

LIEN HOE CORPORATION BERHAD (Company No. 8507-X)

CODE OF ETHICS AND CONDUCT

1. INTRODUCTION

In line with good corporate governance practices, the Board of Directors, the Management and employees of Lien Hoe Corporation Berhad (“the Company”) and its subsidiaries (collectively referred to as “the Group”) have made a commitment to create a corporate culture within the Group to operate the businesses of the Group in an ethical manner and to uphold the standards of professionalism corporate conduct. This Code of Ethics and Conduct (“the Code”) sets out the principles and standards of business ethics and conduct of the Group. The Code is applicable to all Directors, Management and employees of the Group.

The Code contains provisions which encourage any employee who knows of, or suspects a violation of the Code to report their concerns to the Directors and that they will not be discriminated against or suffer any act of retaliation for reporting in good faith on violation or suspected violation of the Code.

2. OBJECTIVE

The objective of the Code is to assist the Directors, Management and employees 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.

3. CODE AREAS OF CONDUCT

3.1 Conflicts of Interest

The Directors, Management and employees should avoid involving themselves in situation where there is real or apparent conflict of interest between them as individuals and the interest of the Group. Directors, Management and employees must not use their positions or knowledge gained directly or indirectly in the course of their duties or employment for private or personal advantage.

3.2 Acceptance and provision of gifts and other form of benefits

The Directors, Management and employees shall not accept or provide inappropriate gifts or other form of benefits which may create conflict of interest ad influence business decisions.

Generally, acceptance of inexpensive non-cash gifts which are occasional, customary during festive or special occasions and gifts from social events attended by Directors, Management and employees are permissible. Infrequent and moderate business meals and entertainment with clients or customers and infrequent invitations to attend local social events and celebratory meals with clients can be appropriate aspects of promoting good business relationships, provided that they are not excessive and do not create the appearance of impropriety.

3.3 Confidential Information

It is pertinent that all Directors, Management and employees exercise caution and due care to safeguard any information of a confidential and sensitive nature relating to the Group which is acquired in the course of their employment, and are strictly prohibited to disclose to any person, unless the disclosure is duly authorised.

3.4 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.

3.5 Protection of Assets and Funds

Directors, Management and employees must protect the assets and funds of the Group to ensure availability for legitimate business purposes and that no property, information or position belonging to the Group or opportunity arising from these be used for personal gain or benefit.

3.6 Business Records and Control

All books, records and accounts should conform to generally accepted and applicable accounting principles and to all applicable laws and regulations. The preparation and maintenance of accurate and adequate business records are the responsibility of the Directors, Management and employees.

3.7 Compliance with laws, rules and regulations

Directors, Management and employees are to understand and comply with the laws, rules and regulations that are applicable their roles and/or position at work.

The Group to ensure compliance with all applicable laws, rules and regulations in jurisdiction and countries within which the Group operates.

3.8 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 business and activities.

3.9 Unlawful or unethical behaviour

Any unlawful or unethical behaviour, including sexual harassment, is unacceptable.

Employees shall treat each other fairly and courteously without regard to race, creed, religion, gender, nationality, age or disability, and shall not create any form of discrimination or prejudice in the workplace.

3.10 Misconduct

No Director, Management or employee is to be involved in or abet any activity that is deemed by the Group to be an act of misconduct.

4. REPORTING OF VIOLATIONS OF THE CODE

Any employee who knows of, or suspects, a violation of the Code is encouraged to report the concerns to the Directors. No individual will be discriminated against or suffer any act of retaliation for reporting in good faith on violation or suspected violation of the Code.

5. REVIEW OF THE CODE

The Code was formalised by the Board of Directors on 22 November 2012. Any subsequent amendments to the Code can only be approved by the Board of Directors. The Code will be periodically reviewed and updated in accordance with the needs of the Company.

The revised Code is approved by the Board of Directors on 21 February 2018.

The Code is made available for reference in the Company's website at www.lienhoe.com.my