

Public Packages Holdings Berhad

Code of Conduct and Ethics

Introduction

This Code of Conduct and Ethics (“Code”) sets out the principles and standards of business conduct and ethics of business of the Group. This Code applies to all Directors and employees of the Group.

Objective

The objective of this Code is to provide guidance to the Directors and employees of the Group in defining the ethical standards and conducts required at work. In addition, this Code helps to uphold the spirit of social responsibility and accountability of the Group in line with the relevant legislation and regulations.

This Code is not intended to be exhaustive, and there may be additional obligations that Directors and employees are expected to observe when performing their duties. For all intents and purposes, this Code is to be interpreted within the framework of the laws and customs of Malaysia, and to be read in line with the Group’s directives, guidelines and policies as issued from time to time. Violation of the Code will not be tolerated and will result in appropriate disciplinary action being taken including terminating the services of the person concerned.

PPH’s 8 Core Values



Areas of Conduct

Company Information, Records and Assets

a. Confidential Information

In the course of employment, Directors and employees may come into possession of confidential, sensitive and/or non-public information relating to the Group or its business associates (“Confidential Information”). Therefore, Directors and employees shall treat all such Confidential Information in the strictest of confidence, not disclose such information to any unauthorised persons, and take all necessary precautions to maintain such confidentiality and not use it, direct or indirectly, for any purpose other than for what has been duly authorised or legally mandated.

b. Company Assets

The Directors and Employees have duty to protect the company assets, including premises, equipment, facilities and any property of the Group, as well as the records and information of

the Group. Company assets shall only be used in safe, ethical and lawful manner and shall not be used for pursuing improper personal gain or opportunity.

Duties of good faith, Diligence and Integrity

a. Conflict of Interest

The term “conflict of interest” describes any circumstances that could cast a doubt on a Director or an employee’s ability to act with total objectivity with regard to the Group’s interest. The Directors and employees should avoid being involved in situations where there is conflict of interests between them as an individual and the interest of the Group. Directors 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 advantages.

All Directors and employees of the Group shall immediately disclose any transaction or relationship that could reasonably be expected to give rise to a conflict of interest, whether direct or indirectly. If in doubt, an employee may consult his/her immediate superior for advice.

b. Gifts, Gratuities, Entertainment and Travel

No personal gifts, favours, entertainment, services or benefits, in cash or in kind, that will or will appear to influence the objectivity and fairness of any business decisions, shall be accepted or provided.

Gifts, favours, entertainment or services that are deemed as not given to influence the Directors’ or employees’ performance of duties include normal business courtesies, token gifts which are occasional, gifts during festive seasons or special occasions and non-cash gifts from social functions attended by the Directors or employees on behalf of the Group.

c. Donation

Donations are part of the Group’s CSR commitment. All donations made must be in accordance with the Group’s procedures and the necessary approval must be obtained.

d. Bribery and Corruption

To observe the highest standards of ethical conduct, Directors and employees shall not in any manner offer or receive any bribes in order to achieve any business or personal advantages in any activities that contravene any applicable anti-bribery or anti-corruption laws.

e. Insider Trading

No Director or employee shall use price sensitive non-public information gained directly or indirectly in the course of their duties or employment (“Insider Information”) for personal benefits. Directors and employees are prohibited to trade in any relevant securities or to provide information to others to trade in any relevant securities until the Insider Information has been publicly released.

f. Compliance with Laws, Rules and Regulations

The Group will comply with all applicable laws, rules and regulations including the constitution of the Group and directives issued by any relevant authorities. The Directors and employees are expected to understand and comply with laws, rules and regulations that are applicable to their positions and/or within their scope of work. No Director or employee shall be involved in or aid or abet in any criminal activity.

Workplace

a. Equal Opportunity and Non-Discrimination

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

The Group upholds a policy of non-discrimination in employment and such policy applies to recruitment, hiring, compensation, promotion, transfer, discipline, demotions, terminations, access to benefits and training as well as all other aspects of employment.

b. Health and Safety

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

c. Harassment, Threat and Violence

Any type of harassment, threat and violence is strictly prohibited in the Group. Any complaint concerning such issues should be directed to the Head of Human Resource or the respective Head of Department or. All such complaints shall be treated with strictest confidence.

Reporting violations of the Code

Any employee who knows of, or suspects, a violation of the Code, is encouraged to *whistle blow or report the concerns* to the Human Resources Manager of the Group. 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.

Review

This Code shall be reviewed regularly to ensure that it continues to remain relevant and appropriate.