

SUPERMAX CORPORATION BERHAD (420205-P)

CODE OF BUSINESS ETHICS

1. OBJECTIVES:

The objective of the Code of Business Ethics (“the CoBE”) is to assist the Directors and employees in defining ethical standards and conduct at work. The CoBE is not intended to be exhaustive, and there may be additional obligations that Directors and employees are expected to behave and conduct when performing their duties.

2. RESPONSIBILITIES:

SUPERMAX recognizes the following four areas of responsibilities:

To shareholders

We are committed to creating and enhancing long-term shareholder value. Handling and cooperation with shareholders should be carried out in a professional manner in our effort to create value for shareholders.

To employees

To respect the human rights of the employees and to recognize that employees are entitled to be treated with respect, fairness and dignity. SUPERMAX appreciates diversity and other differences amongst its employees. Employment decisions will always be based on merit, qualification and required skill-related performance without regard to non-job related criteria such as race, colour, gender, sexual orientation, age or religion. We are committed to maintaining a conducive work environment enhanced by diversity and characterized by fair treatment and respect.

To suppliers and customers

To seek mutual beneficial relationships with suppliers and customers. We strive to provide superior products, good customer service with competitive prices to our customers. Suppliers and customers are to be treated fairly and we hold our suppliers and customers to the same standards of integrity to which we hold ourselves. We do not use our position to secure an unfair advantage in dealings with suppliers and customers.

To society

The Group sees itself as a responsible corporate citizen in Malaysia as well as in all other countries in which it operates. We encourage our employees to participate in community welfare activities as well as charitable events as good citizen. To observe the laws of the respective countries in which we operate in and conform to socially accepted business practices thereat.

3. ACT WITH INTEGRITY IN BUSINESS DEALINGS

Our relationships with our suppliers and customers are built on the principle of honesty and integrity. We do not deliberately provide misleading information, omissions of important facts, or false claims about our business and products. No personal gifts, favours, entertainment or services, in cash or in kind, that will appear to influence objective and fair business decisions, will be accepted or provided.

4. COMPLY WITH LAWS AND REGULATIONS

We shall adhere to all applicable laws, treaties, rules, and regulations as applicable in the jurisdiction within which the Group operates. We endeavour to understand all relevant laws and regulations and abide by their principles and ensure that we do not violate them.

5. RESPECTING THE ENVIRONMENT

We are conscious of environmental issues and will respect the environment by complying with all applicable environmental laws in the jurisdiction within which the Group operates and endeavour to minimise whatsoever environmental impact in our daily business activities.

6. SAFE AND SECURE WORKPLACE

We shall strive to promote good, healthy, safe and secure working environment in compliance with relevant international recognized standards and local laws such as the Occupational Safety and Health Act 1994. All forms of hazards at the workplace are to be constantly identified, risk assessed, mitigated and monitored to prevent accidents.

7. PROTECTION OF ASSETS AND FUNDS

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

8. COMPETITION

We operate under the belief that free, fair and ethical competition is important to society as well as creating business opportunities to the Group save and except that it has to be conducted within the framework of applicable competition laws. Directors and employees should adhere to the local competition laws and also the competition laws of the countries in which our business is conducted.

9. FINANCIAL RECORD KEEPING AND REPORTING

We are committed to comply with the prescribed internal control policies and procedures established from time to time to safeguard and support the integrity and accuracy of the

Group's books and records and financial reporting. All financial books, records and accounts must accurately reflect transactions and events, and conform to the approved accounting standards. We recognize that reliable, transparent and timely reporting of financial performance enhances investors' and other stakeholders' confidence in SUPERMAX.

10. REPORTING

It is the duty of every employee to immediately report any breaches or likely to constitute a breach of the CoBE of which he/she is aware of or has knowledge to either one of the following channels to safeguard the Group's assets, financial integrity and reputation:

- (a) the immediate manager; or
- (b) any Head of Department; or
- (c) the Group Managing Director; or
- (d) the Group Executive Director

11. REVIEW OF THE CoBE

The Board will monitor compliance with the CoBE and review the CoBE regularly to ensure that it continues to remain relevant and appropriate.