

Code of Business Conduct and Ethics

Purpose

The purpose of this document is to outline and provides guidance on standards of behaviour expected of every Director and employee of Scicom (Officers) and where applicable, counterparts and business partners (collectively referred to as “Stakeholders”). The principle of CODE are derived from the Group’s Core Values and Business Principles.

Scope

This Policy shall be applicable to Scicom (MSC) Berhad and its subsidiaries. The CODE applies to every Officer of the Group. Counterparts and business partners are encouraged to adopt similar principles and standards of behavior. The CODE applies to all businesses and countries in which the Group operates.

Definitions

Terms	Descriptions
CODE	Code of Business Conduct and Ethics
Officers	Director and employee of Scicom
Group	Scicom (MSC) Berhad and its subsidiaries
Stakeholders	Counterparts and business partners

Policy

RESPONSIBILITY AND COMPLIANCE WITH THE CODE

Every Officer is responsible to ensure that their actions abide by the CODE and the applicable laws and regulations. The Company will take appropriate action against any personnel who fails to act in accordance with applicable statutory laws, Company Policies and Procedures and this Code.

Employees with questions or concerns about illegal or unethical acts, shall check with the respective reporting manager or Human Resource Manager. Failure to abide by this code and the law will lead to disciplinary measures appropriate to the violation, up to and including dismissal. These terms are included in the employment contract and associated documents.

The CODE shall be communicated to all Officers through employee handbook, the intranet, Scicom’s website and induction programme. Directors and employees are expected to read the entire CODE.

THE CODES

In the performance of his or her duties, each Officer must comply with the letter and spirit of the following codes:

1. CONFLICTS OF INTEREST

Business decisions and actions must be based on the best interests of Scicom and not motivated by personal considerations or relationships. Relationships with prospective or existing suppliers, contractors, customers, competitors or regulators must not affect the making of independent and sound judgment on behalf of Scicom.

The Directors shall declare to the Board on any actual, potential or apparent conflicts of interest, which might influence the Directors' judgment, and if so required to excuse themselves from any deliberation and decision making in relation thereto.

2. CONFIDENTIAL INFORMATION AND INSIDER TRADING

All information obtained in the course of appointment/ employment shall be strictly confidential and not be disclosed to any authorised persons, for the benefit of himself or any other persons. This code applies to all Stakeholders during and after their service with Scicom.

Officers are not allowed to trade in securities based on knowledge that comes from their directorship or employment if that information hasn't been reported publicly. Any person who commits insider trading, shall be subjected to certain criminal and civil actions under the Malaysian Law, which includes the Capital Markets and Services Act 2007.

3. ANTI-CORRUPTION AND ANTI-BRIBERY

Scicom will comply with the anti-corruption laws of the countries in which it does business. Directors, employees and agents, such as Third-Party Sales enterprises will not directly or indirectly offer or make a corrupt payment to government officials, including employees of state-owned enterprises. Employees who are authorised to engage agents, shall make sure that they are reputable and require them to agree in writing to Scicom's standards in this area.

Officers shall never offer, give, ask for, accept or receive any form of bribe. Such bribe includes attempt to influence a decision by offering some form of undue or improper advantage, incentive or favour.

4. COMPLIANCE WITH THE LAW

Directors and employees are required to comply with all applicable laws and regulations wherever the Group does business, including the Anti-Money Laundering and Anti-Terrorism Financing Act 2001, Malaysian Anti-Corruption Commission Act 2018, Personal Data Protection Act 2010 and Competition Act 2010. Perceived pressures from supervisors or demands due to business conditions are not excuses for violating the law. Should there be any questions or concerns about the legality of an action, employees are responsible for checking with the appropriate level of management. The Group reserves the right to report any actions or activities suspected of being criminal in nature to the police or other relevant authorities.

5. SAFETY AND HEALTH

Directors and employees are responsible for maintaining a safe workplace by following safety and health rules and practices. Directors and employees are responsible for immediately reporting accidents, injuries, and unsafe equipment, practices or conditions to a supervisor or other designated person. Scicom is committed to keep its workplaces free from hazards and maintaining a safe and healthy working environment for all employees and the general public in accordance with the Occupational Safety and Health Act 1994.

6. ENVIRONMENT

Directors and employees will respect the environment by complying with all applicable environmental laws in all countries in which the Group conduct operations. Scicom is committed to the protection of the environment by minimizing the environmental impact of the operations and operating businesses in ways that will foster a sustainable use of the world's natural resources.

7. EQUAL OPPORTUNITIES

Scicom is an equal opportunities employer and does not discriminate on gender, creed, religion, age, or the like. Directors and employees are given equal opportunity to grow within the company free of harassment, unfairness or undue interference of any kind. Racism of any kind is unacceptable and will never be tolerated. Scicom operates on the Meritocracy principle where staff are hired and promoted on their professional merits.

8. CONSTANT RESPECT

The Officers will treat each other with respect and fairness at all times and value the difference of diverse individuals from around the world. Employment decisions will be merit based, such as qualifications, talents and achievements, and will comply with local and national employment laws.

9. HARASSMENT

Abusive, harassing or offensive conduct is unacceptable, whether verbal, physical or visual. Examples include derogatory comments based on racial, religious or ethnic characteristics and unwelcome sexual advances. Employees are encouraged to speak out when a co-worker's conduct makes an individual uncomfortable, and to report harassment when it occurs.

10. PROTECTING SCICOM ASSETS

The Officers have a responsibility to protect Scicom's entrusted assets, from loss, damage, misuse or theft. Scicom's assets, such as funds, products and computers, can only be used for business purposes and other purposes approved by the Management. Scicom's assets can never be used for illegal purposes.

11. PROPRIETARY INFORMATION

All Stakeholders will safeguard all proprietary information by marking information accordingly, keeping it secure, and limiting access to those who have a need to know in order to do their jobs. Proprietary information includes any information that is not generally known to the public and is helpful to Scicom or would be helpful to competitors. It also includes information that suppliers and customers have entrusted to Scicom. The obligation to preserve proprietary information continues even after appointment/ employment/ engagement ends.

VIOLATION OF THE CODE

Employees shall report to reporting manager or Human Resource Manager of any suspected violation to the CODE and such other illegal, unethical behavior. Employees may also report any of such misconduct or wrongdoings via the available channel established under the whistle blowing policy.

The Company shall investigate reported concerns promptly and confidentially with the highest level of professionalism and transparency. All internal investigations and audit shall be conducted impartially and without predetermined conclusions. Where external investigations are required, every Officer shall appropriately respond to, cooperate and not to interfere with any lawful government inquiry, audit or investigation.

The Company makes every effort to maintain the confidentiality of any individual who makes such reports. Officers who retaliate or encourage others to do so, will be subjected to disciplinary actions, up to and including termination of employment or engagement. The Company does not tolerate any form of retaliation against anyone who makes a report in good faith.

REVIEW OF THE CODE

This CODE should be reviewed periodically by the Board in accordance with the needs of the Company and new changes to be communicated to the Officers.