



COMPLIANCE MANAGEMENT SYSTEM

COMPANY CODE OF CONDUCT AND BUSINESS ETHICS (CoBE)

1. TRANSPARENCY, INTEGRITY, AND FAIR PLAY

SEMANGAT LESTARI (M) SDN BHD (hereinafter referred as The Company); its directors and employees are fully committed to the principle of honesty, transparency, integrity and fair play in the delivery of goods and services to the customers without any favouritism and discrimination. The Company shall not tolerate any form of corruption, directly or indirectly. We remain accurate and truthful when representing the quality, features or availability of any of our products and services.

This Code of Conduct serves as a standard conduct expected of all employees to adhere and comply with the Company's policy of conducting its business. This Code applies to all employees including temporary and part-time staff.

2. EQUAL OPPORTUNITY FOR ALL EMPLOYEES

The Company practises equal employment opportunity in recruiting, training, work assignment, promotion, transfer, termination and salary regardless of race, colour, sex, religion or age.

3. CONFLICT OF INTEREST

The Company ensures that all decisions are made solely on objective criteria and shall not allow itself to be guided by any personal interest or relationship. Employees who misuse their official position for personal gains or to favour their relatives or friends are liable to disciplinary action or even prosecution.

4 SAFETY AND HEALTH PRACTICES

The Company is committed to provide a conducive and injury-free working environment. All employees should perform work in a safe manner.

5 FAIR COMPETITION

The Company prohibits any form of unfair competition. Employees cannot agree to any arrangement of price fixing and manipulations, commercially or technically and should not participate in any fake offers in tenders or any other forms of competitions for offers.

6 ACCEPTANCE OF ADVANTAGES

The Company prohibits all employees from soliciting or accepting any advantage from any persons having business dealings with the company. Employees should decline the offer if the acceptance could be perceived as against the interest of the company, or lead to complaints of bias or impropriety.

7 FINANCIAL REPORTING

All transactions of the Company must be duly recorded to permit preparation of clear financial statements in conformity with the generally accepted accounting principles. No false or misleading entries may be made in the books and records of the company for any reason. No payments will be done without adequate supporting documentation.

8 WORKING WITH GOVERNMENT AND STATE BODIES AND AUTHORITIES

The Company is committed to complying with all the applicable laws and regulations relating to government (public procurement) bids, contracts and services and ensuring its reports, certifications and declarations to government officials are accurate and complete. The company believes and abides by the rule of free and fair competition.

9 GOVERNANCE AND ANTI-CORRUPTION

The Company has zero tolerance for corruption. The Company restricts all employees from offering or providing anything of value, directly or indirectly to government officials and business partners to secure an undue advantage. The Company prohibits payment, offers of payment, gifts, hospitality and invitations as well as anything of value directly or indirectly with the purpose of influencing or obtaining undue business or personal advantage.

The Company is committed in promoting values of integrity, transparency, accountability and good corporate governance. In complying with laws, policies and procedures relating to fighting corruption, the Company supports corruption prevention initiatives by the Malaysian Government and the Malaysia Anti-Corruption Commission.

10 WHISTLEBLOWER POLICY

The Company adopts a whistle-blower policy where anyone is able to raise concerns regarding any illegal conduct or malpractice without being subjected to victimization, harassment or discriminatory treatment, and to have such concerns properly investigated. Any concerns should be reported directly to the Managing Director.

11 MONEY LAUNDERING

The Company conducts its business relationship only with suppliers, sub-contractors and business partners of verified integrity. The Company shall not engage in or have any dealings with parties in any unlawful and criminal activities. The Company ensures that laws and regulations are adhered to, that business is conducted in conformity with high ethical standards, and that service is not provided where there is good reason to suppose that transactions are associated with money laundering.

12 EXPORT CONTROL

The Company fully complies to all applicable legal provisions for importing and exporting of goods, services and information.



13 HANDLING OF CLASSIFIED INFORMATION AND DATA PROTECTION

Employees are not allowed to disclose any classified or exclusive information to anybody without authorization. The Company does not condone activities that seek to gain an unfair competitive advantage or to the benefit of a third party. Any unauthorized disclosure of any personal data may result in a breach of the applicable legislation on privacy.

14 PROPERTY OF COMPANY

Employees given access to any property of the Company should ensure that it is properly used for the purpose of conducting the Company's business. The Company prohibits misappropriation of the property for personal use or resale.

15 COMPLIANCE WITH THE CODE

It is the personal responsibility of every employee to understand and comply with the Code of Conduct. Every employee shall sign a declaration acknowledging their understanding and be in compliance to the Code.

Any employee who violates any provisions of the code will be subject to disciplinary action. In cases of suspected corruption or other criminal activities, a report will be made to the appropriate authorities.



SEMANGAT LESTARI (M) SDN BHD

Company Registration No: 199401018851 (304530-H)

SUMMARY AND ACKNOWLEDGEMENT

We have a responsibility to act ethically and uphold the Company's values in all our business dealings. Our success depends on our actions. You must never do anything that could appear to be illegal or unethical. Even the appearance of an improper action can be damaging to the Company's reputation.

When faced with a difficult situation, you should never hesitate to seek for help. Together, we can continue to uphold our proud tradition of doing the right thing. It is the key to our success.