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SENI JAYA CORPORATION BERHAD
[Registration No. 199301025122 (279860-X)]
(Incorporated in Malaysia)

CODE OF CONDUCT



Seni Jaya Corporation Berhad
Code of Conduct

This Code of Conduct ("Code"), by its very nature, cannot describe every possible situation that you might encounter in your daily work. If you cannot find an answer in the Code, or if you have questions on how to interpret the Code, please seek guidance. Likewise, if you are aware of something that may be a violation of our Code, our policies or the law, you should speak up and report it so that it can be addressed.

"Seni Jaya Group" or "Group" means Seni Jaya Corporation Berhad and its subsidiaries.

Unless there is something the subject or context inconsistent herewith, words incorporating the singular shall include the plural and vice versa and words importing the masculine gender shall, where applicable, include the feminine gender and vice versa.

References

Companies Act 2016 and any amendments from time to time

Main Market Listing Requirements of Bursa Malaysia Securities Berhad ("Bursa Securities")

Memorandum & Articles of Association of the Company

Malaysian Code of Corporate Governance
Corporate Disclosure Guide 2011

Corporate Governance Guide 2017

INTRODUCTION

What is a Code of Conduct?

"Principles, values, standards, or rules of behavior that guide the decisions, procedures and systems of an organisation in a way that contributes to the welfare of its key stakeholders and respects the rights of all constituents affected by its operations." (*www.wikipedia.org*)

Our Code summarises what the Seni Jaya Group must endeavor to do proactively to increase its corporate value. It also describes the areas in our daily activities that require caution in order to minimise any risks that may occur.

Our Code provides guidance to ensure that we uphold the ethical conduct in our daily work. However, separate regulations may be established by the Board of Directors or other governing body of each Seni Jaya Group of companies when more detailed standards are deemed necessary by such Board of Directors or governing body.

Each of us is expected to embrace the principles of our Code and:

- Show respect in the workplace
- Act with integrity in the marketplace
- Ensure ethics in our business relationships
- Ensure effective communication

Who shall adhere to the Code of Conduct?

Our Code governs all of our business decision and thus, it applies to everyone of the following:-

- Board of Directors of Seni Jaya Group; and
- All employees of Seni Jaya Group.

Our Code governs all our decisions and actions, whether in our offices, advertising sites, factories, in the boardroom or in the trade selling of our products to customers.

A. SHOW RESPECT IN THE WORKPLACE

1. Equal Opportunity

We shall not discriminate or treat employees or job applicants unfairly in matters that involve the recruitment, hiring, training, promotion, compensation or any other term or condition of employment.

Our employment decisions regarding employees and applicants will always be based on merit, qualifications and job-related performance, without regard to non-job-related characteristics such as:

- Race, color, ethnicity or national origin
- Gender or gender identity
- Sexual orientation
- Age
- Religion
- Disability
- Veteran status
- Any other legally protected status

We will not tolerate unlawful discrimination in relation to employment.

2. Anti-Harassment

We are committed to provide a harassment-free environment. "Harassment" is behavior that creates an offensive, intimidating, humiliating or hostile work environment that unreasonably interferes with another person's work performance. Harassment may be physical or verbal, and may be done in person or by other means (such as harassing notes or emails). Examples of harassing behavior include unwelcome sexual advances or remarks, offensive jokes and disparaging comments.

3. Human Rights

We recognise the importance of maintaining and promoting fundamental human rights in all of our operations. We operate under programs and policies that:

- Provide fair and equitable wages, benefits and other conditions of employment in accordance with local laws
- Provide humane and safe working conditions
- Prohibit forced or child labor
- Promote a workplace free of discrimination and harassment

4. Ensuring Workplace Health and Safety

We shall do everything possible to ensure the safety of each employee and shall maintain and improve the workplace environment so that we can work in a safe and healthy surrounding.

We understand and strive to comply with all laws and regulations related to safety and sanitation such as Occupational Safety and Health Act 1994.

The Company shall strive to create a secure work environment that allows employees to balance their personal lives and work.

5. Protection of Privacy

Every officer and employee is expected to respect each other's privacy.

Every officer and employee is expected not to disclose personal information obtained in the workplace or business operations to others without the consent of the individual, unless required by law.

6. Use of Company's Assets with Due Care

Every officer and employee should not improperly use or waste any assets belonging to the Group.

Every officer and employee shall endeavour to protect the Company's assets under his/her care and should not use such assets for his personal gain or the benefit of others.

7. Leading by Example

Directors, managers and supervisors, have the added responsibility for demonstrating, through their actions, the importance of the Code. Ethical behavior is the product of clear and direct communication of behavioral expectations, modelled from the top and demonstrated by example. Directors, managers and supervisors are responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues.

8. Continuous Training and Development

We believes that employees’ skills and development are vital to the success of the Group. As such the Group strives to motivate and retain the best employees by providing continuous training by sending them to attend relevant courses to upgrade their knowledge and skills within their job scope.





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B. INTEGRITY IN OUR MARKETPLACE

1. Ensuring Product Safety and Quality

We are committed to producing high quality advertising display structure across the nation. We maintain customers' trust by constructing superior products at the strategic location, starting with engaging with credible contractors and our operation team continue to monitor until the finished product reaches the customers' hands. We always develop products in an ethical and responsible manner, and follow applicable ethical standards and guidelines relating to research.

2. Responsible Sales and Marketing Practices

We are expected to compete vigorously and effectively, but never unlawfully. For this reason, we are truthful in all of our sales and marketing activities.

We shall not:

- Overstate or misrepresent the qualities of our products
- Use misleading or untruthful statements in our advertisements or labels
- Make claims about our products, product ingredients, or health effects without adequate substantiation and proper legal clearance.

We will ensure that our marketing programs conform to applicable laws and regulations as well as applicable policies of our sector or function.

When making comparisons between competitors' products and services and our products and services, we attempt to be mindful not to discredit other companies.

3. Our Customers

When dealing with our customers, we shall always:

- Earn their business on the basis of our superior products, customer service and competitive price
- Present our services and products in an honest and forthright manner
- Avoid unfair or deceptive trade practices
- Communicate our sales programs clearly



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- Deliver our promises

Our contracts with customers must always reflect the importance and value we place on our business. All customer sales and trade agreements will be in writing and conform to our policies.

If a problem occurs with the quality of a product or service we provide to customers, we endeavor to provide accurate information relating to the product or service and to respond promptly in order to limit the extent of the damage. Furthermore, we strive to take all possible measures to determine the cause of the problem and prevent its recurrence.

4. Our Suppliers

We hold our suppliers to the same standards of integrity to which we hold ourselves.

An unethical or illegal act of a supplier may hurt Seni Jaya Group's reputation as one of the market leaders in the provision of indoor and outdoor media services in Malaysia and may cause a loss of goodwill in the communities we serve. Therefore, all suppliers must comply with the highest requested standard set by us as a condition of doing business with us. Our suppliers include any third-party vendor, consultant, contractor, service provider or supplier of raw materials, ingredients or components relating to advertisement.

Our decision on the selection of a supplier is based on merit, quality of service and reputation.

5. Community Involvement

We encourage our officers and employees to participate actively in community welfare, health care, education, arts and other cultural activities as well as other philanthropic activities as a good corporate citizen.

We engage in meaningful and appropriate donations and support activities as social contributions to respond to social issues and community needs relating to the Group's Philosophy.





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C. ENSURE ETHICS IN OUR BUSINESS RELATIONSHIPS

1. Conflict of Interest

We endeavour to avoid a conflict, or an appearance of a conflict, between our personal interests and the Group's interests.

Conflict of interest may arise amongst us or our family member or a friend at the following situations:

- Engage in activities that compete with, or appear to compete with, the Group's interests
- Let our business decisions be influenced, or appear to be influenced, by personal or family interests or friendships
- Use company property, information or resources for personal benefit or the benefit of others
- Have outside employment that negatively affects our job performance or interferes with our responsibilities in the Seni Jaya Group
- Receive any personal or financial benefit from, have a financial interest in, provide services to or work for a supplier, customer or competitor or a company that seeks to do business with us

"Family member" means such person who falls within any one of the following categories:

- (a) spouse;
- (b) parent;
- (c) child including an adopted child and step-child;
- (d) brother or sister; and
- (e) spouse of the person referred to in subparagraphs (c) and (d) above.

If at any time in our employment, we think that we may have a potential or actual conflict of interest, we have an obligation to disclose the conflict promptly to the Group.



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2. Anti-Corruption

Corrupt arrangements with customers, suppliers, government officials, or other third parties are strictly prohibited. "Corruption" generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means.

Corrupt activities are not only a Code violation; they can also be a serious violation of criminal and civil anti-bribery and anti-corruption laws. Should we become aware of any potential or actual corrupt arrangement or agreement, we have to speak up and report it.

3. Anti-Money Laundering

"Money laundering" is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate.

We will to the best of our ability and knowledge conducting business with reputable customers with legitimate funds, for legitimate business purposes.

4. Insider Trading

In the course of performing our job, we may learn of certain confidential information that qualifies as "material non-public information" about the Seni Jaya Group, its customers, suppliers or business partners or another third party.

"Material non-public information" means any non-public information that could potentially influence the investment decisions of investors. It includes, but is not limited to, the following:

- Financial information such as sales and profits
- Information concerning dividends
- Information concerning alliances with other companies, including merges and acquisitions
- Information concerning charges of major suppliers
- Information concerning new products or new technologies

We are not to disclose material non-public information to anyone outside our Company, including family members and friends.

We must not deal in securities of the Group while we have material, non-public information about the Group.



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In addition, we are not permitted to engage in activities that are designed to hedge or offset any decrease in the market value of the Group’s securities.

5. Protecting the Environment

We intend to be conscious of environmental issues and endeavor to minimise the environmental impact at all times as we engage in our day-to-day work.



D. ENSURE EFFECTIVE COMMUNICATION

1. Corporate Disclosure

Material information from the Company shall be fairly accessible to the general public and the Company applies non-discrimination policy to receivers of the material information. Selective disclosure is prohibited.

The Company may withhold or delay disclosure of certain material information of which, if released, would undermine the interests of the Company or interests of shareholders in general. In such case, the Company shall ensure that confidentiality is maintained at all times to minimise leakage of information.

If confidentiality of information is lost or cannot be maintained, the Company will immediately announce the information to Bursa Securities.

In general, our staff or directors should not respond to any rumour, unless the rumour brings undesirable impact to the interests of the Company or shareholders in general or it is required by relevant authority.

2. Spokesman

Only the Chairman, Managing Director, Executive Directors and General Manager-Finance are authorised spokesman of the Company. Other appointed agent may sometimes be a temporary spokesman of the Company when authorised by spokesman of the Company and with the companion of the spokesman.

Only the spokesman or other authorised person of the Company is allowed to address the public, approve announcement, make press release, clarify rumours and authorise the publication of contents on the Company's website on behalf of the Company.

3. Whistle Blowing

Whistle blowing is a specific means by which a worker or stakeholder can report or disclose through established channels, concerns about any violations of the Code, unethical behavior, malpractices, illegal acts or failure to comply with regulatory requirements that is taking place / has taken place / may take place in the future.

Only genuine concerns should be reported. Such report should be made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the report is not made for personal gain. Malicious and false allegations by the whistle blower will

be viewed seriously and treated as a gross misconduct and if proven may lead to dismissal or termination of the whistle blower.

We are committed to:

- encourage employees to talk to supervisors, managers and other appropriate personnel when in doubt about the best course of action in a particular situation
- encourage employees to report violations of laws, rules, regulations, the Company's policies or the Code to appropriate personnel
- investigate into cases reported and take appropriate actions after conclusion of investigations
- keep identity of the whistle blower in strictest confidentiality
- indemnify the whistle blower

