applicable employment acts, rules, regulations and orders. The disciplinary actions include but are not limited to counselling, suspension from work with / without salary, and demotion with / without salary reduction. However, should the employee continue to perform unsatisfactorily or violate company rules and regulations despite repeated corrective actions, he may have his services terminated.

For the avoidance of doubt, employees shall adhere to all company policies, regulations and rules on discipline and misconduct, which shall prevail over the Code of Conduct and Ethics in the event of any conflict or inconsistency.

### MISCONDUCT

Examples of minor misconduct include, but shall not be restricted to the following and we reserve the right to amend, delete or add any items to the list below:

- i. Failure to clock in or out; missing during working hours; early departure before shift ends.
- ii. Lack of punctuality, including coming to work late, exceeding lunch breaks or prayer breaks, or late to meetings or trainings.
- iii. Excessive medical, emergency or unpaid leave without valid reason in a year.
- iv. Absence without leave for one day or less than one day.
- v. Manipulating medical leave or malingering, e.g. by obtaining medical leave around annual leave, public holiday or off day.
- vi. Sleeping during working hours, e.g. at workstation, trainings, meetings or other official activities.
- vii. Spitting or committing any unhygienic acts on company premises.
- viii. Improperly dressed or groomed for work. (see section on dress code).
- ix. Not taking proper care of uniform provided.
- x. Not taking proper care of tools, equipment or any other company property provided.
- xi. Writing frivolous or offensive notes, memos or letters to other employees, superiors, business associates or other stakeholders.
- xii. Failure to hand-over or return tools and equipment to their proper places at the end of the day.
- xiii. Contributing to unsanitary conditions or poor housekeeping of company premises, e.g. littering.
- xiv. Horse-playing or boisterous fooling around within company premises.
- xv. Failure to keep machines and / or workplace clean and tidy.

- xvi. Not wearing required uniform provided by the Group while at work.
- xvii. Improper attitude towards other employees, superiors, business associates or other stakeholders, e.g. poor manners, shouting, harassment or any immoral acts which brings discomfort to others.
- xviii. Wasting time or loitering during working hours.
- xix. Negligence in performing tasks.
- xx. Laziness or shirking duty.
- xxi. Failure to follow work standards or failure to timely complete or respond on the task assigned.
- xxii. Misuse of company facilities, e.g. toilet, function room, meeting room, canteen, pantry or surau.
- xxiii. Bringing non-employees on company premises without Management's permission.
- xxiv. Excessive use of company telephone facilities for private calls.
- xxv. Not reporting workplace incidents immediately to superior.
- xxvi. Being taken ill but refuses or fails to seek medical attention and / or refusing to comply with a medical practitioner's instructions to proceed on any sick leave.
- xxvii. Failure to follow established safety rules or practices.
- xxviii. Inciting or assisting another employee to commit any of the above offences.

Examples of major misconduct include, but shall not be restricted to the following and we reserve the right to amend, delete or add any items to the list below:

- i. Habitual failure to clock in or out; missing during working hours; early departure before shift ends.
- ii. Habitual lack of punctuality, including coming late for work, exceeding lunch breaks or prayer breaks, or late to meetings or trainings.
- iii. Excessive medical leave without valid reason that exceeds annual entitlement in accumulation.
- iv. Habitual absence without leave or being absent for 2 continuous working days.
- v. Manipulating or malingering, e.g. by obtaining medical leave around annual leave, public holiday or off day.
- vi. Habitual sleeping during working hours, e.g. at workstation, trainings, meetings or other official activities.
- vii. Going on leave without approval from superior.
- viii. Failure or refusal to obey a lawful instruction from supervisor or Group's representative.
- ix. Collection of money or distribution of picture, literature, leaflet or posting notices within company premises without approval from the Management.
- x. Tampering with security guards' or any other safety devices.
- xi. Committing any act subversive to the discipline of the Group or general behaviour.
- xii. Committing any act which is likely to endanger the life or safety of any person or damage the property within company premises.
- xiii. Refusal to accept any communication served either in accordance with the law, Group policies or in the interest of discipline.
- xiv. Trespassing or forced entry or unauthorized occupation of company premises.

- xv. Acting in any manner, including but not limited to publishing any info, data, photo, video and / or other unauthorized content of the Group which would affect the public image of the Group or that of the Group's employees including written, public statement, social media or others.
- xvi. Smoking in restricted areas.
- xvii. Use of profanities, which is likely to invoke sentiments of racial or religious feelings or detrimental to industrial harmony among employees, superiors, clients, or stakeholders.
- xviii. Use of abusive or vulgar language against other employees, superiors, clients, or stakeholders.
- xix. Exhibiting or circulating unauthorized notices, handbills, papers and documents without the Group's permission.
- xx. Spreading rumours, making false or malicious statements, or gossip about other employees' personality, credibility, beliefs, religions, ethnicity or any other sensitive topics within the Group.
- xxi. Insubordination upon official instruction, including refusal to be transferred or relocated; refusal to perform overtime; refusal to perform work without reasonable reason.
- xxii. Watching, reading, showing any materials of pornography during working hours.
- xxiii. Abusive behaviour, e.g. poor manners, violence, fighting, shouting, using offensive or insulting language, using threatening gesture, discriminatory act, or being rude towards other employees, superiors, clients or stakeholders.
- xxiv. Commission or abetment of any illegal act or act that is contrary to Group regulations, including but not limited to intentional go-slow, demonstration, picketing, riot, boycott, insurgence, rebellion at any time.
- xxv. Being involved in harassment issues, including sexual harassment, either implied or express, using offensive sign or language, or committing sexual activities, such kissing, hugging, prostituting, or committing adultery within company premises.
- xxvi. Deliberately starting work late.
- xxvii. Habitual or substantial negligence of duties.
- xxviii. Negligence in performing duty which incurs loss to the Group.
- xxix. Theft, attempted theft, fraudulent or dishonest act, or cheating.
- xxx. Submission of fraudulent, tampered, defaced, or fake documents for official use, e.g. medical certificates, reports, claim forms, death certificates and others.
- xxxi. Being involved in illegal drugs; any illegal substance without prescription from the doctor or authorized personnel which includes purchase, sale, consumption, distribution for personal or other use.
- xxxii. Refusal to perform urine or blood test as instructed by the Group.
- xxxiii. Obtaining or attempting to obtain leave of absence through false reason(s).
- xxxiv. Deliberately going to other doctors to obtain medical leave when being refused by the first doctor.
- xxxv. Withholding overtime unreasonably.
- xxxvi. Forging attendance record by clocking in or out on behalf of another employee.
- xxxvii. Instructing other employees to clock in on his behalf regardless of reasons provided.
- xxxviii. Being involved in any criminal activity or gangsterism.

- xxxix. Failure to report at once to superior after noticing any defect of an equipment that relates to the employee's work.
- xl. Failure to report of any defect or occurrence which an employee may have notice or which may endanger himself or any other person or which may result in damage to property or persons at work.
- xli. Failure to observe safety rules.
- xl.ii. Refusal to wear or use safety equipment provided by the Group.
- xl.iii. Engaging in private work or trade within or outside the Group which is directly or indirectly in conflict with the Group's interest.
- xl.iv. Habitual refusal to follow safety rules, regulations, procedures and practices.
- xl.v. Use of company IT equipment for personal reasons.
- xl.vi. Unauthorized use of company vehicle or equipment.
- xl.vii. Habitual breaches of any Group order, practices or any laws applicable to the establishment of rules made thereunder.
- xl.viii. Failure to declare or attempt to hide any essential information requested during job interview, especially regarding past employment records, criminal records, medical records or bankruptcy records.
- xl.ix. Breach of any material laws, guidelines or regulations which would prejudice the reputation of the Group and subject the Group to suffer losses.
- L. Inciting or abetting another employee to commit any of the offence listed above.

Due to the varying nature of jobs and different working environments within the Group, it is also the employee's responsibility to stay informed from time to time and adhere to the local guidelines at respective work locations in addition to the misconduct guidelines above.

# DRESS CODE

Employees are expected to always be suitably and neatly groomed and appropriately dressed to project an image of sobriety and efficiency whilst at work. Where applicable, you are responsible for wearing uniforms in proper conditions.

The following list is a guideline of what attire is considered as appropriate and inappropriate:

Appropriate / using Company Uniform	Inappropriate
Dresses (Below knee length)	Any type of denim, including jean dresses, denim shirts, denim pants, denim skirts, etc. (excluding denim shirt provided by the Group)
Suits / pantsuits / ties	Any material resembling denim
Skirts (Below knee length)	Casual / sport T-shirts (including logo merchandise)
Blouses / shirts	Casual shorts
Blazers	Khaki or Dockers - style pants
Vests	Stirrup pants and leggings
Pants in business suitable fabrics	Casual sandals, athletic or canvas shoes, casual boots, clogs
Any type of business shoes (heels, flats, etc.)	Flannel shirts
Smart and discreet jewelleryes	Short / crop tops, tank tops, etc. (must be fully covered by clothing where skin must not be shown)
Socks must always be worn (for male employees)	Big chunky dangling jewelleryes

On Fridays, employees are allowed to dress in a smart casual manner or in the company t-shirt. However, the outfit should be appropriate enough to attend meetings with business associates in case there is a requirement to do so. The Group is confident that you will use your best judgment in following the dress code. This is not an all-inclusive list and the Group reserves the right to determine the appropriateness of your attire. As a rule of thumb: If you are unsure whether an article of clothing is acceptable, most likely it isn't. In other words, if in doubt, don't wear it.

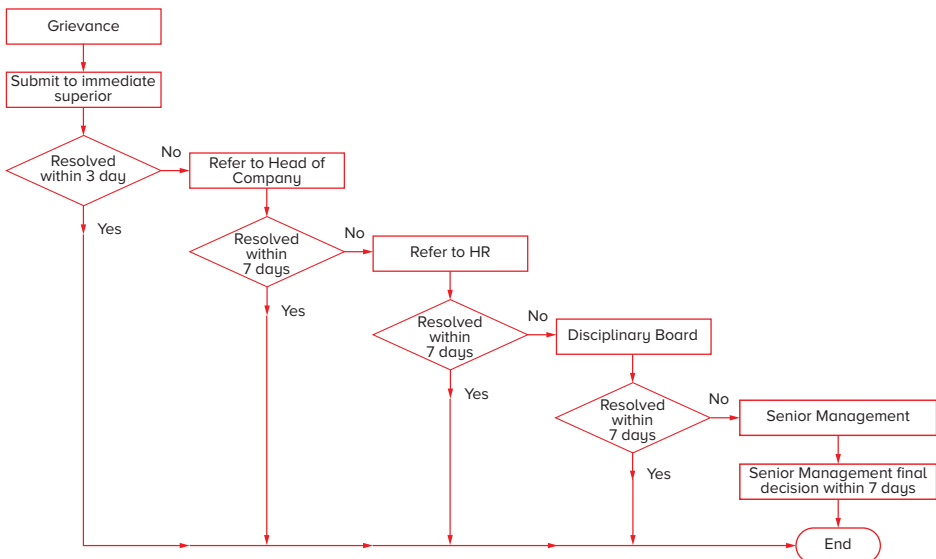
## Part 5 –

## Grievance Procedures & Whistleblowing

### GRIEVANCE

A grievance is generally defined as a formal complaint raised by an employee when there is a belief that an injustice has been committed against him. Where possible, an internal dispute shall be resolved by both parties at their own discretion. A grievance should only be raised as the last resort following the failure of both parties to achieve settlement without external interventions. The Group strives to resolve any grievances that arise in an amicable, equitable, and timely manner involving the least number of parties, hence the practice of an escalating system in our grievance procedures.

Grievance Procedures:



Depending on the issue, circumstances, evidence and approach, the outcome of the grievance procedures may vary. Below are the possible outcomes:

i. Amicable settlement

Upon reaching mutual settlement that end up with a win-win situation for the parties involved, the grievance will be considered as resolved and no further actions shall be taken. The person in charge for each stage of the resolution shall prepare and submit a report for recording purposes in a confidential manner and submit a report to the Human Resources Department for record-keeping purposes.

ii. Insufficient evidence

If there is insufficient evidence or the complainant refused to cooperate in the investigations, the issue will be closed upon furnishing a report accordingly to the Human Resources Department. The Human Resources Department will proceed with the necessary actions, including recording a statement through discussion with those involved. Close monitoring will be conducted accordingly based on the circumstances required. No retaliation shall be made against the complainant if the report is made based on good faith and reasonable grounds.

iii. Disciplinary action

Upon completion of the investigations (with sufficient evidence and good faith), necessary disciplinary actions will be taken as per the Group's disciplinary processes, provided that there is an element of misconduct or breach in Group rules and regulations, Standard Operating Procedures or any Group practices. Any record or evidence produced during this process will be filed accordingly in the employees' personal files.

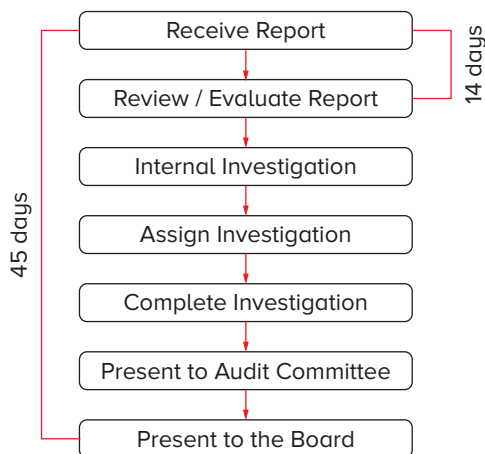
iv. Bad faith

Upon completion of the investigations, if any element of spite, bad faith, or wrongful and baseless accusation is found in the grievance raised, disciplinary actions will be taken accordingly against the complainant.

## WHISTLEBLOWING

The Group takes initiatives to constantly ensure that the highest levels of integrity and legal compliance is adopted by its top management and employees within the Group. Employees are expected to demonstrate professionalism and good business ethics and the Group takes very seriously ethical breaches or conflicts of interest that arise in the Group. In 2018, in order to build a more transparent and accountable workforce, we have reviewed our Whistleblowing Policy (publicly available on the Group's official website at <https://www.annjoo.com.my>). Under this policy, any disclosure of suspected wrong-doings which includes mismanagement, mal-practices, corrupt practices, fraud and abuse of power or breach of any laws and regulations by any member of the Board, management or employees are welcomed. The policy provides employees with an avenue to report wrong doings in an appropriate manner and without fear of reprisal.

## Whistleblowing Management Procedures:



Improprieties include, but are not limited to the following:

- i. Fraud, bribery, corruption, blackmail;
- ii. Criminal offences;
- iii. Misuse of position, funds or assets of the Group
- iv. Non-disclosed of conflicts of interest;
- v. Acceptance of gifts or favour beyond the threshold allowed by the Group;
- vi. Intentional error, fraud, or misrepresentations in Group statements or records;
- vii. Questionable accounting practices or disclosures;
- viii. Unsafe work practices or conduct which jeopardizes the health and safety of individual and brings harmful effects to the environment;
- ix. Unlawful, unethical or improper conduct including sexual, physical or other abuse of human rights;
- x. Failure to comply with legal or regulatory obligations;
- xi. Miscarriage of justice;
- xii. Suppression or concealment of any information related to the above; and
- xiii. Any actions taken in reprisal against a whistleblower.

## Acknowledgement And Pledge To Comply To Ann Joo Group's Code Of Conduct And Ethics

- ☐ I hereby confirm that I have received the copy of Ann Joo Group's Code of Conduct and Ethics ("Code"). I also understand that the Group reserves the right to amend the contents of the Code from time to time and I shall be notified of these amendments.
- ☐ I hereby declare that I have read and understood the Code and thereby fully understand that throughout the course of my employment with Ann Joo Group, I shall comply and abide with the Code and all such other policies mentioned in the Code which includes but not limited to Ann Joo Resources Berhad's Anti-Bribery and Corruption Policy and Procedures.
- ☐ I understand that it is my responsibility to clarify with the Human Resources Department for any uncertainty related to the Code before acting ambiguously.
- ☐ I understand that any non-compliance with the Code on my part during the term of my employment may result in disciplinary actions taken against me.
- ☐ I understand that upon signing, this Acknowledgement and Pledge shall replace and supersede any prior acknowledgement / pledge / declaration that the Group may have with me with respect to the subject matter covered by this Acknowledgement and Pledge.

Employee Signature:	
Name:	
IC / Passport Number:	
Designation:	
Company:	
Date:	

*Please sign and return the duplicate copy of this form to your Human Resources Business Partner / Representative.*



