



Employee Code of Conduct

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APPROVED

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Introduction

The following Employee Code of Conduct (“**Code**”) serves as guidance on the ethical framework at workplace to all Employees in MTT Shipping and LogisticsBhd. (“**MTTSL**” or “**Company**”). With the Code, Employees are expected to work with high commitment, dedication and professionalism. The Code will be a reference and guide to the Employees who is also responsible for the social and environmental growth of the surroundings in which MTTSL operates.

The Company’s professionalism and integrity must at all times be upheld in the business dealings with:

- a) Customers
- b) Investors
- c) Vendors, suppliers and contractors
- d) Government and regulators
- e) The business community as a whole
- f) Community where the business operates

This Code emphasizes on the following underlying values of the Company:

- a) Innovation
- b) Integrity
- c) Transparency
- d) Safety

Definitions

Term	Description
Company or MTTSL	MTT Shipping and Logistics Bhd. and its subsidiaries.
Code	The Employee Code of Conduct
Confidential Information	Any information pertaining to the Company which is not released to the public and the release of such information may result in the following situations: (a) Provide a competitive edge to competitors (b) Degrade the company’s reputation and image
Employee	Any person under the employment of the Company including permanent, probationary, contract, and temporary employment. Where an Employee is employed under a contract, the terms and conditions of his contract shall apply where they differ from the policies in this Code.
Relatives	Refers to the Employee’s parents, siblings, grandparents, and parents-in-law of the relevant Employee.
Spouse	An Employee’s legal wife or husband.
Management	The management team consisting of Executive Chairman, Managing Director, and Executive Directors of the Company.
HRD	Human Resources Department of the Company

Purpose

The Code shall serve as the documentation of the Company's commitment in business dealings in a manner that is professional, fair and efficient. It is designed to enhance the Company's standard of corporate governance and corporate behaviour with the intention of achieving the following objectives:

- a) To provide guidance to the Management and Employees of the Company on the appropriate conduct at workplace.
- b) To establish a standard of ethical behaviour, integrity and commitment required of all Employees based on acceptable values.
- c) To uphold the spirit of responsibility including social and environmental responsibility in line with the regulations and guidelines for administration of MTTSL.

Every Director and Employee in the company is responsible to familiarise and act in accordance with the policies detailed in the Code and any amendments that may be made from time to time. The Company reserves the right to amend, delete or augment any provision in this code as and when it deemed necessary. Every Employee is required to certify that they have read, understood and agreed to comply with the Code.

Scope

The Code is applicable to Directors, Management, and all levels of Employees of the Company.

Employees

All Employees are to read, understand and comply with this Code. Unawareness of the existence of this Code will not be accepted as an excuse in any case of breaching.

Employees may be subject to disciplinary action, up to and including termination of employment or dismissal based on the severity of offence committed and, if warranted, legal actions or criminal sanctions, for violating the law or the Code or other policies, procedures, directives and guidelines of the Company.

Managers

As leaders in the Company, Managers have added responsibilities of:

- i. Promoting compliance and ethical values via leadership by example.
- ii. Ensuring that their direct subordinates understand and comply with the Code, and providing explanation where the application of this Code may seem unclear.

Employee Conduct

Workplace Environment

Health & Safety

The Company strives to provide a healthy, safe and conducive workplace environment. Every Employee shall observe and adhere to the highest standards of professional conduct complying with all Occupational Safety and Health laws and regulations and the Company's environmental safety rules and regulations.

- a. Each Employee should do the utmost by identifying potential occupational risks, establish controls and monitor performance accordingly.
- b. Upon identifying any potential threat to health and safety, the Employees are responsible to adhere to the prescribed safety rules and to act, raise and react to any of the concerns.
- c. Safety and health training programs provided will be different between Employees, based on their job scope and the needs of the training. Employees will be divided into the following groups:
 - i. Head of Departments ("HODs")
 - ii. Office-Based Employees
 - iii. Others (Contractors, temporary Employees, etc.)

Sexual Harassment & Violence

The Company strictly does not tolerate and condone any form of sexual harassment and violence to provide a comfortable and respectful working environment.

Any Employee who believes that he/she has been subjected to sexual harassment can lodge a report to HRD who will be responsible to review the case and consider the appropriate course of action where applicable. In the event where the HRD is implicated, the report shall be lodged directly to Managing Director and/or Compliance Department. Upon review of the report lodged, Managing Director and/or Compliance Department will identify and consider the appropriate course of action to be taken against the wrongdoer.

Respect, Equality and Non-Discrimination

Employees of MTTSL, consisting of diverse community, shall act with integrity and treat every person met during work with respect in order to produce a work environment that is free from discrimination or harassment.

The Company is against any form of discrimination, intimidation or degrading treatments towards any Employee, such as mental or physical harassment, discriminatory gestures, and any coercive, threatening and abusive element observed in verbal or physical contact.

The Company endeavours to provide equal opportunity to ensure that employment decisions, promotion and rewards are entirely based on performance and merit with no regard to race, religion, gender, sexual orientation, age, disability, nationality or other factors that are unrelated to the Company's legitimate business interests.

Working Culture

Attendance and Punctuality

Employees are required to be punctual and adhere to the specified working hours of the Company. Regular attendance and punctuality are vital to maintain efficient and effective workflow.

- a. Employee who is unable to commence work on time on any particular day must inform the immediate superior earliest possible.
- b. Employee who is unable to be present at work due to sickness must submit the medical certificate to HRD on the day returning to work.
- c. Employee is required to apply leave via e-leave system at least three (3) days prior to going on annual leave. The Employee is responsible to obtain approval from relevant superior on the leave application before going on leave.
- d. Without any reasonable circumstances, an Employee must not be continuously absent from work for more than two (2) consecutive days without having obtained prior approval for leave from relevant superior.

Commitment

- a. All employees shall, in the course of their employment with the Company and in carrying out their duties and responsibilities in respect thereof, diligently and to the best of their ability perform such responsibilities and responsibilities as may from time to time be assigned or designated to them.
- b. All employees are expected at all times to promote and advance the interests of the Company and shall not do anything to bring disrepute to the Company.
- c. All employees shall obey, comply with and observe rules, regulations, procedures, practices, orders, directives and policies of the Company.

Insubordination

Employee shall not refuse to perform any lawful and reasonable work assigned by the superior. This includes refusal to perform any work assigned and slowing down the work deliberately with the intention to cause adverse effect on the quality and quantity of work assigned, consequently degrading Company's reputation.

Professional Conduct

- a. All Employees must observe and adhere to the highest standards of professional conduct at all times with integrity, propriety and modesty.
- b. All Employees, under any circumstances, must not commit any act or omission that would bring damage to the Company, its reputation or general interest.

Appearance

Employees must ensure that their appearance reflects the professionalism expected of them which include personal hygiene and well grooming.

All Employees must be neatly, appropriately and decently attired at all times at the workplace, during meetings or during the event of any official duties assigned outside the workplace. Every Employee representing the company must maintain the good image and professional outlook for the Company.

All Employees are required to adhere to the dress code guidelines as per the Company's Dress Code Policy.

Code of Ethics

Confidentiality

It is the Company's policy that any information pertaining to the Company that is not generally available to the public, whether generated internally or acquired from other sources, shall be kept confidential during and after employment by the Company.

- a. Employees are not permitted to discuss among themselves or with others, within the workplace or outside the Company's premises, confidential information pertaining to the company's businesses and its customers' details directly and indirectly to anybody, especially to competitors.
- b. Non-public information must not be disclosed to anyone outside the Company, except when the disclosure is necessary for business purposes, but the matter must first be referred to the respective Head of Departments for approval to prevent misuse of the information.
- c. Employees are required to inform the relevant head of departments or Human Resources manager, and also Corporate Affairs when there is a request seeking the disclosure of confidential information pertaining to the Company.

Publications Using Social Media

Whilst the Company respects the Employees' rights to freedom of speech, they must be mindful of what is acceptable and what is not to be posted on social media. It should be understood that any form of information published on social media can spread rapidly and are difficult to retract, hence extra caution is required before publishing anything.

- a. Employees are strictly prohibited from posting any information or material (including photos and videos) that may affect the reputation of the Company, its Management, the Company's Employees and/or its customers, business partners and suppliers.
- b. Employees may use social media to reflect personal views, but Employees are required to ensure that it does not give the impression that the posting is made on behalf of the Company. Employees must also be aware that their comments may implicate the Company even if it was posted as a personal post.
- c. Employees shall not engage in any online discussion on social media that involves sensitive or confidential information obtained during employment.

Press Release and Public Statement

Every Employee has the responsibility to maintain strict confidentiality with respect to the Company's business dealings and only make public comments consistent with legal and regulatory obligations, any confidentiality agreements with its business partners, and in accordance with the Company's policies.

- a. Any Employee approached by investors, prospective investors, media and analysts on confidential information shall refer such requests to Corporate Affairs Department.

- b. Employees shall not initiate contact with the media or analyst unless it is part of the job responsibilities, and with prior Management's approval and knowledge. In all instances, Employees shall exercise caution in communications to external parties.

Company Resources and Property

All Employees have the responsibility to respect and protect all of the Company's resources and properties that they have been given access to from loss, damage, theft, waste and improper use for personal purposes.

Employees who are involved in theft of company assets, including but not limited to, unauthorized removal of Company products, equipment or information, or theft through embezzlement or intentional misreporting of time or expenses, may be terminated or prosecuted as a criminal.

The types of Company resources and property include:

Physical Property

Equipment, systems, facilities and supplies shall only be used for conducting the Company's business or for purposes authorized by Management. They shall not be used for Employees' personal activities to the extent that it would affect the interests of the Company.

Information and Communication System

Company's computer system such as emails and connections to the internet shall be used for conducting the Company's business or for other incidental purposes authorized by the Management. It is inappropriate to use them for personal activities, which may interfere with Employees' productivity.

Employees shall not misuse them to access illegal websites and/or download materials that contain illegal, obscene, racist, abusive, political, subversive, controversial and offensive content as well as other materials that have no bearing on the Company's business.

Proprietary Information

Examples of proprietary information (whether written or verbal, and whether on paper or electronic form) includes but not limited to product and services, financial data and projections, marketing strategies and business plans, organizational and personnel information, trade secrets, customer databases and any data that is not a public information or if known will have an adverse effect on the Company.

It is critical that Employees treat such information as confidential and take all necessary safeguards to protect this information even after the Employee leaves the Company.

Intellectual Property Rights

Company's intellectual property includes all ideas, inventions or any form of copyrighted works produced by Employees as a result of the work performed for or on behalf of the Company in the course of employment, and shall not be reproduced, distributed or altered without authorization.

Employees shall understand their responsibility to protect the Company's intellectual property and seek advice from the Compliance Department when in doubt of their obligation in this regard. The Company's ownership of such intellectual property shall continue even after the Employee leaves the Company.

Accounting and Financial Reporting

Employees in the accounting and financial management roles are entrusted to provide full, fair, accurate, complete, objective and timely financial disclosures.

- a. Employees are required to record and classify transactions in the proper accounting period and in the appropriate account and department. Delaying or accelerating the recording of revenue or expenses to meet budgetary goals is not acceptable.
- b. No Employee should ever conceal asset, liability or transaction from management, internal or external auditors or other persons, including governmental, regulatory and tax authorities. Every Employee is required to report any transaction that appears to be contrary to the established policies.
- c. Employees must not distort the true nature of any transaction nor falsify any document or report.
- d. Employees must ensure that every estimate and accrual must be supported by appropriate documentation and be based on Employee's best judgment.
- e. Employee shall not engage in any scheme to defraud money, property and services.

Data Integrity and Data Retention

Ensuring accurate and complete business and financial records is everyone's responsibility, not just a role for accounting and finance personnel. Accurate report keeping and reporting reflects on the Company's reputation and credibility and ensures that the Company meets its legal and regulatory obligations.

- a. Employees shall record and report all information accurately and with integrity.
- b. Employees should manage the records securely in line with their importance and in compliance with legal, tax, regulatory, accounting and other business retention requirements as required by the laws in the Country.
- c. Any situations of improper influence or data misrepresentation should be immediately reported to the Head of Department.

Business Code

Customers

The Company operates with a long-term commitment in developing close relationships with the customers in order to be able to continuously meet or exceed their expectations.

- a. Customers must always be treated with respect and understanding. Employees should always try to fulfil the needs of the customer in the best possible manner, whilst complying with laws and regulations.
- b. All customer complaints must be dealt with promptly and fairly in order to ensure the highest level of satisfaction and maintaining the Company's image and reputation at the highest level.

Suppliers

When dealing with suppliers, Employees shall follow the established guidelines and procedures.

- a. Employees have to be alert of the suppliers' activities that may be in breach of our Company policy on the Supplier Code of Conduct. In any case of breaching by the supplier or impropriety involved, it has to be reported to Head of Department and Compliance Department immediately.
- b. When contracting with a supplier, Employees are required to act objectively and fairly by seeking to obtain the best value for the Company on the basis of price and service quality.

Competitors

The Company practices healthy competition in elevating our market position, emphasizing the need to do so fairly, having honest communication and to never misrepresent the quality, features or availability of our products and services.

- a. When engaging in marketing, promotion and advertising activities, Employees should maintain high standards of fairness and integrity.
- b. Employees must also follow the Antitrust and Competition Laws in place in the countries where the business was conducted.
- c. Any breach of general or specific competition regulations, such as illegal cooperation on pricing, illegal market sharing or any other behaviour that is in breach of relevant competition laws, must be avoided by all means.
- d. Employees shall not use improper or illegal means to acquire a competitor's trade secrets or other confidential information. Employees shall only use such information to evaluate the merits of the products, services and marketing of the Company. Such information shall only be made available to other Employees on a need-to-know basis.

Bribes and Corruption

Employees must never, directly or through intermediaries, offer, give, solicit or accept bribes in order to achieve business or personal advantages or engage in any transaction that can be construed as having contravened the Company's Anti-Bribery and Anti-Corruption Policy.

- a. Employees shall be aware of the fact that bribes may be in any form, monetary or otherwise including but are not limited to unauthorized remuneration such as referral fee, commission, gifts, business amenities, premiums or discounts of an inappropriate value or of an unreasonable level or that are not generally offered to others or that are prohibited by law or may reasonably be viewed as having crossed the boundaries of ethical and lawful business practice.
- b. Prior to giving or accepting any business amenity or other gifts, Employees shall assess the appropriateness of their actions if the action could influence the business relationship between the Company with that organization or on any business decisions.

Employees must refrain from any activity or behaviour that could give rise to the appearance of suspicion of such conduct or the attempt of thereof.

Gifts and Hospitality

It is the policy of the Company that Employees submit declaration of gifts and/or hospitality received from or provided to external parties, whether directly or indirectly, including but not limited to contractors, suppliers, customers, or any other party having business dealings with the Company.

- a. Employees shall declare all gifts and hospitality received from or provided to external parties through the Gifts and Hospitality Declaration Form. The decision regarding the gifts and hospitality received, whether to be accepted, declined or transferred to company's ownership, is subject to approval by the Head of Department.
- b. Employees shall refer to the Company's Anti-Bribery and Anti-Corruption Policy for the guidelines on receiving and offering gifts or hospitality.
- c. Any Employee found to have received or provided gifts and hospitality in breaching the above provisions shall be subjected to disciplinary action.

Money Laundering

Money laundering is the process of concealing the identity of proceeds from illegal means and converting it to a legitimate source of income or asset.

- a. Employees shall only conduct business with partners involved in legitimate business activities with funds derived from legitimate sources.
- b. Employees are expected to be mindful and attentive to detect any risk of the Company's business or financial transactions being used for money laundering activities and to prevent any illegal form of payments.
- c. Employees are required to raise any suspicious transaction to the Head of Compliance.
- d. Employees shall be aware of the Anti-Money Laundering and Anti-Terrorism Financing Act 2001 in Malaysia or the Anti-Money Laundering laws in the country where business was conducted at.

Immediate superior is encouraged to have two-way communications with subordinates and ensuring that they are adequately informed on the developments in the laws relating to money laundering.

Conflicts of Interest

Employees are required to act in the best interest of the Company at all times. Employees are prohibited from using their position or knowledge gained directly or indirectly in the course of their duties and responsibilities or employment for private or personal advantage or for any unauthorized purpose.

If there are cases of potential or actual conflict of interest, Employees are obliged to disclose the conflict promptly by submitting the Declaration of Interests Form. Any dealings of family members, relatives or friends with the Company must be disclosed, regardless of direct business dealings or through a third-party supplier or contractor.

Employees must not work in any other trade, business, employment or directorship other than the employment with the Company, whether within or outside of working hours, without the prior written approval from the Human Resource Department.

Political and Charitable Contributions

Employees shall not use the company's funds and resources to make contributions to any political campaign, political party, political candidate or any of Employee's affiliated organizations unless otherwise authorised by the Company.

Employees may make contributions to charitable organisations and provide non-commercial sponsorships, subject to the following conditions:

- a. The contributions and sponsorships are not made to secure any improper businesses or other advantages.
- b. The contributions and sponsorships do not give rise to any conflict of interest.
- c. Steps have been taken to verify the recipient's reputation or status as a charitable organisation.

Disciplinary Actions

In the event where an Employee commits an offence, the Company will investigate the severity of the offence committed and determine as to whether it is a minor or major offence. The disciplinary action taken will be based on the severity and category of the offence.

Misconducts in employment are classified into two (2) categories as follows:

- | | |
|------------|----------------|
| Class I – | Minor Offences |
| Class II – | Major Offences |

Please refer to the Employee Handbook for further classification and examples on both major and minor offences.

Disciplinary actions that may be taken by the Company after due inquiry and investigation include:

- a. Verbal warning
- b. Written warning
- c. Final warning
- d. Downgrading of position in the Company
- e. Dismissal

The Company may also report to the relevant Government authorities if deemed necessary, depending on the circumstances of the case. The Company may also use its absolute discretion and close the matter with a verbal advice or counselling.

Compliance with the Code

All Employees are required to comply with this Code. Being unaware of this Code will not be accepted as an excuse for its breach. The Company requires all Employees to complete and submit the [Code of Conduct Declaration Form](#) every year.

Review of the Code

The Management will monitor compliance with the Code and review the Code regularly to ensure it remains relevant and appropriate.

Reporting of Violations of Code

Compliance Department

UOA Business Park

Unit 13A-1, Level 13A, Tower 8

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