

GUH HOLDINGS BERHAD

Company No.: 4104-W
(Incorporated in Malaysia)



CODE OF ETHICS AND CODE OF CONDUCT

1. INTRODUCTION

The purpose of the Code of Ethics and Code of Conduct (hereinafter referred to as “the Code”) is to provide guidance to employees for ethical and appropriate conduct in performing their tasks. As members of GUH, we should comply with the Code and apply it whenever we are in the position of making a decision which relates to GUH's interest.

2. CODE OF ETHICS

To protect the best interest of GUH and stakeholders, every director and employee of GUH, the wholly-owned subsidiaries and sub-subsidiaries should uphold the following principles:

2.1 **Integrity**- we are open, honest and trustworthy in dealing with co-workers, customers, suppliers, contractors, representative, shareholders and communities we affect.

2.2 **Dependability**- we are reliable and responsible for any work which we undertake and will do the best in delivering what we promised.

2.3 **Excellence**- we strive to demonstrate high quality in delivering goods and services to be outstanding.

2.4 **Fairness**- we are impartial and refrain from practicing discrimination at all time.

3. CODE OF CONDUCT

3.1 Integrity

Every director and employee:

- a) Shall execute responsibilities with honesty and dignity at all time;
- b) Shall refrain from accepting or giving any form of bribes, kickbacks or any other unlawful or unethical benefit;
- c) Shall establish trust that reflects sincerity and sound image of GUH;
- d) Shall refrain from providing falsified or misleading information that can impair one's judgement;
- e) Shall adhere to moral and ethical principles acceptable by GUH and local regulation where its subsidiaries operate;
- f) Shall not knowingly be a party to any illegal activity or acts that are discreditable to GUH.

3.2 Dependability

Every director and employee:

- a) Shall be diligent and attentive to details in performing their roles and responsibilities;
- b) Shall be consistent in communication and applying standards in GUH;
- c) Shall be trustworthy by keeping promises and respect for the confidentiality of

- information pertaining to works;
- d) Shall be assumed for full responsibility for every decision made by their own;
- e) Shall be devoted to resolve challenges faced at the workplace.

3.3 Excellence

Every director and employee:

- a) Shall be goal-oriented and strive to achieve results beyond ordinary standards wherever possible;
- b) Shall continuously monitor and enhance their performance by adopting continuous learning;
- c) Shall be prudent in planning by having alternative to prepare for unforeseen situation;
- d) Shall be resourceful and disclose any material fact that can elevate the performance of GUH;
- e) Shall be persevere and dedicated to complete the task with desired outcome.

3.4 Fairness

Every director and employee:

- a) Shall be impartial in expressing opinions and carrying out their responsibilities;
- b) Shall provide equal opportunity at workplace and refrain from practicing favouritism;
- c) Shall avoid any situation that involves conflict between their personal interest and the interest of GUH;
- d) Shall be able to provide justification for every decision made pertaining to work;
- e) Shall strive to ensure arm's length transaction in every business dealing.

4. MEASURES TO CONTROL

4.1 GUH will always, to its best, deter the following from happening:

- a) conflict of interest
- b) corrupt practices
- c) unlawful/unethical behaviour
- d) misappropriation of asset
- e) non-compliance with laws, rules & regulations

4.2 As such, the following monitoring and controlling mechanism has been established:

- a) Group's Policies & Procedures
- b) Security systems
- c) Discretionary Authority Limits
- d) Advocates segregation of duties
- e) Formal chain of command
- f) Physical safeguarding of assets

This Code has been adopted by the Board of Directors on 26 February 2018.