



Policy

This record describes in detail the principle of actions regarding:

Code of Conduct and Ethics

Group Human Resources

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1. Policy Statement

- 1.1 The purpose of this Code of Conduct and Ethics is to outline how NanoMalaysia Berhad (“NMB” or “the Company”) and its subsidiaries (collectively herein defined as “NMB Group” or “the Group”) do business the right way.
- 1.2 Integrity is the most important core value of the Group, where all directors and employees are expected to abide by their moral and ethical convictions, and doing the right thing in all circumstances, even if no one is watching them. Having integrity means being true to oneself and doing nothing that would demean or dishonour oneself or the Group.

2. NanoMalaysia Berhad’s Commitment

- 2.1 At NMB Group, we conduct our business with utmost integrity and with respect for our stakeholders comprising of our business partners, employees and the public. The standards of conduct and behaviour of company directors, management, officers and employees in Malaysia are prescribed by the Companies Act 2016. They are also regulated by common law and other government legislation on topics relevant to enhancement of the effectiveness of conducting the business of the companies, including anti bribery and corruption law, whistleblowing law, taxation law, personal data protection law, competition and corporate governance.
- 2.2 NMB Group believes that such standards apply to all stakeholders. Accordingly, the Group has developed this Code of Conduct and Ethics (“the Code”) for all stakeholders to read and pledge to accept this Code and ensure compliance as a minimum guideline for ethical conduct.

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3. Objectives

- 3.1 To establish a set of principles and practices that will set parameters and provide guidance and direction for conduct and decision-making of the Board of Directors, the Management Team, officers and employees of NMB Group.
- 3.2 To record the ethical and professional standards of corporate and individual behaviour expected of the Board of Directors, the Management Team, officers and employees of NMB Group.
- 3.3 To assist the Board of Directors, the Management Team, officers and employees of NMB Group in carrying out their duties and responsibilities in accordance with the standards of professional conduct expected by the Group.

4. Scope

- 4.1 This Code applies to all directors and employees of the Group.
- 4.2 The Group expects the business associates and other parties providing goods and/or services to or on behalf of the Group in any capacity to also comply with the accompanying Third Party Code of Conduct¹, and all applicable provisions of this Code, in the course of providing goods and/or services to NMB Group.
- 4.3 This Code is intended to supplement all applicable local laws, regulations and other internal policies and is not intended to substitute any local or international laws and regulations.

¹ See NMB-BAC-POL-00004 - Third Party Code of Conduct

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5. Definitions

The following definitions are included in this Code.

Board Committees	Committees established by the Board of Directors from time to time including the Board Audit and Risk Committee (“BARC”) and the Board Nomination and Remuneration Committee (“BNRC”).
CEO	The Chief Executive Officer of NMB.
Company Secretary	The secretary to the Board of Directors or the person normally exercising the functions of the secretary to the Board of Directors as defined in the Companies Act 2016.
Directors	Directors include all independent and non-independent directors, executive and non-executive directors of the Group and shall also include alternate or substitute directors.
Employee	A person employed by NMB Group, whether confirmed in a position or on probation, or any other person employed on contract, temporary basis, or secondment, or retain or appointed by NMB Group for a fixed or indefinite term to perform any function for NMB Group (inclusive of interns and apprentices).
Management Team	The management personnel of NMB including the CEO; and reference to the word ‘he’ shall include the female gender unless otherwise stated.
NMB/the Company	NanoMalaysia Berhad.
NMB Group/the Group	NanoMalaysia Berhad and its subsidiaries.
Misconduct	A mode of behaviour or conduct which is inconsistent with expressed or implied obligations to NMB.
Whistleblowing	Disclosure by a person to NMB Group, or to those in authority of mismanagement, corruption, illegality, violation of the Code or some other wrongdoings.

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6. Principles

- 6.1 The principles have been developed to align with the various legal and regulatory obligations that apply to all directors and employees as well as the standards of conduct and behaviour expected by NMB.
- 6.2 All directors and employees are expected to exercise self-discipline and control in this regard, to comply with this Code, and the Anti-Bribery and Corruption Policy² on conflicts of interest and related party transactions.

7. Professional Excellence

- 7.1 All directors and employees must comply and faithfully abide with the law, the Constitution, this Code, the Board Charter, policies, and procedures of NMB, which, inter alia, matters in relation to:
- a) corruption, bribery and fraud.
 - b) criminal offences or breaches of Malaysian law.
 - c) accepting gifts/favours beyond the threshold allowed by NMB.
 - d) misuse and/or misappropriation of NMB's funds or assets, including intellectual property.
 - e) financial and/or operational impropriety within NMB.
 - f) gross mismanagement within NMB.
 - g) sexual harassment of any kind, or physical or mental or other abuse of human rights.
 - h) acts or omissions jeopardising the health and safety of NMB's employees or the public; and
 - i) concealment in relation to any of the above.
- 7.2 All directors and employees must exercise due care, diligence, and skill in the conduct of their duties and in organisational affairs.
- 7.3 All directors and employees must fully disclose, at the earliest opportunity, information that may result in a perceived or actual conflict of interest.

² See NMB-BAC-POL-00001 - Anti-Bribery and Corruption Policy

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- 7.4 All directors and employees must act with integrity, honesty, and probity always and must not act in a manner which is adverse or detrimental to the interests and objectives of NMB or diminishes the reputation or standing of NMB.
- 7.5 All directors and employees must maintain a professional level of courtesy, respect, and objectivity in all NMB's activities.
- 7.6 All directors and employees must act in good faith and in the best interests of NMB.
- 7.7 All directors and employees must act fairly and impartially in all matters.

8. Bribery, Corruption and Conflict of Interest

- 8.1 NMB and its subsidiaries has adopted a ZERO TOLERANCE policy against all forms of bribery and corruption, whether active or passive.
- 8.2 The Group is committed to the highest ethical standards and integrity in the conduct of its businesses and operations.
- 8.3 All directors and employees must comply to the Group's Anti-Bribery and Corruption Policy³.
- 8.4 All directors and employees must ensure that all third party, which includes all customers, contractors, vendors, suppliers, solicitors, agents, consultants, joint venture partners and any person(s) appointed by them in any capacity to deliver the goods or perform any part of the services to NMB, must comply to the Group's Third Party Code of Conduct⁴.

9. Equal Opportunity

- 9.1 NMB ensures the right of all directors and employees to appropriate and effective services without discrimination on the basis of their make-up in respect to gender, race, religion, age, political affiliation, or disability, in accordance with all applicable legal and regulatory requirements.

³ See NMB-BAC-POL-00001 - Anti-Bribery and Corruption Policy

⁴ See NMB-BAC-POL-00004 - Third Party Code of Conduct

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10. Misconduct

- 10.1 Any violation or infringement of this Code, the terms and conditions of employment, any legal or statutory laws and any conduct on the part of the director or employee which is inconsistent with the faithful discharge of his/her duties towards NMB whether committed within or outside the premises of NMB would be construed as a misconduct. The examples are stipulated in Appendix 1 are some possible misconducts. It is important to note that the list is not exhaustive.
- 10.2 Even though in general NMB considers what a director or employee does in his/her own free time is a private matter, however, where such off duty conduct or behaviour have an adverse effect on relationship between the director or employee concerned and NMB, or on NMB's business or reputation, disciplinary proceedings may be taken by NMB against person(s) involved.
- 10.3 Example of off-duty conduct or behaviour, which may attract disciplinary proceedings include but not exhausted to:
- a) Conduct or behaviour that results in adverse publicity on the director or employee, which may then have detrimental impact on NMB's standing.
 - b) Friction created between two or more parties which in turn renders continued working relationships impossible.
 - c) The relationship of trust and confidence has irretrievably broken down by NMB and the director or employee.
 - d) The director or employee being involved in activities outside of work, which could make him/her unsuitable for continued service with NMB.
- 10.4 It is also important to note that this Code is not intended to affect or abrogate any existing or independent right of NMB conferred by law, including the enforcement of its contractual rights expressly or impliedly forming part of the contract of employment with the individual director or employee.

11. Confidential Information

- 11.1 All parties must respect the confidentiality of sensitive information known due to service of all directors and employees of NMB.
- 11.2 Confidential information may be in written, oral, or electronic (both voice and data) form and originate from different sources (e.g., technology applications, business strategies, customer lists, credit, procedures, personnel information, etc.). It is best to

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assume that all information relating to NMB (business or personal) is confidential, unless clearly stated otherwise.

- 11.3 All parties must exercise due care in handling information/data (including the safekeeping, and or destruction thereof) obtained in the course of their duties, in particular information/data which is considered as confidential).
- 11.4 All parties are bound by any statutory/legal provision which regulates data/data privacy such as Computer Crime Act 1997 or the Personal Data Protection Act 2010.

12. Collaboration and Cooperation

- 12.1 All directors and employees are expected to respect the diversity of opinions as expressed or acted upon by other directors and employees, and formally register dissent as appropriate.
- 12.2 All directors and employees are expected to promote collaboration, cooperation, and partnership internally within the Company, the Group and amongst business associates, other parties and stakeholders.

13. Responsibilities to Stakeholders, Employees and Customers

- 13.1 All directors and employees are expected to have positive relationships with NMB's stakeholders and customers, and always attempt to respond to their enquiries and requests as quickly as possible.
- 13.2 All directors and employees are committed to delivering value for stakeholders and customers and exert NMB's best efforts to maximise stakeholders' and customers' benefit.
- 13.3 NMB treats all stakeholders and customers equally.
- 13.4 All directors and employees are expected to ensure adequate safety measures and provide proper protection to everyone at NMB's workplaces.
- 13.5 NMB is always expected to promote professionalism, and to raise the competency of directors, management, officers, and employees when engaging with stakeholders and customers.

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14. Responsibilities to the Nation, Society, Community, and the Environment

- 14.1 As a company limited by guarantee under a Ministry of the Federal Government of Malaysia, NMB complies to the laws, regulations and guidelines set by the Government of Malaysia.
- 14.2 NMB strives to align its strategies and activities towards national policies, programmes and initiatives set by the Government of Malaysia for the betterment and economic wellbeing of society.
- 14.3 All directors and employees are expected to have a strong commitment to the improvement of society as well as the communities NMB serves and in which it operates. NMB encourages the support of charitable, civic, educational and cultural causes.
- 14.4 NMB as an entity including all directors and employees, shall not directly or indirectly participate in party politics and shall not make payments to political parties or individual politicians in any country.
- 14.5 NMB adopts an objective and positive attitude and gives the utmost cooperation for the common good when dealing with governmental authorities or regulatory bodies.
- 14.6 NMB respects the environment and strives to protect the natural resources of where it conducts business.
- 14.7 NMB strives to align its programmes and activities towards the United Nations' 17 Sustainable Development Goals ("SDGs").
- 14.8 NMB ensures compliance with all environmental laws and regulations of where it conducts business.
- 14.9 NMB encourages effective use of natural resources and improvement to quality of life by promoting corporate social responsibility activities.

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15. Directors and Employees Training and Declarations

- 15.1 The Group conducts awareness programmes for all directors and employees to introduce and refresh awareness of the Code, and to continuously promulgate integrity and ethics. This includes the Code of Conduct and Ethics training, assessment and attestation.
- 15.2 All new directors and new recruits shall complete training on this Code. New recruits are expected to pass the assessment at the end of the training.
- 15.3 The Management Audit, Risk and Compliance Committee (“MARCC”) may at any time recommend that certain trainings be repeated to any employee or group of employees in any department or Region if deemed necessary based on circumstantial requirements.
- 15.4 Group Human Resources shall maintain all records of trainings.
- 15.5 All directors and employees shall declare that they have read, understood and agreed to always abide by this Code, by completing the Integrity Pledge Form⁵. A copy of this declaration shall be documented and retained by Group Human Resources.

16. Compliance Controls

- 16.1 The Management Audit, Risk and Compliance Committee (“MARCC”) shall have the oversight of the implementation of compliance controls related to this Code and shall review the suitability of this Code from time to time, considering relevant developments in the legislature as well as evolving industry and international standards.
- 16.2 The Internal Auditors shall conduct regular risk assessments to identify risks potentially affecting the Group.
- 16.3 Non-compliance identified by the validation or identified through other risk assessments undertaken shall be reported to the BARC.
- 16.4 The Management Human Resources Committee (“MHRC”) shall initiate investigations on potential acts of Code violation deemed necessary based on reasonable cause for suspicion. The Chairperson of the MHRC shall maintain a direct reporting line to the BARC, as well as to the Board.

⁵ See NMB-GHR-FRM-00007 – Integrity Pledge Form

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17. Reporting of Code Violations

- 17.1 Any director or employee who is aware of any irregularity, misbehaviour, or non-compliance of this Code, are duty-bound to lodge an official report via NMB's whistleblowing mechanism as outlined in the Whistleblowing Policy⁶.

18. Investigation

- 18.1 All grievances and incidents reported will be reviewed by the BARC. When necessary, an investigation will be carried out on the reported incident.
- 18.2 Directors and employees who raised the issue may be called to cooperate fully with the investigation. Such director and employee will be protected via NMB's Whistleblowing Policy.

19. Sanctions for Non-Compliance

- 19.1 If any director(s) or employee(s) are found to have violated this Code, NMB at the recommendation of the BARC, through the BNRC and through the Board, will not hesitate to take the appropriate disciplinary action.
- 19.2 This may include termination of employment or directorship, depending on the severity of the Code violation.
- 19.3 Further legal action may also be taken in the event that the Group's interests have been harmed as a result of non-compliance.
- 19.4 The Group shall notify the relevant regulatory authority if any identified criminal incidents have been proven beyond reasonable doubt.
- 19.5 Where notification to the relevant regulatory authorities have been done, the Group shall provide full co-operation to the said regulatory authorities, including further action that such regulatory authority may decide to take against convicted directors or employees.

⁶ See NMB-BAC-POL-00003 - Whistleblowing Policy

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Appendix 1 – List of Possible Misconducts (non-exhaustive)

1. Absenteeism without prior approval and reasonable excuse.
2. Habitual absenteeism from work without prior permission and reasonable excuse.
3. Late attendance or habitual late attendance.
4. Leaving workplace or leaving earlier than the stipulated working hours, without permission.
5. Failure to attend training programmes approved by the Management.
6. Refusal to wear staff identification card provided by the Management.
7. Posting, altering, or removing any matter on the bulletin boards posted within the Company's premises without proper authorisation.
8. Entertaining unauthorised visitors within the Company's premises.
9. Using the Company's vehicle, equipment, or appliances without authorisation.
10. Trespassing into restricted area of the Company.
11. Holding meetings unrelated to the affairs of the Company within the Company's premises without permission.
12. Indecently dressed within the Company's premises.
13. Present at the Company's functions and guest areas without proper authorisation.
14. Present within the Company's premises after working hours without proper justification or authorisation.
15. Failing to observe health, fire and safety rules or failing to report unsafe action of other staff members.
16. Spending too much time on the telephone for personal matters.
17. Smoking in designated non-smoking areas within the premises of the Company.
18. Insubordination.
19. Petitioning/lobbying against the Company or issues related to the Group, amongst employees or to the public.
20. Taking part in any anti-government activities.
21. Posting any false, derogatory or negative material against the Group, its directors, employees and stakeholders on personal social media account(s).
22. Violating and/or non-compliance to policies and procedures of the Group.
23. Not following standard operating procedures of stipulated work process within the Group.
24. Obtaining paid leave under false pretences.

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25. Conduct business and/or act in a manner to tarnish or discredit the good image of the Group or the good service provided by the Group to the public.
26. Failure to comply with Company's dress code where required.
27. Industrial sabotage.
28. Conducting private services during or after working hours or selling goods in direct competition with the Group.
29. Making false, improper, excessive or incorrect entries on any claims to the Group.
30. Conviction of any criminal offences.
31. Failure to report to the Company on any contagious and/or infectious disease so contracted.
32. Forging or defacing medical certificates or other official documents with the intention to cheat the Company.
33. Taking sick leave through false pretences.
34. Deliberate falsification of records.
35. Abandonment of service.
36. Taking excessive medical leave to avoid work or an unwillingness to perform contractual duties and obligations.
37. Diverting business away from the Group and thereby causing loss to the Group.
38. Loitering during working hours.
39. Enticing or inducing other employees to work in another establishment.
40. Entering the Group whilst under suspension.
41. Failure to wear Company corporate clothing, where required, whilst at work.
42. Littering and spitting within Company premises.
43. Deriving personal advantage from the employee's employment or obtaining a personal advantage in the name of the Group's business.
44. Failure to disclose to the Group that the family's members of the employee are involved in business transactions with the Group.
45. Using the Group's facilities to carry out personal business without permission.
46. Personal registration of a business or trademark with the knowledge that the name was coined and developed specifically by and for the Group.
47. Reporting for work under the influence of alcohol or non-prescribed drugs.
48. Refusal to submit to a search when instructed.
49. Under detention or imprisonment for suspected criminal or subversive acts / offences.

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50. Refusal to go on transfer.
51. Refusal to sign job description issued by the Group.
52. Deliberately and without good cause accessing internet sites containing pornographic, offensive or obscene materials.
53. Instigating and/or encouraging fellow employees to commit any of the above offences.