



Registration No.: 196201000416 (4887-M)
(Incorporated in Malaysia)

CODE OF CONDUCT AND ETHICS

1. INTRODUCTION

The Code of Conduct ("the Code") which sets out the principles and standards of business ethics and conduct of Seal Incorporated Berhad and its subsidiaries ("the Group") to enhance the standard of corporate governance and corporate behaviour with the intention of achieving the following aims:

- To establish a standard of ethical behaviour for Directors and employees based on trustworthiness and values that can be accepted, are held or upheld by any one person.
- To uphold the spirit of responsibility and social responsibility in line with the legislation, regulations and guidelines for administering a company.

2. APPLICATION

The Code is applicable to all employees and Directors of the Group. Both Directors and employees are required to uphold the highest integrity in discharging their duties and in dealings with stakeholders, customers and regulators.

3. CODE AREAS

3.1 Conflict of Interest

- The Directors and employees shall not engage directly or indirectly in any business activity that competes or is in conflict with the Group's interest and should avoid putting themselves in situations where there is conflict of interest between them as individuals and the interest of the Group.
- The Directors and employees must not use their positions or knowledge gained directly or indirectly in the course of their duties or employment to divert to their personal advantage (directly or indirectly) any business opportunity that the Group is pursuing.
- The Directors and employees should at all times act with utmost good faith towards the Group in any transaction and to act honestly and responsibly in the exercise of their powers in discharging their duties.

The following questions will help the Directors and employees to have a better understanding whether a situation might constitute a conflict of interest:

- Do I or does my family member or associate gain any advantage by virtue of my position in the Group?
- Could personal interests in this situation affect any decision I might make?
- Could this situation affect the fulfilment of my responsibilities as the Director/employee in the Group?



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3.2 Confidentiality of Information

- The Directors and employees must consider any information concerning the Group's business, its customers and suppliers to which they have access or possessed as confidential and should be kept strictly confidential at all times.
- The Directors and employees shall exercise due care and diligence to safeguard the confidential information and must neither disclose to a third party nor use that information for their own advantage or that of others.

3.3 Insider Trading

The Directors and employees are bound by the Group's guidelines on insider trading as stated in its "Corporate Disclosure Policy".

3.4 Compliance with Laws and Regulations

The Group is required to comply with all applicable laws, rules and regulations in jurisdictions within which the Group operates. The Directors and employees must ensure that they keep abreast, understand and comply with the relevant laws and regulations which are applicable to their positions and works.

In the event of any suspected violation of law, the employees should report promptly to their immediate superior/Head of Department where the Directors shall communicate to the Chairman of the Board.

3.5 Health, Safety and Environment

3.5.1 Health and Safety

The Group is committed to ensuring a safe and healthy working place for its Directors and employees. The Group will ensure it complies and maintains a proper occupational safety and health practices to commensurate with the nature of its businesses and activities. The Directors and employees should understand and abide by the Group's policies and procedures on the occupational safety and health.

The Directors and employees shall ensure effective use of natural resources and minimise any adverse impact on the environment of the Group's processes and products.

3.5.2 Sexual harassment and violence

The Group will not tolerate and condone any form of harassment and violence. Any employee who believes that he/she has been subjected to harassment can lodge a report to Head of Human Resource Division who will be responsible to review the case and consider the appropriate course of action where applicable.



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3.6 Protection of Group's Assets

The Directors and employees should not misappropriate the assets owned by the Group. Any misappropriation should be immediately reported and properly investigated. Appropriate disciplinary and/or legal action will be taken.

The Directors and employees shall use the Group's assets for legitimate purposes and in the best interests of the Group. They should exercise reasonable care to protect the assets and ensure it is used efficiently.

These shall include tangible assets such as equipment and machinery, hardwares, facilities, materials, resources and also intangible assets such as proprietary information, goodwill, harmonious relations with customers and suppliers and etc.

4. REPORTING OF NON-COMPLIANCE

The Directors and employees are to report genuine suspicions of non-compliance with the Code. Anyone who is aware of, or suspects a non-compliance of the Code is encouraged to whistleblow or report it through the Group's Whistleblowing Policy and Procedure.

5. REVIEW AND AMENDMENTS TO THE CODE

The appropriateness and effectiveness of the Code will be continuously monitored and appropriate agreed improvements will be adopted where necessary. Any amendment to the Code must be approved by the Board of Directors.