

LB ALUMINIUM BERHAD

CODE OF CONDUCT

1. PURPOSE

This Code of Conduct (“Code”) defined ethical behaviours in a manner that is efficient, effective, fair, responsive, integrity and respect that all employees of LB Aluminium Berhad and its subsidiaries (“the Company”) need to demonstrate when working for the Company.

- i. To maintain a healthy, safe and productive work environment;
- ii. To provide guidance to employees on their conduct in or outside the workplace where they can be identified as the Company’s employees; and
- iii. To highlight key issues and identifies the relevant policies and procedures within the Company.

Employees shall observe and abide by the following:

- i. To comply and observe the guidelines set out in this Code, all statutory laws and regulations, the Company’s established rules, regulations, policies and procedures at all times;
- ii. To maintain the Company’s reputation for high integrity and business ethics;
- iii. To inculcate good values and display desirable and positive work behaviour at all times and in their daily activities; and
- iv. On all occasions discharge his duties and responsibilities with high standard of professionalism, dedication, honesty and integrity, goodwill and courtesy, and display high sense of proactive, cooperative, innovative and public accountability.

2. SCOPE

This Code covers the requirements of employees’ conduct at the workplace, the usage and safeguarding of the Company’s assets, business conduct when dealing with external parties, conflicts of interest and reporting of violations of the Code.

All employees of the Company are expected to abide by and observe this Code. Adherence to this Code shall be a condition of employment.

Terms and conditions of employment include not only the contractual and written terms and conditions but also those terms that are understood and applied in practice or by common consent without incorporated into the contract of service.

The Code applies to all employees working for the Company (including full time, part time, fixed term, permanent, contract, outsource, apprentice and trainees) subject to local laws and regulations of the countries of operation. It sets out the minimum

requirements, which shall be complied with, unless doing so violates the local laws and regulations.

The Code is not exhaustive and therefore, it does not preclude the possibility of dismissal for other offences of similar gravity not specified.

3. RESPONSIBILITY AND ACCOUNTABILITY

All employees are required to comply with this Code. Being unaware or pleading ignorance of this Code will not be accepted as an excuse for its breach.

All managers have the added responsibility to set a good example and to lead the employees under their supervision in the application of the Code in their daily business conduct. They are also responsible for promoting open and honest two-way communication to facilitate discussions that may occur in situations where the application of the Code may not be so clear. Managers should diligently be on the lookout for indications where unethical or illegal business conduct has occurred.

The Code shall be read in conjunction with the **Company's Employee Handbook**.

4. EMPLOYEE CONDUCT

4.1 WORKPLACE REQUIREMENT

- To maintain a healthy, safe and productive work environment that is free from discrimination or harassment based on race, religion, politics, gender, sexual orientation, marital status, national origin, disability, age or other factors that are unrelated to the Company's legitimate business interests.

4.2 WORKING ATTITUDE

Maintaining social, ethical, and organizational practices, policies and norms including:

- Act with integrity;
- Firmly adhering to codes of conduct and ethical principles in all interactions;
- Comply with rules and regulations and laws governing the business;
- Presents information and data accurately and completely;
- Be fair towards everyone regardless of status or personal relationship;
- Keeps commitment, delivers as promised, does not over-promise;
- Acts consistently and accept responsibility for mistakes, complies with established control systems and rules;
- Safeguard the interest of the Company;
- Have zero tolerance towards corruption in any form;
- Be determined to win and take pride in winning together as a team;
- Treats change and innovation as opportunities for improvement, growth or learning;

- Places higher priority on organization's goals than on personal goals; and
- Doing things in an organized and systematic manner and maintain good time management.

4.3 USE OF RESOURCES AND PROTECTION OF COMPANY'S ASSETS

- Employees shall be responsible for protecting the Company's assets entrusted to them and shall take all necessary steps to prevent theft, loss, damage or misuse of assets belonging to the Company. Any such occurrence shall be reported immediately to the immediate superior;
- Employees are not allowed to use Company's assets including equipment, resources and proprietary information for any work unrelated to the business of the Company.
- The types of assets that shall be protected are defined as, but not limited to:
 - i. Physical Assets such as equipment, systems, facilities, supplies, etc.;
 - ii. Information and Communication Systems including connections to the internet;
 - iii. Confidential Information including information (whether in written or spoken form and whether on paper or electronic form) relating to technical, product and services, financial data and projections, marketing strategies and business plans, organisational and personnel information, trade secrets, pricing guidelines, methodology or prices of products and services, projects information, customer information, drawings, proposals, product costs, payroll records, any records and any non-published financial or other data that is not public information. The Company's ownership of such proprietary information shall continue even after the employee leaves the Company;
 - iv. Intellectual Property Rights; and
 - v. Employees shall return all the Company's assets entrusted to them upon cessation of their employment.

4.4 CYBER SECURITY

- Cyber Security involves the application of a multi-disciplinary collection of resources, processes and controls to protect the Company's computer systems and its data from the occurrences of attack, theft or damage. It is vital to protect the data and employees are required to comply with the Company's policies and procedures to maintain a high level of security and trust;
- Employees must protect their access credentials and not share them in any circumstances. Employees should work on assigned hardware and approved software only and exercise caution when using email and the internet to avoid phishing exploits and malware. The security software installed on computers are to protect employees and the Company, they must not be tampered with or circumvented. Employees are to consult the IT or Security department when in doubt on the right action to take on cyber security issues;
- Every employee shall maintain adequate knowledge and awareness of the security process and controls by going through the scheduled training assigned;

- Employees are expected to use good judgement when using social media and be mindful that irresponsible use of social media can tarnish the reputation of the Company; and
- Copying of software programs or the use of illegal software is strictly prohibited. No employee should bring in or take out external storage device.

4.5 PRIVACY

All Company's customer, business partner and employee personal information, may it be in physical or digital form, are strictly private and confidential. Confidentiality is critical to protecting the integrity of our information assets, competitive advantage and regulatory compliance. Failure to do so may expose the Company and employees to legal liabilities. Therefore, it is the duty and responsibility of every employee to:

- Ensure a high standard of data protection and privacy within the organisation;
- Access, utilise, manage, maintain and disseminate all such information in accordance with established business purpose(s), accurately and in a secure manner;
- Respect customers' rights to privacy;
- Adhere to the prevailing relevant laws, policies and procedures including observing proper/prescribed exercise of controls;
- Exercise good judgement by seeking clarification or proper authorisation prior to disseminating confidential, proprietary, sensitive or personal information; and
- Report any non-conformity or violation of personal information to the relevant authority.

Please refer to the **Company's Data Protection Act Policies and Procedures** for more information.

4.6 COMPLIANCE WITH ENVIRONMENTAL LAWS & HEALTH & SAFETY PRACTICES

- The Company practice strict compliance with applicable laws and regulations on environment and Health & Safety;
- The Company strives to create a safe working environment for its employees. However, it is the duty of all employees to observe safety instructions and regulations at all times:
 - i. Work and behave safely;
 - ii. Personal Protective Equipment ("PPE") must be used;
 - iii. Comply with health and safety procedures and instructions relevant to their work and / or about which they have been trained and notified;
 - iv. Support team leaders to ensure that everyone they work with, including contractors and visitors, are familiar with and follow applicable health and safety procedures and instructions;
 - v. Only undertake work that they are trained and competent enough to do;

- vi. Identify health and safety hazards and manage or control risks arising from their operations, activities and services; and
- vii. Report all incidents, accidents in line with reporting requirements, including thorough investigation, follow-up and communication of lessons learned.

4.7 INFORMATION INTEGRITY AND RETENTION

- Employees shall record and report all information accurately and with integrity in the right time periods;
- Records shall be managed securely in line with their importance and in compliance with legal, tax, regulatory, accounting and other business retention requirements;
- All employees are required to provide the Company with accurate information as well as to notify any changes of status, of the following:
 - Home address;
 - Contact telephone number;
 - Latest education attained;
 - Marital status;
 - Birth/death in immediate family;
 - Information of spouse and next of kin; and
 - Any other information as required by the Company from time to time.

4.8 NON DISCRIMINATION

- All employees, officers and management should respect the rights and cultural differences of other individuals in the Company. The Company is an equal opportunity employer and will not discriminate against any employee or applicant because of race, religion, politics, gender, sexual orientation, marital status, national origin, disability, age or other factors; and
- This Code applies to all terms and conditions of employment, including, but not limited to, hiring, placement, promotion, termination, layoff, recall, transfer, leave of absence, compensation and training. Discrimination and prejudice constitute unacceptable behaviour.

4.9 HARASSMENT FREE

- The Company is committed to maintaining a work environment that is free of any form of harassment including sexual harassment. Employees shall avoid any behaviour or conduct that could reasonably be interpreted as harassment; and
- Employees are encouraged to report any such harassment immediately.

5. BUSINESS CONDUCT

5.1 GENERAL REQUIREMENTS

- Business conduct relates to the conduct of employees while engaged in business dealings for and/or on behalf of the Company;

- All employees are aware of the **Company’s Anti-Bribery Corruption Policy (“ABC Policy”)** and **Third Party Management Guidelines**;
- Dealings with third parties including customers, vendors and partners as well as government authorities shall be consistent with the policies and procedures as set out in the ABC Policy;
- Employees shall be cognizant of the fact that bribes may be in any form, monetary or otherwise and shall be dealt with in accordance with the ABC Policy as well as the **Company’s Limits of Authority (“LOA”)** ;
- As a rule, employees are discouraged from giving or accepting gifts, entertainment and other benefits to or from third parties. The rules and regulations relating to gifts and entertainment are set out in the ABC Policy and LOA in which all employees are expected to follow; and
- Employees must be ethical and lawful in all of their business dealings.

6. CONFLICT OF INTEREST

6.1 GENERAL REQUIREMENTS

- Employees shall not engage in any activity or advance their personal interests at the expense of the Company’s interests.
- All employees shall be alert to potential and perceived conflict of interest situations and shall diligently assess and avoid such activity or situation.
- Employee shall not engage in any outside employment or conduct own business without the consent of the Company; and
- The policies and procedures set out in the Company’s ABC Policy on conflict of interest shall apply and all employees are expected to refer to the ABC Policy when there is doubt or to refer to his superior or Head Of Finance for clarification.

7. GENERAL MISCONDUCT

Misconduct can be defined as an act or omission by an employee which is inconsistent with the expressed or implied terms and conditions of employment.

Employees shall not commit any of the following examples of offence:

- i. Absent without leave for more than two (2) days without reasonable excuse;
- ii. Persistently late to work;
- iii. Leave work place repeatedly during working hours without permission;
- iv. Careless damage of Company’s property on a small scale;
- v. Wilful defacing, abusing or destruction of Company or fellow employee’s property;
- vi. Quarrelsome at work place;
- vii. Removal or defacement of notices, circulars or documents put up on Company’s notice boards;
- viii. Distributions of unauthorized, subversive notices, pamphlets etc., within the Company’s premises;
- ix. Failure to wear uniform, shoes, etc. provided by the Company at work;

- x. Failure to follow safety procedures, signs and instructions;
- xi. Failure to furnish information;
- xii. Loitering within the Company's premises during and/or after working hours;
- xiii. Obstructing other employees from carrying out their work;
- xiv. Smoking within Company's premises where smoking is prohibited;
- xv. Pretend to be ill in order to escape work or attend training;
- xvi. Misdemeanor;
- xvii. Scanning/punching punch-card/employee card for another employee;
- xviii. Unlicensed money-lending;
- xix. Wilful insubordination or disobedience of any lawful and reasonable order of his superior;
- xx. Violence, abusing or assaulting other employees, supervisors or visitors within the Company;
- xxi. Wilful slowing down in work performance and or inciting other employees to do so;
- xxii. Conduct any manner which can reasonably be construed as being irresponsible causing lacking efficiency to the Company;
- xxiii. Participating, abetting, inciting or instigating an illegal strike or any other act in furtherance thereof;
- xxiv. Theft or misappropriation of Company's money or property;
- xxv. Fraud, dishonesty or falsification in connection with the business or property of the Company ;
- xxvi. Medical claim for dependents;
- xxvii. Accepting or receiving bribes or any illegal gratification in cash or kind;
- xxviii. Stealing from other employees;
- xxix. Removing from the office, without proper authority, any secret or confidential documents or files belong to the Company;
- xxx. Disclosing secret or confidential information concerning the affairs of the Company to any unauthorised party;
- xxxi. Falsifying or destroying Company's records or files or documents;
- xxxii. Making oral or written statement against the interests and goodwill of the Company;
- xxxiii. Acts that bring disrepute or embarrassment to the Company;
- xxxiv. Breach of trust or fiduciary relationship;
- xxxv. Any act amounting to conflict of interests;
- xxxvi. Fighting;
- xxxvii. Riotous or incident or immoral behaviour within the Company;
- xxxviii. Gambling in the Company's premises;
- xxxix. Intoxicated (under the influence of alcohol or dangerous drug) while on duty;
 - xl. Sleeping while on duty;
 - xli. Improper use of tools entrusted to him;
 - xlii. Wilful damage to Company's property;
 - xliii. Not reporting any defect of machinery or occurrences noticed which may endanger himself or any other person;
 - xliv. Endangering the safety of other employees within the Company's premises;
 - xlv. Possess lethal weapon or acting violently, riotously or in a manner likely to endanger the life and safety of any person within the premises of the Company;
 - xlvi. Excessive alteration or defacing Company uniforms in any way without authorisation;

- xlvi. Driving Company vehicle without authorisation or use for any unauthorised purposes;
- xlviii. Holding unauthorised meeting or illegal gathering within Company's premises;
- xlix. Misrepresented information, at the time of employment, i.e. age, qualifications, previous experiences, conviction in court of law, or dismissal by a previous employer;
 - I. Being convicted of any criminal offences;
 - li. Abetment of or attempt to commit any of the above acts of misconducts; and
 - lii. Usage of cell phone during working hours without permission.

8. REPORTING VIOLATIONS AND SUSPECTED VIOLATIONS

The Company reserve the right to take disciplinary action against any employee found to be in breach of this Code.

The Code outlines the process for employees who require clarification on any aspects of the Code to avoid any misinterpretation or violation of the Code.

Employees who come across any unlawful or unethical situation, or any suspected violations of this Code shall raise their concerns following the guidance as set out in the **Company's Whistle-Blowing Policy**.

All reports shall be discreetly, promptly and thoroughly investigated in accordance to applicable laws and regulations. In the event of severe non-compliance or misconduct, disciplinary proceedings shall be taken by the Company after due inquiry. Appropriate disciplinary actions shall be taken, including dismissal.

Reports shall be treated with the strictest confidence. Employees who report violations or suspected violations shall be protected from any threat. This assurance does not however extend to those who are found to have raised the matter under false or malicious intention.

9. TRAINING AND EVALUATION

All employees of the Company shall be made aware of the Code and its contents upon commencement of their employment and this shall form part of the Induction Programme.

The Code is available on the Company's website and be accessible to all employees.

10. DISCIPLINARY ACTION

Objectives of disciplinary action are:-

- i. All employees are required to meet certain standards of performance and follow the Company's rules and regulations in order to maintain a healthy, safe and productive work environment;
- ii. To ensure the Company continue to progress towards a high level of integrity and professionalism through good discipline;
- iii. The disciplinary action taken aims at correction rather than punishment.
- iv. To ensure employees set a high standard of discipline and obey the rules and regulations, rather than to have discipline enforced upon them;
- v. To ensure disciplinary issues at the lowest level;
- vi. To ensure employees to regain positive attitudes towards the job, their superiors and the Company, as well as to acquire a will to improve;
- vii. To ensure employees that a repetition of the misconduct or poor performance could result in a more serious disciplinary action;
- viii. To ensure whole disciplinary matters through natural justice; and
- ix. To ensure poor performers achieve the performance standard expected from them within a stipulated time set by their superior.

The scope of the disciplinary procedures applies to all level of employees in the Company. It is the responsibility of all managers, head of departments and supervisors at every department to manage their employees discipline levels and performance in adherence to the Code. Any non-adherence should be immediately informed to the Head of Department or Human Resource Department ("HR").

Disciplinary action will only be taken in the light of good reason and clear evidence.

Action on all misconducts shall be taken within three (3) working days after reported or detected by department concerned. For serious case, action shall be taken within twenty four (24) hours. HR will provide advisory upon request to all departments regarding the disciplinary procedures.

Where misconduct constitutes a criminal offence, e.g. theft of Company's property, the employee will be subjected to both disciplinary action and criminal sanction.

Punishment will be commensurate to the gravity of the offence and there is no compulsion on the Management to follow a progressive punishment pattern.

Aggrieved employees may appeal to the Executive Director who may set aside, alter or decrease the penalties imposed as per Company's grievance procedure. An employee may continue to work in the premises whilst appealing against the disciplinary action except when appealing against dismissals or on suspension period. This must be made from outside the premises.

Normal warnings and other stern disciplinary measures will affect annual reviews and promotions throughout the entire duration of the employee's service with the Company.

All employees shall give their full co-operation in any disciplinary investigations, provide statement of being witness or support the officers concerned in performing their investigations. Staff at departments concerned shall keep all disciplinary documents in proper and filing. He or she will furnish the investigating officer with the document whenever necessary.

This policy was approved by the Board of Directors on 29 June 2021.