
CODE OF ETHICS AND CONDUCT

1. SCOPE

- i. The Code of Ethics applies to all Directors, Management and Employees (including full time, probationary, contract and temporary staff) of the Group. Violation of any of the Code's provisions can result in disciplinary action, including termination of employment.

2. CORE SECTIONS OF CONDUCT

- i. Act with Integrity and Ethics

(a) Avoid conflict of interest

A conflict between your personal interests and the interests of the Group is a conflict of interest. All of us must avoid such conflicts and situations that may be perceived as creating a conflict of interest that may influence our judgment in the discharge of responsibilities. Directors, Management and Employees must not use their positions or knowledge gained directly or indirectly in the course of their duties or employment for private or personal advantage (directly or indirectly).

(b) Acceptance and provision of gifts and entertainment

It is important not to accept or provide inappropriate gifts or entertainment as it may create conflict of interest and influence business decisions. Generally, acceptance of inexpensive "token" non-cash gifts which are occasional, customary gifts during festive or special occasions and gifts from social events attended by the Directors, Management or Employees is permissible. In addition, infrequent and moderate business meals and entertainment with clients and infrequent invitations to attend local social events and celebratory meals with clients can be appropriate aspects of promoting good business relationships, provided that they are not excessive and do not create the appearance of impropriety.

If in doubt, before accepting any gifts or courtesy, please consult with your respective Head of Department and/or Business Unit Head for advice and approval relating to acceptance of gifts and entertainment.

(c) Inside information and securities trading

No Director, Management or Employee shall use price sensitive non-public information, which can affect the prices of the securities of the Company and/or related listed companies when it becomes publicly known, for personal benefit. Directors, Management and Employees are prohibited to trade in securities or to provide information to others to trade in securities of the Company and/or related listed companies until the Inside Information is publicly released.

(d) Fraud

All Directors, Management and Employee must not engage in any forms of fraudulent acts or any dishonest conducts involving property or assets, or on the financial reporting and accounting of the Group or third party. This may not only entail sanctions but also result in criminal charges.

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ii. Protect the Group's Assets and Intellectual Property

(a) Protection of assets and funds

All Directors, Management and Employees must protect the assets and funds of the Group to ensure availability for legitimate business purposes and that no property, information or position belonging to the Group or opportunity arising from these be used for personal gain.

(b) Confidential information

All Directors, Management and Employees must exercise caution and due care to safeguard any information of a confidential and sensitive nature relating to the Group which is acquired in the course of their employment, and are strictly prohibited to disclose to any party, unless the disclosure is duly authorized or legally mandated. In the event that a Director, Management or an Employee know of material information affecting the Group which has not yet been publicly released, the material information must be held in the strictest confidence by the Director Management or Employee involved until it is publicly released.

(c) Records management and control

All books, records and accounts must be controlled and maintained so that they are prepared on timely basis and conform to generally accepted and applicable accounting principles and to all applicable laws and regulations.

iii. Comply with Laws and Regulations

(a) Ensure compliance with applicable laws and regulations

The Group will comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions and countries within which the Group operates.

Each of us is responsible for taking appropriate actions to understand and comply with the laws, rules and regulations that are applicable to their positions and/or work.

iv. Working with One Another

(a) Health and Safety

The Group will use its best endeavors to ensure a safe workplace and maintain proper occupational health and safety practices to commensurate with the nature of the Group's businesses and activities. Such a commitment in return requires that all Directors, Management and Employees understand and abide by the Group's policies and procedures.

(b) Sexual harassment

Sexual harassment by any Director, Management or Employee is unacceptable. It is the Group's policy to provide all Employees with a working environment free from any form of sexual harassment. Any questions concerning issues of such should be directed either to the Employees' superior or the Human Resource Department. All such reports and/or complaints shall be treated with strictest confidence.

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(c) Fair and courteous behavior

All Employees are to treat their fellow Employees fairly and courteously without regard to race, creed, religion, gender, nationality, age or disability, and shall not create any form of discrimination or prejudice in the workplace.

(d) Prohibition of illegal drugs & alcohol at work place

The use, possession, distribution or sale of controlled substances such as drugs or alcohol or being under the influence of such controlled substances is strictly prohibited while on duty, on the Company's premises or worksites or while operating equipment or vehicles.

(e) Computer and Email policy

Electronic resources are the Company's property and subject to review or access by the Company at any time. Inappropriate use of network and electronic resources may result in disciplinary action, up to dismissal. The employee should be careful to safeguard his password, log off the terminals when not in use and not permit unauthorized personnel to access his terminal.

3. REPORTING OF VIOLATIONS OF THE CODE

- i. Everyone is encouraged to report concerns of violation of the Code, unlawful and unethical behaviour through the Group's existing Whistle-Blowing Policy. The provision, protection and procedure of the Whistle-Blowing Policy for reporting of the violations of the Code are available on the Company's website. No individual will be discriminated against or suffer any act of retaliation for reporting in good faith on violations or suspected violations of the Code.

This Code is approved and adopted by the
Board of Directors of Inta Bina Group Berhad on 24 May 2018
