

EKUITI NASIONAL BERHAD

# CODE OF ETHICS



## **CODE OF ETHICS**

#### **EXECUTIVE SUMMARY**

Ekuiti Nasional Berhad (Ekuinas/Company) desires to maintain a reputation for integrity that is in keeping with its responsibilities and position. In accordance with this objective, it requires all employees to observe high ethical business standards of honesty and integrity and to apply these values to all aspects of our business and professional practices.

The Company accepts that it is not possible to draw up specific definitions for universal application of this Code and it acknowledges that situations may arise which appear ambiguous and difficult to interpret as violating the Code. The onus is on all employees to approach each situation with a conscience.

In situation where external parties intend to extend business courtesies to the Company, you should channel them to the Corporate Governance & Risk Management Department and/or the Audit Committee. As a general rule, business courtesies valued more than RM500.00 should not be accepted. However, if the business courtesies, irrespective of the value may be construed as given to influence decision making in the Company, it should not be accepted. Any exception to the above could only be approved by the Chief Executive Officer.

The Code applies to all employees of the Company, Ekuinas Capital Sdn Bhd and their subsidiary companies (Group).

Should any conflict arise between the English version and any other version in a different language, the English version stated herein shall prevail.

This code is to be read together with the Company's other policies and procedures.



#### **OBJECTIVE OF THE CODE**

The Code of Ethics shall serve as a guide and reference to assist our employees to live up to our high ethical business standards, and it provides guidance on the way we conduct business and duties in a manner that is efficient, effective and fair.

The Code highlights key issues and identifies the relevant policies and procedures and resources to help employees conduct business and duties in line with our standards. It is not a comprehensive manual and employees should seek advice from the Audit Committee or Corporate Governance & Risk Management on any doubts of the appropriateness of business practices.

#### RESPONSIBILITY AND ACCOUNTABILITY

#### Employees:

All employees are to comply with this Code as a matter of course and ignorance of the existence of this Code or any related amendment or variation to it will not be accepted as an excuse for its breach. Any violation or breach of the code will render the employee liable to disciplinary action by the Company.

#### Management:

Management is to ensure that they lead and manage the employees according to the Code. In the situation where the Code is not clear, Management is responsible to facilitate discussions and seek clarification from relevant parties. Management should be alert and on the lookout for indications that are unethical or even illegal business conduct that has occurred.



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## **Changes Control**

Version	Change Effective	Description of Changes
1	23.10.2009	First Issuance of Code of Ethics
2	01.08.2023	Revision to the first issuance of Code of Ethics



#### I. THE COMPANY

#### A. Safe Work Environment

#### (i) Safe and Conducive Work Environment

- a. It is the policy of the Company to assure that the activities of the Group are conducted with full concern for safety of its facilities in order to protect the safety and health of its employees, communities adjacent to our operations and the general public.
- b. The Company is committed to providing a safe and conducive work environment and will provide appropriate safety and health training and will require strict adherence to safety rules and procedures.

#### (ii) Employees' Obligations

- a. It is everyone's responsibility to promote safe behaviour and be responsible for immediately reporting accidents, injuries, and unsafe equipment, practices or conditions to a Supervisor or other designated person. All employees must report to work free from the influence of any substance that could prevent us from conducting work activities safely and effectively. Threats or acts of violence or physical threats on fellow employees are prohibited.
- b. We must follow all rules and regulations laid down on safety matters; influence and persuade others to do the same and report cases of non- compliance.
- c. All rules and regulations on safety matters must be adhered to. Any non-compliance must be reported.
- d. Employees are to use common sense and best judgement to ensure safety.

## B. Asset and Property

#### (i) Employees' Responsibilities

a. All the Company's assets and property assigned to staff must be protected from loss, damage, misuse, illegal use and theft.



- b. All the Company's assets and property are meant to be used only for business purposes and other purposes approved by the Management.
- c. All the Company's assets and property must be returned to the respective department when it is no longer needed for business purposes.

#### (ii) Company Vehicles and Petrol Card

- a. Authorised employees assigned to drive Company vehicles must ensure the usage is for official Company work purposes only.
- b. Petrol cards assigned to Company vehicles are for purchasing fuel only.

#### (iii) Internet Access and Software

- a. Internet access is provided for business purposes which include any research work related to the user's field of work.
- b. The Company reserves the right to revoke the user's Internet access if he/she is found to be abusing the facilities outside the scope of the work.
- c. There shall be no other means of accessing the Internet except for the specific means provided by the Company.
- d. Materials from the Internet that are or could be perceived as offensive from religious, political, racial or gender perspectives are classified as objectionable material. These include materials that have the potential to incite hatred or ill feelings of various parties. Such activities are considered to be a serious breach of this Code.
- e. Only software that is developed by the organization, or that is licensed or provided by the developer to the organization may be used.
- f. All employees (permanent or contractual) are to restrain from the following:-
  - Duplicating copyrighted material without the owner's consent;
  - Copying software from one machine to another without the owner's documented authority;
  - Copying Company proprietary software for use in computers that do not belong to the Company, or for any purpose other than authorized by the Company; and



• Installing unauthorized software on the desktop (this is to prevent computer viruses from infecting the system).

#### C. Information

#### (i) Confidential and Proprietary Information

- a. Confidential and proprietary includes:
  - i. Any information that is not generally known to the public and is helpful to the Company or the Group or would be helpful to competitors;
  - ii. Information that suppliers, companies or business that the Company, through the Fund has invested in or is a potential investment (Investee Companies) have entrusted to us; and
  - iii. Technical information, data, know-how and information relating to business, marketing strategies, financial condition and operations of all companies in the Group.

#### (ii) Employees Obligations

- a. We will not disclose information about the Group or Investee Companies to unauthorized people or use the information for personal gains.
- b. Each and every employee is expected to exercise judgement in seeking clarification or proper authorization prior to disseminating confidential, proprietary or sensitive information.
- c. Employees are required to declare any conflict of interest that may arise. Such declaration should be done:
  - During the organisation's mandatory annual declaration;
  - As and when a conflict arises;
  - · During the recruitment process; and
  - Before any tender or bidding process; and before participating in an investment or major trading activity.

#### (iii) Information To Be Protected

a. All confidential and proprietary information (defined above) including information in relation to securities, financial condition, earnings or activities of the Company, the Group and Investee Companies and information that is particularly sensitive which include knowledge of acquisitions and divestiture, new products or process, audit reports and earning figures and trends must remain confidential until it is fully and properly disclosed to the public.



- b. All the Group's corporate, Investee Companies and employee's information are strictly private and confidential, and must be treated as such at all times. They must not be disclosed to anybody without proper authorization. There shall be no release of such information to casual contacts made through the Internet or any other means of information dissemination.
- c. The Company's policy is to recognize fully and respect the legal rights of others on matters involving the ownership, use and disclosure of Intellectual property. This includes the avoidance of any act which would result in the improper use of any trademark or service mark belonging to another party. It also includes the avoidance of any act which would result in unauthorized use of appropriation of any design, formulation, product or is covered by valid patent belonging to another party.
- d. The obligation to preserve confidential and proprietary information continues even after employment ends.

#### (iv) Recording and Storing of Information

- All books, records and accounts are to be kept in a complete and accurate manner and:
  - i. there can be no "special funds" or other accounts representing the Company assets, which are "off-the books" or otherwise maintained outside the Company's normal financial accounts;
  - ii. employee expense account reimbursements are to be only for proper and authorized business expenditures accurately described in such accounts;
  - iii. fees and commissions to consultants, agents and other third parties must be legal, proper and reasonable in relation to customary commercial practice.
- b. Storage media containing confidential data or licensed or copyrights software, must not be taken off-site by employees and contractors without consent and authorization from the owner or your immediate supervisor.

#### D. Time

#### (i) Punctuality

a. Employees must be punctual with regards to working hours, attending meetings, conferences training and appointments; both in-house as well as with external parties.



- b. Employees must be at their assigned workstation, ready to work at the beginning of their daily working hours. They are also expected to remain at work hours.
- c. They are also expected to remain at work until the end of their assigned work hours, except for approved breaks and outside appointments.

#### (ii) Absence with Permission

a. An employee needs to obtain prior approval from the immediate supervisor if she/he has to leave the workplace to attend to urgent personal matters outside the Company during work hours.

#### II. OUR CUSTOMERS/CLIENTS/INVESTEE COMPANIES

#### A. Internal Customers/Clients

#### (i) Relationship with Colleagues

- a. At Ekuinas we believe that the internal customer is as important as our external customers. As such, we shall conduct ourselves in a professional manner and in the best interest of the Company and demonstrate the highest regard for one another and shall treat each other with respect, avoiding any language or behavior that intimates or offends others in any dealings with them.
- b. Abusive, harassing or offensive conduct is unacceptable, whether verbal, physical or visual. Examples include derogatory comments based on racial or ethnic characteristics and unwelcomed sexual advances. We are encouraged to speak out when a co-worker's conduct makes us uncomfortable, and to report harassment when it occurs.

#### (ii) Employee's Responsibility

a. We shall each be responsible for fostering an atmosphere that promotes good relations between one another.



b. Managers are to direct and manage their subordinates in the most effective and efficient manner and make fair decisions without discrimination based on the Company-provided guidelines and policies. Do not discriminate against any individual or group because of race, religion, gender or disability. Do not use your position or other advantage you may have, such as seniority or physical size, to harass or intimidate others.

## **B.** External Clients/Investee Companies

#### (i) Integrity and Professionalism

- a. We will build long-term relationship with our clients and Investee Companies into which the Fund has invested, by demonstrating honesty and integrity.
- b. To maintain the Company's valuable reputation, compliance with our quality processes and safety requirement is essential. We damage our good name when we deliver services that fail to live up to standards.
- c. The Company will avoid doing business with, or having any affiliation with, parties who fail to accept the organisation's core values and policies, or parties who may harm the company's reputation.

#### (ii) Relationship With Clients/Investee Companies

- a. We are to ensure that the highest ethical standards are demonstrated.
- b. Client/Investee Companies' information is to be kept / maintained with highest confidentiality.
- c. We will employ the highest business standards when we interact with them face-to-face, through our correspondences, and over the telephone.



## III. DEALING WITH VENDORS, SUPPLIERS/CONTRACTORS

### A. Doing Business with Others

#### (i) <u>Legal & Ethical Business Deals</u>

- a. Business decisions and action must be based on the best interests of the Company and must not be motivated by personal considerations or relationships. Relationships with prospective or existing suppliers, contractors, competitors or regulators must not affect our independence and sound judgment when acting on behalf of the Company.
- b. Declaration to the Management must be made in situation that may be, or appear to be, a conflict of interest.
- c. The Company will avoid doing business with, or having any affiliation with, parties who fail to accept the organisation's core values and policies, or parties who may harm the company's reputation.
- d. Employees who are employed on a full time basis are not allowed to work for, or receive payment for services from any competitors, customers, distributor or suppliers of the Company without the prior written approval of Management.
- e. Bribes and kickbacks are not acceptable.

#### (ii) Conflicts of Interest

- a. The Company will not permit and never has permitted conflicts of interest on the part of its employees. Accordingly no employee shall knowingly become involved in a conflict of interest or upon discovery allow such conflict of interest to persist without reporting it to Management.
- b. This means that we, or any of our family members cannot receive gifts, loans, business deals or other special preferences beyond what are otherwise ordinarily available from a person or organization that does, has done, or wants to do business with the Company or is a competitor of the Company.
- c. In dealing for the Company we must not realize any profits apart from our regular compensation. The only exceptions are gift of small value extended as a business courtesy. This includes sales promotion items or the



occasional business meal.

## B. Giving and Receiving Business Courtesies

#### (i) Guiding Principles

- a. Employees must not accept kickbacks, lavish gifts or guaranties in any form. We may, however, accept items of nominal value, such as small promotional items bearing another company's name. We will not accept anything that might make it appear that our judgement for the Company would be compromised.
- b. Fees and commissions to consultants, agents and other third parties must be legal, proper and reasonable in relation to customary commercial practices.

#### (ii) <u>Business Courtesies</u>

- a. In principle, staff should not accepts gifts from vendors, suppliers, contractors, Investee Companies, clients and other third parties that may influence, or are even be perceived to be able to influence decision making. Decision making should be objective, based purely on merits and should benefit the Company. Decision making should never be based on your personal interest.
- b. The only exception to the above policy is normal business practices in Malaysia, e.g. business lunches or token souvenirs. Any other form of request of sponsorship or gifts from vendors / suppliers for the purpose of family day, dinner etc would require approval from the Company.
- c. Gifts to or from Investee Companies or suppliers are appropriate only if:
  - (i) The monetary value is modest;
  - (ii) The requisite people have been informed.
- d. Gifts in the form of cash is strictly prohibited.



e. Any giving or receiving gifts or business courtesies (exceeding the business norms) from/ to vendors, portfolio companies, clients and other third parties with business relationship that may influence, or perceived to be able to influence decision making or there is potential / perceived conflict of interest, must be reported to the Corporate Governance & Risk Management Department (CGRM) or the Audit and Risk Management Committee (ARMC) via the form provided in Appendix 1.

In addition, any gifts valued more than RM500 from / to any party are to be declared and will require the CEO's approval.

#### (iii) Business Norms

- a. We also understand though, that giving practices vary among cultures. In some rare situations, it would be impractical to refuse or return a gift. This may include gifts that are offered during celebration of a festival, or special occasions such as official launches or openings. In such cases, employees are to practice good business sense and discretion.
- b. In situations where employees are faced with business situations that may also call for the giving of gifts example signing ceremonies, corporate visits and the Company functions, proper approval must be obtained.
- c. Appropriate gifts include occasional business meals or transportation by the Company vehicles to the Company-related meetings, seminars or the Company facilities.
- d. We may also provide entertainment that is reasonable in the context of the business. We consider "entertainment" to include a representative of both parties at the event.
- e. Entertainment that is lavish or frequent may appear to influence one's independent judgement on behalf of the Company. If an invitation seems inappropriate, we must turn down the offer or pay the cost of the entertainment.
- f. In general, a sound principle to remember in deciding whether to give or accept business courtesies would be: "Would you be comfortable discussing the acceptance or giving of the gift with your manager, colleagues or a newspaper reporter?" If your answer is no, then do not proceed.



## C. Purchasing and Procurement Practice

#### (i) The Company's Best Interest

- a. Purchasing decisions must be made based solely on the Company's best interest with proper agreement documented and clearly identifying the services or products to be provided, the basis for earning payment, and the applicable rate or fee. The amount of payment must commensurate with the services or products provided.
- b. All staff involved in procurement of one form or another must comply with the features of sound procurement practices as follows:
  - i. All vendors are to be treated equally and all are afforded the same information at the same time;
  - ii. Ensure that no information leaks during the procurement process;
  - iii. No conflict of interest through relationships, receipt of gifts etc. to ensure no favouritism amongst vendors. Any conflicts of interest (or potential thereof) through relationships or friendships with people in other companies invited by us to tender for any project must be declared to the Tender Committee, where formed or immediate supervisor. In a situation where there is evidence or suspicion of improper behaviour during the tender process or after its award, it must be reported to the Audit Committee or Corporate Governance & Risk Management Department.
  - iv. There should be more than one bidder:
  - v. There should be transparency, which ensures that the procurement process is auditable and justifiable, and can stand up to scrutiny;
  - vi. There should be more than one company staff and function involved, which would ensure counter checks on the staff and visibility that not one person makes a decision; and
  - vii. Getting the best deal for the Company and the process can stand up to scrutiny by any party.

#### (ii) Commitment on Behalf of the Company

a. Any monetary commitment done on behalf of the Company must be in accordance with the approved limits of authority.

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- b. All employees must comply with these limits of authority and be aware that Management will view violation of his/her authority seriously and any non-compliance will result in disciplinary action.
- c. Requisition approval must be subject to the limits of authority.
- d. No employee is permitted to break down the total value of commitment i.e. purchase or contract, into smaller orders to avoid approval by higher approving authority.
- e. An employee can only delegate his or her limit of authority to line subordinates in the functional area that he/she is responsible for, and the delegation must be time or task specific. A line subordinate who has been delegated authority is not allowed to further delegate the authority given to him/her.

#### (iii) Commitments by Resignees and Consultants

- a. An employee who has given the notice to resign and is serving the notice period, or an expatriate staff who is within three months of the end of his/her assignment/contract, is not allowed to make any commitments on behalf of the Company.
- b. No consultants (i.e. a person who is not a full-time or a full-time secondee from another company) are allowed to make or approve any commitment on behalf of the Company.

#### (iv) Cash and Company Monies

- a. We will follow all instructions on how to handle cash and other Company funds that we are responsible for. We will maintain tight control over the funds we are responsible for, and report any non-compliance immediately to the appropriate channel.
- b. The Company's financial records will conform to generally accepted accounting principles. There must be no undisclosed or unrecorded funds or assets.



#### IV. OTHER EXTERNAL PARTIES

## A. Safeguarding Our Reputation

#### (i) Establishing Business Relationships

- a. We will not do business with parties who are likely to harm the Company's reputation.
- b. We will also avoid doing business with parties who intentionally and continually violate the law. All arrangements with third parties must conform and comply with the Company's policy and the law.
- c. We will not use a third party to perform any act prohibited by law or by this Code of Ethics.

#### (ii) Maintaining Ethical Practices

- a. We will not make payments to third parties to secure sales or obtain favourable terms or treatment.
- b. Gifts of substantial value or extravagant entertainment of such parties are prohibited since they may be construed as attempts to influence their decisions.
- c. Assistance or entertainment given to third parties should not compromise or even appear to compromise their integrity.

#### (iii) Product and Services Endorsement

a. Employees are not allowed to endorse products and services of a third party without prior approval from the Company.

## **B.** Government Agencies

#### (i) <u>Dealings With Government Officials and Contracts</u>

a. Employees involved with business deals with government officials and/or government contract must comply with applicable laws and regulations.



b. Employees are expected to co-operate with reasonable requests for information from government agencies and regulators, and to consult with relevant Ekuinas departments before responding to any non-routine requests. All information provided must be correct and accurate. We will not alter or destroy documents or records in response to an investigation or other lawful request.

#### (ii) Offers and Unlawful Payments Are Disallowed

- a. All payments made to Government officials, statutory bodies must be as per applicable law and regulations.
- b. This requirement applies both to employees and agents, such as service agents and dealers, irrespective of geographical location.

## C. Competitors

- (i) Competitors' Proprietary Information, Trade Secrets, etc.
  - a. All information of competitors must be obtained with owner's consent and from legal sources.
  - b. If information is obtained by mistake that may constitute a trade secret or confidential information of another business, or if we have questions about legality of information gathering, we should consult the Audit Committee, or Corporate Governance & Risk Management Department.

#### (ii) Maintaining Ethical Practices in a Competitive Environment

- a. We must never use any illegal or unethical methods to gain competitive advantage (including in obtaining information about our competitors).
- b. We will sell the Company's product and services fairly and honestly, stressing their quality and value.
- We will not use tactics that unfairly undermine the products of competitors (in advertisements, demonstrations or by disparaging comments or innuendoes).



#### D. Media

#### (i) Third Parties' Queries

- a. To ensure professional and consistent responses, requests from the media should be forwarded to the Corporate Communication Department.
- b. Requests from financial analysts and shareholders should also be treated in the same manner.

## E. Political Parties, Non-Governmental Organisations (NGOs) and Non-Profit Organisations (NPOs)

#### (i) Contributions to Political Parties

- a. No employee may propose that the Company make a political contribution without prior determination that such a contribution is lawful and no such proposal may be acted upon without the express approval or concurrence of the Board of Directors.
- b. No political contributions utilizing the Company's funds or other resources are permitted to be made, directly or indirectly, to any political candidate or any political party except where such contributions are permitted by law and expressed permission has been given by Board of Directors.

#### (ii) Contributions to NGOs and NPOs

- a. Any contributions to be made on behalf of the Company to NGOs and NPOs must have prior written approval from the Board of Directors.
- b. Employees' personal involvement in such organizations, has to be done on your own expense and time. Employees are prohibited to be involved in such organisations' activities during work hours.



#### **BREACH OF CODE**

Employees are required to follow all established rules and practices in the Code of Ethics. The Company will hold each Manager, supervisor and employee accountable in ensuring observation of high ethical business standards and to apply these values to all aspects.

A breach of the Code will be construed as misconduct and may be subjected to disciplinary action.

#### A FINAL WORD

#### Expectations from an Ekuinas Employee

Ekuinas' employees are required to comply with all applicable laws and regulations wherever we do business. Perceived pressures or demands from supervisors or business conditions are not excuses for violating the law or the Code of Ethics. Employees will also be expected to sign off annually a declaration that they will abide with the Code in the form provided in **Appendix 2**.

#### Consult Your Immediate Supervisor and Manager

If you have the question about the Code of Ethics, your first point of contact is your immediate supervisor or Manager. They will be able to engage in discussions with you about the Code and advise you accordingly. Alternatively, you may seek the advice of the Audit Committee or Corporate Governance & Risk Management Department when in doubt.



#### **APPENDIX 1**

INFORMANT'S PARTICULARS



1.

2.

3.

Risk Management Department.

require approval from CEO.

## CORPORATE GOVERNANCE & RISK MANAGEMENT BUSINESS COURTESIES DECLARATION FORM

Designation			DEPARTMENT/ COMPANY				
В.	DETAILS (	F BUSII	IESS COURTESIES				
	COURTESIES RECEIVED			COURTESIES	GIVEN OUT		
	Description of item received		Description of item given out				
	Date Received :		Date Issued :				
	Received from			Recej			
(Name of individual/ company)			(Name of individual/ company)				
	Estimated value/ costs: RM		Actual costs: RM				
	Reason / Purpose of courtesies		Justification for giving courtesies				
I hereby declare that the inform	ation provided above as true to the best of my knowledge and undertake to upd provided in		_	ement Department shou	ld there be any variation	n to the information already	
	provided in	ans acci					
DECLARED BY			VERIFIED BY				
					HEAD OF DEPART	MENT	
DATE			DATE			<del></del>	
	C. COURTESIES ABOVE RM500		FOR CORPOR	RATE GOVERNANCE & I	RISK MANAGEMENT US	SE ONLY	
	APPROVED / REJECTED BY:		RECEIVED BY		DATE		
			REVIEWED BY				
	CEO		REMARKS				
DATE			DATE				
Notes:							

All business courtesies shall be acknowledged by the respective HOD and declared to Corporate Governance &

Courtesies valued less than RM500 which can be construed as given to influence decision making shall also

Courtesies received or given out with value of more than RM500 shall require approval from CEO.

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#### **APPENDIX 2**

Employee No.:
Name. :
Department :
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Ekuiti Nasional Berhad
I hereby acknowledge that I have received and read the Code of Ethics of Ekuiti Nasional
Berhad and agree to comply not only with the terms and conditions but the spirit of the Code of
Ethics, failing which, appropriate disciplinary action may be taken against me.
Thank you.
[signature of employee]
[Signature or employee]