

1.0 POLICY STATEMENTS

i-Stone Technology Sdn. Bhd. and its subsidiaries (the “Group”) Code of Conducts reflects the Group’s existing culture and serves as a guide for our directors, managers and employees in their daily activities. It describes the values, principles and practices that guide business conduct in the Group. This Code of Conduct reflects the objective of management to reinforce company-wide ethical standards and to sustain a work environment that fosters integrity, caring, respect and professionalism. It is to serve the long-term interest of the Group by following the policy strictly to be lawful, highly principled and socially responsible in all business activities.

This Code of Conduct is applicable to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary).

2.0 COMPLIANCE WITH LAWS, RULES AND REGULATIONS

The Group and its employees commit to conduct its business in compliance with applicable laws, rules and regulations and in accordance with high ethical principles and standards. The Group’s reputation for integrity, quality and honesty is based on this commitment and helps to ensure its long-term success. Refer to i-Stone Employee Handbook for exhaustive list of common acts of misconduct.

3.0 CORPORATE RESPONSIBILITY

The Group is dedicated to operate the business economically, socially and environmentally responsible. The Group is committed to the principle of sustainable development. It strives to make efficient use of natural resources and minimize the environmental impact of its activities and products over their life cycle.

4.0 ANTI-BRIBERY AND CORRUPTION

The Group prohibits corruption and bribery, and have zero tolerance on any practice that seek to obtain business through improper means. Neither the Group’s employees nor its immediate family members are allowed to offer, receive or accept any kind of benefit to or from business partners, government officers, customers and vendors which might compromise, or appear to compromise, the ability to make objective and fair business decisions. Please refer to i-Stone Anti-Bribery and Corruption Policy for more details.

5.0 OFFERING BUSINESS COURTESIES

Any employee who offers business courtesies must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon the Group. Accepting business courtesies must be done in accordance with approved company procedures and Anti-Bribery and Corruption Policy. Management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.

Employees who are in doubt over providing business courtesies should discuss with their reporting manager or representative from the HR department.

6.0 DISCRIMINATION AND HARASSMENT

The Group is a social responsible employer and recognizes its employees as a great strength. The Group seeks high commitment from its employees. The Group is committed to provide equal opportunities to every employees of the Group and promotes professional and personal growth. The Group respects each employee and promotes courteous and constructive views, criticisms and exchanging ideas. The Group does not tolerate discrimination or harassment of any kind. Threats or acts of violence and physical intimidation are forbidden. The use of illegal drugs and alcohol in the workplace is not tolerated. Various types of discrimination and harassment which occur at work includes:

- Race, ethnic origin, nationality or skin color
- Gender and/or sexual orientation
- Religious or political convictions
- Membership or non-membership of a trade union
- Disabilities, illness, sensory impairments or learning difficulties

(This list is not exhaustive)

7.0 SEXUAL HARASSMENT

Sexual harassment is defined as unwanted and unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual related gesture. The Group prohibits inappropriate sexual related gesture at work including the following:

- Comments, jokes or degrading language or behavior that is sexually harassing
- Sexually suggestive objects, books, magazines, photographs, cartoons, pictures, calendars, posters, electronic communications, website or other material
- Unwelcome sexual advances, requests for sexual favors, or any sexual touching
- Offering favorable terms or conditions of employment or benefits in exchange for sexual favors or threatening or imposing less-favorable terms or conditions of employment if sexual favors are refused

(This list is not exhaustive)

Sexual harassment is prohibited whether between members of the opposite sex or members of the same sex.

8.0 CONFLICT OF INTEREST

Conflict of interest exists when a person has a private interest that differs from the Group's interest. In conflicting situation, the employees shall put the interest of the Group above personal interest. Conflict of interest can arise in many situations including the following but not limited to:

- Receiving improper personal benefits as a result of their positions in the Group or through access to confidential information
- Serving as directors, managers, employees, advisers or agents of any competing business or other business or non-profit organisation that would adversely affect their commitment to the Group, unless such service is specifically approved by the Group.

The Group encourages all employees to participate in community services in their local nonprofit origination. However, it must ensure that all activities outside their commitment as an employee does not result in conflicting interest. Any conflict of interest or potential conflict of interest should be reported and discussed with the employee's reporting manager or representative from the HR department. For more details, please the i-Stone Employment Agreement.

9.0 RECORD-KEEPING

The Group ensures that relevant information are properly kept and consistent with the period specified in the Group record retention policy or any local rules and regulations. All reports, statement and records, whether held electronically or in hard copy, must reflect the actual events and transaction accurately. Dishonest reporting within the Company, or to organizations or persons outside the Company, is strictly prohibited.

10. PROTECTION AND PROPER USE OF ASSETS

Employee is responsible for safeguarding and making proper use of the Group's property and asset. Each employee has an obligation to protect the Group's property from loss, damage, theft, embezzlement or destruction. Any situations or incidents that could lead to such result should be reported by employees immediately to their superior. All asset shall be return to Group after leave the employment.

11. CONFIDENTIALITY AND PRIVACY

Information is one of the Group most valuable corporate assets. Effective dissemination of information is critical to the success of the Group. Employees are required at all times, to safeguard any Confidential Information or proprietary information unless disclosures are required by specific laws or regulations. "Confidential Information" include but not limited to (i) intellectual property, such as trade secrets, patents, trademarks, copyrights, manufacturing know-how, designs, inventions and database; (ii) business and marketing information; (iii) salaries information; and/or (iv) any material non-public information. It is the Group's policy that all personal information on employees, customers, business partners or suppliers be used diligently and treated confidentially. For more details, please the i-Stone Employment Agreement.

12.0 HEALTH AND SAFETY

The Group commits to adhere to the highest standard of health and safety of each of its employees, customers and visitors by maintaining a workplace that is safe and/or free of hazardous conditions. The Group has established a Health and Safety Committee and Emergency Resonse team (ERT) to organize safety programs which includes procedure for correcting unsafe working conditions and responding to emergency situations.

13.0 PROFESSIONALISM

Employees are required to adhere to the highest standard of professionalism. Employee are encourage to pursue innovation and new ideas from time to time.

14.0 ACCOUNTABILITY

All employees including the Directors and Senior Manager are required to comply under this Code of Conduct. Violations of the Code of Conduct will lead to reprimanding, follow by dismissal should there be no corrective action. Any changes in, or waiver of this Code of Conduct will be disclosed to all employees.

15.0 CONCERNS & COMPLAINTS

If any employee have concerns or complaints about the matters covered under this Code of Conduct, including possible violations of the Code of Conduct, he/she should submit queries to their reporting manager or representative from HR. Employees are advised to demonstrate professionalism and respect during enquiry. The Group has incorporated a whistleblowing policy where any employees that suspect any irregularity, or suspected irregularity, involving employees as well as customers, consultants, vendors, contractors and/or any other parties with a business relationship with the Group, is encouraged to send a report verbally or in writing to designated communication channel at whistleblowing@i-stone.com.my.