10.0 SECTION 3: CODE OF BUSINESS CONDUCT

10.1 Policy

10.1.1 The Company is committed to the highest standards of ethical business conduct. This Code of Conduct is binding on all employees, whose actions must always be such as to avoid any impropriety. In addition, the Company and its employees are subject to the Laws of Malaysia in every respect.

10.1.2 The Company will deal only with those organisations having ethical standards compatible with its own declared policy. The employee will report promptly to the appropriate authority (ies) whenever it knows or is informed by a reliable source, that a client, supplier, subcontractor orother participant (including employees) in a project of the Company is acting illegally or unethically. Employees found to be in breach of these ethical guidelines also will be subject to the Company's disciplinary action.

10.1.3 Employees who have any doubts on the appropriate course of action involving matters of business ethics should consult their supervisor or HR..

10.1.4 To ensure that all employees are aware of their ethical obligations, a copy of this Code is provided to all new staff which is to be read and, when fully understood, acknowledged by the employee by signing the attached sheet.

10.2 Employee Obligations

10.2.1 Employees are expected to give their best efforts at all times so as to provide our clients with quality service and products. This obligation extends to the protection of the physical and intellectual assets of the Company and its client(s). Accordingly, employees:

10.2.1.1 shall keep confidential all proprietary information of the Company and its client(s), which includes commercial and humanresource data, design and intellectual property of all forms;

10.2.1.2 shall not speak to the media or publish anything about the Company or client business unless authorized;

10.2.1.3 shall inform the Supervisor or HR about breaches of the law and safety matters as soon as they become aware of them.

10.2.1.4 must use the resources of the company and its client(s) only for relevant business purposes. This applies both to physical (e.g. materials) and non-physical resources (e.g. software, intellectual property, etc);

10.2.1.5 shall keep accurate and sufficient records organized in a manner so as to inform fairly and honestly those who receive(or have use for) the information, in the conduct of the Company business or that of its client(s); and

10.2.1.6 shall observe established delegation of financial and personnel authorizations.

10.3 Integrity of Business Practices

10.3.1 Employees of the Company have the obligation to inform the senior management as soon as they become aware of practices or circumstances, which may involve them in unethical conduct or conflictof interest. This obligation applies when dealing both within the Company and externally. In doing business with any organization the following standards apply:

10.3.1.1 employees must deal fairly and equitably with their colleagues and external contacts;

10.3.1.2 employees must not misrepresent themselves or the company to anyone. If a misunderstanding occurs, immediate clarification should be made once this becomes evident;

10.3.1.3 employees must not engage in any 'collusive' practices which may lead to a client of the Company receiving less than a fair and competitive service;

10.3.1.4 unauthorized copying or use of software and other data or documentation can result in criminal liabilities. The improper use of such proprietary information is strictly forbidden;

10.3.1.5 gifts and entertainment shall not be offered or accepted where there is any obligation incurred or such offer or acceptance can be construed as a bribe. The provisions of the Prevention of Bribery Ordinance shall apply in all respects. In this regard the acceptance of souvenirs, advertising and promotional items of nominal value only is permitted. Items of more substantialvalue should be declined or recorded and disposed of in accordance with stated Company procedures;

10.3.1.6 entertainment in the form of customary business amenities such as meals with associated drinks may be accepted or offered provided it is not unduly lavish or frequent;

10.3.1.7 the Company will meet all reasonable expenses associated with your travel, food and accommodation on company recognized business. Such arrangements should not be accepted from suppliers unless at the supplier's facilities or otherwise unavailable through normal commercial sources.

10.4 Personal Behavior

10.4.1 The personal behavior of employees should reflect the ethical standards of the company and respect the rights of the company and its client(s) to your services as an employee. A conflict of interest exists if an employee has any interests or activities held outside the company that may be advanced at the expense of the company or its client(s).

10.4.2 The test to be applied is whether the combination of your job, the form and amount of external investment and the external company structureand involvement with the Company could influence your actions as an employee of the Company. In particular:

10.4.2.1 your external personal activities must not give rise to real or perceived conflicts of interest. Should any such occasion arise you must declare any interest openly and abstain from the decision-making process;

10.4.2.2 employees may not perform services in competition with the company either alone or in conjunction with another Company or person without the prior consent of the company;

10.4.2.3 you must not use inside information, confidential material or non-public information for your own financial benefit eitherdirectly or indirectly. In additional to being a violation of law,it will be grounds for instant dismissal;

10.4.2.4 you may not perform outside work or solicit non- C o m p a n y business on Company premises or in Company time nor may you use company or client resources for outside work;

10.4.2.5 you may not use your association with the Company or its client(s) to sponsor, endorse or advance the interests of another organization except where you have the prior written consent of the management.

10.4.2.6 employees may not accept nor may they offer money or any other benefit or advantage in the performance of their duties other than as part of a recognized commission or payment scheme which is available to all suppliers or providers;

10.4.2.7 employees should not borrow from or lend money to clients, suppliers or contractors of the Company.

10.5 Breach of Conduct

10.5.1 The Company recognize that a breach of ethical business behavior may result in its removal from the list of suppliers and services to the Government. Accordingly, the company will regard any breach of these ethical guidelines by employees in the most serious manner andimplement immediate disciplinary action or dismissal.

10.6 Conflict of Interest

10.6.1 As an employee of the company, you should avoid situations where yourown interests conflict with the best interests of the Company, or may appear to someone else to do so.

10.6.2 A conflict of interest may occur, for instance, if you or a member of your immediate family or a business or other Company with which you are associated would be affected materially by decisions you make as part of the Company's responsibility. Or, a conflict might occur if you or a family member or associate stood to gain from confidential the Company information to which you have access as part of your job. A clear case of conflict arises if you accept gifts or valuable favors from individuals or firms doing or wanting to do business with the Company or attempting to influence some the company decision.

10.6.3 If you are in a conflict of interest situation, or think you may be, discuss it with your supervisor in confidence. You can also discuss the situation with the HR Department.

10.7 Gift Pre-requisites And Entertainment

10.7.1 For an employee to accept commissions, a share in profits, gifts in cash, gift certificates, travel or other payments, materials, services, repairs or improvements at no cost or at unreasonably low prices, excessive or extravagant entertainment or gifts of merchandise of more than nominal value from any organization, firm or individual doing or seeking to do business with the Company or any of its affiliate/subsidiary without prior notice to the HR Department may seem to be committing a major offence.

10.8 Utilization of Information Technology

10.8.1 All employees shall observe the following Information Technology guideline at all times while in the employment of the Company and the Company reserves the right to institute disciplinary action or institute grievance procedures for any breach of the Code or where the breach constitutes a serious misconduct, the Company reserves the right to dismiss any employee.

10.8.2 To object and use facilities for the purposes for which the employee is authorized. Violations include:

10.8.2.1 install your own software on the Company's computing resources;

10.8.2.2 installing illegal licensed software which is not meant to reside on the Company's computing facilities which is assigned to you;

10.8.2.3 using another person's account or attempting to capture other users' passwords without consent;

10.8.2.4 circumventing normal resource limits, log on procedures and security regulations;

10.8.2.5 trying to obscure your true identity as the sender of electronic mail;

10.8.2.6 using the Company's computing resources for commercial purposes; and

10.8.2.7 using the Company's computing resources to harass, intimidate orthreaten other users.

10.8.3 At all times respect the privacy of other users. Files, disks, electronic mail, information, programs and data owned by individual users shouldbe considered private, whether or not the information is accessible by other users. Tampering with electronic mail, interfering with or intercepting its delivery and using electronic mail for criminal purposes may be criminal offences.

10.8.4 At all times respect the rights of others to make use of the Company's computing resources. Violations include:

10.8.4.1 placing obscene or harassing material in areas that can be/are publicly accessed;

10.8.4.2 sending/forwarding chain letters or deliberately flooding a user with automatically generated mail;

10.8.4.3 distributing information not intended for distribution by owner;

10.8.4.4 printing or sending excessive copies of documents, files, data or programs;

10.8.4.5 attempting to modify or remove computer equipment;

10.8.4.6 attempting to degrade or disrupt system security or performance; and

10.8.4.7 damaging or vandalizing company computing facilities, equipment, software or computer files.

10.8.5 At all times faithfully and diligently obey and comply with respect appropriate copyright laws, licenses, confidentiality and trade secret agreements. Much of the software and data that resides on the Company's computer facilities is protected by copyright laws and license agreements from the owner of the copyright. The number of copies and distribution of the copies may not be done in such a way that the number of simultaneous users exceeds the number allowed.

10.8.6 At all times obey and comply with the established guidelines for any networks or systems used inside or outside the Company. Accessing computer, software, data or information, or networks without proper authorization, regardless of whether any damage is done or whether the computer, software, data, information, or network in question is owned by the company, will be deemed as an abuse of your company computing privileges.

10.8.7 An employee who is authorized to add or delete files from a hard drive of a company computer must take reasonable and appropriate steps to see that all license agreements are faithfully executed on all systems, networks and servers for which they have responsibility.

10.8.8 An employee must take reasonable precautions to guard against corruption of data or software or damage to hardware or facilities of the company and must treat information about and information stored by the system's users as confidential.

10.8.9 Where there is an indication that misuse has occurred, the alleged offence is to be reported immediately by the employee to the Company for investigation and the Company may restrict a user's computing privileges.

10.8.10 An employee who is found abusing with the company computing resources may also be liable for civil or criminal prosecution. An employee should observe strictly that nothing in this Information Technology guideline can preclude enforcement by the company under the laws and regulations.

10.8.11 Not at any time during the continuance employment with the Company attempt to authenticate another computer user.

10.8.12 Not any time during the continuance employment with the Company play games on computers.

10.8.13 Not any time during the continuance employment with the company provide content(s), which violates copyright or trademark laws. All software must be secured to prevent copying except that which explicitly allows copying, such as public domain software. It is the employee's responsibility to know what the copyright laws are.

10.8.14 The employee is not allowed to run a business or charge any money for access, contents or usage of their server. Any financial transaction is in direct violation of the Company's policies and may result in legal action.

11.0 SECTION 4: RULES AND REGULATIONS

11.1 Policy Statement

An employee of Hin Press Sdn Bhd must at all times maintain reasonable standards of work and conduct. In circumstances when an employee fails to meet the reasonable standard of work and conduct, the company reserves the right to undertake disciplinary action against an employee in accordance to the principles of natural justice.

11.2 Grounds for Disciplinary Action

11.2.1 An employees shall at all times maintain reasonable standards of work, conduct and discipline in accordance to expressed or implied obligations to and expectations of the Company.

11.2.2 The company shall reserve the right to undertake disciplinary action on grounds of misconduct against the employee concerned for any misconduct, indiscipline or any breach of the Company's rules and regulations in accordance to the general principles of natural justice.

11.2.3 A serious misconduct shall be construed as the occurrence of a major misconduct or a repetition of minor misconducts.

11.2.4 The categories and examples of misconduct are as follows:

<u>Major Misconduct</u>

11.2.4.1 Disclosing any confidential information, including confidential information of the company clients to third parties without proper authorization.
11.2.4.2 Theft, arson, assault, or other serious crimes.
11.2.4.3 Any material information intentionally excluded from, or misrepresented in the Employment Application Form.
11.2.4.4 Habitual absence without leave, or absence without leave for more than three (3) consecutive working days.
11.2.4.5 Falsification, defacement or destruction of any record of the Company, including interfering with the record of attendance or recording attendance on behalf of any other employee.
11.2.4.6 Willful insubordination or disobedience, whether alone or together with others, to any lawful and reasonable order of a superior office or customer/client of the Company.
11.2.4.7 Defrauding or attempting to defraud.
11.2.4.8 Misappropriation of Company funds.
11.2.4.9 Serious pecuniary embarrassment.