

# SKB SHUTTERS CORPORATION BERHAD

## CODE OF CONDUCT AND ETHICS

### 1. OBJECTIVE

SKB Shutters Corporation Berhad and its group of companies (collectively referred to as “the Group”) are committed to the ethical standards in its business conduct. In keeping with our commitment and in line with good corporate practices, the Company has adopted this Code of Ethics and Conduct (“Code”) which sets out the principles and standards of business ethics and conduct of the Group.

Accordingly, the Board shall define and ensure that the objectives of its Code of Conduct and Ethics are met by:

- a. Setting a role model in practicing the provisions in this Code;
- b. Committing and ensuring the implementation of appropriate internal systems to support, promote and strengthen the awareness and compliance with this Code;
- c. Ensuring implementation of appropriate communication channel to receive feedbacks; and
- d. Integrating this Code into management decision, practices and procedures.

### 2. APPLICATION

This Code is applicable to all Directors and employees of the Group, including full time, probationary, contract and temporary staff.

All Directors and employee of the Group shall read, understand and comply with this Code. Disciplinary action, termination of employment or legal and criminal charges may be taken against any Directors and employee who have violated this Code.

### 3. PRINCIPLES

We are responsible to:

- i. Our Clients, by constantly striving to improve our quality and competitiveness of our development ethically and responsibly in order to serve our clients better.

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- ii. Our Contractors, business associate and partners, subject to their adherence to the universal principles of code of ethics, by allowing them to make a fair profit.
- iii. Our Employees, by creating safe, healthy and secured working environments free from any form of danger and sexual harassment. Merit and performance shall be duly recognized and be rewarded with fair remuneration and career advancement opportunity.
- iv. Our Communities, by embracing social equity and diversity, complying with regulatory requirements and supporting good causes and charities.
- v. Our Environment, by preserving and protecting the environment and natural resources to ensure sustainability.
- vi. Our Dependents, by treating them fairly and not exercising our position in an abusive way, taking advantage of them or manipulating them with our power and ability to punish or penalize them.
- vii. Our Shareholders, by upholding our code of ethics in conducting our business and creating wealth and rewarding them; and
- viii. Our Stakeholders, by not accepting and giving any favors, rewards and benefits with an intention to corrupt and to bribe for improper gain and advantage.

Complementing these general principles, the Group has further defined specific provisions with respect to insider trading, money laundering, corruption, conflicts of interest and abuse of power into Anti-Bribery and Anti-Corruption Policy. No Directors, Officers and staff shall:

- (a) Enter into any transaction in the securities while they are in possession of non-public information about that Company or recommend others to purchase the securities of the Company on the basis of insider information;
- (b) Assisting money laundering activities which may include, but not limited to accepting payment in large and unusual amount of cash; or payments made by or to third parties who are not parties to the contract; or payments made in currencies differ from invoices;

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- (c) Soliciting gifts or favours in connection with their official duties; or accepting gift which would create or give rise to the appearance of impropriety or bias that would damage the reputation of the Group;
- (d) Providing gift, bribes and benefits to influence other stakeholders in order to obtain and retain business or secure an unfair advantage in any business transaction;
- (e) Taking part in deciding with respect of any transaction, contract or proposed contract or arrangement in which s/he is interested, directly or indirectly; and
- (f) Abusing its power by imposing his/her will over a subordinate, through the exercising of the power conferred to his/her position for gaining benefits or particular objective that is usually in violation of laws, rules and regulations.

#### 4. BOARD'S RESPONSIBILITY

The Board should periodically review this Code and to ensure the implementation whistleblowing communication channel to receive feedbacks and other appropriate internal systems to support, promote and to comply with this Code when making their business and operation decisions.

#### 5. MANAGEMENT'S RESPONSIBILITY

Management should ensure this Code is readily available to all staff members and communicate the Code with staff members periodically to reinforce its importance and relevance.

In making operational and business decisions, Management is responsible to the Board to observe the principles of this Code. Management shall ensure their action consistent with the spirit of this Code and promote good culture of ethics when interacting with all stakeholders of the Group.

#### 6. STAFF MEMBERS' RESPONSIBILITIES

All staff members are required to:

- adhere to the provisions of this Code; and

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- report any suspected violations in accordance with whistleblowing policy of the Company.

It shall be noted that non-compliance of this Code may not only entail disciplinary sanctions, but also criminal charges.

### 7. REPORTING OF VIOLATIONS OF THE CODE

Any parties who know of, or suspect any violation of the Code, are encouraged to whistle blow or report the violations in accordance with the Group's whistleblowing policy and procedure which is available on the Company's website.

### 8. DOCUMENTATION

This Code shall be included in Employee Handbook. All employees are required to read and familiarise themselves with this Code and acknowledge their understanding and compliance with this Code annually during their employment with the Group.

### 9. CORPORATE DISCLOSURE REQUIREMENT

Copy of the Board's approved code of conduct shall be published in the corporate website at [www.skb-shutters.com](http://www.skb-shutters.com).

This Code of Conduct and Ethics is made in accordance with the resolution of the Board dated 27 August 2020.