

ALCOM GROUP BERHAD

CODE OF CONDUCT

Introduction

This Code of Conduct is a foundational document for Alcom Group Berhad (AGB) that sets forth the principles and standards guiding our corporate behaviour and decision-making. This Code is designed to ensure that all our business activities are conducted with the highest level of integrity and in compliance with applicable laws and regulations. By adhering to this code of conduct, we affirm our commitment to ethical practices, transparency, and accountability in all aspects of our operations.

Foreword by President and Group CEO

As we push forward in our commitment to sustainability and our vision of achieving a net gain by 2050, the importance of integrity and ethical conduct in every aspect of our operations cannot be overstated. Our Code of Conduct is the practical guide that ensures we stay on this path, making decisions that are not only good for business but also right for our communities and the environment.

This document isn't just about rules; it's about how we live our values daily, ensuring that our drive for innovation and growth never compromises our ethical standards. It outlines the basic principles we all must follow to help AGB lead in responsible business practices and maintain our trust with customers, partners, and each other.

As we strive to transform our industry and reduce our environmental footprint, every decision counts. From avoiding corruption and ensuring fair dealings to respecting each other's rights and safety, this Code is your roadmap.

Let's continue to work together with the transparency and integrity that define us as a team. Our journey towards a sustainable future is ambitious, but with your commitment to these principles, I am confident we will not only reach our goals but set new standards for our industry.

Thank you for your dedication to making AGB a leader in sustainable and ethical business.

Heon Chee Shyong
President and Chief Executive Officer
ALCOM Group Berhad

Table of Content

INTRODUCTION	1
FOREWORD BY PRESIDENT AND GROUP CEO	2
1. GENERAL BUSINESS PRINCIPLES	4
2. OBJECTIVE	6
3. PART I: CORE VALUES AND CULTURE	7
4. PART II: DUTIES OF GOOD FAITH, FIDELITY, DILIGENCE, AND INTEGRITY	12
5. PART III: WORKPLACE CULTURE AND ENVIRONMENT	22
6. PART IV: DISCIPLINE, DISCIPLINARY PROCESS, AND SANCTIONS	27

1. General Business Principles

At Alcom Group Berhad (AGB), we are committed to conducting our business operations ethically, responsibly, and transparently. This commitment is the cornerstone of our success and the foundation of the trust we foster with our stakeholders, including employees, customers, suppliers, and the communities where we operate.

Ethical Business Practices:

We hold ourselves to the highest ethical standards in every aspect of our business. This means conducting all operations with integrity, fairness, and respect for the rights and interests of everyone involved. We strictly prohibit any form of corruption, bribery, or unethical behaviour and are committed to accountability at every level of our organization.

Responsibility and Accountability:

As a responsible corporate citizen, AGB is dedicated to being accountable for our actions and their impacts on the environment, communities, and broader economy. We make decisions with a view of their long-term effects, ensuring that we contribute positively to sustainable development and the well-being of future generations.

Transparency and Open Communication:

Transparency is central to our approach. We believe in maintaining open and honest communication with all our stakeholders, providing clear, accurate, and timely information about our activities, performance, and governance. This transparency builds trust and ensures that we are held accountable for our actions and outcomes.

Alignment with National Operations and Legal Standards:

AGB operates across diverse legal and cultural landscapes as a corporation. Our Code of Conduct is designed to align with the varied environments in which we operate, ensuring compliance with both local and international laws and regulations. We are committed to

understanding and respecting the legal and ethical standards of each country in which we operate, adapting our practices as necessary to uphold our commitment to global ethical standards.

By adhering to these General Business Principles, AGB ensures that its path towards sustainable success is guided by integrity, responsibility, and a profound respect for the values that define us as an industry leader.

2. Objective

Purpose:

The purpose of this Code is to provide a clear framework for ethical and responsible conduct that all individuals associated with AGB are expected to follow. It serves as a guide to help employees, directors, and third-party contractors understand and adhere to our commitment to integrity, ensuring that every decision and action reflects our corporate values and ethical standards.

Applicability:

This Code applies universally across AGB, covering all employees, directors, and third-party contractors regardless of their role, location, or level within the organisation. It is essential for everyone connected with AGB to understand and comply with the principles and standards outlined in this Code to maintain the trust and confidence of our stakeholders and uphold our corporate reputation.

Consequences of Non-Compliance:

Non-compliance with this Code can have serious consequences for both the individuals involved and the organisation. Individuals who violate the Code may face disciplinary action, up to and including termination of employment or contractual relationships. Such actions not only affect the individual but can also lead to legal penalties for AGB, damage to our reputation, and potential financial losses.

It is the responsibility of every employee, director, and third-party contractor to familiarise themselves with this Code, understand its implications, and adhere to its guidelines in all professional activities. By doing so, we collectively ensure that AGB continues to operate with the highest ethical standards and contributes positively to our shared goals and the broader community.

3. Part I: Core Values and Culture

3.1. Application

The Code of Conduct at Alcom Group Berhad (AGB) is rooted in our core values and the culture we have cultivated over the years. This part of the Code defines its scope and underscores the universal application of our principles to uphold integrity and ethical behaviour across all levels of the organisation.

Scope and Applicability:

This Code applies to every individual who is part of or interacts with AGB, including all employees, whether full-time, part-time, or temporary, directors, and third-party contractors. It is relevant to every decision and action, regardless of the role or position within the company, and extends to our interactions with customers, suppliers, partners, and the communities where we operate.

The principles outlined in this Code are not just guidelines but expectations for behaviour and professional conduct. They serve as the foundation for how we operate daily, ensuring that our business practices reflect our commitment to ethical standards.

Importance of Integrity and Ethical Behaviour:

Integrity and ethical behaviour are not optional; they are essential to maintaining the trust and confidence of our stakeholders and achieving long-term success. These principles are integral to our identity and crucial for sustaining our reputation as a leader in our industry.

At AGB, we expect everyone to adhere to these values, demonstrating honesty, fairness, and respect in every interaction. This commitment to ethical conduct helps us navigate complex challenges, make responsible decisions, and foster a positive and inclusive workplace environment.

By embracing and applying the principles in this Code, each member of the AGB family contributes to a culture of integrity and ethical excellence, ensuring that we not only meet but exceed the ethical expectations set before us.

3.2. Corporate Values and Culture

At Alcom Group Berhad (AGB), our corporate values and culture are the fundamentals upon which our business is built. These values guide our actions and decisions, ensuring that we consistently exhibit the highest levels of integrity and professionalism in all that we do.

3.2.1. AGB's Core Values

- a) Integrity:** We commit to honesty and fairness in all our interactions. Integrity is the cornerstone of our business, compelling us to make the right choices, even when they are not the easiest.
- b) Excellence:** We strive for the highest standards in our products, services, and performance. Excellence is not just a goal but a mindset that drives continuous improvement and innovation.
- c) Respect:** We treat everyone with dignity and value their contributions. This respect extends to our colleagues, customers, partners, and the communities where we operate.
- d) Accountability:** We take responsibility for our actions and their outcomes. This means being answerable for meeting our commitments and correcting our mistakes.
- e) Sustainability:** We are dedicated to sustainable practices that protect the environment and contribute positively to society. This commitment guides our operations and strategic planning.

3.2.2. Expected Behaviour

Each member of the AGB team is expected to embody these values in their daily work.

This includes:

- Making decisions that reflect our commitment to ethical business practices.
- Communicating openly and honestly, ensuring transparency in all dealings.
- Treating all stakeholders with respect and consideration.
- Being proactive in identifying and addressing issues that may impact our ethical standards.
- Supporting a workplace culture that encourages feedback, collaboration, and continuous learning.

3.2.3. Maintaining Integrity and Professionalism

To uphold our values and maintain the highest standards of integrity and professionalism, AGB provides the following guidelines:

Consistent Application: The principles and values in this Code must be applied consistently, regardless of position or circumstance. This uniformity ensures that our culture remains strong and our standards clear.

Ongoing Education and Training: Regular training sessions are provided to all employees to reinforce our values and the importance of ethical conduct. This education helps team members navigate complex situations and make informed decisions.

Supportive Environment: We foster an environment where employees feel safe to voice concerns and seek advice. Open communication is encouraged, and resources are available to guide ethical decision-making.

Monitoring and Enforcement: Regular reviews are conducted to ensure compliance with this Code. Any deviations are addressed promptly and fairly, with corrective actions taken to reinforce our commitment to our values.

By adhering to these guidelines and living our core values, every member of AGB contributes to a culture of integrity and excellence that not only defines who we are but also shapes our future success.

3.3. Definitions

To ensure clarity and a common understanding of key terms used throughout the Code of Conduct, Alcom Group Berhad (AGB) provides the following definitions:

Integrity: Adherence to moral and ethical principles, ensuring honesty, fairness, and consistency in all actions and decisions.

Excellence: The pursuit of the highest quality and performance in all aspects of our business, from products and services to customer relations and internal processes.

Respect: The act of valuing and considering the rights, feelings, and traditions of others, fostering an inclusive and supportive work environment.

Accountability: The obligation to take responsibility for one's actions and the outcomes of those actions, including owning up to mistakes and taking steps to rectify them.

Sustainability: A commitment to conducting business in a way that meets the needs of the present without compromising the ability of future generations to meet their own needs, encompassing environmental, social, and economic dimensions.

Stakeholders: Individuals or groups who are affected by or have an interest in the operations and outcomes of AGB, including employees, customers, suppliers, investors, communities, and regulatory bodies.

Compliance: The act of adhering to laws, regulations, and standards set by governmental bodies and industry organisations, as well as internal policies and guidelines established by AGB.

Conflict of Interest: A situation in which an individual's personal interests could interfere with or appear to interfere with the performance of their duties or the best interests of AGB.

Bribery and Corruption: The offering, giving, receiving, or soliciting of any item of value to influence the actions of an official or other person in charge of a public or legal duty. Corruption includes any illegal behaviour that undermines an individual's or organisation's integrity.

Transparency: The practice of openly and honestly disclosing information to stakeholders to foster trust and facilitate informed decision-making.

Ethical Behaviour: Conduct that is consistent with what individuals and society consider to be good values and involves demonstrating respect for key moral principles like honesty, fairness, equality, dignity, diversity, and individual rights.

These definitions are fundamental to understanding and applying the principles laid out in the Code of Conduct, ensuring that all AGB team members operate with a shared vocabulary and a clear sense of purpose.

4. Part II: Duties of Good Faith, Fidelity, Diligence, and Integrity

4.1. Conflict of Interest

At Alcom Group Berhad (AGB), we recognise that conflicts of interest can undermine our core values and compromise the integrity of our decision-making processes. Our duty is to act in the best interests of AGB and its stakeholders, maintaining transparency and fairness in all our business dealings.

4.1.1. Guidelines on Avoiding and Managing Conflicts of Interest

Identification and Disclosure: Employees, directors, and third-party contractors must proactively identify and disclose any situations that may lead to a conflict of interest. This includes situations where personal, familial, or financial interests might influence or appear to influence their professional judgment or actions.

Recusal: Individuals should recuse themselves from any decision-making processes where they have a conflict of interest. This ensures that decisions are made impartially and in the best interests of AGB.

Consultation: When in doubt, individuals are encouraged to consult with their supervisors or the compliance department to assess and address potential conflicts of interest.

Documentation: All disclosed conflicts of interest and the actions taken to manage them should be documented to maintain a record of compliance and transparency.

4.1.2. Detailed Scenarios and Examples Where Conflicts Might Arise

Personal Investments: An employee has significant shares in a supplier company that is bidding for a contract with AGB. The employee must disclose this investment and refrain from participating in the procurement process to avoid influencing the outcome.

Family Connections: A director's sibling applies for a high-level position within AGB. The director should not be involved in the hiring process to ensure that the recruitment is based on merit and not personal relationships.

Secondary Employment: An employee works part-time for another company in the same industry. This could divide their loyalty and affect their productivity and decision-making at AGB. They must disclose this employment and may need to terminate the secondary job if it poses a conflict.

Gifts and Hospitality: Receiving expensive gifts or lavish hospitality from a client or supplier could influence or appear to influence an individual's impartiality. Employees should adhere to AGB's gift policy and either decline such offers or report them according to the established guidelines.

By adhering to these guidelines and recognising potential conflicts of interest, AGB ensures that all decisions are made with the highest level of integrity, safeguarding the trust of our stakeholders and the reputation of our organization.

4.2. Fighting Corruption and Unethical Practices

At Alcom Group Berhad (AGB), we uphold a zero-tolerance policy towards bribery, corruption, and all forms of unethical behaviour. Maintaining the integrity of our operations and protecting the interests of our stakeholders are paramount. This commitment is reflected in our rigorous approach to preventing, identifying, and addressing corrupt practices.

4.2.1. Prohibition Against Bribery, Corruption, Money Laundering and Unethical Behaviour

No Bribery or Corruption: AGB prohibits the offering, giving, soliciting, or accepting of bribes or kickbacks in any form. This applies to dealings with both public officials and private sector entities. Our policy extends to indirect actions through

intermediaries or third parties intended to influence business outcomes inappropriately.

Anti-Money Laundering: AGB is committed to the highest standards of anti-money laundering compliance. This includes adhering to all relevant laws and regulations to prevent money laundering and terrorist financing. The standard country legislation, The Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (AMLA), and procedures include thorough customer due diligence, continuous monitoring of transactions, and regular employee training. We strive to ensure transparency and integrity in all our operations to protect the financial system and uphold our corporate responsibility. This comprehensive approach is designed to uphold ethical standards and ensure compliance with relevant regulations.

Ethical Business Conduct: All employees, directors, and third-party contractors must conduct their business dealings transparently and fairly. This includes adhering to competitive practices, respecting contractual obligations, and ensuring that all transactions are properly recorded and justified.

Gifts and Hospitality: While business gifts and hospitality can be part of building normal business relationships, they must not be used to exert undue influence or gain improper advantages. AGB provides clear guidelines on acceptable gifts and hospitality to prevent these gestures from crossing ethical boundaries.

4.2.2. Procedures for Reporting and Dealing with Unethical Practices

Reporting Mechanisms: AGB has established secure and confidential channels for employees and other stakeholders to report suspicions of corruption or unethical behaviour. This includes a whistle-blower hotline, a dedicated email address, and direct access to Human Resources department

Investigation and Response: Upon receiving a report, AGB commits to prompt and thorough investigations to ascertain the facts. The process is handled with the utmost

confidentiality to protect the identity of the reporter and ensure fairness in addressing the issue.

Corrective Actions and Sanctions: If a violation of our anti-corruption policies is confirmed, AGB will take appropriate corrective actions. This may include disciplinary measures against the individuals involved, up to and including termination of employment or contractual relationships. Legal actions may also be pursued where necessary.

Education and Training: To reinforce our commitment to fighting corruption and unethical practices, AGB provides regular training to all employees. This training covers our policies, the importance of ethical behaviour, and how to recognise and respond to unethical situations.

By adhering to these principles and procedures, AGB ensures that our business is conducted with integrity and in compliance with all applicable laws and regulations. This approach not only protects our company but also contributes to a broader culture of ethical business practices in the industry.

4.3. National and International Trade

At Alcom Group Berhad (AGB), we are committed to conducting our national and international trade activities in full compliance with applicable laws and regulations. This includes adhering to antitrust and competition laws, as well as navigating the complexities of export and import controls, international boycotts, and economic sanctions.

4.3.1. Compliance with Antitrust and Competition Laws

Fair Competition: AGB is dedicated to maintaining fair competition in all markets where we operate. This involves adhering to antitrust laws that prohibit practices such as price-fixing, market allocation, and other activities that unfairly restrict trade or harm consumer interests.

Market Behaviour: Employees must avoid discussions or agreements with competitors that could be construed as collusion. This includes informal gatherings where sensitive topics like pricing, market division, or sales territories might be discussed.

Compliance Training: AGB provides regular training to ensure that all employees, particularly those in sales, marketing, and procurement, understand and comply with antitrust and competition laws.

4.3.2. Rules about Export and Import Controls, International Boycotts, and Economic Sanctions

Export and Import Controls: AGB complies with all laws governing the export and import of goods and services. This includes obtaining necessary licenses, adhering to documentation requirements, and ensuring that all transactions meet legal standards.

International Boycotts and Sanctions: AGB follows international regulations regarding trade embargoes and sanctions. Employees must ensure that our business activities do not violate restrictions imposed by the United Nations, the European Union, the United States, or other international bodies.

Due Diligence: Before engaging in international trade, AGB conducts thorough due diligence to identify potential risks and ensure compliance with relevant laws and regulations. This includes screening partners and transactions for connections to restricted or sanctioned entities.

Reporting and Record-Keeping: Accurate and comprehensive records of all international trade transactions must be maintained. Employees are required to report any suspicious activity or potential violations to the compliance department immediately.

By adhering to these guidelines, AGB ensures that our national and international trade activities are conducted ethically and in compliance with all relevant laws, protecting our reputation and contributing to a stable and fair market environment.

4.4. Assets of AGB

At Alcom Group Berhad (AGB), safeguarding and properly utilising company assets are crucial responsibilities that contribute to our efficiency and overall success. Our approach ensures that all assets, whether physical, intellectual, or digital, are used effectively, securely, and in a manner that aligns with our business objectives and ethical standards.

4.4.1. Responsibilities Related to the Safeguarding and Proper Use of Company Assets

Protection of Physical Assets: Employees are responsible for protecting AGB's physical assets, including equipment, buildings, and inventory, from damage, theft, or misuse. This includes ensuring that these assets are used for legitimate business purposes and maintained in good working condition.

Use of Intellectual Property: AGB's intellectual property, such as patents, trademarks, and proprietary information, is a vital asset. Employees must respect and protect these assets by avoiding unauthorized use, disclosure, or duplication. Proper handling of intellectual property rights not only safeguards AGB's interests but also respects the rights of others.

Digital Security: Digital assets, including software, databases, and electronic information, require stringent security measures. Employees must adhere to AGB's cybersecurity policies, which include using strong passwords, avoiding unauthorised software installations, and protecting sensitive data from unauthorized access or breaches.

Financial Resources: Employees must ensure that AGB's financial resources are used prudently and for approved purposes. This includes following proper procedures for expenditures, avoiding wasteful practices, and ensuring that all financial transactions are accurately recorded and reported.

Personal Use of Company Assets: While limited personal use of certain assets, like computers and phones, may be permissible under specific guidelines, employees must prioritise the business needs of AGB. Any personal use should not interfere with work responsibilities or result in additional costs to the company.

Reporting Misuse or Theft: Employees are required to report any suspected misuse, theft, or unauthorised access to company assets immediately. Prompt reporting helps mitigate potential losses and ensures corrective actions can be taken swiftly.

By adhering to these responsibilities, every member of the AGB team plays a part in maintaining the integrity and value of our assets. This collective effort is essential for our operational effectiveness and the long-term sustainability of our business.

4.5. Financial Integrity

At Alcom Group Berhad (AGB), maintaining the accuracy and integrity of our financial reporting is essential to our credibility and the trust our stakeholders place in us. Our commitment to financial integrity is foundational to our operations, guiding how we record, report, and manage financial information.

4.5.1. Obligations to Maintain Accuracy and Integrity in Financial Reporting

Accurate Record-Keeping: All financial transactions must be accurately recorded in AGB's accounting systems according to established accounting principles and standards. This ensures that our financial statements reflect the true financial position and performance of the company.

Transparency and Disclosure: AGB is committed to full transparency in its financial reporting. We provide clear, comprehensive, and timely information to investors,

regulators, and other stakeholders. This includes adhering to all disclosure requirements and ensuring that all financial reports are complete and free from misleading information.

Internal Controls: Robust internal controls are essential to prevent and detect errors or fraud in financial reporting. AGB has implemented stringent control measures, including segregation of duties, authorisation protocols, and regular audits to safeguard the integrity of our financial processes.

Compliance with Laws and Regulations: We adhere to all relevant financial laws, regulations, and standards, including those related to tax, securities, and corporate governance. Compliance helps protect AGB from legal and reputational risks and ensures our operations remain sustainable.

Training and Awareness: Employees involved in financial reporting and management are provided with ongoing training to keep them updated on accounting standards, internal policies, and best practices. This education fosters a culture of financial diligence and accountability.

Whistle-blower Protection: AGB encourages employees to report any suspicions of financial misconduct or discrepancies. We ensure that whistle-blowers are protected from retaliation, and all reports are investigated thoroughly and impartially.

By fulfilling these obligations, AGB ensures the reliability and integrity of our financial reporting, reinforcing our reputation as a responsible and trustworthy organization. This commitment is central to our business strategy and the confidence our stakeholders have in our financial stewardship.

4.6. Confidentiality Obligations/Intellectual Property/Public Communications

At Alcom Group Berhad (AGB), the protection of confidential and proprietary information, along with the responsible management of intellectual property and public communications, is paramount. These aspects are crucial for maintaining our

competitive edge, safeguarding our reputation, and ensuring compliance with legal and ethical standards.

4.6.1. Protection of Confidential and Proprietary Information

Confidentiality Practices: Employees are required to maintain the confidentiality of information that is not public and could be harmful to AGB or beneficial to our competitors if disclosed. This includes financial data, strategic plans, customer information, and any other sensitive material.

Access and Sharing: Access to confidential information should be limited to those who need it to perform their job duties. Employees must avoid sharing this information with anyone outside of AGB, including family and friends, without proper authorisation.

Data Security: Robust measures must be taken to protect digital and physical records containing confidential information. This includes using strong passwords, securing files, and following all IT security protocols.

4.6.2. Intellectual Property Management

Respect for AGB's IP: All forms of intellectual property owned by AGB, such as patents, trademarks, copyrights, and trade secrets, must be used appropriately and protected against infringement or misuse.

Innovation and Creation: Employees involved in creating new intellectual property are required to follow AGB's procedures for documenting and securing these assets, ensuring that AGB retains all rights and benefits.

Legal Compliance: Employees must respect the intellectual property rights of others and ensure that all third-party content used by AGB is properly licensed or falls within legal use parameters.

4.6.3. Guidelines on Public Communications and Social Media Use

Official Communications: Only designated spokespeople are authorised to make official statements or releases on behalf of AGB. This ensures consistency and accuracy in our messages to the public, media, and other external stakeholders.

Social Media Use: Employees are encouraged to be mindful when using social media, particularly regarding how their posts could reflect on AGB. Personal posts should not disclose confidential information or represent AGB's views without authorisation.

Guidance and Training: AGB provides guidelines and training on effective and responsible public communications, including social media use. This helps employees understand the impact of their communications and how to avoid potential pitfalls.

By adhering to these guidelines, AGB ensures the protection of its vital assets and maintains a responsible and professional presence in all forms of communication. This approach not only protects our business interests but also reinforces our commitment to transparency and ethical conduct.

5. Part III: Workplace Culture and Environment

5.1. Safe and Secure Work Environment

At Alcom Group Berhad (AGB), we are committed to maintaining a workplace that is not only productive but also safe, secure, and conducive to the well-being of all employees. This commitment is fundamental to our values and essential for fostering a positive and respectful work environment.

5.1.1. Importance of a Safe, Secure, and Conducive Workplace

Health and Safety: The health and safety of our employees are paramount. AGB implements rigorous safety protocols and procedures to prevent accidents and injuries. Regular training, safety drills, and the use of appropriate personal protective equipment are integral to our approach to ensuring a safe workplace.

Secure Facilities: We maintain secure facilities to protect our employees and company assets. This includes access controls, surveillance systems, and emergency response plans that are regularly reviewed and updated to address potential security threats.

5.1.2. Policies Against Discrimination, Harassment, and Substance Abuse

Discrimination and Harassment: AGB has zero tolerance for discrimination or harassment based on race, gender, age, religion, sexual orientation, disability, or any other protected characteristic. Our policies clearly define unacceptable behaviours and provide a mechanism for reporting and addressing any incidents of discrimination or harassment.

Substance Abuse: To ensure the safety and productivity of our workforce, AGB prohibits the use, possession, or influence of illegal drugs or uncontrolled substances in the workplace. Our policy also covers the responsible use of alcohol and provides support for employees seeking help with substance abuse issues.

Reporting and Resolution: Employees are encouraged to report any safety concerns, instances of discrimination or harassment, or violations of our substance abuse policy. AGB ensures that all reports are treated confidentially, investigated promptly, and resolved fairly to maintain trust and uphold our commitment to a respectful workplace.

By adhering to these principles and policies, AGB nurtures a workplace culture that prioritises safety, security, and the overall well-being of every employee. This culture is not only a reflection of our values but also a key driver of our success and sustainability as a company.

5.2. Sustainability and Environmental Responsibility

At Alcom Group Berhad (AGB), our commitment to sustainability and environmental responsibility is integral to our business strategy and operations. We recognise that our long-term success depends not only on economic performance but also on our ability to minimise our environmental impact and contribute positively to the planet's health.

5.2.1. Commitment to Sustainable Practices

Resource Efficiency: AGB is dedicated to using resources efficiently, reducing waste, and optimising energy consumption across all our operations. We invest in technologies and processes that lower our environmental footprint, such as energy-efficient equipment and recycling programs.

Emissions Reduction: We are actively working to reduce our greenhouse gas emissions through a variety of initiatives, including improving process efficiencies, utilising renewable energy sources, and engaging in carbon offset projects like mangrove planting to enhance our carbon capture efforts.

Sustainable Sourcing: AGB prioritises the procurement of materials and services from suppliers who adhere to sustainable and ethical practices. This includes using

recycled materials where possible and supporting suppliers who demonstrate a commitment to environmental stewardship.

Biodiversity and Ecosystem Protection: We understand the importance of preserving biodiversity and ecosystem services. AGB engages in initiatives that protect natural habitats, support wildlife conservation, and restore areas impacted by our operations.

5.2.2. Minimising Environmental Impact

Pollution Prevention: AGB implements strict measures to prevent pollution, including controlling emissions, managing waste responsibly, and treating effluents to meet regulatory standards before discharge.

Water Conservation: Recognising the critical importance of water, we employ strategies to reduce water usage and improve water management in our facilities, including water recycling and the implementation of water-saving technologies.

Education and Engagement: AGB believes in the power of education and actively engages with employees, communities, and stakeholders to raise awareness about environmental issues. We provide training and support community initiatives that promote environmental sustainability.

Continuous Improvement: We are committed to continuous improvement in our environmental performance. AGB regularly reviews and updates our environmental policies and practices to reflect the latest research, technological advances, and best practices in sustainability.

By upholding these commitments, AGB not only ensures compliance with environmental regulations but also positions itself as a leader in sustainable business practices. Our dedication to environmental responsibility is a key component of our identity and a fundamental aspect of our strategy to ensure a sustainable future for all.

5.3. Employee Relations

At Alcom Group Berhad (AGB), fostering positive and respectful employee relations is essential to creating a productive and harmonious workplace. Our approach focuses on supporting healthy workplace relationships and promoting occupational health to ensure the well-being of all employees.

5.3.1. Guidelines on Non-Business Workplace Relationships

Professionalism and Boundaries: AGB encourages a professional work environment where personal relationships do not interfere with job performance or decision-making. Employees are expected to maintain clear boundaries that prevent conflicts of interest or perceptions of favouritism.

Disclosure of Relationships: Employees involved in intimate or familial relationships with colleagues, especially those that could influence managerial decisions or create conflicts, are required to disclose these relationships to Human Resources. This allows AGB to take appropriate steps to manage potential conflicts and ensure fairness in supervisory and reporting relationships.

Respect for Diversity and Inclusion: AGB is committed to respecting diversity in workplace relationships. All interactions should be free from discrimination and harassment, fostering an inclusive environment where every employee feels valued and respected.

5.3.2. Guidelines on Occupational Health

Health and Safety Programs: AGB implements comprehensive health and safety programs designed to prevent workplace injuries and illnesses. This includes regular risk assessments, safety training, and provision of appropriate personal protective equipment.

Mental Health Support: Recognising the importance of mental well-being, AGB offers support programs, counselling services, and resources to help employees manage stress, maintain work-life balance, and address mental health concerns.

Promotion of Healthy Lifestyles: AGB encourages employees to lead healthy lifestyles through wellness programs that include health screenings, fitness activities, and health programs.

Accommodations and Support: We provide reasonable accommodations and support for employees with disabilities or health conditions to ensure they can perform their work effectively and safely.

Continuous Monitoring and Improvement: AGB is committed to continuously monitoring and improving our occupational health policies and practices. Feedback from employees is actively sought and used to enhance the effectiveness of our health and safety measures.

By adhering to these guidelines, AGB ensures that employee relations and occupational health are managed in a way that promotes a positive, healthy, and productive work environment for all.

6. Part IV: Discipline, Disciplinary Process, and Sanctions

6.1. Importance of Good Conduct and Discipline

At Alcom Group Berhad (AGB), we understand that maintaining a high standard of conduct and discipline is essential for the integrity and success of our organisation. Good conduct and adherence to our policies not only foster a positive work environment but also safeguard our reputation and operational efficiency.

6.1.1. Explanation of Disciplinary Processes and Potential Sanctions for Non-Compliance

Clear Expectations: AGB sets clear expectations for employee behaviour through our Code of Conduct and various policies. Understanding these expectations is crucial for all employees, as they form the basis of our disciplinary process.

Reporting and Investigation: When a potential violation of our policies is identified, it should be reported immediately to the appropriate supervisor, Human Resources, or through our designated whistle-blower channels. AGB ensures that all reports are taken seriously and investigated promptly and fairly. Confidentiality is maintained throughout the investigation process to protect all involved parties.

Disciplinary Actions: Depending on the severity and nature of the violation, disciplinary actions can range from verbal warnings to more serious consequences, including written warnings, suspension, demotion, or even termination of employment. Sanctions are applied consistently to uphold the integrity of our policies and to demonstrate our commitment to ethical conduct.

Right to Appeal: Employees have the right to appeal disciplinary decisions they believe are unjust. This process provides an opportunity for a thorough review and ensures that all aspects of the situation have been fairly considered.

Rehabilitation and Support: AGB believes in rehabilitation and support for employees who have violated policies but are willing to change their behaviour. We

provide counselling, training, and other support mechanisms to help these employees align their conduct with our organisational values.

Documentation and Record-Keeping: All disciplinary actions and their outcomes are documented and retained in employee records. This documentation helps in tracking patterns, ensuring consistency in handling violations, and making informed decisions about employment matters.

By adhering to this structured approach to discipline and sanctions, AGB maintains a work environment that is not only productive and positive but also reflective of our core values and commitment to high ethical standards.