



CODE OF CONDUCT AND ETHICS POLICY

This Code of Conduct & Ethics sets out the acceptable practices and ethics that guide the employees of the SLIC Group of Companies (“**SLIC Group**”).

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1. Accountability
 - 1.1 All employees of the SLIC Group are responsible for acting in accordance to the Core Values, policies and Code of Conduct of the SLIC Group (“**Code**”) and ensure compliance with the relevant laws, rules and regulations of the respective countries that the SLIC Group conducts its business in.
 - 1.2 Any employee who violates the Code may be subjected to disciplinary action, including dismissal, depending on the facts and circumstances of each case.
 - 1.3 All employees of the SLIC Group are obliged to exercise all reasonable care in safeguarding the SLIC Group's properties and assets against any loss, damage, misuse, illegal use and/or theft and are expected to use such resources for the SLIC Group's business purposes.
2. Responsibility
 - 2.1 The SLIC Group conducts its businesses ethically, honestly, and in compliance with the laws and regulations of the respective countries that it conducts its businesses in.
 - 2.2 All SLIC Group activities including the sourcing, distribution, sale and services, must be conducted with respect and in consideration of issues relating to legal rights, health and safety, and the environment.
3. Non-Discrimination
 - 3.1 The SLIC Group maintains a policy of non-discrimination and greatly values and respects the diversity, cultural and religious differences of its employees.
 - 3.2 Every employee is expected to cooperate and support the SLIC Group's vision of cultivating and maintaining a work environment that is free from discrimination.
 - 3.3 During the hiring process, candidates will also be evaluated based on their willingness to adhere to the vision, values and overall corporate culture of the SLIC Group.
4. Communications
 - 4.1 All employees of the SLIC Group are expected to exercise due care, diligence and etiquette in all work-related communications, be it in written form, verbal or otherwise, and to ensure that the contents are clear, truthful, courteous and accurate.
 - 4.2 The SLIC Group exercises a no tolerance policy for any communications made by its employees over the course of business and/or using SLIC Group's resources that contain any material found to be discriminatory, defamatory, offensive, contains sexual connotations, pornographic, misleading and/or any other communications of a similar nature.
5. Conflicts of Interest

- 5.1 All employees of the SLIC Group are obliged to act solely in the best interests of the Group at all times.
- 5.2 No employee is permitted to engage, either directly or indirectly, in any act or practice that conflicts with, or appears to conflict with, the interests of the SLIC Group, even in their own time. This includes using any of the SLIC Group's assets or resources for personal interests and gain.
- 5.3 A conflict of interest may arise where the employee has a personal relationship or financial or other interest that would or could potentially interfere with his existing obligations or exercise of judgment in decision making as an employee of the SLIC Group. It is also a conflict of interests where a supervisor or a person in a position to determine the remuneration and/or promotion of a subordinate is in a personal, romantic or intimate relationship with the subordinate.
- 5.4 All employees of the SLIC Group are obliged to disclose and report in writing as soon as practically possible concerning all potential and real conflicts of interest, stating in detail the facts, nature and extent of the conflict. This written report should be made either to the employee's immediate supervisor(s) and/or executive director(s).
- 5.5 The employee must take prompt action in eliminating the said conflict if requested to do so by the SLIC Group. The SLIC Group has the sole discretion in determining the nature of conflict of interests and the next steps or disciplinary action to be taken in relation to it.
- 5.6 Where it is found that the employee is engaged in any activity that is in conflict of interests with the SLIC Group which provides personal and monetary gain, whether directly or indirectly, particularly where it is at the expense and loss of the SLIC Group, the SLIC Group is entitled to claim compensation for such unlawful profiteering from the conflict of interest, which may include deduction of the employee's salary until such payments are repaid in full or legal action against the employee.

6. Business Ethics

- 6.1 We are determined to maintain a work environment where trust is of paramount importance.
- 6.2 All SLIC Group companies, and/or their employees shall refrain from offering, giving, demanding or receiving bribes and/or any other improper gratification.
- 6.3 "Gratification" shall include but not be limited to pecuniary and non-pecuniary benefits such as money, donation, gift, loan, fee, reward, valuable security, property or interest in property, movable or immovable property, financial benefit, office, dignity, employment, contract of employment or services, agreement to give employment or render services in any capacity, any offer, undertaking or promise, whether conditional or unconditional, of any gratification, including favours which is of value to the recipient, forbearance which is beneficial to the recipient, and any other gratification as defined in the Malaysian Anti-Corruption Commission Act 2009.

- 6.4 Any gratifications to be given, if at all and only under circumstances which are approved by the employee's head of department or Human Resource Department, should only be a token gift either for purposes of expressing appreciation or for customary and festive purposes. Such gifts should not at any material time, be given with the intention of obtaining any favour or hopes of retaining business or undue influence for obtaining future business from the recipient of the gifts.
- 6.5 "Public officials" are defined as any person who is a member, an officer, an employee or a servant of a public body.
- 6.6 When dealing with public officials, employees of the SLIC Group should ensure that any giving or receiving of gratification does not relate to, in any form whatsoever, the public official's official dealings or public duty. The SLIC Group recognises that the practice of giving and receiving gratification varies between countries, regions, cultures, and religions, so the definitions of what is acceptable and not acceptable will inevitably differ for each. At all material times, employees are to ensure compliance with laws of their respective jurisdictions, and the higher standard will be applicable to all employees to avoid non-compliance of any laws on anti-bribery which may be applicable to the SLIC Group as a whole.
- 6.7 Where it is inappropriate to decline the offer of a gratification (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gratification may be accepted so long as it is declared and surrendered to the employee's immediate supervisor and/or head of department, who will assess the relevant circumstances and take the necessary steps, including returning the gratification on the employee's behalf, where appropriate.
- 6.8 Any gratifications given and received should always be disclosed to the employee's immediate supervisor and/or head of department, and the employee must ensure that all requisite approvals have been obtained.
- 6.9 The intention behind a gratification being given and/or received should always be considered. If there is any uncertainty, the gratification should be declined where possible, failing which the employee should seek the advice of the employee's immediate supervisor and/or head of department.
- 6.10 Other than as permitted above, no employee of the SLIC Group is allowed to accept any gratification, including but not limited to gifts, hospitality favours, benefits or any form of advantage from third parties, unless specific approval has been given by the employee's head of department or Human Resource Department.
- 6.11 Any employee that breaches any of the above rules will fall within the scope of serious misconduct and may be subjected to disciplinary action, up to and including dismissal, depending on the facts and circumstances of each case.

7. Outside Employment

- 7.1 Employees are hired on the premise that SLIC is their primary employer and that any other employment or commercial involvement, even outside of working hours is strictly prohibited particularly where it conflicts with the interests of the SLIC Group, unless express approval is obtained.

- 7.2 Employees and managers are required to obtain written approvals from their head of department or Human Resources Department before participating in outside work activities. If you are already engaged in any outside employment, you are required to disclose and obtain approval from the Human Resource Department. Any approval given is at the sole discretion of the SLIC Group and can be withdrawn at any time with or without prior notice, and the employee is required to immediately cease such outside employment, failing which the SLIC Group is entitled to claim compensation for any unlawful profiteering as a result of any conflict of interest.
8. Insider Trading
- 8.1 Employees who are in possession of market sensitive information are not allowed to trade in securities of the Company if that information has not been made public. Employees are also prohibited from disclosing any non-public price sensitive information to any third party.
9. Anti-Money Laundering
- 9.1 "Money laundering" concerns the process of engaging with and/or concealing, directly or indirectly, the identity of the proceeds of illegal activities or converting the illegal proceeds to a legitimate source of income or asset.
- 9.2 All employees of the SLIC Group are prohibited from dealing in any money laundering activities and must comply with the applicable anti-money laundering laws.
- 9.3 In the event that any employee has a reasonable suspicion of money laundering activities being conducted as part of the SLIC Group's business, employees are expected to alert their immediate manager or supervision to the same.
10. Distribution and Solicitation
- 10.1 Employees cannot distribute non-SLIC Group related materials during their working hours and on the SLIC Group's premises.
- 10.2 The acts of solicitation and/or distribution of any materials relating to the sale of any goods or services unrelated to the SLIC Group's business is strictly prohibited anywhere on the Group's premises.
11. Personal Data Protection
- 11.1 The SLIC Group respects and is committed to the protection of employee's personal information and privacy. The SLIC Group collects and handles employee information in accordance with the Malaysian Personal Data Protection Act 2010.
- 11.2 All employees, particularly employees who have access to personal data of any persons, whether employees, consultants, customers, suppliers, and/or any related party whereby personal data is processed and accessed, must not

unlawfully use, access and/or revise such personal data for any purpose or reason. All employees are to ensure that such personal data processed within the SLIC Group is protected at all material times and in compliance with the applicable laws.

12. Confidential and Proprietary Information

- 12.1 The SLIC Group greatly values and protects all confidential and proprietary information.
- 12.2 Proprietary information includes but is not limited to emails, documents and all other files, electronic or otherwise, edited and/or stored on the SLIC Group equipment and are considered to be the exclusive property of the SLIC Group.
- 12.3 All employees of the SLIC Group are expected to exercise the highest possible standards of professionalism, ethics and integrity in order to protect the Group's assets and standing and ensure the proper use of the same.
- 12.4 Employees may have access to confidential and proprietary information during their employment with the SLIC Group. Such information cannot be shared or utilised for personal gain or any other gain to any individual, business or third party entity, including family and friends, except where expressly approved by the relevant company under the SLIC Group, required by law and/or reasonably necessary for the purposes of carrying out your duties under employment within the SLIC Group. This obligation of non-disclosure is effective even after the termination of employment.
- 12.5 Where such confidential and proprietary information needs to be disclosed to persons outside the SLIC Group, the relevant parties are recommended to undertake all necessary measures to ensure that all confidential and/or proprietary information are sufficiently protected for instance through the execution of a non-disclosure agreement.
- 12.6 The SLIC Group reserves its right to take any and all appropriate action against previous or current employees who, whether directly or indirectly, breach the aforesaid obligation relating to the confidential and proprietary information of the SLIC Group.
- 12.7 In the event that you are unsure of what is permissible or non-permissible, you are advised to seek guidance from your head of department or the Human Resource Department.

13. Social Media Policy

- 13.1 Employees of the SLIC Group are a representative of the SLIC Group at all times and are prohibited from bringing the SLIC Group's (and each of the companies under the SLIC Group) name and reputation into disrepute.
- 13.2 All employees of the SLIC Group are reminded that any messages or posts made online are presumed to be public and permanent. Online messages or posts can be copied, forwarded or subpoenaed and the original publisher will have no control over the ultimate use, distribution and/or publication of the message or post. As

such, all employees are strongly encouraged to exercise discretion at all times when using and publishing on online platforms.

14. Press Release and Public Statements

- 14.1 All queries and/or requests made by members of the third party media outlets are to be directed to the Group Corporate office of SL Innovation Capital Berhad to ensure that a consistent and professional approach is adopted when addressing all external media queries.
- 14.2 No employee of the SLIC Group is permitted to make any public releases or public statements on behalf of the SLIC Group, or any of the companies within the SLIC Group, whether orally, in writing or otherwise, without having obtained prior written approval from the Group Corporate office of SL Innovation Capital Berhad.

15. Whistleblowing

- 15.1 The Company encourages employees to raise genuine concerns, including the reporting of unlawful, unethical or questionable behaviour, in confidence and without risk of reprisal.
- 15.2 The policy covers, but is not limited to:
 - a. Breach of policies and/or procedures;
 - b. Fraud, theft, embezzlement or dishonesty;
 - c. Corruption/bribery;
 - d. Bullying and harassment;
 - a. Actions which can cause physical danger/harm to another person and/or can give rise to risk of damage to properties/assets;
 - e. Forgery or alteration of any documents belonging to the Company, customers, another Financial Institution, or agents of the Company;
 - f. Poor or unethical sales practices, including mis-selling;
 - g. Profiteering as a result of insider knowledge;
 - h. Gross mismanagement or dereliction of duties;
 - i. Conflict of interest;
 - j. Misuse of position or information; and
 - k. Any other similar or related irregularities.
- 15.3 If any employee has concerns about any of the matters set out above or that the integrity of the SLIC Group is being compromised in any other way, the employee should bring this to the attention of his immediate supervisor, head of department or a Human Resource Manager.
- 15.4 Employees must exercise sound judgment to avoid baseless allegations.
- 15.5 Employees who intentionally file false reports will be subjected to disciplinary action and possible termination.