

## **POLICY ON CORPORATE CODE OF CONDUCT**

### **A) GENERAL STATEMENT**

This section explains the guidelines on Corporate Code of Conduct and Business Ethics Policy to ensure that all employees have an understanding on the minimum standards expected of them in relation to corporate conduct and business ethics. It is designed to maintain discipline and order in the work place among employees of all levels. It also sets out the circumstances in which such employees would be deemed to have breached the Code and the actions that can be taken against them if they do so.

The Code of Conduct is subject to the laws of this country and the country where they are on an official business trip. Employees are expected to comply with the Code and all applicable laws, rules and regulations in which ever country where they have business dealings.

### **B) PURPOSE**

Our Code sets out standards which OCB Berhad (“the Company”), its officers/staffs and subsidiaries/branches are required to comply with when dealing with each other, shareholders, other stakeholders and the broader community. Our Code is not exhaustive, and OCB Berhad has developed or will develop specific detailed policies, procedures, directives and/or guidelines to support, promote or ensure compliance with our Code. Our Code is to be read and applied in conjunction with such policies, procedures, directives and guidelines which are currently in place.

#### **1) POLICY**

##### **A) Integrity**

Business Integrity is the key standard for the selection and retention of those who represent OCB Berhad. They must display a high level of integrity, irrespective of dealing with internal staff or external parties. OCB Berhad will observe and follow specified standard procedures and must respect one another so that all will be treated equally and fairly. Paying bribes or kickbacks, engaging in industrial espionage, leaking data of customers’ information to 3rd Party without authority, or gaining inside information or influence are just a few examples of what could give us an unfair competitive advantage and could result in violations of the law.

**B) Fair & Considerate**

All employees, irrespective of their level shall be fairly treated. All employees are entitled to and deserve a workplace in which they feel respected, and appreciated. The Company will not tolerate harassment or discrimination of any kind especially involving race, colour, religion, gender, age, national origin, sexual orientation or disability. Our goal is excellence in the workplace and an environment that supports honesty, integrity, respect, trust and responsibility.

While everyone who are employed by the Company must contribute to the creation and maintenance of this environment, our executives and management personnel are charged with special responsibilities for fostering a work environment that is free from the fear of retribution.

Managers and team leaders must be careful in words and conduct to avoid placing, or seeming to place, pressure on subordinates that could cause them to deviate from acceptable ethical behaviour.

**C) Honesty and Trustworthy**

The success of our business is dependent on the trust and confidence we earn from our employees, customers and shareholders. One should not utter words which are false and becomes detrimental to another staff. Although everyone has the right to speak up, that should not be used to discredit others in public as this can lead to misinformation. We gain credibility by adhering to our commitments, displaying honesty and integrity and achieving Company goals solely through honourable conduct. We all deserve to work in an environment where we are treated with dignity and respect.

**D) Protection of Personal Data Information**

An employee shall create, retain and dispose of our Company records as part of our normal course of business in compliance with OCB Berhad's policies and guidelines as well as all regulatory and legal requirements. An employee shall not furnish or leak personal data of employees to others except that have been legally required on our Company to provide such information. For verification purpose (i.e: bank, credit firm, hire-purchase agent, etc), prior written consent has to be obtained from the employee concerned. All corporate records must be true, accurate and complete, and Company data must be promptly and accurately entered in our books.

**E) Anti-Bribery & Corruption Policy**

Any form of bribery and corruption is prohibited. OCB Berhad and any third party acting on behalf of OCB must not provide, offer or accept bribes, kickbacks, corrupt payments, facilitation payments, or inappropriate gifts. All subsidiaries/branches and any third party acting on behalf of OCB Berhad must comply with all applicable anti-bribery laws and regulations.

**F) Conflict of Interest**

Avoid investments that could affect or appear to affect your decision making on behalf of the Company. If you are responsible for selecting or dealing with a supplier on behalf of the Company, your personal interests and relationships must not interfere or appear to interfere with your ability to make decision in the best interest of the Company. In the process of selecting suppliers, we must always follow the applicable Company procurement guidelines. 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 OCB Berhad may conflict with our personal, shareholder's or customer's interests. The Company's interest must prevail.

**G) Charitable Contribution**

It is the policy of OCB Berhad to make contributions to charitable bodies/parties. Contributions to charitable funds and bodies should be made only with the approval of the Chief Operating Officer cum Executive Director who is responsible for the control of such expenditure.

**H) Providing Quality and Safe Products – Innovation and Quality**

OCB Berhad is committed to contribute to society by providing high quality products whilst creating value for our stakeholders. To this end, OCB Berhad is committed to Total Quality Management and we aim to achieve Total Customer Satisfaction and to be recognised as a preferred supplier of innovative and quality products and services that consistently meet our customers' evolving needs, whilst meeting all regulatory requirements.

OCB Berhad also recognises that in addition to providing assurance to all consumers, relevant certification also benefits everyone, as the products would have strictly adhered to stringent requirements which have high standards of safety, quality and hygiene conditions.

**I) Careful Communication**

OCB Berhad employees are not allowed to spread malicious rumours about any other member of the Company and misrepresenting OCB Berhad to others.

OCB Berhad employees are also required not to make defamatory, slanderous, seditious or derogatory statements and not to infringe or authorise any infringement of copyright or any other legal right by email or other forms of communication. Any such communication will not be condoned by OCB Berhad and is outside the scope of the employment of the individual concerned. OCB Berhad will not accept any liability in respect of such communication, and the employee responsible will be personally liable for any damages, penalties or other liability arising.

All employees are strictly prohibited from spreading any kind of pictures or caricatures or write-ups of any other employee of the Company in any social media that may cause or injure the reputation or the image of the employee concerned and or the Company itself.

**J) Workplace Health & Safety**

OCB Berhad strives to provide safe and healthy working conditions. In order to do so, health and safety rules and regulations apply at all sites. It is the responsibility of each Subsidiaries and Branches to comply with the regulatory health and safety requirements. OCB Berhad will endeavour to prevent any injuries at work, both for employees and for our contractors.

**K) Prevention & Eradication of Drug, Alcohol & Substance Abuse**

OCB Berhad views seriously the case of employees and contractors engaging in substance abuse at the workplace. Appropriate actions will be instituted against anyone who presents himself at work under the influence of illegal substances or, possesses, distributes, or sells illegal drugs in the workplace.

**L) Sexual Harassment**

It is the policy of the Company to promote a safe and healthy working environment that fosters mutual respect where individual employees irrespective of status or position are treated with dignity and free from sexual harassment. Employees are strictly prohibited from engaging in any form of harassment, humiliation and intimidation of sexual nature.

**M) Labour**

The Company is committed to uphold the human rights of workers, and to treat them with dignity. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. The recognized standards, below, were used as references in preparing the Code and may be a useful source of additional information.

**❖ Child Labour- (Minimum Age & Young Workers)**

Illegal child labour is not permissible.

- Child labour is not to be used in any stage of manufacturing. The term "child" refers to any person who has not completed his 15th year of age.
- Young Workers shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. The term "Young person" means any person who, not being a child has not completed his 18th year of age.

**❖ Freely Chosen Employment / Force Labour**

Forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or trafficking of persons shall not be used. This includes transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities. As part of the hiring process, workers will be provided with a written employment agreement that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin. All work must be voluntary and workers

shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to employees' identity or immigration documents, such as government-issued identification, passports or work permits, unless the holding of work permits or government issued document is required by law or agreed by the employee. OCB Berhad prohibits all such physical and/or mental oppression.

❖ **Non-Discrimination**

OCB Berhad provides equal employment opportunity and anti-discrimination in the workplace. The Company do not condone gender, racial, religious, nationality, or all other form of discrimination. All employees shall be treated fairly and no words, act or behaviour that is discriminatory in nature should be tolerated.

❖ **Working hours, benefits and wages**

The Company shall adhere to the strictest applicable laws and/or industry standards relating to wages, working hours, overtime and benefits. Overtime shall be voluntary, and to adhere to the maximum allowed under applicable laws and regulations, be remunerated at a higher rate than the hourly rate and shall be paid in legal tender on a regular basis.

❖ **Disciplinary Practices**

OCB Berhad shall not engage or support any type of harsh disciplinary practices to their employees and workers.

❖ **Freedom of Association**

In conformance with local law, the Company respects the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

**N) Management Responsibility**

The top management shall declare OCB Berhad Code of Conduct as policy of the organization which includes:

- a) To conform all the requirements of Code of Conduct.
- b) To comply with applicable national and international laws.
- c) To improve social conditions of the employees and workers continuously.

**O) Environment**

The Company shall comply with environment protection laws with regard to its production and procurement processes.

**P) Trade**

The organization shall comply with the trade laws and regulations on import and export of products and its components.

**Q) Gift and Entertainment Policy**

**a) Payments to External Parties**

OCB Berhad is not allowed to directly or indirectly offer or make payments in cash or in kind to any party or person (including but not limited to Government officials, business partners (e.g. suppliers and customers)

**b) Gifts**

As a general rule, OCB Berhad employees should not accept presents or gifts. However, under certain circumstances, token gifts (not cash) in line with local custom and practice, are acceptable.

**c) Entertainment**

OCB Berhad employees are also encouraged to ensure that entertaining by or of third parties is reasonable in its extent and appropriate to the particular business circumstances. The Chief Operating Officer cum Executive Director will determine the appropriate standards.

**2. REVIEW OF THIS POLICY**

The Board of Directors reserve the right to change, add, suspend, cancel, remove, discontinue or otherwise modify this Policy unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with laws and regulation and/or accommodate organizational changes within the Company or Group.

**OCB BERHAD**

**MOHD HARRIS BIN PARDI**

Chief Operating Officer cum Executive Director