

KAMDAR GROUP (M) BERHAD (Company No. 577740-A)

CODE OF ETHICS

Kamdar Group (M) Berhad ("Kamdar") and its Group of companies ("Kamdar Group") will strictly observe the principles of honesty, impartial and fairness with legal and moral standards. All employees of Kamdar Group must comply with all national, provincial and local laws, ordinances, regulations of their localities, as well as this policy.

The code of ethics of Kamdar aimed to provide staff with certain rules and standards to be followed in their connections with customers, suppliers and other related parties of our business. Kamdar strictly prohibits any suspicious or illegal intelligence gathering, in order to protect the reputation and employees to avoid the occurrence of any unethical business behavior.

Kamdar is committed to develop business with high ethical standards, determined to provide quality products and outstanding services globally.

All Directors, Management and staffs will strictly comply with high ethical standards and perform all obligations of an outstanding corporate.

I. To achieve this target, all employees shall assume the following responsibilities :

- a) Sincerely and equally treat all of the customers and suppliers;
- b) Avoid conflict of personal interests and corporate interests;
- c) Protect and proper use of internal information, materials, property and resources of the Company; and
- d) Non-public information shall keep in confidential and is not for private interests.

II. When dealing business on behalf of Kamdar, each employee shall adhere to high ethical standards to maximize its benefits. The following situations shall be handled with extra-care to avoid violation of the rules and regulations of Kamdar :

- a) Employees shall not accept or claim any amount of cash, gifts, privileges or hospitality, unless it is consistent with normal business practices, such as normal business meals, annual trips, service award, etc.;
- b) Employees shall strive to avoid or shall accurately report any potential conflicts of interest between individuals and Kamdar;
- c) Without permission, employees shall not disclose confidential information to external person or employees within the Group who are not privy to such information; and

- d) When reporting or handling the financial statements, employees shall not be tamper with, falsify, deliberately omit, hide the fact etc. If the staff have any questions in relation to the ethics standards of Kamdar, please refer to the supervisors or managers for a clear guide. It is the responsibility of every employee to protect the tangible and intangible assets of the Group.

III. Non-discriminating principles

As part of its code of ethics, Kamdar insists that everyone is equal and respect given to every individual.

Kamdar will not discriminate against suppliers, employees or stakeholders.

IV. Gifts

Any form of request, demand or acceptance of any gifts with economic values from suppliers, representatives of suppliers or potential suppliers is prohibited.

The selection of suppliers, partners is based on competitive prices, reliable quality and timely delivery. Bribery or preferential condition is strictly forbidden.

Bribery or other actions to customers to achieve sales target of the Company is prohibited.