

CODE OF ETHICS AND CONDUCT

INTRODUCTION

The Poh Kong corporate name has meaning and obligation that goes far beyond its commitment to generations of Malaysian customers who have patronised its vast network of jewellery retail chain stores across the country.

For the Group and employees, it reflect a broader commitment based not only on passion, honesty and hard work but on the strict adherence to the law, business ethics and public responsibility. It is a pledge of spirit and attitude, of what is good and right, and observance of a Code of Ethics and Conduct (“Code”) to serve everyone whose lives we touch and providing the highest possible customer satisfaction.

Poh Kong is Malaysia’s fastest growing and largest jewellery retail chain store. This coveted achievement is the result of fulfilling Poh Kong’s vision and mission statements, honouring its core business principles and values, and upholding commitments in our Code in how we do business everywhere.

VISION

Poh Kong’s vision statement is, “To achieve product and service excellence”.

MISSION

Our mission statements are :-

1. To be the largest jewellery retail chain with different retail concepts and provide wide distribution network for customers’ convenience and easy accessibility;
2. To offer extensive range of local and international renowned jewellery brands to cater to customers’ diverse preferences and needs;
3. To continue leading the gold market and establish in-house brands;
4. To be the most preferred jewellery brand for all occasions as our jewellery is closely connected with the most important and meaningful events in life;
5. To improve our employees’ performance and quality of service;
6. To improve production and operation efficiency;
7. To implement effective and timely communication between management and employees; and
8. To implement an effective IT system.

CORE PRINCIPLES

The Poh Kong Group maintains a dominant market leadership and has processes in place to fulfill its vision and mission that are complemented by a set of business principles in offering quality, value, trust and choice products.

The hallmarks in the Group's excellence, success and team spirit are embedded into Poh Kong's corporate culture through a set of shared beliefs and core values as follows :-

- (i) Quality - Product, Service, Excellence, Craftsmanship;
- (ii) Value - Preference, Profit, Worth, Return-on-investment;
- (iii) Trust – Reputation, Commitment, Honesty, Transparency; and
- (iv) Choice – Design, Price, Location, Convenience.

These above shared beliefs and core values have been internalised by the Group as characteristics that are accepted and cherished by both the Company and employees.

Poh Kong's business principles are focused in the concept that the customer is in the centre of everything the Company does via its professional sales team by offering excellent and personalised service in fulfilling customers' satisfaction in the stores.

CODE PRACTICES

The Poh Kong Code of Ethics and Conduct is developed for its employees to observe and maintain the highest standards of professional endeavour, integrity, confidentiality, and personal conduct. The Code helps interpret the Company's basic principles on what actions that need to be taken for the benefit of stakeholders.

In today's challenging environment of free enterprise and tough competition, our Code is a discipline and an inspiration for us to share and put into practice our commitments to the following :

DIRECTORS

As prescribed by Section 132 of the Companies Act 1965, Directors of a Company shall at all times act in good faith and in the best interest of the Company. Directors shall adhere to the general principles of integrity, objectivity, accountability, openness, honesty and leadership.

The Directors shall observe the Directors' Code of Ethics, which includes the following:

- (i) Observe high standards of corporate governance, in particular the practices set out in the Malaysian Code on Corporate Governance 2012, the Main Market Listing Requirements of Bursa Malaysia, the Companies Act, 1965 and the Capital Markets and Services Act, 2007;

(ii) Not misuse information gained in the course of duties for personal gain or for any other purpose, nor seek the opportunity of the service as Directors to promote private interests or those of connected persons, firms, businesses or other organisations; and

(iii) Directors shall adhere to the regulatory requirements pertaining to trading in the Company's shares, including insider trading.

EMPLOYEES

We promote fair treatment of employees on the basis that Poh Kong is a meaningful people-oriented workplace. The Company treats their staff as members of a family and values employees as the most important people assets.

The Company respects human rights and continues to select employees based on qualification, work experience, hard work, team spirit, honesty, talent and positive attitude, regardless of religion, race, age or gender.

Poh Kong's responsibility is to protect the health and lives of employees by maintaining a clean and safe work environment commensurate with the nature and type of business operations of the Group. The Company will continue to provide employees opportunities for training, self-development, and promotions in a challenging environment.

CUSTOMERS

In keeping with Poh Kong's vision, "To achieve product and service excellence" the Company promises to constantly strive to fulfil customers' needs and wants and to exceed their expectations.

Our goal to exceed Customers' Satisfaction is achieved by delivering value-for-money products and value added services.

Customers must win our trust that we will provide products and service excellence, at competitive levels of pricing on quality products, services that meet or exceed their expectations and a commitment of continuous product and service innovation.

We must serve our customers to the best of our ability through trained sales professionals with the ability to fulfil customers' delight and complete satisfaction in making their purchasing decision.

Quality and service excellence must be perceived by customers to be the number one driving force behind the Poh Kong's success and sales achievement.

Our sales professional have been trained to accept the 'customer is always right' in their interaction with them. In servicing, we should always respect and serve our customers sincerely. We have to be patient, friendly, responsible and appreciate their continuous

support. We should win customers' trust with excellent service and treat customers with care by delivering quality products and services.

Superior customers' satisfaction is Poh Kong's competitive advantage and the ultimate weapon in the market place.

PARTNERS

All our business relationships must reflect our personal integrity, respect for one another, honesty and a commitment to do what is right, fair, reasonable and lawful.

We cultivate strong relationship with our business partners in pursuing innovative business practices and collaborate to help develop better products and services at fair and reasonable prices.

Business partners must have the opportunity to make a fair profit to ensure the level of quality and service excellence is delivered to our customers. All efforts must go toward the benefit of customers who together with employees and business partners are among the Company's most important contributors to the business revenue.

At Poh Kong, we do not tolerate the acceptance of gifts, money or special favours from business partners designed to secure our business in any situation.

COMMUNITIES

Poh Kong is passionate about contributing to the local communities in which it operates in line with the principles of corporate social responsibility (CSR).

CSR programmes have enabled the voluntary commitment of resources, both financial and human capital have been deployed to causes that are of real benefit to the needs of the communities. Financial support by the Company and volunteer activities by employees with charities have made a significant difference to the quality of life of our communities.

The Company will continue implementing various meaningful and sustainable programmes aimed at enriching the communities in which we part of the wider environment.

SHAREHOLDERS

The Company carry out activities in a sustainable manner to promote responsible practices to its shareholders.

Poh Kong strives to enhance corporate value and maintain long term growth for the benefit of shareholders by disclosing and disseminating all material information in a timely, open, fair and transparent manner. It will act in the best interests of shareholders by sound management

practices that result in high returns for its shareholders.

We maintain close dialogues with our shareholders so as to resolve their concerns about managerial and Company issues. We will avoid conflicts of interest, misuse of information or abuse of power.

The Company retains independent auditors to verify the accuracy of our financial statements and other accounting records. We disclose information promptly and accurately, and respond to events in a forthright manner.

Poh Kong not only abide by laws and regulations, but conducts its business on high ethical standards and conduct so that there will be no questions as to our integrity and good intentions.

