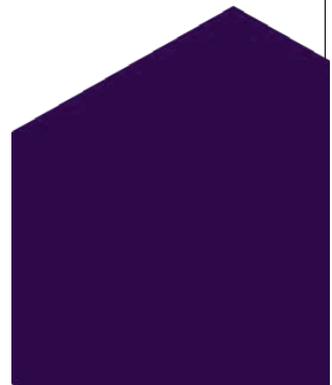
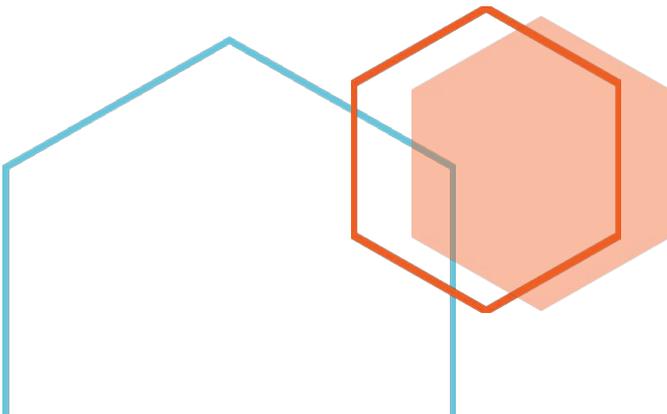




CODE OF BUSINESS ETHICS



**STEEL HAWK ENGINEERING
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CODE OF BUSINESS ETHICS

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1. INTRODUCTION

1.1 Objective

This Code provides guidance in resolving any business ethical issues that one may encounter in conducting business and standards of behavior expected of all Employees of STEEL HAWK in line with STEEL HAWK's vision and mission and STEEL HAWK Core Values.

1.2 Scope

The Code applies to the Board of Directors, Management, Employees and all Business Partners of STEEL HAWK.

If a local law conflicts with a policy in the Code, one must comply with the local law. If a local custom or practice conflicts with a policy in the Code, one must comply with the Code.

This Code shall by no means be exhaustive nor does it include all of the policies of STEEL HAWK. The Code provides general guidance for resolving a variety of legal and ethical issues for us. We are also expected to comply with other applicable policies, procedures, guidelines, directives, rules and practices issued by STEEL HAWK. We are also expected to apply sound judgment in deciding on ethical means of dealing in any given situation involving Customers, Business Partners, competitors, regulators, public and STEEL HAWK matters in general and ask for help when needed.

This Code may be reviewed, changed and updated from time to time which we are expected to comply and be bound by it.

The latest version of the Code is available on STEEL HAWK's website.

1.3 Responsibility and Compliance to The Code

Director, Management, and Employee are expected to:

- understand and comply with the Code;
- ensure the subordinates understand and comply with the Code;
- portray and exercise good ethical values;
- aware with the changes or amendment of the Code;

- be accountable for behaviors of the subordinates in failing to comply with the Codes and
- other applicable policies, procedures, guidelines, directives, rules and practices.

Employees should also agree and declare compliance to the Code upon appointment to or joining STEEL HAWK which is to be read together with the terms and conditions of employment.

Employees may be subjected to disciplinary actions including but not limited to withholding of bonuses, increments and merit award, denial of promotion and termination or dismissal of employment for violating the Code.

We also expect our Business Partners to understand and comply with the relevant aspects of the Code. Violation of the Code may result in blacklisting or termination of their contract by STEEL HAWK.

Should there be other policies and procedures of the Company that are in conflict with this Code, the policies as covered in this Code shall prevail over the others.

“Under unusual circumstances, approval of any action not compliant with the Code must be sought in advance and may be granted only by the Group Chief Executive Officer or the Board of Directors of the Company. Waiver of the Code must be promptly disclosed to the Board of Directors. When a waiver is granted, the Group Chief Executive Officer or the Board of Directors shall ensure that appropriate controls are in place to protect the Company and its shareholders.”

2. DEFINITIONS

2.1 In this Code unless the context otherwise requires the following terms shall have the meanings hereby respectively assigned to them:

Asset: shall mean tangible or intangible resources controlled by the Company as a result of past transactions or events and from which future economic benefits are expected to flow to the Company.

Associate Company: shall mean a company or enterprise in which the investor company has significant influence that is the power to participate in the financial and operating policy decisions of the associate company but no control over those policies.

Board of Directors: shall mean all Directors of the Company be it, independent and non-independent executive directors and non-executive directors and, includes the alternate director. The term "Board of Directors", wherever appropriate shall also be referred to the board of directors of the Group of Companies. The term "Board of Directors" or Board shall have the same meaning and may be used interchangeably.

Business courtesy: shall mean a gift or favor from a person or a firm, regardless of whether a business relationship exists between the Company and that person or firm, for which fair market value is not paid by the recipient, which includes tangible or intangible benefit, such as non-monetary gifts, meals, drinks, entertainment, recreation, prizes, transportation, discounts, tickets, passes, promotional items or use of donor's time, material or equipment.

Business Partners: for the purpose of this Code shall mean person or entity, which STEEL HAWK has engaged with or entered into a procurement process of acquiring supplies of goods and services in order to fulfill the company's strategic and operational needs that require coordination of multiple disciplines across the end to end procurement value chain : pre-sourcing, sourcing and post sourcing and commercial arrangement to supply products or equipment and render services of any nature or to collaborate or to form an alliance through a letter, contract or memorandum of understanding. A Business Partner may include but is not limited to suppliers, service providers, customers, agents and/or resellers, contractors, sub-contractors, vendors, consultants, representatives, joint venture partners and others acting for or on behalf of STEEL HAWK.

Business Policy & Governance: A set of documents that outlines STEEL HAWK's policies and governance across key functional areas and indicates relevant process and procedures that supports the respective policies and governance.

Code: shall mean this STEEL HAWK' Code of Business Ethics, a set of rules and policies, which shall govern the business conduct and relations of the Board of Directors, Management, Employees and Business Partners of STEEL HAWK.

Competitors: shall mean any persons or entities that render the same or similar services or supply the same or similar products to what the Company renders or supplies, in anyone or a number of business environments.

Confidential Information shall be mean to include:

- a. Any information in any form whatsoever not generally known, and proprietary to the Company including but not limited to Personal Data, information relating to their processes, operations, trade, products, research, development, manufacture, purchasing, business, business prospects, transactions, affairs, activities, know-how, intellectual property, accounting, finance, planning, operations, customers, engineering, marketing, merchandising and selling, proprietary trade information, payroll figures, personal data of the Board of Directors, Employees, customers' list, records, agreements and information, technical and other related information, and any books, accounts and records kept by the Company for the purpose of its business;
- b. All information disclosed to the Director or Employee or to which the Director or Employee obtains access during his tenure which he has reason or ought to have reason to believe to be Confidential Information and this shall be presumed to be Confidential Information and this shall include (but shall not be limited to) price lists, business methods, customer history, records, information and inventions; and
- c. Any such information as described in paragraphs (a) and (b) above which relate to the Company including its Customers and Business Partners.

Conflict of Interest: shall mean any personal interest or material interest that a Director or an Employee may have and could be seen to have the potential to interfere with their objectivity in performing their duties or exercising their judgment on behalf of the Company.

Customers: shall mean any persons or entities to which the Company provides its products and render its services, which may include potential customers, Business Partners or Competitors.

Close Relationship: shall mean relationship between Director or Employee with such person who may include but not limited to any one of the categories:

- i. Spouse;
- ii. Parent including Parent In-Law;

- iii. Child including an adopted child and step child;
- iv. Brother or sister; and
- v. Spouse of the person referred to in sub-paragraphs (iii) and (iv) above.

Director: shall mean any of the directors of the Company holding office for the time being, which includes his duly appointed alternate.

Division: Refers to the key functional area in which you work [e.g. Group IT, Group Procurement, Group Accounting, Group Human Resource Management, Project Management Team etc.]

Employee: For the purpose of this Code, it shall mean all personnel including the senior and top management, managers, assistant managers and non-executives under the employment of the Company which comprise permanent, contract, leasing, trainees and interns. The term "Employee" or "Employees" shall have the same meaning and may be used interchangeably.

Ethics: Refers to standards of conduct, which indicate how to behave, based on moral duties and virtues arising from the ability to distinguish right from wrong and the commitment to do what is right.

Facilitation payments: Facilitation payment commonly known as "facilitating", "speed" or "grease" payments are payments made to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has an interest.

Family: For the purpose of this Code, the term family shall be defined as person who has Close Relationship which is hereinbefore defined.

Government Officials: Government official includes, any person who is a member, an officer, an employee or a servant of a government agency whether federal or state authorities.

Gratification: Gratification shall have the meaning as assigned to it under Section 3 of the Malaysian Anti-Corruption Commission Act 2009.

Information: shall mean all communications and all information whether written, visual or oral and all other materials:

- a. supplied to the Employee by the Company during the Employee's employment with the Company;

- b. relating to any Inventions, improvement, report, recommendation or advice given to the Company by the Employee in pursuance of his employment with the Company; and
- c. concerning the business, associations, transactions or financial arrangements of the Company with any other persons or bodies, including other technical or commercial cooperation agreements

Intellectual Property Rights: refers to the legal rights granted with the aim to protect the creations of the intellect. These rights include but are not limited to patents, industrial designs, trademarks, copyrights, service marks, confidential information, designs, knowhow, techniques, processes, equipment, software programs, software source documents, formulae, hardware, software, firmware, sketches, drawings, models, inventions (whether patentable or not), schematics, samples, audio and/or visual contents, business plans, engineering items or information, marketing information, data, materials, analysis, compilations, forecasts, studies, experience and/or copies and reproductions thereof.

Inventions: shall mean all patentable and non-patentable inventions, discoveries and improvements, processes and know-how, copyright works (including without limitation computer programs), new designs discovered or created by the Employees in the course of or for the employment or discovered or created by the Employees as a result, whether directly or indirectly, of anything done by the Employees in pursuance of his duties with the Company and/or (as the case may be) based whether directly or indirectly on any item of the Information.

IP Manual: shall mean the manual comprising of policies and procedures on how STEEL HAWK proposes to manage intellectual property and related issues.

Integrity and Governance Unit (IGU): shall mean the integrity and governance unit of STEEL HAWK.

Management: Management shall cover top management, and senior management of STEEL HAWK.

Officer of Steel Hawk: means any person who is a member, an officer, an employee or a servant of STEEL HAWK.

Proprietary Information: shall mean information held by a person or entity concerning the know-how, trade secrets or other information of any kind, whether in printed or electronic format, including but not limited to the intellectual property rights, technical information, business processes, sales forecasts, marketing strategies, customer lists or potential customer information, financial records or operations which is regarded as being confidential in nature (whether or not labelled as confidential) and belongs to and owned by the Company.

Personal Data: shall mean personal data (having the meaning ascribed under the PDPA), including but not limited to, the personal information of STEEL HAWK's customers and/or employees.

Public Body: Public body shall have the same meaning as assigned to it under Section 3 of the Malaysian Anti-Corruption Commission Act 2009 and shall include STEEL HAWK.

Sexual Harassment: shall mean any unwanted conduct of sexual nature having the effect of verbal, non-verbal, visual, psychological or physical harassment that might, on reasonable grounds, be perceived by the recipient as placing a condition of a sexual nature on his or her employment or as an offence or humiliation or threat to his/her well-being, but has no direct link to his/her employment.

Subsidiary Company: Subsidiary company is a company or enterprise in which the investor company (known as the parent) has power to exercise control over the financial and operating policies of the subsidiary company so as to obtain benefits from its activities and as defined under Section 5 of the Companies Act 1965.

STEEL HAWK or Company: shall mean STEEL HAWK ENGINEERING SDN BHD. The term "STEEL HAWK" or "Company" shall have the same meaning and may be used interchangeably.

STEEL HAWK Core Values: shall mean the values adopted by the Company to be applied by the Board of Directors, Management and Employees of the Company in their daily work and operation, which consist of the following principles: total commitment to customers, uncompromising integrity and respect and care.

STEEL HAWK: shall mean the Company.

References to "We" in this Code refer to any person to whom this Code applies. Where more specific references are used, such as Employee or Director, the more specific reference is intended.

3. OUR DEALINGS WITH EMPLOYEES

We respect and treat each Employee fairly and equally.

3.1 Respect for Individual

We will treat each other with respect and fairness at all times, just as we wish to be treated ourselves. In line with STEEL HAWK Core Values, we should:

- Propagate team spirit, co-operation among Employees;
- Practice mutual respect and courtesy in all our dealings and interactions; and
- Demonstrate understanding and open-mindedness for all concerns, comments, ideas and feedback received.

We will value the diversity of the individuals among us.

We are committed to keep personal information of the Board of Directors, Management and Employees as private and confidential. Access to and knowledge of the personal information of the Board of Directors, Management and Employees will be limited to people in the Company who need the information for legitimate purpose only.

3.2 Harassment, Threat and Violence

We will not tolerate any types of harassment, threat and violence whether verbal, physical or visual. These actions or behaviors include but are not limited to derogatory comments based on gender, religion, racial or ethnic characteristics, physical attributes, spreading of malicious rumors or use of emails, voicemail or other forms of social media which can cause disharmony, disunity, feelings of enmity, hatred, prejudice or ill-will. We do not tolerate any forms of Sexual Harassment and will ensure compliance with the Human Resource Policy on Sexual Harassment. We are encouraged to speak out if other Employee's conduct makes us feel uncomfortable, and to report any form of harassment, threats and violence when it occurs.

3.3 Safety, Health and Environment

We are responsible in maintaining a safe workplace by following the safety, health and environment rules and practices such as the STEEL HAWK's Occupational Safety and Health Manual.

We are responsible for immediately reporting accidents, injuries, and unsafe equipment, practices or conditions to a supervisor or other designated person. STEEL HAWK is committed to keep its workplaces free from hazards.

The onus is also on us to declare immediately any dangerous/contagious disease that we are afflicted with to our superior or other designated persons appointed by STEEL HAWK.

3.4 Drugs, Alcohol and Prohibited Substances

We are strictly prohibited from the use, possession, distribution or sale of illegal drugs, alcohol or prohibited substances while in the course of STEEL HAWK's business.

3.5 Weapons

We are strictly prohibited from possessing any weapons or illegal materials, imitation or otherwise including but not limited to firearms, explosives or sharp objects in the course of STEEL HAWK's business.

3.6 Criminal Breach of Trust

We shall not commit a criminal breach of trust in violation of any law of the country in which the business is conducted.

In the context of Malaysian law, criminal breach of trust is as defined under the Penal Code (Act 574).

3.7 Criminal Activities and Wrongdoings

We shall at all times uphold the good name and reputation of STEEL HAWK during or after office work. We shall not engage or be involved in any behaviors or activities that may be categorized as tarnishing the image of STEEL HAWK or subversive or commit any criminal offence punishable under the law of the country in which the business is conducted.

If we are found to be involved in any behaviors or activities that may be categorized as subversive or commit any wrongdoing, criminal or otherwise that may be detrimental to the image and reputation of STEEL HAWK, we shall be dealt with in accordance with STEEL HAWK's disciplinary policies and procedures and/or liable in the court of law.

3.8 Giving Evidence in Court

If we are subpoenaed or required to give evidence in court for any legal proceedings related to STEEL HAWK's business, we should first refer it to the immediate superior who will consult with the integrity and governance unit and in the case of labor related matters to Group Human Resource, failing which disciplinary action may be instituted against the person concerned.

3.9 Equal Opportunity

We believe and shall on best endeavor provide equal employment opportunities for all applicants regardless of the race, ethnicity, religion, national origin, gender or disability.

3.10 Business Dress and Attire

We must ensure that when dealing with the Customers, we are not dressed in such a manner or wear clothing that may offend the Customers or compromise health and safety standards.

Wherever the Company provides uniform or special attire, we must abide by the requirement.

3.11 Leaving STEEL HAWK

We must return all STEEL HAWK assets including STEEL HAWK Proprietary Information and Intellectual Property if we are leaving STEEL HAWK for any reason including retirement and any disclosure or use of STEEL HAWK Proprietary Information are not allowed.

3.12 Relationship with Clubs, Societies and Non-Governmental Organizations

STEEL HAWK promotes and encourages active participation by Employees through nongovernmental, charitable organizations and also clubs and societies within STEEL HAWK. Whilst such activities outside working hours are permitted, we must ensure that the reputation and interest of STEEL HAWK are not compromised.

To avoid any direct or potential conflict of interest these non-governmental, charitable organization, clubs and societies are not allowed to have any business arrangement with STEEL HAWK except in exceptional circumstances and authorize in writing by the Human Resource Manager, Group Human Resource Management.

4. OUR DEALINGS WITH CUSTOMERS

STEEL HAWK gives total commitment to its Customers.

4.1 Total Commitment to Customers

In-line with STEEL HAWK Core Values, we must be

- Proactive in dealing with Customers' needs and try to exceed their expectations;
- Sensitive to Customers' needs and requirements; and
- Responsive and serve customers with conviction and professionalism.

4.2 Product and Service Quality and Safety

Compliance to quality processes and safety requirements are essential to maintain STEEL HAWK's valuable reputation. We may damage our good name and reputation if we deliver products and services that fail to live up to the Company's standard of quality.

Commitments made to Customers must be reasonably honored. If commitments could not be honored, prompt feedback must be given to Customers within agreed time frames or organizational guidelines.

4.3 Sales and Marketing

We will build long-term relationships with our Customers by demonstrating honesty and integrity. All of our marketing and advertising must be accurate and truthful. Deliberately misleading messages, omissions of important facts, or false claims about our competitors' offerings are not acceptable.

4.4 Customer Information

We must comply with STEEL HAWK's policies and licenses and applicable laws and regulations concerning the protection of Customers' information including the protection of Personal Data.

We protect the confidential information that our customers share with us, and do not share this information with anyone inside or outside the Company who does not have

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a legal or contractual right or legitimate business need to have it. We take proactive steps to protect our customers' property and assets.

5. OUR DEALINGS WITH BUSINESS PARTNERS

Building quality relationships with Business Partners gives STEEL HAWK a competitive advantage.

5.1 Doing Business with Others

In line with STEEL HAWK Core Values and this Code we should:

- Practice honesty in all our actions and statements;
- Demonstrate trustworthiness in carrying out all our duties and responsibilities;
- Exhibit sincerity in all our interpersonal relationships;
- Approach our work with full dedication; and
- Treat all our stakeholders with fairness.

STEEL HAWK endeavors to do business or associate with Business Partners who share STEEL HAWK Core Values and Ethics and the principles of the Code.

5.2 Agents and Consultants

Commissions, rates or fees paid to any dealers, distributors, agents, finders or consultants must be reasonable in relation to the value of the product or work that is actually being done. Any payment made must be in line with the Anti-Corruption Guide of STEEL HAWK.

5.3 Procurement Practices

STEEL HAWK's procurement philosophy is to procure by open and transparent procedure goods/ services/works that are the best in terms of quality, price, quantity, delivery, supplier and technology as to ensure the best returns to the Company. All participants in the procurement processes need to uphold the basic principles of trust, honesty, fairness and transparent behavior in the business dealings.

All Employees handling procurement shall not have any conflict of interest in any procurement activities under their responsibility. Such Employee shall abstain from participating if such conflict exists.

All documents relating to procurement processes shall be documented, filed and properly kept by the person responsible. Purchasing agreements should clearly identify the services or products to be provided, the basis for payment, and the applicable

price rate or fee. The amount of payment must commensurate with the services or products provided.

5.4 Raising Concerns

If any Business Partners wish to report any possible violation of the Code, he/she may do so through the option available under Article 14 of STEEL HAWK Whistleblowing Policy.

6. OUR DEALINGS WITH SHAREHOLDERS

STEEL HAWK is committed to protect shareholders' investments and deliver value.

Our contact, handling and cooperation with shareholders should be carried out in a professional manner.

In our effort to create value for shareholders, STEEL HAWK is committed to clearly communicate its strategy and activities regularly to its shareholders and, to that end, maintain active dialogue with investors through a planned program of investor relations activities and engagements.

If we are approached by shareholders or prospective shareholders on confidential or sensitive information, we must refer them to Investor Relations or Group Communication Division in accordance to the Group Communications Policy.

Only information which is published and available in the public domain may be disclosed.

7. OUR DEALINGS WITH COMPETITION

STEEL HAWK believes in competing fairly and ethically because we all benefit from fair, free and open markets. We compete strictly on the merits of our products and services and make no attempts to restrain or limit trade.

7.1 Competition Law

We must comply with all applicable competition laws. We must strive to adhere to and operate within all laws intended to protect and promote free and fair competition.

We should familiarize themselves with and always follow all guidelines, policies and directives issued by STEEL HAWK pertaining to compliance with applicable competition laws. Breaching the provisions of such laws may result in STEEL HAWK incurring large fines and being exposed to legal action by aggrieved parties. Below are key provisions which must be complied with in this regard but they are by no means meant to be exhaustive.

Key Provisions:

- We must not talk with or share information (directly or indirectly) with competitors to fix prices or other terms of sale, set production levels, divide up markets, customers or territories, or boycott any customer.
- We should not be involved in any discussions on details of pricing, costs, profits, trading terms, marketing and distribution plans or new product launches with competitors or trade associations.
- When in contact or communicating with STEEL HAWK's customers, the following acts are prohibited:
 - a) disclosing the commercial terms of one customer to another customer;
 - b) passing commercially sensitive information to competitors through customers;
 - c) imposing conditions of sale that can exclude competitive products or limit a customer's scope of resale;
 - d) fixing resale prices;
 - e) forcing a customer to buy other products which have no connection with the products being purchased or requested (tying practices);
 - f) refusing to supply products to any customer without any objective justification;

- g) selling goods at excessively low prices hence preventing a new entrant or forcing existing competitors out of the market; and charging different prices or imposing different commercial terms on customers in equivalent transactions without any objective justification.
- h) If any of the above prohibited matters or other competition sensitive matters are raised or discussed in any trade association meeting or other meeting with competitors (whether formal or otherwise), we should immediately object to such discussion and leave the meeting.

8. OUR DEALINGS WITH COMMUNITIES

STEEL HAWK is a responsible corporate citizen in all communities wherever we do business.

8.1 Community Services

We serve society by providing engineering services at a fair and competitive price, and by actively supporting the communities in which we operate. Our support towards the community will be focused on the areas of education and nation-building activities. STEEL HAWK's involvement with the community should be carried out with integrity and the highest regard to good corporate governance and transparency.

8.2 Personal Community Activities

We are encouraged and free to support community, charitable, Non-Governmental Organizations and causes of our choice; as long as we make it clear that our views and actions are not those of STEEL HAWK. We must however ensure that no conflict of interest be it actual or potential exists between our employment with STEEL HAWK and our duties in community affairs, whether elective or appointed, paid or voluntary. We must ensure that our outside activities do not interfere with our job performance.

8.3 Environment

We will respect the environment by complying with all applicable environmental laws in all countries in which we conduct businesses. STEEL HAWK is committed to the protection of the environment by minimizing the environmental impact of our operations and operating our businesses in ways that will foster a sustainable use of the world's natural resources. We must support this commitment by complying with STEEL HAWK's environmental policies and programs.

We must notify STEEL HAWK if any hazardous materials come into contact with the environment or are improperly handled or discarded.

8.4 Communicating to External Audiences

We are not allowed to spread malicious rumors about any member of STEEL HAWK and misrepresenting STEEL HAWK to others.

We are also required not to make defamatory, slanderous, seditious or derogatory statements and not to infringe or authorize any infringement of copyright or any other legal right by email or other forms of communication. Any such communication will not

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be condoned by STEEL HAWK and is outside the scope of the employment of the individual concerned. STEEL HAWK will not accept any liability in respect of such communication, and the employee responsible will be personally liable for any damages, penalties or other liability arising.

9. OUR DEALINGS WITH GOVERNMENTS

As a responsible citizen, it is our obligation to comply with the law.

9.1 Government as Customer

We must take special care to comply with all legal and contractual obligations in dealing with the governments. National and local governments all around the world have specific and varied procurement laws, regulations, practices and procedures that have been established to protect the public interest.

These laws generally prohibit or put strict limits on gifts, lavish entertainment and travel offered to government officials. They also often apply to the hiring of current or recently retired officials and their family, and to any conduct that may be viewed as improperly influencing objective decision-making.

When liaising with Business Partners to fulfill their commitment, we must also be responsible for communicating these unique governmental requirements to them. When dealing with government officials and contracts we are responsible to know and comply with applicable laws and regulations.

9.2 Crossing National Borders

When importing or exporting products, services, information or technology, STEEL HAWK will comply with applicable local laws, regulations, and restrictions. In addition, when we travel internationally on company business we are subject to laws governing what we import and export. Board of Directors, Management, Employees and Business Partners are responsible for knowing the laws that pertain to them, and for checking with their import/export compliance officials when in doubt.

9.3 Lobbying

We must comply with all local laws concerning lobbying in any jurisdiction in which STEEL HAWK engages in lobbying activity. Such activity must also be in accordance with the policies and procedures of the Company.

10. OUR DEALINGS WITH COMPANY'S ASSETS

We protect the Company's assets and use them in the best interest of STEEL HAWK.

10.1 Protecting STEEL HAWK's Assets

As part of our job, we will have access to and use many types of STEEL HAWK's assets. These assets may be tangible ranging from equipment to computer hardware. It can also include intangible assets such as intellectual property and computer software, and from our work time to STEEL HAWK's brand identity.

We are responsible for the protection of all STEEL HAWK's assets used in carrying out STEEL HAWK's business. We must take reasonable steps to prevent theft, loss, abuse, misuse, waste, or damage to, such resources regardless of condition or value and return to STEEL HAWK upon cessation of employment. We must also use these resources only for legitimate business purposes. We must also ensure that our use of any STEEL HAWK's resources is properly authorized.

Never use STEEL HAWK's resources to conduct outside business activities that may materially benefit us or engage in any unethical or illegal activities. We must also not allow STEEL HAWK's resources to be borrowed, loaned, or disposed of, except in accordance with STEEL HAWK's policies.

Our work time is also considered to be a valuable STEEL HAWK's resource. Limit personal activities during working hours to avoid interfering with our productivity or that of others.

We are also responsible for the proper expenditure of the company's funds including expenses.

i. Customer or Business Partner's Assets

In the same way that we are responsible for all physical Company's property entrusted to our care, we are also responsible for property of STEEL HAWK's customers or Business Partners in our custody.

We should treat it as we would our own, and not damage it, deface it or remove it or for personal use unless authorized to do so.

ii. Information Communication Technology

All STEEL HAWK's computer and other information and communication technology ("ICT") facilities must be safeguarded against theft, damage and improper usage. STEEL HAWK does not permit the usage of ICT facilities involving sensitive and illegal matters, infringement of intellectual property rights, unauthorized access, misuse

of the STEEL HAWK's time and resources and risking of the integrity of STEEL HAWK's ICT facilities.

To the extent allowed by applicable laws in the respective countries in which STEEL HAWK operates, STEEL HAWK reserves the right to monitor each employee's email messages, instant messaging, blogs, use of the internet and contents in company issued ICT facilities. This information can be recovered and used as evidence in domestic proceedings and courts of law or disclosed to the authorities or regulatory bodies as the case may be.

We must use STEEL HAWK's ICT facilities responsibly and primarily for the business purposes for which they are intended. The ICT facilities include access to the internet, intranet, email services and all other ICT hardware, software, systems and peripherals.

iii. Intellectual Property Rights

All works created during the course of employment and are capable of being protected as intellectual property rights such as (but not limited to) trade or service marks, patents, and copyright (hereinafter referred as the "Intellectual Property Rights"), whether directly or indirectly shall vest in and be the absolute property of STEEL HAWK and we are responsible to protect and further the Company's interests.

We will not infringe any third party's Intellectual Property Rights during the course of the employment with STEEL HAWK.

iv. Proprietary and Confidential Information

We must protect and value all Proprietary and Confidential Information concerning STEEL HAWK and its Customers and Business Partners.

We must also ensure that we keep in complete secrecy all Confidential Information and Proprietary Information entrusted in us, and not use or attempt to use any such information in any manner which may or is likely to injure or cause loss, either directly or indirectly, to STEEL HAWK.

The restriction as stated above shall continue to apply after the termination or cessation of our employment or contract with STEEL HAWK.

If we are required to disclose any Proprietary or Confidential Information, ensure that we immediately notify STEEL HAWK in writing and obtain a written authorization from STEEL HAWK prior to any such disclosure.

Any unlawful or unauthorized disclosure of Proprietary or Confidential Information may result in irreparable damage to STEEL HAWK.

We should be responsible to know what information is proprietary and confidential and to obtain clarification when in doubt. This obligation continues even after leaving STEEL HAWK.

The use of the Company's information for personal gain is strictly prohibited. In particular, we should not trade our Company's information or conduct "information brokering" with unauthorized parties.

Where Proprietary and Confidential Information are entrusted to persons outside of STEEL HAWK, efforts must be made to ensure the continuing protection and confidentiality of that information. Within STEEL HAWK, Proprietary and Confidential Information should be disclosed only on a "need-to-know" basis.

10.2 Trading on Insider Information

We are not allowed to trade in securities based on price sensitive information that is in our possession or has come to our knowledge in the course of our employment with STEEL HAWK. Price sensitive information are information that, if made generally available, would or would tend to have a material effect on the price or value of the securities of the Company ("Price Sensitive Information").

A person is an "insider" if that person possesses Price Sensitive Information and knows or ought reasonably to know that the information is not generally available publicly.

As an illustration, an Employee, who possesses the Price Sensitive Information shares or communicates the said Information, to his or her spouse, who then informs the neighbor and later the said Information flows to the neighbor's relatives. All these persons in the chain of transmission are deemed as "insiders" or "tippees" and are subject to the law.

It is against the laws of many countries to trade or to "tip" others who might make an investment decision based on insider information. In the context of Malaysian law, insider trading is considered as prohibited conduct under Part V, Subdivision 2 of the Capital Market and Services Act 2007 ("CMSA") and punishable under Section 188 (4) of the CMSA.

10.3 Accuracy of Company Records

We require honest and accurate recording and reporting of information in order to make responsible business decisions. This includes data such as quality, safety, and personnel records, as well as all financial records.

All financial books, records and accounts must accurately reflect transactions and events, and conform both to required approved accounting standards and to STEEL HAWK's system of internal controls. In the context of Malaysian law, Section 2 of the Financial Reporting Act 1997 states "approved accounting standards means accounting standards which are issued or adopted by the Malaysian Accounting Standards Board (MASB) under paragraph 7(1A) (a) and 7(1A) (b) and in relation to

foreign companies listed on a stock exchange in Malaysia, acceptable internationally recognized accounting standards”.

No false or artificial entries may be made. When a payment is made, it can only be used for the purpose spelled out in the supporting document.

We are responsible for the proper expenditure of the STEEL HAWK’s funds including expenses.

No secret fund of the Company cash or other unrecorded assets shall be set up for whatever purpose.

We should be sure that the transaction is genuine and properly documented when spending or committing STEEL HAWK’s funds and that STEEL HAWK receives appropriate value in return.

10.4 Recording and Retaining Business Communications

All business records and communications should be clear, truthful and accurate. Business records and communications often become public through litigation, government investigations and/or the media. We will avoid exaggeration, colorful language, guesswork, legal conclusions, and derogatory remarks or characterizations of people and companies. This applies to communications of all kinds, including e-mails and “informal” notes or memorandums. Records should always be retained and destroyed according to STEEL HAWK’s record retention policies.

10.5 Sharing Best Practices

STEEL HAWK allows and encourages sharing of best practices document, information and knowledge with another company or organization provided that the information and knowledge shared are not regarded as proprietary information and not detrimental to or adversely affecting the Company’s business and competitive advantage.

10.6 Dealing with Personal Data

The Company complies to the Personal Data Protection Act (PDPA) 2010 with regards to the collection, recording, holding or storing of personal data as well as maintaining confidentiality in usage of information related to employee’s personal data. The Company will manage and use personal information properly, as well as carefully emphasize privacy security in the collection, processing, storage, usage and transmission of personal information.

11. CONFLICT OF INTEREST

We operate and make business decisions based on the best interests of STEEL HAWK. STEEL HAWK expects us to be free from actual or potential conflicts of interest.

11.1 General Considerations

Business decisions and actions must not be motivated by personal interest, considerations or relationships. Relationships with prospective or existing Business Partners, Customers, competitors or regulators must not affect your independent and sound judgment on behalf of STEEL HAWK.

Conflict of interest will arise where our ability to perform our duties effectively and impartially is potentially impaired by an outside appointment, relationship or activity. We should not take improper advantage of our positions or of information obtained in the course of our employment.

We are expected to exercise basic common sense in avoiding any conflict of interest and to act in a manner consistent by giving our full-time services to STEEL HAWK. On occasions, however, the question of whether or not conflict of interest exists may be less clear and open to interpretation. Whenever such a case arises, we should consult our respective superior.

11.2 Outside Business Appointments, Directorships/Undertakings

i. General Rule

The general rule is that we may not accept employment in or undertake work for any other company, firm or organization unless in exceptional cases and only with written permission of the Human Resource Manager, Human Resource Management.

Any outside activity must be strictly separated from our employment of STEEL HAWK and should not harm our job performance. We must ensure that our skills are not used in such a way that could adversely affect STEEL HAWK.

We may be allowed to:

- a. Help the community by serving on boards of non-profit or community organizations, as long as the activities are not to the disadvantage of STEEL HAWK and should not affect our job performance. However, if such organization has any relationship or might expect financial or other support from STEEL HAWK, we must obtain prior approval of the Human Resource Manager, Human Resource Management.

- b. Receive honorariums for lectures/speeches delivered or expert advice rendered in our capacity as experts in certain fields or as Employee of STEEL HAWK. All invitations for our services must be approved by the respective line managers. Honorarium received must be declared to the approving line manager. Human Resource Management shall have the discretion to seek clarification on the amount of honorariums received, if deemed necessary.
- c. Serve on STEEL HAWK's behalf as an officer or Board Member of a company that represents and reflects the interest of STEEL HAWK.

We are not allowed to:

- a. Accept outside directorships or become partners in entities, which are either listed on the STEEL HAWK's list of authorized Business Partners of any tier that have any form of business dealings with STEEL HAWK directly or indirectly.

11.3 Ownership of Equity in Entities Having a Business Relationship with STEEL HAWK

We are not allowed, either directly or indirectly, e.g., through our Family as proxy, holding shares or other forms of beneficial interest in:

- a. Privately owned entities which derive the major part of their income from contractual or other business arrangements with STEEL HAWK;
- b. Privately owned entities which are listed in STEEL HAWK's list of authorized Business Partners of any tier, even if the entities concerned do not derive most of their income directly or indirectly from contractual or other business arrangements with us.
- c. Privately owned entities supplying materials, equipment, property and/or services to STEEL HAWK whether directly or indirectly.

As can be seen, the above ruling does not apply to shares held by us in publicly quoted companies, which have a business relationship with STEEL HAWK, either directly or through a subsidiary.

However, in this case, if there is any possibility that such a holding could cause conflict with our duty as an Employee, we should bring the matter to the immediate attention of the Human Resource Manager, Human Resource Management in writing.

As an Employee we have to also take note of Section 3 of MACC Act which provides a wider definition of the word Family; and Employee may be charged under Section 23 of MACC Act if it is proven that the Employee has used his/her office or position for any gratification for himself/herself or his/her relative.

11.4 Personal Relationship

The potential for conflict of interest also exists if any person with whom we have a romantic, intimate relationship or Close Relationship also works at STEEL HAWK or is in a reporting relationship to us. This may also create opportunities for favoritism or bias. Such relationships can also undermine core values such as respect and trust amongst Employees and Business Partners.

Accordingly, we are not allowed to be in the same Division and/or should not directly or indirectly supervise or be in a position to influence the hiring, work assignments or assessments of such persons that we have relationship. Any relocation of such person must have written permission from the Human Resource Manager of Human Resource Management.

11.5 Contractual Dealings with Employees

STEEL HAWK shall not purchase or lease property, equipment or materials from or enter into contractual arrangements (other than employment contracts) with Employees, except in exceptional circumstances and authorized in writing by the Human Resource Manager, Human Resource Management.

As a further exception, STEEL HAWK has no objection to renting houses or buildings owned by Employees or their Family provided such interest has been declared to the Human Resource Manager, Human Resource Management.

11.6 Investment Activities

We must not allow our investment activities to influence, or appear to influence, our independent judgment on behalf of STEEL HAWK. The situation that is most likely to create the appearance of a conflict of interest is when we have an investment in a competitor, Business Partners, or Customers and our decisions may have a business impact on this outside party. If there is any doubt about how an investment might be perceived, it should be disclosed to our superior.

We are also prohibited from directly or indirectly buying, or otherwise acquiring rights to any property or materials, when we know that STEEL HAWK may be interested in pursuing such an opportunity and the information is not public.

11.7 Political Activities and Donations

i. Political Donation

We must not make any political contribution or payments on behalf of STEEL HAWK.

ii. Political Activities

STEEL HAWK recognizes that Employees in their role of citizen has the right to participate in legitimate political activities. However, we must disclose and obtain prior written approval from the Human Resource Manager, Human Resource Management if we want to stand for election or wish to hold any elected position as office bearer in any political party at the Branch, Division, State or National level of the political party.

We must first resign from the employment of STEEL HAWK if we wish to actively participate full time in politics or nominated as a candidate in any election or elected as representative in Federal or State Legislative Body.

We should not be seen to be supporting or giving any preference to any political party. Do not express our political views in such a way that others think we are speaking on behalf of STEEL HAWK.

We must ensure that any participation in political campaigns is conducted on our own time, with our own resources and in accordance to the Company's procedures applicable. Our involvement is to be kept separate from our role and responsibilities as an Employee of STEEL HAWK.

11.8 Personal Finances

We and our Family may not borrow money from or lend money to Customers, Business Partners or independent contractors. We should not in any manner place ourselves under any serious obligation to any person who is directly or indirectly subject to our official authority or with whom we have or likely to have official dealings.

However, we may borrow money or purchase items on credit from a Customer or Business Partners that is in the financial services business, as long as we do not receive preferential treatment.

This policy does not prevent us from borrowing from or lending money to family members or friends in a personal capacity and not in contravention of business ethics.

In any event we must not put STEEL HAWK in a pecuniary embarrassment that might tarnish the good name of STEEL HAWK.

11.9 Money Laundering

We must understand the business and background of any prospective third party that wants to do business with STEEL HAWK. Due diligence needs to be carried out in order to understand the business and background of such party to determine the services and the origin and destination of money and property of such party.

Any suspicious incidents of money laundering transactions needs to be reported to our superior or Group Procurement. Do not try to investigate any case of money laundering ourselves as this may be harmful to us or hamper any official investigation that may be carried out.

For the purpose of this provision "money laundering" occurs when the criminal origin or nature of money or assets is hidden in legitimate business dealings when legitimate funds are used to support criminal activities and terrorism.

In Malaysia the offences of money laundering fall under the Anti-Money Laundering and Anti-Terrorism Financing (Amendment) Act 2014.

11.10 Public Services, Recreational, Sporting and Community Activities

We are encouraged to participate in any outside working hours of unpaid voluntary public service, recreational, sporting and other community activities of such nature. We must be able to discharge our dual responsibilities satisfactorily both in respect of the time taken up by the outside activity and our full time employment in STEEL HAWK.

If we wish to serve on statutory or public bodies, we must obtain written permission from the Human Resource Manager Human Resource Management. We must obtain written permission from our immediate supervisor if we consider it sufficiently important to take time off during working hours to undertake some outside activity or duty.

11.11 Disclosures and Declarations

All Management and Employees are responsible to disclose and/or declare the following:

No	Type of Declaration	To Who	Frequency
1	Declaration of Assets by, Employees Top Management & BODs	Through the IGU by STEEL HAWK	Annually
2	Conflict of Interest	Human Resource Manager	As and When
	Family having interest in the form of directorships, partnerships, shareholdings, consultancies, advisories or through third parties and the entity(s) has business dealings with STEEL HAWK (direct or indirect)		
	Family working or provides any kind of services to competitors (direct or indirect)		

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3	Employee with Close Relationship or having romantic or intimate relationship and working in the same Division	Head of Division*	
4	Employees and Family renting out any type of property to STEEL HAWK	Human Resource Manager	

Note: *

The Head of Division must make immediate disclosure to the Human Resource Manager upon becoming aware of such relationship.

12. UNDERSTANDING THE RULES ABOUT GIFTS, ENTERTAINMENT AND CORPORATE HOSPITALITY

STEEL HAWK prohibits the use of gifts, entertainment and corporate hospitality to unethically influence business decisions. We must comply with all relevant and applicable policies, procedures, laws and regulations related to these.

“Gifts, entertainment and corporate hospitality” means anything of value. It can include the following (a non-exhaustive list):

- Meals
- Travel and lodging
- Discounts
- Loans
- Cash
- Services
- Prizes
- Transportation
- use of vehicles or vacation facilities
- home improvements
- tickets to entertainment/sport events
- gift cards or certificates
- stocks
- products
- favorable terms on a product

12.1 Gifts

We or our Family are prohibited from, directly or indirectly:

- soliciting, requesting, receiving gifts (cash or otherwise) from STEEL HAWK Business Partners or any third parties that has dealings with STEEL HAWK; or
- providing gifts to third parties that has business dealings with STEEL HAWK

We must inform Business Partners or any third parties involved in business dealings with STEEL HAWK on this Gift Policy and they must respect and adhere to STEEL HAWK's policy.

i. Receiving/ Accepting

We are not allowed to receive or accept a gift for ourselves or a third party. Where circumstances make it impossible, difficult or impractical to reject gifts, we should immediately fill in the Gift & Entertainment Reporting Form and submit it to our Head of Division for his/her decision on the treatment of the gift. STEEL HAWK Head of Division must exercise proper care and judgment in determining the appropriateness of the gift and then decide whether to approve the acceptance of the gift or require the gift to be returned.

ii. Providing / Offering

We are not allowed to provide gifts to third parties unless it is in accordance with the Corporate & Premium Gifts Guidelines.

We are also discouraged to provide a gift or offer if it would violate the recipient's policies or could, in any way, be perceived as a kickback or bribe.

iii. Exceptions to Gift Policy

There are certain circumstances where the provisions of gifts are permitted which are as follows:

- a. Exchange of gifts on a company-to-company level
- b. Gifts from company to external institutions or individuals in relation to the company's official functions, events and celebrations
- c. Gifts from STEEL HAWK to Employees and Directors and/or their family members in relation to an internal or externally recognized Company function, event and celebration
- d. Token gifts of nominal value normally bearing STEEL HAWK company's name or logo or that are given out equally to members of the public, delegates, customers, exhibitions, training, trade shows, etc. and deemed as part of the company's brand building or promotional activities
- e. Gifts to external parties who have no business dealings with STEEL HAWK (e.g. monetary gifts or gifts in kind to charitable organizations).

12.2 Entertainment & Corporate Hospitality

Any travel related sponsorship by Business Partners are strictly not allowed unless the trip is for and executed between STEEL HAWK and the Business Partner and approved in advance by the immediate superior.

Unless prohibited by law or the policy of the recipient's organization, STEEL HAWK may pay any transportation and lodging expenses for or incurred by the Customers or Business Partners and the visit must be for legitimate business purpose, for example, on-site examination of equipment, contract negotiations, or training.

Any travel provided by STEEL HAWK or Business Partners must be supported by a detailed program.

Offering entertainment or corporate hospitality in order to win or keep business is unethical and, in many cases, illegal. Be sure we understand the rules and ask questions if we are unsure about whether a particular form of entertainment or corporate hospitality is acceptable.

We are discouraged to give or accept entertainment or corporate hospitality that are illegal, inappropriate or would violate our commitment to STEEL HAWK. We should politely decline entertainment or corporate hospitality that does not comply with this or more restrictive policies.

Exceptions:

STEEL HAWK Directors and Employees may take part in events paid for by Business Partners or a third party if:

- They are part of relationship building (customer engagement)
- They are business-related and if participating, in the particular situation, it is in the interest of STEEL HAWK, and
- The host also participates in the event, and
- Levels of common business practice are not exceeded, and
- Participating in the event may not improperly influence business decisions

12.3 Providing Gifts and Entertainment to Government Officials

STEEL HAWK Employees should be especially careful when offering gifts, entertainment and corporate hospitality to Government Officials. The Government prohibits giving anything of value to Government Officials in order to obtain or retain business or to secure some other improper advantage. It is important to ensure that gift, entertainment and corporate hospitality to the Government Officials cannot be construed as bribe and must be made in accordance to STEEL HAWK Management Guidelines

Providing gift, entertainment and corporate hospitality to Government Officials or their family/household members is generally considered a red flag situation.

Occasionally, offering gifts to Government Officials may be appropriate to build goodwill and strengthen working relationship. There are situations in which entertaining Government Officials may be appropriate such as providing a meal after a tour of STEEL HAWK's facility or accompanying an official to an occasional sporting or cultural event which is not extravagant or lavish.

If approval is obtained for us to provide gift, entertainment or corporate hospitality to Government Officials, we must ensure that the gift, entertainment or corporate hospitality is not excessive or lavish, and must commensurate with the official designation of the Government Officials and not in his personal capacity.

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Any request to provide gift, entertainment or corporate hospitality by Government Officials must be in writing.

The providing and giving gifts, entertainment and corporate hospitality to Government Officials must be in accordance with the relevant Government of Malaysia's circular.

13. FIGHTING BRIBERY AND CORRUPTION

We aspire to execute a Zero-Tolerance policy with a top down approach.

13.1 Compliance to Laws

We and our Business Partners are expected to comply with the Malaysian Anti-Corruption Commission Act 2009 ("MACCA") and all other anti-bribery and anti-corruption laws and regulations, domestic and international and treaties of the countries where we do business.

Being an officer of STEEL HAWK, any Employee of STEEL HAWK who use his office or position for gratification as provided for under Section 23 of the MACCA, commits an offence and will be dealt with under the MACCA.

13.2 Bribery and Corruption

We are prohibited from accepting or soliciting, giving or offering any form of gratification as an inducement or reward to do or forbear any act in relation to any matter in which any Business Partners, friends or Families has an interest whether directly or indirectly.

Our Business Partners are also prohibited from offering and/or giving any form of gratification to us as an inducement or reward for us to use our office or position when making any decision, or take any actions in relation to any matter in which the Business Partners, friends or Families have an interest whether directly or indirectly.

In the event that any request for bribe is received or any offer for bribe are being made, it is our duty to submit together with the full and true description and, if known, the name of the person who solicited, or obtained or attempted to obtain the gratification to the Ethics Line as provided under the chapter of Whistle-Blowing Policy and Reporting Concerns under this Code.

Any offence of accepting, soliciting, giving or offering of any form of gratification will be dealt with under the MACCA or any other laws applicable.

13.3 STEEL HAWK Anti-Bribery Anti-Corruption Manual (ABAC)

STEEL HAWK Anti-Bribery Anti-Corruption Manual has set out the guidelines in the ABAC in relation to improper solicitation, bribery, and corruption that may arise in the course of STEEL HAWK's business. In the event of conflict between this Code and the ABAC, the ABAC Manual will prevail.

14. WHISTLE-BLOWING POLICY & REPORTING

STEEL HAWK and its Board of Directors are committed to internal whistle blowing program by introducing a safe and acceptable platform for STEEL HAWK Employees and Business Partners to channel concern about improper conduct not limited to illegal, unethical, improper business conduct affecting the Company and about business improvement opportunities.

The internal whistle-blowing program allows us to take appropriate preventive and corrective actions inside the Company without the negative effects that come with public disclosure, such as loss of Company image and reputation, financial distress, loss of investor confidence or drop in value of share prices.

Employees and also Business Partners are encouraged to discreetly disclose concerns about improper business conduct within STEEL HAWK. In this manner, the Employees and Business Partners can help STEEL HAWK to monitor and keep track of such illegal, unethical or improper business conduct within STEEL HAWK which otherwise may not be easily detected through normal process or transaction. STEEL HAWK may not investigate or entertain any anonymous disclosure and Employee and Business Partner may not be protected under this policy if the Employee's or Business Partner's identity is not being disclosed.

This Policy is aimed for Employees and Business Partners to raise the matters in an independent and unbiased manner.

Employees and Business Partners may make a disclosure of improper conduct based on his or her reasonable belief that any person is engaged, is engaging or is preparing to engage in improper conduct. The disclosure of improper conduct does not necessarily lead to any disciplinary action or prosecution against the person whom the disclosure is made. Employees and Business Partners are just required to provide sufficient information for management to take appropriate steps.

The whistleblower protection conferred on a whistleblower will be:

- a. Protection of confidential information; and
- b. Protection against detrimental action.

We give assurance that Employees and Business Partners will not be at risks to any form of employer's harassment which is not limited to threats, victimization, retribution or retaliation from their superiors or from any of the Management. However, the protection conferred under this program will be revoked if the whistleblower:

- a. participated in the improper conduct disclosed;

- b. willfully made the disclosure which you knew or believed to be false;
- c. the disclosure of improper conduct is frivolous or vexatious; and
- d. the disclosure of improper conduct is made with the motive of avoiding dismissal or other disciplinary action.

Any attempt to retaliate, victimize or intimidate against anyone (whistle-blower) making report in good faith is a serious violation of the Code of Business Ethics and shall be dealt with serious disciplinary actions and procedures.

All concerns received will be duly investigated and deliberated by an independent committee appointed by the Board of Directors for further steps to be taken, if any, based on the findings of the investigation.

If Employees and Business Partners have concerns about illegal or unethical conducts in the workplace or in the business dealings with STEEL HAWK, and feel uncomfortable discussing the problems through normal channels, they are strongly urged to use the Ethics Line with identity only known to specific persons. These services are not a substitute for speaking directly to us, but as an encouragement and to facilitate disclosure of improper conduct and to protect Employees and Business Partners from detrimental action and for the matters to be disclosed further.

As provided by the law, Employees and Business Partners may also report illegal or unethical practices directly to the statutory bodies such as the Malaysian Anti-Corruption Commission, the Securities Commission, the Royal Police Malaysia or other similar government agencies where the business is located. In such event, protection of the confidential information is also provided for under the respective law such as the Evidence Act 1950, MACCA, Companies Act 1965, WPA and the Witness Protection Act 2009.

All Employees and Business Partners should be alert and sensitive to situations that could result in actions by themselves, or others, which might violate the Code.

If an Employee or a Business Partner is uncertain about what is proper conduct in a particular situation or wishes to raise any matter arising in connection with the activities of the Company or behavior of any Employee which knowingly or unknowingly may have violated this Code, it is the Employee's and the Business Partner's obligation to make at least one of the following contacts:

- i. Consult the immediate superior who may, at his or her discretion, address the situation personally or in consultation with other appropriate personnel such as from the Enterprise Ethics & Integrity Unit, Legal Division, Human Resource Management and Group Internal Audit.
- ii. If any concerns that a breach of law or violation of this Code has occurred or, if a person wish to raise a matter in confidence, or even on a "no name" basis,

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that person may consult directly with an authorized member of the Human Resources Management or Group Internal Audit or the Ethics Line. The Company will not disclose the person's identity without his or her permission unless the disclosure is required under the law.

It is the duty of every Employee and Business Partner to report any breaches or suspected breaches of any behavioral or business conducts and ethics commitments of which he/she is aware of or has knowledge, whether these relate to the Employee or the Business Partners, direct reports or others to the following channels:

Whistleblowing Reporting Channels



steelhawk-wb@bdo.my



+603 2616 7112



[Steelhawk_BDOEthicsLine](#)



In person to Head of Integrity & Governance Unit using the prescribed Whistle-blowing Form;



In writing the Chairman, Board of Directors, Steel Hawk Berhad

15. PROCESS

No	Process	Sub-Process	HOD	Ethics & Integrity Unit	Human Resources
1.0	Communicate the objectives	Ensure that Employees have a copy of the Code/access to STEEL HAWK Website	R, A	R	
		Employees must sign a Certification of Compliance to the Code of Business certifying their understanding and compliance to the Code within one (1) month from the date of their employment or whenever required by the Company	R, A		R, A
		Ensure that the Employees are conversant with the principles of the Code	R, A		R, A
		Abide by the standards embodied in the Code	R, A		R, A
		Report any violation of the Code	R, A		
2.0	Declaration of Assets and Interest	Newly recruited Employees to fill-in and sign Declaration of Assets and Interest Form within one (1) month from the date of their employment	R, A		R, A
		Existing Employees to complete the DOA form annually and/or to update any changes	R, A	R	
3.0	Gifts	Employee to declare any gifts that is accepted/declined through the Gift & Entertainment Reporting Form	R, A	R	

Note: R: Responsible, A: Accountable

16. CERTIFICATION OF COMPLIANCE TO STEEL HAWK'S CODE OF BUSINESS ETHICS

I hereby certify that I have read and understood STEEL HAWK's Code of Business Ethics (the "Code") and I understand that the Code applies to all Directors, Employees and Business Partners of STEEL HAWK.

I agree that any business decisions and actions that I am dealing with, shall be based on the best interest of STEEL HAWK and shall not be motivated by personal interest, considerations or relationships. My relationships with prospective or existing Business Partners, Customers, Competitors or regulators shall not affect my independent and sound judgment on behalf of the Company.

I also certify that neither I or my Family (based on the relevant facts and information, which is to the best of my reasonable knowledge) have shares, conducts business, ha other direct or indirect financial interest or liability or serves as an officer, director, committee member or employee of any business entity that will have potential interference or affect any of my business decisions and area of responsibilities.

I further certify that I do not know of any other matters, including Family or personal relationship, as defined by Article 122A (2) of the Companies Act 1965 which might give rise to an apparent or possible conflict of interest involving my present employment.

I also certify that I do not perform any outside employment or activity that conflict with my official duties.

I am also aware of the policies regarding gift, entertainment or corporate hospitality from or to any Business Partners with whom I am dealing with, and I certify that I have not violated these prohibitions.

I hereby agree that I will fully comply with all provisions of the Code and understand my responsibility to immediately report any known or possible conflict of interest situations or suspected violations of the Code to my immediate supervisor or the Ethics Line.

I also certify my understanding that any failure by me to comply with this Code may result in disciplinary action taken against me, including but not limited to withholding of bonuses, increments and merits award, denial of promotion, and termination of my employment.

I CERTIFY THAT THIS STATEMENT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Signature : _____

Name : _____

Staff No. : _____

Designation : _____

Date : _____



STEEL HAWK ENGINEERING SDN BHD

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