



MMS VENTURES BERHAD

Company No. 200401008621 (647125 - P)
(Incorporated in Malaysia)

CODE OF CONDUCT AND ETHICS

1 OVERVIEW

The Code of Conduct and Ethics (“CoCE”) sets out the principles and standards of business ethics and conduct of the Group. The Directors and employees of the Group shall not depart from the guiding principles contained herein in conducting the day-to-day duties and operations of the Group.

2 OBJECTIVES

- 2.1 The objective of the CoCE is to assist the Directors and employees in defining ethical standards and conduct at work. The CoCE is not intended to be exhaustive and there may be additional obligations that the Directors and employees are expected to behave or conduct when performing their duties.
- 2.2 All Directors and employees shall always observe and ensure compliance with all applicable laws, rules and regulations to which they are bound to observe in the performance of their duties. Violation of any of the CoCE’s provisions can result in disciplinary action, including termination of employment.

3 COMPLIANCE WITH LAW

- 3.1 The Group is subject to local, state and federal laws and all Directors and employees have a duty to act within these laws.
- 3.2 No Director or employee can be directed to carry out an illegal act, and no Director or employee can justify an illegal act by claiming to be acting under the order of a superior/upper management, or to be simply complying with a certain policy or instruction.

4 CONFLICT OF INTEREST

- 4.1 The Directors and employees should avoid involving themselves in situations where there is real or apparent conflict of interest between them as individuals and the interest of the Group. Directors and employees must not use their positions or knowledge gained directly or indirectly in the course of their duties or employment for private or personal advantage, directly or indirectly.
- 4.2 In addition, a Director or an employee shall avoid any situation in which the Director or employee has an interest in any entity or matter that may influence the Director or employee’s judgment in the discharge of responsibilities.

5 CONFIDENTIAL INFORMATION

- 5.1 All Directors and employees are required to exercise caution and due care to safeguard any information of a confidential and sensitive nature relating to the Group which is acquired in the course of their employment and are strictly prohibited to disclose to any person, unless the disclosure is duly authorised or legally mandated.
- 5.2 In the event that a Director or employee knows of a material information affecting the Group which has not yet been publicly released, the material information must be held in the strictest confidence by the Director or employee involved until it is publicly released.

6 GROUP ASSETS AND FUNDS

- 6.1 All Directors and employees must look after the assets and funds of the Group under their charge to ensure their availability for legitimate business purposes and that no property, information or position belonging to the Group or opportunity arising from these be used for personal gain.

7 GIFTS

- 7.1 Giving and receiving any share of profits, commissions, cash and its equivalents are strictly prohibited.
- 7.2 Gifts, favours, entertainment or services that are deemed as not given to influence the Directors' or employees' performance of duties (include normal business courtesies such as meals or entertainment), token gifts which are occasional, gifts during festive or special occasions and gifts from social functions attended by the Directors or employees on behalf of the Group, are permissible.

8 HEALTH AND SAFETY

- 8.1 The Group places high priority on maintaining a healthy and safe working environment for all its employees, Directors and business associates.
- 8.2 The Group will use its best endeavours to ensure a safe workplace and maintain proper occupational health and safety practices to commensurate with the nature of the Group's business and activities. Such a commitment in return requires all Directors and employees understand and abide by the Group's policies and procedures.
- 8.3 Smoking is not permitted within all premises and properties of the Group.

9 HARASSMENT IN THE WORKPLACE

- 9.1 The Group will not tolerate any form of harassment by any Director or employee in the workplace.
- 9.2 Any questions concerning issues of such should be directed either to the employees' superior or the Human Resource Department. All such reports and complaints shall be treated with the strictest confidence.
- 9.3 Any person suspected to have committed criminal harassment will be handed over to the relevant authorities.

10 CYBERSPACE ABUSE AND SOFTWARE PIRACY

- 10.1 The Group will not tolerate any form of abuse of cyberspace.
- 10.2 All Directors or employees who have access to emails or internet access provided by the Group are required to use such services exclusively for work, business and matters of the Group. The use of such services for personal reasons is not permitted.
- 10.3 The intentional sending and viewing of illicit and sexually explicit materials on Group's computers and/or IT facilities is strictly prohibited.
- 10.4 The Group forbids the use of pirated software in its computers and IT facilities. The relevant departments and operations of the Group are expected to conform to local copyright laws and to reasonably ensure that any software used is a fully licensed product.

11 ENVIRONMENT

- 11.1 The preservation and conservation of the environment is the priority of the Group. All Directors and employees are strongly encouraged to practice the reuse and recycling of office materials and stationeries as and when possible.

12 BUSINESS CONDUCT

- 12.1 Outside Interest
Directors and employees shall not engage in an outside interest that will undermine the performance of the Directors and employees or bring disrepute to the Group.
- 12.2 Fair and Courteous Behaviour
All employees are to treat their fellow employees fairly and courteously without regard to race, creed, religion, gender, nationality, age or disability and shall not create any form of discrimination or prejudice in the work place.
- 12.3 Misconduct
No Director or employee is to be involved in or abet any activity that is deemed by the Group to be an act of misconduct (includes the consumption of drugs and alcohol).

13 FAIR DEALING AND EQUALITY IN EMPLOYMENT

- 13.1 The objective is to ensure a working environment in which employees, customers, suppliers and other business partners are treated fairly and equitably irrespective of gender, race, age and religion.
- 13.2 The Group does not tolerate abuse of power. It is important that the employees can work in a fair and safe place that encourages innovation and continuous improvement.
- 13.3 The Group will compete effectively and fairly in the markets in which it operates through legal and ethical business practices.

14 ANTI-MONEY LAUNDERING AND ANTI-TERRORISM FINANCING

- 14.1 The Group does not condone, facilitate or support any activity that is even remotely associated with money laundering or financing of terrorism.
- 14.2 All Directors and employees are prohibited from directly or indirectly engaged in a transaction that involves proceeds of unlawful activity.
- 14.3 All Directors and employees are required to promptly raise any suspicious transactions to their immediate superior when they have reasons to suspect that the transaction or attempted transaction involves proceeds from an unlawful activity or that the customer is involved in money laundering or financing of terrorism.

15 INSIDER TRADING

- 15.1 Directors and employees who have access to insider information on the Group that may impact the value of MMSV's shares which are publicly traded are not allowed to make use of such information for personal gain or disclosing such information to external parties, including family members.
- 15.2 All Directors and employees must safeguard any information that they have access to in the course of their daily duties or while discharging their responsibilities.
- 15.3 All Directors and employees must ensure that all transactions in MMSV's shares comply with the procedures set out in the Bursa Malaysia Securities Berhad's Listing Requirements and any laws on insider trading.

16 GUIDELINES TO IMPLEMENTATION AND COMPLIANCE

- 16.1 Chief Executive Officer and Human Resource Manager shall oversee the communication, implementation and compliance of these principles and rules in their respective organisations.
- 16.2 All Directors and employees are to have free access to this document and must be conscious that contravention of these principles and rules on their part will result in appropriate disciplinary action.

17 REVIEW OF THE CODE

The Board will monitor compliance with the CoCE and review the CoCE regularly to ensure that it continues to remain relevant and appropriate.