



HCK CAPITAL GROUP BERHAD (484964-H)

CODE OF CONDUCT

1. INTRODUCTION

In line with good corporate governance practices the Company adopted a Code of Conduct (“the Code”) to address matters relevant to the Company’s legal obligations as well as other obligations to its stakeholders. The Code is not intended to be exhaustive, and there may be additional obligations that Directors, officers and employees are expected to behave or conduct when performing their duties.

The Code is applicable to all Directors, officers and employees (including full time, probationary, contract, part time and temporary staff) of the Group.

2. KEY AREAS OF CONDUCT

Compliance with Laws

All Directors, officers 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. In addition, all Directors, officers and employees must comply with the ethical and technical requirements of any relevant regulatory or professional body. The Group reserves the right to report any actions or activities suspected of being criminal in nature to the police or other relevant authorities.

Conflicts of Interest

There may be times when personal interests conflict with those of the Company, or its stakeholders. In these circumstances, all Directors, officers and employees of the Company should take appropriate action to remove or manage the conflict.

When such conflicts arise they should immediately be referred to the Chief Financial Officer in the case of employees and the Executive Chairman in the case of Directors.

Confidentiality

It is pertinent that all Directors, officers and employees exercise caution and due care to safeguard any information of confidential and sensitive nature relating to the Group during their course of duties. They must not disclose official or confidential information to others or third parties, unless proper authorisation is given or legally mandated.

Confidential information received by each Director in the course of the exercise of directorial duties shall be kept confidential and will not be disclosed or released to any person other than Board members, except as required by law or as agreed by the Board.

Dealings in securities

No Director, officer 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, officers 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.

Use of the Company’s resources

No Director, officer or employee shall use property, information or opportunity arising during their course of duties for personal gain. Assets include confidential information, all office equipment, computer systems and data, and other operating plant of the company. Any use of assets must be authorised.

Equal opportunity

All employees will be treated fairly and courteously without regard to race, creed, religion, gender, nationality, age or disability. The Company will seek to avoid any action or decision that will cause discrimination or harassment of any employee.

Competition

The Company competes fairly in the markets in which it operates.

Environment, 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 businesses and activities. The Group must not compromise the responsibility to its employees and the environment and must at all times comply with local laws.

Misconduct

No Director, officer or employee is to be involved in or abet any activity that is deemed by the Group to be an act of misconduct. Directors, officer and employees shall not engage in an outside interest that will undermine the performance of the Directors, officers and employees or bring disrepute to the Group.

3. REPORTING OF VIOLATION OF THE CODE

Any employee who knows of, or suspects, a violation of the Code, is encouraged to whistle blow or report their concerns through the Whistle Blowing Policy. No individual will be discriminated against or suffer any act of retaliation for reporting in good faith on violations or suspected violations of the Code.

4. REVIEW OF THE CODE

The Code may be reviewed regularly by the Board to ensure that it continues to remain relevant and appropriate.

5. 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.



ACKNOWLEDGEMENT OF RECEIPT/DECLARATION SHEET

CODE OF CONDUCT FOR EMPLOYEES OF HCK CAPITAL GROUP BERHAD GROUP OF COMPANIES (“THE GROUP”)

I, the undersigned, hereby declare that I have fully understood the contents of the “Code of Conduct” and shall strictly abide to the procedures and guidelines stipulated in the “Code of Conduct” for Employees/ Directors of the Group.

I also understand that should I have any doubt or need clarifications, I will contact Human Resources Department.

(Signature)

Name :

NRIC :

Date :

(Please submit this declaration sheet duly signed to the Human Resources Department)