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# CODE OF CONDUCT

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## AGENDA

- Introduction
- Code of Conduct – Key Elements

## INTRODUCTION

- ALCOM Code of Conduct
- Explains how we should carry out our duties on behalf of the company
- Outlines the company's expectations for behavior
- Sets the tone for our culture
- Full compliance to Code of Conduct is required of all employees
- Certification/acknowledgement will be required of all employees
  
- The Code of Conduct are important elements of ALCOM's Corporate Governance program.
  
- Other important elements include:
  - The Delegation of Authority (DOA)
  - Code of Conduct for the Board of Directors and Senior Management
  - Code of Ethics for Senior Financial Officers

# CODE OF CONDUCT

## Code of Conduct – Five Key Elements

1. Act With Integrity and in ALCOMs' Best Interests
2. Promote a Desirable Work Environment
3. Safeguard the Company's Assets
4. Engage in Ethical Interactions with Government
5. Deal Fairly with Third Parties

### 1. ACT WITH INTEGRITY AND IN ALCOMs' BEST INTERESTS

- **Good Faith and Due Care; Commitment to Corporate Governance**

Employees must act in good faith and exercise due care, diligence and integrity in performing their duties and in maintaining ALCOMs' corporate governance practices

- **Conflicts of Interest**

Employees must avoid taking any action that creates, or appears to create, a conflict between their own interests and the interests of ALCOM.

- **Gifts and Gratuities**

Employees must exercise caution when dealing with gifts, gratuities and other forms of special benefits to or from customers, suppliers or competitors, which can be construed as an attempt to secure favorable treatment. As a general rule, employees should consult their Human Resources or Legal representative before giving or accepting gifts or gratuities.

### 2. PROMOTE A DESIRABLE WORK ENVIRONMENT

- **Promote Human Rights**

ALCOM is guided by principles of non-discrimination and respect for human rights and individual liberties of all citizens. All employees are expected to conduct themselves in a manner that assures customers, suppliers and fellow employees are treated with respect, fairness and dignity.

- **Workplace Free from Harassment; No Retaliation**  
No form of harassment in the workplace will be tolerated. ALCOM encourages employees to report violations of company policies and any applicable laws to an appropriate manager, supervisor, Human Resources representative or through the Ethics contact number. ALCOM and its employees may not retaliate against another employee for reporting, in good faith, violations of the Code of Conduct or requirements of law.
  
- **Employee Privacy – No Unreasonable Expectations**  
ALCOM respects the privacy of all employees. However, employees shall have no unreasonable expectation of privacy in their use of business tools or in their work spaces or property.
  
- **Properly Use Equipment, Electronic Mail and Internet**  
All software and hardware are the property of ALCOM and should be used for business purposes, which includes the use of the internet and electronic mail systems. Incidental and limited, appropriate personal use is permitted provided it does not interfere with business activities. Each employee is responsible for the maintenance and protection of data, files, other materials and equipment of ALCOM. Each employee is also responsible for any electronic data or files he or she sends to others.
  
- **No Unlawful Use of Alcohol or Drugs in the Workplace**  
ALCOM prohibits use of alcohol and the unlawful possession, manufacture, use or distribution of controlled substances in the workplace or at any place where an employee could be construed to be a representative of the Company or one of its subsidiaries or affiliates. Any use of alcohol at Company sponsored functions or activities must be authorized by ALCOM Management. Consult with your local policy for more details.
  
- **Promote Sustainability; Respect the Environment, Health and Safety**  
ALCOM strives to be a good corporate citizen. To ensure that we are a top-performing company economically, environmentally and socially, ALCOM is committed to delivering sustainable solutions in its processes and products. Each employee is encouraged to promote sustainability as it applies to his or her daily practices within the Company. In addition to its

own standard operating procedures, ALCOM will comply with all environmental, health and safety laws and regulations. Employees should be environmentally aware and sensitive and are required to report any noncompliance with environmental laws or regulations. Employees should report all accidents, injuries, occupational illnesses and unsafe conditions or practices to their supervisor.

### 3. SAFEGUARD THE COMPANY'S ASSETS

- **Properly Use Company Assets**

Employees may not use, spend or dispense of Company funds or property (including intellectual property, computers, phones, vehicles and other assets) for personal use or benefit in a manner or for a cause that is unethical or illegal, or without proper authorization.

- **Protect Confidential Information and Intellectual Property**

Employees must not disclose Company trade secrets, business information, market-sensitive data or other proprietary information without appropriate management approval. Intellectual property rights must be kept confidential, protected and managed in compliance with all applicable Company requirements, restrictions and laws, including software licensing requirements.

- **Keep Good Books and Records**

Employees are responsible for maintaining written records and expense reports in sufficient detail to completely, accurately and fairly reflect all transactions and expenditures.

- **Loans to Employees, Officers or Directors**

ALCOM may not make or arrange loans to its employees, officers or directors that would violate Company policy or applicable laws.

### 4. ENGAGE IN ETHICAL INTERACTIONS WITH GOVERNMENT

- **Political Activities**

ALCOM respects employees' rights to take part in the political process, but they may not do so during business hours or through the use of ALCOM facilities or property. ALCOM will not make any contributions to support the candidacy of any person seeking elective office, unless approved in advance by the Board of Directors and in accordance with legal requirements.

- **Ethical Government Relations**

ALCOM applies ethical standards in its dealings with governments, governmental agencies and governmental officials.

- **No Obstruction of Government Investigations**

ALCOM will cooperate with any lawful government investigation. It is illegal to destroy or conceal documents, records or other information with the intent of impairing the integrity or the availability of information for use in a government investigation.

- **Ethical Business Practices; Comply with Export Controls**

Employees may not pay money or anything of value to government officials, parties or political candidates for the purpose of influencing the acts or decisions of such officials in order to obtain business or any improper advantage. All employees must keep accurate and truthful records reflecting payments and transactions for all foreign and domestic business activities. ALCOM must comply with all applicable trade restrictions and boycotts imposed by the government, which may prohibit the Company from conducting business in specified countries or with specified individuals and entities. Additional obligations may arise under the laws of other countries, and questions of compliance should be directed to your regional legal counsel.

## 5. DEAL FAIRLY WITH THIRD PARTIES

- **Use Ethical Marketing and Sales Practices**

ALCOM operates with integrity in the conduct of its commercial transactions with third parties.

- **Comply with Competition and Antitrust Law**  
Employees must comply with all antitrust and competition laws and regulations.
  
- **No Insider Trading**  
Employees must strictly adhere to the prohibitions against trading, and must not disclose material “inside information” to other persons.
  
- **Fair Disclosure and No Selective Disclosure**  
Employees who communicate regularly on ALCOM behalf with the investment community and senior officials must comply with Malaysia fair disclosure requirements and, where applicable, with the requirements of other jurisdictions (e.g., ALCOM must publicly disclose any material information that has been disclosed selectively to any person in the investment community). However, it is acceptable to provide information to select audiences if it has already been disclosed in the Company’s public filings.
  
- **Responding to Inquiries from the Press or Financial Community**  
Employees should refer all inquiries from the media to the MD’S office for the appropriate communications leader. All inquiries from the financial community should be directed to the MD’s office in Bukit Raja.
  
- **Bribery, Kickback and Fraud**  
No funds or assets of the Company shall be paid, loaned or otherwise disbursed as bribes, “kickbacks”, or other payments designed to influence or compromise the conduct of the recipient. Employees shall not accept any funds or other assets for assisting in doing business with the Company directly or indirectly from making or receiving improper payments.

Improper payment means receiving or paying bribes or giving, offering, or promising to give money or anything else of value to any person, including government official, customer, supplier, agent and/or any third party in order to improperly influence any act or decision of a person, or to otherwise gain improper benefit for the company.

- **Cooperate with Independent Auditors**

Employees may not intentionally mislead ALCOM independent public accountants or other auditors in connection with their audit of ALCOM financial statements.

Employee acceptance of Code of Conduct – ALCOM Group. I have read and understand the ALCOM's Code of Conduct.

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(Signature of Employee)

Dated: \_\_\_\_\_