



POLYMER LINK HOLDINGS BERHAD

Registration No. 201301011960 (1041798-A)
(Incorporated in Malaysia under the Companies Act 1965
and deemed registered under the Companies Act 2016)

**CODE OF CONDUCT
AND ETHICS POLICY**

Code of Conduct and Ethics Policy			
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1.0 INTRODUCTION

- 1.1 This Code of Conduct and Ethics Policy ("**Policy**") serves as a clear guideline that establishes the ethical principles, standards, and expectations governing the behavior and actions of all individuals, business partners, customers and suppliers associated with Polymer Link Holdings Berhad, ("**Polymer Link**" or the "**Company**") and its subsidiaries (hereinafter referred to as the "**Group**"). This Policy outlines the Company's unwavering commitment to fostering a corporate culture built on integrity, transparency, and ethical behavior across all facets of its operations and interactions.
- 1.2 The Policy provides general principles for ethical behavior and does not cover every ethical situation that employees and directors may encounter in their course of work. In cases where the code of ethics does not provide clear guidance, employees should use their judgment and consult with their respective Heads of Department or the Human Resources Department.

2.0 RESPONSIBILITY AND COMPLIANCE

- 2.1 Employees are responsible for acting in accordance with the policies, principles and guidelines detailed in the Policy, and any update or amendment which may be issued from time to time by the Company. Employees are also responsible for reporting any violations or suspected violations of the Policy to the appropriate party at ethics@polymerlink.net in accordance with the Whistleblowing Policy of the Group. This could be the Company's Head of Human Resources Department, the employee's Head of Department, the Executive Chairman of the Board of Directors of Polymer Link ("**Board**") (in the case of any Director) or such other officer designated by the Company from time to time.
- 2.2 Non-compliance with the Policy will be treated seriously and may result in disciplinary action, including the possibility of suspension or dismissal, and if warranted, legal proceedings against the employee. In addition to disciplinary action, employees who violate applicable laws may also be subject to civil and/or criminal penalties.
- 2.3 The Policy should be read and applied in conjunction with all other related or applicable policies, procedures, and guidelines. This is to ensure that employees are aware of all of the rules and regulations that apply to them.

3.0 ETHICAL CONDUCT

- 3.1 Integrity: Upholding the highest standards of integrity is paramount for all individuals affiliated with the Group. This entails consistently demonstrating honesty, transparency, and fairness in all business endeavors, with the overarching goal of safeguarding and enhancing the Group's reputation and standing in the marketplace.
- 3.2 Conflicts of Interest: The Group places significant emphasis on identifying, disclosing, and managing conflicts of interest. Individuals are obliged to promptly disclose actual or potential conflicts to the Group. The transparent management of such conflicts is essential to prevent any compromise to the Group's interests.

- 3.3 Insider Trading: Adhering to strict ethical and legal standards regarding insider trading is mandatory. Employees must refrain from using non-public information for personal gain, and they are obligated to comply rigorously with all relevant securities laws and regulations.
- 3.4 Fair competition: The Group is dedicated to operating in an industry that upholds fair and reputable business practices, showing respect to all shareholders and competitors, in a manner that aligns with how we would like to be treated.

4.0 RESPECT AND FAIR TREATMENT

- 4.1 Diversity and Inclusion: Embracing diversity and fostering an inclusive work environment are foundational principles of the Group. Every individual, regardless of their race, gender, age, religion, disability, or any other protected characteristic, is entitled to fair and equitable treatment.
- 4.2 Harassment and Discrimination: The Group is resolute in its stance against any form of harassment, discrimination, or intimidation. A zero-tolerance policy is enforced, ensuring that all individuals are empowered to promptly report any incidents of such behavior without fear of reprisal.
- 4.3 Safe and Respectful Workplace: Creating and maintaining a workplace that is free from bullying, harassment, and any behavior that threatens safety or mutual respect is the collective responsibility of every individual within the Group.

5.0 CONFIDENTIALITY AND DATA PRIVACY

- 5.1 Confidential Information: Safeguarding the confidentiality of the Group's proprietary information, trade secrets, and confidential data entrusted to the Company by its partners, clients, and stakeholders is a legally binding obligation.
- 5.2 Data Privacy: Compliance with relevant data protection laws and regulations is non-negotiable. Responsible handling and protection of personal and sensitive data are integral components of the Company's commitment to data privacy.

6.0 FINANCIAL INTEGRITY

- 6.1 Accuracy of Records: Accurate, complete, and transparent financial records are indispensable for presenting a truthful representation of the Company's financial position and performance.
- 6.2 Fraud and Corruption: Absolute adherence to anti-money laundering and terrorist activities, anti-bribery, anti-corruption, anti-fraud principles and compliance with tax and trade controls is mandatory. Employees are prohibited from engaging in any form of bribery, corruption, or fraudulent activity. Practices regarding the acceptance and provision of gifts and entertainment must align with the Group's policies and relevant laws.

7.0 HEALTH AND SAFETY

Workplace Safety: The Company bears the legal obligation of providing a safe and healthy work environment. Individuals are required to follow established safety protocols, report hazards, and take proactive measures to prevent accidents.

8.0 ENVIRONMENTAL RESPONSIBILITY

Sustainability: The Company acknowledges its role in environmental sustainability. It commits to operating in an ecologically responsible manner, minimizing its environmental footprint, and actively participating in sustainability initiatives.

9.0 SOCIAL RESPONSIBILITY

Community Engagement: Employees are encouraged to participate in community engagement and volunteer activities. This engagement reflects the Group's dedication to positively impacting the communities it operates within. The Group will also practice inclusive and equal employment opportunity and will not have forced labor and/or child labor.

10.0 REPORTING VIOLATIONS

Whistleblower Protection: The Company ensures robust safeguards for individuals reporting suspected violations of the Policy. Confidentiality and anonymity are guaranteed, and the Company is committed to preventing any form of retaliation against whistleblowers.

11.0 ENFORCEMENT AND CONSEQUENCES

Violation Consequences: Breaches of the Policy are subject to a range of disciplinary measures. These measures may include, but are not limited to, employment termination, legal actions, and other appropriate remedies necessary to rectify the violation.

12.0 CONCLUSION

12.1 The Policy is a binding testament to the Company's dedication to upholding the highest ethical standards, unwavering integrity, and professional conduct. It mandates that all individuals affiliated with the Company adhere to these principles and actively contribute to a corporate culture characterised by transparency, respect, and ethical business practices.

12.2 The Policy is subject to periodic legal review and updates to ensure its continued legal efficacy and relevance.

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