

CODE OF ETHICS AND CONDUCT

Introduction

The Code of Ethics and Conduct (“Code of Ethics”) is put in place to ensure the correct operations of Ewein Berhad (the “Group”)’s businesses and related activities with a view to safeguard its image and reputation. In addition, with increased attention being given to the corporate governance in our business environment, the Board of Directors the Group has adopted the Code of Ethics which clearly states the values and inspiring principles behind the achievement of its business objectives which are of fundamental importance for the correct operation of its businesses.

Person Subject to the Code

All Directors and employees of the Group are obliged to make an active contribution in their observance of this Code of Ethics. It is also expected of those who have business relations with the Group including suppliers, subcontractors, agents and consultants to be familiar and comply with the relevant parts of the provisions of this Code of Ethics when performing such works and services.

The Directors of the Group have to take the principles of the Code of Conduct into account when laying down the companies’ objectives, proposed investments, carrying out projects and making all related management decisions and actions. When implementing these decisions and actions, the Group’s managers and heads of department are bound by the same principle, both internally with a view to reinforcing the sense of cohesion and team spirit, and in their dealings with third parties.

Any violation of the principles of the Code of Ethics may be treated as a breach of the term of employment relationship and/or breach of discipline, and may be subject to disciplinary sanction and the relevant legal consequences.

Code of Business Conduct

The following Code of Business Conduct has been approved by the Board of Directors of the Group. Any amendments and/or update thereto will be reviewed and approved by the Board of Directors:

- Comply with the legislative and regulatory provision in force in all the countries in which the Group operates;
- Comply with employees’ handbook and policies and procedures established from time-to-time;
- Communicate clearly and accurately information about our businesses in a non-discriminatory manner;
- No tolerance of any discriminatory behaviour or any form of harassment or sexual offence;

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- Promote healthy, safe, and conducive working environments. Employees at all levels are required to conduct themselves in a responsible manner and act in accordance with the safety system and all the company's procedures which form an integral part thereof;
- Develop a reputation for honesty, fairness, responsibility and integrity with the person or party who has a business relationship with the Group;
- Safeguard and protect the image and reputation of the Group;
- Treat all information in relation to the Group's business, or to its customers, with confidentiality;
- No acceptance of gifts in cash or in kind, for our personal benefit from suppliers, potential suppliers or other third parties.

We will continue to strive to make a positive contribution to society and the environment by maintaining high standards of marketing ethics, respecting human rights, respecting the environment, supporting community organisations, supporting employee development, and managing significant corporate responsibilities and risks in our businesses.

The revised Code of Ethics and Conduct has been adopted by the Board on 17 August 2022.