



CODE OF CONDUCT

Policy

The Company (“Gadang”) provides this Code of Conduct to serve as a guide to proper business conduct for all Gadang staff. We must observe the highest standards of ethics and integrity in our conduct. This means following a basic code of ethical behaviour that includes the following:-

1) Conflict of interest

We are expected to devote our services full-time to Gadang and to avoid situations that may question whether we have acted in the best interest of the Company. We must not be engaged in other forms of business activity within the Company’s time.

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of Gadang may conflict with our own personal or family interests. We owe a duty to Gadang to advance its legitimate interests when the opportunity to do so arises. We must never use Gadang property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with Gadang.

Below are some ways in which conflict of interest could arise (*this list is non-exhaustive*).

- a) Being employed (we or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while we are employed by Gadang.
- b) Having a personal interest, financial interest or potential gain in any Gadang transaction.
- c) Owning or having a substantial interest in a competitor, supplier or contractor.
- d) Placing company business with a firm owned or controlled by us or our close family member.

Determining whether a conflict of interest exists is not always easy to do. Staff with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, staff must seek advice from their managers or the Group Human Resource department.

2) Confidentiality

We must be very confidential in all areas concerning our Company’s business. Information that is obtained at work is ‘privileged information’. This privileged information must not be used for any other purpose and must be treated with the strictest confidence.



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We must not disclose any trade secrets, security password, articles, computer data, salary or remuneration package and other confidential information and/or documents to any person (whether staff or external party) not authorized to receive such information from our Company.

3) Crime

An act of fraud is an act of deliberate deception or trickery intended to achieve an unauthorized material gain. Fraud is a crime. Gadang will not tolerate staff involved in fraudulent activities.

- a) Company asset
We cannot take home, use or borrow Company asset without first seeking approval for it in a proper manner. We cannot misuse or mishandle Company asset.
- b) Money
We cannot take home, use or borrow money that belongs to the Company. There cannot be any irregularity in the handling or reporting of money.
- c) Company records
We cannot manipulate, falsify or alter company records and documents. There can be no lies and invention or suppression and intended omission of facts and transactions from records.

The above are examples of crime, there may be other examples not listed.

In our company we want to be free of crime. Every one of us, at all designations, must be honest.

4) Professional conduct

We conduct all of our business activities professionally and with integrity. We take great care to be completely objective in our judgment and any recommendations that we give, so that issues are never influenced by anything other than the best interest of the Company. We must not, at any time, bring Gadang into serious disrepute.

5) Fair and equitable treatment

Every one of us must, at all times, act in a fair and equitable manner in all dealings with business associates and other staff members. All staff, at all designations, should be treated with respect and dignity.

Our company recognizes equal opportunity for all. Our staff must not be treated unfairly due to race, creed, sex, religion, age or any other reason.



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ACKNOWLEDGEMENT

I, _____, NRIC number
_____ acknowledge that I have read the contents of this Code
of Conduct and I understand that a breach by me, of any provision of this Code of Conduct, may be a
cause for summary dismissal.

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Signature

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Date