

GROMUTUAL

GROMUTUAL BERHAD 200301022614 (625034-X)

Code of Ethics and Conduct

The Board of Directors, the Management and the employees of Gromutual Berhad and its subsidiary companies (“the Gromutual Group”) are committed to observe and maintain a good business practices that governed by the following fundamental principles :-

1. Compliance with laws and regulations;
2. Avoid conflict of interest;
3. Respect confidentiality;
4. Exhibit good personal behaviours; and
5. Health and safety.

The code of ethics and conduct serves as a basic guide for the Gromutual Group in the day to day operation activities and it was not designed to cover all possible matters that may occur. The Directors and employees also need adhere to the discipline and rules as stated in the employees’ manual.

1. Compliance with laws and regulations

Gromutual Group will comply with the laws and regulations that governs the business activities. The Directors and employees are required to keep abreast with the latest development and changes of all relevant laws, rules and regulations by attending seminars, internal training and workshop.

The Directors and employees are responsible to perform their duty in accordance with the applicable laws, rules and regulation thoroughly and on timely basis.

2. Avoid conflict of interest

The Directors and employees will always act in the best interest of the Gromutual Group and shall avoid any conflict of interest whenever possible. They must not use their position in course of their duty and employment to acquire personal advantage and benefit whether directly or indirectly.

The Directors and employees shall not pursue any activities outside that having conflict of interest with the Gromutual Group even though they carry in their personal capacity at their own risk and cost.

In the event where a conflict of interest occurs or a situation that may lead to potential conflict of interest, the Gromutual Group require the relevant person to disclose to his or her line of reporting superior and resolve in a fair and transparent manner.

3. Respect confidentiality

The Gromutual Group value and protect our confidential information at the same time respect the confidential information of others.

Confidential information consists of information that are not or yet to be released to the public. It includes trade secrets, business planning, marketing strategy, design and ideas, financial information and data. All this information is crucial to continue success of the Gromutual Group and shall not be disclosure to third party unless the disclosure was duly authorised or required by the relevant law and regulation.

Gromutual Group respects that third parties such as joint venture owners, contractors, consultants and customers have similar interest in protecting their confidential information. Similar care shall be applied to handling of third parties' confidential information.

The Directors and employees shall refrain from disclosing confidential information outside or using the confidential information acquired to their personal advantage directly or indirectly.

4. Exhibit good personal behaviours

Good personal behaviours is important to enhance the unity in working environment and maintain reputation.

(i) Integrity

The Directors and employees shall exhibit good working attitude, behaviour, courtesy, honesty and professionalism at all times during the course of performing their duties and tasks. In performing their duties, due care and diligence must be exercised.

(ii) Punctuality and good time management

The Directors and employees shall accept task assigned to them and perform their duty within the given time frame and ensure delivery of result on time.

(iii) Gromutual group's property and fund

Where, in the course of employment with the Group, the Director and employees shall exercise reasonable in handling the Group's property and fund, they must ensure legitimate use of such property and fund for Gromutual Group's business purpose and not for personal gain and enjoyment.

(iv) Acceptance of tokens

The Directors and employees shall not be allowed to accept any financial advantages where in cash or in kind from any third party in return for any preferential treatment of a third party in any circumstances. Severe disciplinary action (including dismissal & legal action) will be taken against an employee who has been found guilty of this gross misconduct.

(v) Discrimination and harassment

Gromutual Group embrace diversity and respect the personal dignity of our people. The Directors and employees shall respect the personal dignity, privacy and personal rights of every person and are committed to maintaining a workplace free of discrimination and harassment.

Therefore, the Directors and employees must not discriminate on the basis of origin, nationality, religion, race, gender, age or sexual orientation, or engage in any kind of verbal or physical harassment.

5. Health and Safety

Gromutual Group will use its best endeavors to ensure a safe workplace and maintain proper occupational health and safety practices to commensurate with the nature of the Gromutual Group's businesses and activities. Such a commitment in return requires that all Directors and Employees understand and abide by the Group's policies and procedures. All employees are also insured under a medical/surgical insurance policy in addition to the compulsory coverage provided for under the Employee's Social Security Act 1969.

Reporting on violations of the code of ethics and conduct

Any failure to comply with the code of ethics and conduct may result in disciplinary action, including the possibility of dismissal and, if warranted, legal proceedings or criminal sanctions.

The Directors and employees shall report any practices or actions believed to be inappropriate under this Code to their superior and the human resource manager. If it is appropriate, in view of nature of the reported matter, reports of violations may be made directly to the higher levels including the Group Managing Director or Deputy Managing Director cum Chief Executive Officer or whistle blow or report the concerns, in confidence through Whistle Blowing Policy which is available on the Company's website.

All complaints shall be properly investigated and no individual shall be retaliated or incriminated for making such reports in good faith.

Review of the code of ethics and conduct

The Board of directors will review and monitor the code of ethics and conduct regularly to ensure its remain relevant and appropriate.