

EMPLOYEES' CODE OF CONDUCT AND ETHICS

1. STATEMENT OF POLICY

At Puncak Niaga Holdings Berhad ("Company"), we believe that the principles of honesty, high ethical standard of practices, integrity and fairness are the cornerstone of respectable and successful business. It is the policy of the Company that all employees shall observe and adhere to the highest standard of professional ethics and personal action. The Company sets out clearly the code of conduct and ethics that guide all employees in the discharge of their daily duties and when dealing with others.

2. CODE OF CONDUCT AND ETHICS OF EMPLOYEES

- i) To faithfully and diligently accept and perform duties as well as abide by all of the policies, rules, regulations and practices of the Company, expressed or implied, in all aspects and at all times;
- ii) Not to engage directly or indirectly in any other business or occupation whatsoever that compete or is in conflict with the Company's business;
- iii) Not to engage in any detrimental activity, criminal activity, be guilty of any misconduct which can cause damage to the Company, its employees and its property, directly or indirectly;
- iv) Not to divulge confidential information, directly or indirectly to any person or company except with the Company's approval;
- v) Not to use abusive language and physical violence between employees;
- vi) Not to deliberately misrepresent facts or falsify data or records on other material and non- material documents to gain personal benefits; and
- vii) Sexual harassment shall not be tolerated at any workplace and its applies to all employees, contractors, vendors, visitors regardless of gender, age, sexual orientation, marital status and position. Any employee who is found to have committed the misconduct shall be subjected to disciplinary action including termination.