

Rubberex Corporation (M) Berhad

(Company no. 372642-U)

CODE OF CONDUCT AND ETHICS

1.0 INTRODUCTION

This Code of Conduct and Ethics (“Code”) applies to all employees of Rubberex Corporation (M) berhad and its subsidiaries (referred to collectively as “Rubberex” or the “Group”), as well as non-executive members of the boards of directors of Rubberex. The Code helps define how we run our business by setting the highest standards of conduct throughout the Group. Its compliance is mandatory.

Questions on how the Code may apply may be directed to the Human Resource department of Rubberex.

In the rest of this document, the term “Code” refers to this Code of Conduct and Ethics, as amended from time to time.

The Code reflects and supports the vision and values upheld by Rubberex.

2.0 RUBBEREX’S CORE VALUES

We strive to promote and uphold these values for the Group:-

HONESTY	Conduct our businesses with morality, fairness and integrity, safeguard our reputation at all times
RESPECT	Treat each other as well as our customers, suppliers and stakeholders with respect
TEAMWORK	Work as a team in a participative environment to bring about better results
CARE	Be aware of the impact of our activities on the environment, safeguard the environment and engage actively with the community; ensure a safe and clean workplace
ZERO WASTE	Discourage waste of resources and opportunities, leakage of business and abuse of assets. Properly plan, fund and execute projects
DIVERSITY	Celebrate the richness of an environment that comes from a diverse workforce in gender, race and age

3.0 APPLICATION OF THE CODE OF CONDUCT AND ETHICS

The Code is not a standalone document. It is an integral part of the Group’s governance framework that includes Rubberex’s board charter, risk management and internal control, whistleblowing and other policies and guidelines applicable to Rubberex’s detailed areas of operations.

Every employee of Rubberex is encouraged to read and understand the documents that collectively form the Group's governance framework.

Rubberex supports the highest ethical standards in the conduct of its various business activities. This includes not only with regards to compliance with the laws that govern our activities, but also to continuously sustain and demonstrate uncompromising integrity with strong regard for others and the environment in which we operate.

As it is not possible to prescribe specific behaviours or standards for each situation that requires ethical judgment, the Code acts as a frame of reference in prescribing standards and guidance on situations and issues that are critically important to Rubberex. The Code can also help to identify when it would be appropriate to ask for guidance from your manager or superior as to the proper course of conduct in any situation, which is not specifically covered by the Code.

The Code applies to each employee of Rubberex, including foreign workers, whereby this Code may be translated to their native language if required. Violating the Code may subject an employee to a poor or unsatisfactory performance review, disciplinary action, including immediate termination, and/or legal actions. Each employee is encouraged to read and understand the Code so as they are clear as to their expectations as an employee of Rubberex. The Code forms part of the employment terms and conditions, will be reviewed periodically and may be changed from time to time.

3.1 *Conducting Business with Honesty and Integrity*

One of our core values is to conduct business with uncompromising integrity and professionalism. We practice this by:

- Dealing with our customers, suppliers and others fairly and honestly;
- Acting as a responsible corporate citizen, respecting human rights, working together with our communities and managing the impact of our business on the world around us;
- Keeping accurate financial and other books and records; and
- Respecting privacy and commitments we have given to others.

3.2 *Interaction with Customers, suppliers and others*

Our business has been built upon strong relationships of mutual respect and trust with other manufacturers, joint venture partners, customers, suppliers and others. To maintain and build upon these relationships, we treat everyone we deal with with fairness, honesty and respect.

In our marketing and in our interactions with customers and potential customers, we must always present Rubberex's products and services in a fair, accurate and responsible manner.

We value our relationships with our suppliers and communicate our requirements and expectations to them on a timely and open basis.

3.3 *Being a responsible corporate citizen*

For us, corporate responsibility means achieving business success in ways that demonstrate respect for people and the planet while upholding the values and high standards of ethics in matters concerning environmental health and safety. We strive to be a part of every community in which our business is located and be sensitive to the impact of our business on that community and the world around us.

At Rubberex, we:

- Promote equal opportunity for our employees at all levels with respect to issues such as race, gender, age, ethnicity or religious beliefs, and have zero tolerance for offensive behavior such as the exploitation of children, physical punishment, sexual harassment, involuntary servitude or other forms of abuse;
- Respect our employees' voluntary freedom of association;
- Reward our employees fairly and provide the opportunity to improve their skills and capabilities;
- Provide a safe and healthy workplace, protect human health and the environment, and promote sustainable development;
- Are sensitive to the impact of our business on communities and work with communities to at least maintain or improve the quality of life in those communities; and
- Promote the practice of these principles by those with whom we do business.

3.4 *Preparing and maintaining accurate financial and other records*

Our financial and other business records not only reflect but also shape the business decisions we make. We are responsible for ensuring that Rubberex's books and records are complete, fair, accurate, timely and understandable reflections of the group's operations and business activities.

We engage internal and external auditors to ensure that the way we conduct our business and keep records is consistent with relevant accounting, industry and internal standards. We must cooperate with auditors and ensure that anyone acting under our direction also cooperates with auditors.

4.0 Adherence to Laws and Regulations

Rubberex must comply with the laws of the respective countries in which it does business. We are each responsible for understanding and complying with the applicable laws or regulations.

Where the Code or company guidelines differ from any laws or regulations, we must always follow the higher standard. Should an employee believe that any requirement of the Code conflicts with the law, they are encouraged to consult with Human Resource and/or Management.

Violations of laws and regulations have serious consequences, civil and criminal, both for the company and for the individuals involved. Therefore, when questions arise on these or other

legal matters, employees are encouraged to seek guidance from Human Resource and/or Management.

5.0 Insider Trading

Any employee who is aware of material, non-public information regarding Rubberex or any other company in the Group must not:

- Trade in Rubberex securities;
- Disclose that information to others who may buy or sell securities because of the information; or
- Otherwise use the information for personal advantage or the personal advantage of others.

6.0 Intellectual Property

We must use the confidential information of Rubberex or others only for business purposes and disclose it only to those who are authorized and have a need to know. Even after we leave the Group's employment, we must continue to protect confidential information (whether Rubberex's or another party's) and not use or disclose it without authorization.

Furthermore, we must not request or encourage anyone to use or disclose privileged, proprietary, or confidential information unless they are authorized to do so by the owner of that information.

8.0 Public Communications

Only authorized employees may make any public statements on behalf of Rubberex, whether to the media, investors, or in other external forums, including the Internet. This includes disclosing new or confidential information regarding Rubberex through social media applications and websites. Should an employee be contacted by a reporter or the public on a topic on which he/she is not authorized to speak, they are urged to refer the inquiry to the Head of Corporate Affairs or to the Managing Director.

When speaking on business or technical topics in a public setting or posting on the Internet – including through social media applications and websites – employees must make it clear that they are expressing their own views and not those of the Company, unless speaking as an authorized representative of the Company.

9.0 Acceptance of gifts and conflicts of interests

Any gifts or entertainment offered or accepted should be a reasonable extension of a business relationship. It should occur infrequently and be modest in nature.

However, there are some principles that cannot be compromised:

- We do not offer or accept a bribe, that is, anything designed to obligate a person to act improperly with regard to our business;
- We do not offer or accept cash or cash equivalents without approval;

- We never participate in any business entertainment activity that would violate the law or embarrass us by its public disclosure;
- We consult Human Resource before offering anything of value to government or political party officials, as such gifts and entertainment are strictly regulated and often forbidden entirely; and
- We do not seek favors directly or indirectly, such as gifts, entertainment, sponsorships, or contributions from organizations doing business or seeking to do business with Rubberex.

Where an employee makes or is involved in sourcing or purchasing decisions for Rubberex, he/she must make those decisions with uncompromising integrity, honesty, independence and objectivity of judgment. We must seek the most technically efficient, cost-effective and high quality products and services, and to evaluate them using consistent and unbiased standards contained in applicable policies and procedures of Rubberex. Therefore, we must not accept any gifts, entertainment or gratuities that could influence, or be perceived to influence, our sourcing and purchasing decisions.

We do not make any gift or provide a benefit of any kind to Government or a Government official or anyone connected to a Government official where it might be seen as a bribe. Where gifts are offered, they must be infrequently given symbolic gifts of no or very little commercial value, and they should typically have the company logo embroidered or imprinted. Suitable gifts of this nature may include pens, t-shirts, mugs or similar souvenirs.

10.0 Protecting the Company's Assets and Reputation

Applicable security and use procedures are in place to protect the company's physical assets from theft, loss, damage, or misuse. Theft, loss, damage, or misuse of company physical assets must be reported to the respective heads of department as soon as possible.

11.0 Maintaining Information Security

We need to take personal responsibility to safeguard both Rubberex owned and third-party owned proprietary and confidential information from unauthorized disclosure, changes, or loss.

We must comply with all company security policies and procedures, including the company's data protection policies, for handling information assets and systems to ensure that we meet legal obligations, protect our reputation, and protect our investment in proprietary information.

GENERAL GUIDELINE

The Code serves as our guide for conducting business with integrity. It is not an employment contract and confers no rights relating to employment.

The Code is not a complete list of company guidelines. Employees are expected to know and comply with all company guidelines related to his/her job. Violation of these other guidelines may also result in discipline, up to and including termination of employment.