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Code of Conduct and Ethics

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Prepared By:	Effective Date:	Version Number: 3.0
Management	21 December 2020	
Approved By:	Revision Date:	
Board of directors	09 June 2023	

Code of Conduct and Ethics

This Code of Conduct and Ethics (“the Code”) applies to all Ecomate Holdings Berhad (“Ecomate”) directors, employees, consultant and any other person who represent the company (“Covered Parties”); as well as their subsidiaries. Ecomate and its subsidiaries are referred to herein collectively as the “Group”.

Objective

The objective of the Code is to assist the Directors and Employees (as defined under Clause 3 of the Code) in defining ethical standards and conduct at work. The Code is not intended to be exhaustive, and there may be additional obligations that Directors and Employees are expected to behave or conduct when performing their duties. For all intents and purposes, 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.

1) Compliance with the law and regulations

Making the Right Decision

Concern for what is right should be the first consideration in all business decisions and actions, and that includes compliance with the law. Never enter into any transaction or perform any task that could reasonably be considered legally suspect, even if it might be common practice in your country or area. If in any doubt at all, seek advice and direction from your manager or Head of department.

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2) Personal Integrity

A. Criminal Record

If you are charged with, and/or found guilty of, a criminal offence, you must inform your Human Resources department, or your manager/Head of department who will then consult with Human Resources. Certain employees subject to licensing requirements may also be required to report the situation to the applicable regulator. There may be employment consequences if you are charged or found guilty of an offence.

B. Gifts and Entertainment

You may not accept, offer or give gifts, entertainment or other benefits (referred to as “gifts” in this section) having more than nominal value from or to existing or potential customers, suppliers, employees or others doing or seeking to do business with Ecomate. Further, you must never solicit gifts of any size at any time.

Gifts of nominal value may be accepted, offered or given provided they:

- Are not in cash or readily convertible to cash (such as securities, cheques or money orders);
- Are consistent with accepted business practice;
- Cannot be construed as an attempt to influence, or as a form of payment for a particular transaction or a referral;
- Do not contravene any law and would not compromise your integrity or that of Ecomate (or, in circumstances where you are offering or giving the gift, the integrity of the recipient or their organization); and
- Would not adversely affect your reputation or the reputation of Ecomate if knowledge of the gift was to become public.

If you have any doubt about whether a gift is of nominal value or may otherwise be accepted, offered or given, you must seek guidance from your manager/Head of department or Human Resources department.

C. Alcohol and Substance Abuse

Ecomate is committed to providing a work and business environment that is free of alcohol and drug abuse.

The following conduct is prohibited:

- Consuming alcoholic beverages in quantities that affect work performance or impair your judgment during working hours;
- Consuming, possessing, selling or distributing illegal substances, especially while in Ecomate’s premises, at any Ecomate’s function, or at any time when you could be identified as a Ecomate employee.

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D. Harassment, Discrimination and Violence in the Workplace

Ecomate is committed to conducting all its affairs with fairness and equity, and this includes the treatment of employees, shareholders, customers, suppliers and competitors. Any behaviour that could be construed as harassment or discrimination on any ground protected by human or civil rights law will not be condoned. Similarly, violence of any kind in the workplace, at a Ecomate's event or in the presence of or directed towards any employee, customer or supplier will not be tolerated. Any employee who engages in, or threatens to engage in any violence, will be subject to serious disciplinary action.

E. Use of the Internet, Email and Electronic Media

Knowingly transmitting, viewing, generating, printing, retrieving, downloading or storing any communication of a discriminatory, defamatory, obscene, damaging (such as viruses), threatening or harassing nature, or any material that is inappropriate for the business environment (such as sexually oriented literature or pictures, or chain letters), is prohibited. You are also prohibited from disclosing confidential or proprietary information about or belonging to Ecomate for any purpose that is illegal, against company policy or contrary to the best interests of Ecomate.

F. Dealing with Ecomate Assets

You must make every effort to protect all Ecomate's property and assets from harm, loss or misuse, especially those that are in your custody or control and are your responsibility. These may include cash, negotiable instruments such as drafts, money orders, securities or certificates, premises, equipment, bank records, customer or employee information, or computer resources and information systems. They also include all information between Ecomate and its customers, employees or business partners, which must be kept secure from third parties. Should you become aware of any actual or potential harm, loss or misuse of Ecomate's property, you must immediately notify your manager or other appropriate company official. Ecomate's property may be used only for the purpose of executing your accountabilities with Ecomate.

G. Conflict of Interest

Ecomate is committed to proactively detecting and disclosing any conflict of interest situations, and provides a measure to eliminate or mitigate them. To prevent a conflict of interest, any Ecomate employee must be vigilant and adopt appropriate behaviour in situations in which the objectivity of business decision may be impaired, especially in:

- External commitments
- Personal relationships
- Receiving an item of value

H. Encourage the reporting of unlawful or unethical behaviour

It contributes to creating a safe environment in which employees are not afraid to bring up and disclose conflicts of interest, fair dealing, insider trading and reporting structure of non-compliance.

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I. Confidential Information

It is pertinent that all Directors and Employees exercise caution and due care to safeguard any information of a confidential and sensitive nature relating to the Ecomate 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 an Employee knows of material information affecting the Ecomate 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.

J. Inside Information and Securities Trading

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

K. Health and Safety

Ecomate 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 Ecomate Group's businesses and activities. Such a commitment in return requires that all Directors and Employees understand and abide by Ecomate Group's policies and procedures.

3) **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.

4) **Waiver of The Code**

Waiver of the Code may be made by the Board or the appropriate Committee of the Board. Waiver of the Code may be granted on a case-by-case basis and only in extraordinary circumstances.

This Policy was updated and adopted by the Board on 09 June 2023 and is made available on the Company's website, www.ecomate.com.my.