

# **FARMIERA GROUP OF COMPANIES**



## **CODE OF CONDUCT**

## **OBJECTIVE**

The Farmiera Code of Conduct establishes a framework of ethical standards for directors and all employees in their interactions with colleagues, customers, shareholders, suppliers, competitors, the broader community, and the environment.

## **SCOPE**

This policy applies to all directors and employees within the Farmiera Group.

## **COMPLIANCE**

This policy is now in effect across the Farmiera Group, and it is mandatory for directors and all employees to adhere to it. Employees found in breach of the Code may be subject to disciplinary action.

## **CODE OF CONDUCT**

The Code of Conduct serves as a comprehensive framework, embodying a series of policies designed to articulate the ethical benchmarks for the conduct of all employees while carrying out their duties on behalf of the Company.

This Code of Conduct is intricately aligned with the Malaysian Code on Corporate Governance (MCCG), emphasizing the commitment to fostering transparency and ethical conduct. In adherence to MCCG Practice and Guidance, it is imperative that every employee and officer acts equitably and with unwavering integrity, steadfastly refraining from any abuse of power or authority for personal advantage.

It is mandatory for all individuals within the company to diligently adhere to applicable laws, rules, and regulations to prevent any deviation from legal and regulatory compliance.

Every employee is expected to exhibit behaviour that aligns with Farmiera's philosophy and core values. The following Code of Conduct is to be adhered to at all times by every employee within the Farmiera Group:

### **1. Demonstrating Commitment**

Employees are required to demonstrate unwavering commitment and loyalty to the Farmiera Group and its mission. Teamwork is emphasized, and employees are expected to collaborate to promote and advance the Group's interests continually. Professional conduct and attire are imperative, and adherence to all Group policies, procedures, rules, and regulations, whether explicit or implicit, is mandatory. Furthermore, employees should conscientiously work towards achieving the Key Result Areas assigned by Management to fulfill the Group's objectives.

### **2. Embracing Our Core Values**

We expect our employees to adopt a mindset centered on quality as they carry out their responsibilities. This includes the careful selection of raw materials known for their consistent quality, the meticulous attention to detail in the production process, and ensuring that the public has access to products and services that consistently meet high-quality standards, all offered at fair and reasonable prices. The unity of both employees and management is paramount for the success of our enterprise. Employees are encouraged to be team players within the Farmiera Group, fostering collaboration among themselves to advance the Group's overall well-being.

Additionally, all employees are urged to make continuous improvements in their work. This ongoing commitment to enhancement ensures that the Company maintains its competitive edge and effectively contributes to the betterment of both the Company and society as a whole.

### **3. Preventing Conflicts of Interest**

It is imperative that all employees avoid situations where their personal interests conflict with those of the Company. A "conflict of interest" arises when an individual's private interests interfere with, or appear to interfere with, the Company's interests. Such conflicts can occur when an employee's actions or interests might compromise their ability to perform their work for the Company objectively and effectively.

Conflicts of interest can also emerge when employees or their family members receive improper personal benefits due to their position within the Company. Here are examples of conflicts of interest:

**(a)** Engaging in any capacity (such as part-time employment or consultancy) for a competitor, customer, or supplier while being employed by the Company.

**(b)** Directly or indirectly owning a significant financial interest in a company that has substantial business dealings with the Farmiera Group or is involved in a significant area of activity similar to that of the Group.

**(c)** Accepting gifts, payments, or services of substantial value, offering sexual favors, excessive entertainment, or recreational trips from competitors, consultants, suppliers, or customers, which may be perceived as inappropriate.

**(d)** Business trips sponsored by consultants, suppliers, customers, or business partners must have a justifiable benefit for the Company and require approval from the Managing Director.

**(e)** Engaging in activities that knowingly compete with the Farmiera Group's business, services, or other interests.

**(f)** Diverting business to family members or to suppliers or customers owned, managed, or employing family members or relatives who have a significant role in the business without obtaining approval from the Managing Director

### **4. Preventing Bribery and Corruption**

Under no circumstances are employees permitted to engage in bribery or corruption as part of the Company's operations. They shall not offer or provide gifts, payments, or any benefits, either directly or indirectly, with the intent to gain an improper business advantage from public officials or external parties on behalf of the Company.

In addition, employees must not seek, offer, or accept bribes or graft for personal gain or on behalf of their relatives to influence their actions in relation to the Company's affairs.

Employees are not allowed to accept personal gifts or hampers during festive seasons or celebrations. If gifts are received on such occasions, they must be promptly disclosed to their Heads of Department (HODs) and the Head of HR. The distribution of these gifts will be at the discretion of the Management and will be shared among all employees. Employees are strictly prohibited from accepting cash or cash vouchers of any amount.

In summary, employees must ensure that their activities comply with all relevant anti-corruption measures.

### **5. Practicing Confidentiality and Data Protection**

Every employee must uphold the confidentiality and security of information entrusted to them by the Company or its clients, except in cases where disclosure is authorized by the Company or mandated by the law.

"Confidential information" encompasses all non-public data that could be advantageous to competitors or harmful to the Company, its clients, or suppliers if disclosed. This includes, but is not limited to, data related to trade secrets, business operations, research findings, plans for new products, objectives, and strategies, records, databases, employee salaries and benefits, personal employee information, lists of clients and suppliers, and any financial, tender, or pricing details that have not been made public. Proprietary intellectual property, including patents, trademarks, and copyrights, some of which may be publicly accessible but are owned by the Farmiera Group, must also be safeguarded.

Unauthorized use or distribution of confidential or proprietary information or data is a violation of Company policy and may also have legal implications. Such actions can lead to adverse consequences for both the Company and the individuals involved, potentially resulting in legal action and disciplinary measures.

Employees are explicitly prohibited from using, disclosing, or publishing any portion of confidential information, either during their employment or after leaving the Company, without the prior consent of the Company. All proprietary information held by the employee must be returned to the Company upon their departure.

In the event that an employee receives a subpoena or other requests for the disclosure of Company information, they are to promptly seek guidance from the Farmiera's HR Department.

## **6. Communicating Externally and Internally**

All employees are required to exercise discretion when it comes to making or disseminating public statements, whether spoken or written, concerning the policies or decisions of the Farmiera Group. Only authorized personnel, as designated by the CEO, have the authority to make official statements about the Company to the media, government entities, or private sectors, both domestically and internationally.

If an employee is invited to speak at public talks, seminars, or conferences related to their job, they must obtain prior approval from the CEO if they intend to participate. Furthermore, employees must strictly adhere to the Company's guidelines governing email and social media etiquette when communicating with internal or external parties.

## **7. Protecting Company Assets and Resources**

It is the responsibility of all employees to make a conscientious effort to safeguard the assets of the Company and to ensure their efficient utilization. Unnecessary wastage, negligence, and theft can significantly affect the Company's financial performance and overall efficiency.

Therefore, any suspected instances of fraud or theft should be promptly reported for thorough investigation. Company equipment should be used exclusively for Company-related purposes, with limited allowance for incidental personal use.

Moreover, employees are strictly forbidden from installing illegal software on Company computers or using Company computers to access illicit websites, such as those involving pornography or gambling.

## **8. Ensuring Equal Opportunity, Non-Discrimination and Fair Employment**

The Farmiera Group upholds policies regarding the recruitment, progression, and retention of employees that unequivocally prohibit discrimination based on race, color, gender, religion, national origin, or age. Our corporate philosophy is founded on the principle that all employees must be treated with respect and dignity.

To further this objective, any behavior involving discrimination or harassment towards others, including sexual harassment, will not be condoned. Every employee is obliged to adhere to the Company's policies on equal opportunity, non-discrimination, and the prevention of harassment.

## **9. Ensuring Safety and Environmental Responsibility**

It is the duty of all employees to conduct our business in an environmentally responsible manner and foster a safe workplace for all individuals. We must prioritize the efficient use of non-renewable energy and raw materials, reduce waste, and minimize any negative environmental impacts resulting from our products. It is incumbent upon us to identify and monitor environmental risks associated with our business operations to prevent any industrial accidents or mishaps that could jeopardize the safety of our employees and customers.

## **10. Preventing Insider Trading**

All employees are expressly forbidden from utilizing non-public information they have acquired through their employment with Farmiera or any other companies to affect their or anyone else's decision to buy or sell securities. Confidential information must be shielded from unauthorized disclosure, and any authorized sharing of confidential data should be confined to individuals with a legitimate "need to know" basis.

## **11. Abuse of power or authority**

The abuse of authority or power is the improper use of a position of influence, power or authority by an individual towards others, in particular where the alleged offender imposes the will over a subordinate, through the exercising of the power conferred by the position of the superior for gaining benefits or particular objective that is usually in violation of laws, rules and regulations.

All employees must demonstrate respect in their interactions with other employees, in particular subordinates.

## **12. Compliance**

The Directors and employees shall always observe and ensure compliance with all applicable laws, rules and regulations to which they are bound to observe in the performance of their duties. They also required to comply with the ethical and technical requirements of any relevant regulatory or professional body.

## **13. Reporting Violations**

Employees are encouraged to report any violations of this Code or concerns about abuse of power or non-compliance. Whistleblowers will be protected, and a confidential reporting system is in place.

## **CONCLUSION**

While recognizing that no Code of Conduct can foresee every conceivable situation, the Company places an expectation upon each employee to act with unwavering honesty, integrity, and discernment. Employees are encouraged to exercise independent professional judgment and to proactively discourage any wrongful behavior in the execution of their duties and responsibilities on behalf of the Company.

All employees are entrusted to faithfully and diligently carry out their official responsibilities as assigned by the Company, to the best of their abilities, and to take full accountability for their actions. They are required to adhere to all existing and forthcoming guidelines, policies, and procedures issued by Management from time to time.

It is important to note that this Code is subject to potential changes and periodic reviews at the discretion of the Company.

The End

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