Innochemie Sdn Bhd Code of Conduct Policy

Objective

Innochemie Sdn Bhd recognises the need to establish a Code of Conduct policy for its employees and associates in order to define the way business relationships, official dealings and social behaviour needs to be maintained within and outside of office premises.

Scope and Applicability

This policy covers all employees across levels and hierarchy in the organisation. All employees, partners & vendors:

- Permanent
- Part-time
- Contract
- Temporary

Also the employees of:

- Partners
- Vendors

Policy/Process

Anti Bribery

Innochemie Sdn Bhd and its employees shall neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits that are intended to or perceived to obtain business or uncompetitive favours for the conduct of its business.

Non-discrimination

Innochemie Sdn Bhd have a zero-tolerance policy against discrimination in any form and our employees are provided with equal and merit-based career opportunities regardless of race, religion, and/or gender. Innochemie Sdn Bhd encourage employees to report any incidents of discrimination and provide multiple channels for them to do so, such as through HR or Head of Department.

Workplace Violence Prevention Policy

Innochemie Sdn Bhd maintains a zero tolerance standard of violence in the workplace. The purpose of this policy is to provide employees guidance that will maintain an environment at and within Innochemie Sdn Bhd property and events that is free of violence and the threat of violence.

PROHIBITED BEHAVIOR:

Violence in the workplace may include, but is not limited to the following list of prohibited behaviours directed at or by a co-worker, supervisor:

1. Direct threats or physical intimidation.
2. Implications or suggestions of violence; including “veiled threats”.
3. Assault of any form.
4. Physical restraint, confinement.
5. Dangerous or threatening horseplay.
6. Loud, disruptive or angry behavior or language that is clearly not part of the typical work environment.
7. Blatant or intentional disregard for the safety or well-being of others.
8. Any other act that a reasonable person would perceive as constituting a threat of violence

Innochemie Sdn Bhd will promptly and thoroughly investigate all reports of threats of violence or incidents of actual violence and of suspicious individuals or activities. The identity of the individual making a report will be protected as much as possible. Innochemie Sdn Bhd will not retaliate against employees making good-faith reports of violence, threats, or suspicious individuals or activities. To maintain workplace safety and the integrity of its investigation, retaliate may suspend employees suspected of workplace violence or threats of violence, either with or without pay, pending investigation.

Anyone found to be responsible for threats of or actual violence or other conduct that is in violation of these guidelines will be subject to prompt disciplinary action up to and including termination of employment.

Innochemie Sdn Bhd encourages employees to bring their disputes to the attention of their Head of Department or the HR department before the situation escalates. Innochemie Sdn Bhd will not discipline employees for raising such concerns.

Sexual & other Harassment

At Innochemie Sdn Bhd, we strive to create a safe and secure work environment that is free of any form of sexual harassment. We are committed to promoting everyone's right to work in a respectful and dignified environment and will not accept any kind of sexual harassment in the workplace. All incidents of sexual harassment will be taken seriously and investigated immediately. Any individuals found to have violated this policy will face disciplinary action, including possible termination of employment. All complaints of sexual harassment will be treated with respect and in confidence. No one will be victimized for making such a complaint.

Definition of sexual harassment

Sexual harassment means any unwanted conduct of a sexual nature, in any form, whether verbal, non-verbal, visual, gestural or physical, directed at a person which is reasonably offensive or humiliating or is a threat to his well-being.

I. Verbal Harassment
   E.g. offensive or suggestive remarks, comments, jokes, jesting, kidding, sounds, questioning.
II. Non-verbal/Gestural Harassment
   E.g. leering or ogling with suggestive overtones, licking lips or holding or eating food provocatively, hand signal or sign language denoting sexual activity, persistent flirting.
III. Visual Harassment
   E.g. showing pornographic materials, drawing sex-based sketches or writing sex-based letters, sexual exposure.
IV. Psychological Harassment
   E.g. repeated unwanted social invitations, relentless proposals for dates or physical intimacy.
V. Physical Harassment
   E.g. inappropriate touching, patting, pinching, stroking, brushing up against the body, hugging, kissing, fondling, sexual assault.

Fair Employment Conditions

We operate in full compliance to applicable wage, work hours, overtime and benefits laws.

Working Hours Policy

At Innochemie Sdn Bhd, working hours are governed by the Malaysia Employment Act 1955 and the Employment (Limitation of Overtime Work) Regulations 1980. Standard

working hours are set at 8 hours per day and 45 hours per week, with specific hours outlined in each employee's contract. Overtime is paid according to legal requirements for any hours worked beyond the standard limit. Employees are entitled to rest breaks during their shifts, and the company actively monitors working hours to ensure compliance. Concerns regarding working hours can be addressed with the Human Resources department.

Child and forced Labour Policy

Innochemie Sdn Bhd does not employ any person below the 18 years of age and the age is substantiated by the person's Malaysian national registration identity card. Innochemie Sdn Bhd is committed in strict compliance with applicable child labour laws as legislated in the Children and Young Persons (Employment) Act 1966. Innochemie Sdn Bhd does not use or tolerate the hiring of child labour under any circumstances. Innochemie Sdn Bhd abides and strictly complies with international child labour conventions and child labour laws and regulations establishing a minimum age for employment in the countries in which it operates.

Innochemie Sdn Bhd explicitly prohibits the use of forced or compulsory labour in its premises. No employee is made to work against his/her will or work as bonded/forced labour, or subject to corporal punishment or coercion of any type related to work.

Freely chosen employment

Ensure that employees work of their own free will and are free to leave the Company upon reasonable notice under the terms of their labour contract. There shall be no unreasonable restrictions on freedom of movement in the company.

Privacy/Data Protection

We respect the confidential personal data of our employees and treat all personal data with integrity.

Intellectual Property Protection Policy

This policy establishes guidelines for the protection, use, and management of intellectual property within Innochemie Sdn Bhd.

Employees must promptly disclose any inventions, designs, or creations that may be patentable or otherwise protectable. Employees may use Innochemie Sdn Bhd's

intellectual property only for company-related purposes. Unauthorized use of Innochemie Sdn Bhd's intellectual property is prohibited.

Employees must maintain the confidentiality of Innochemie Sdn Bhd's trade secrets and proprietary information. Innochemie Sdn Bhd will take necessary legal actions to protect its IP rights against infringement.

Protecting Company Assets

The assets of Innochemie Sdn Bhd should not be misused but employed for the purpose of conducting the business for which they are duly authorised. These include tangible assets such as systems, facilities, materials, and resources as well as intangible assets such as proprietary information, relationships with customers and suppliers, etc.

Safety Environment

Innochemie Sdn Bhd shall strive to provide a safe and healthy working environment and comply, in the conduct of its business affairs, with all regulations regarding the preservation of the environment of the territory it operates in.

Quality of Products and Services

Innochemie Sdn Bhd shall be committed to deliver services of the highest quality standards backed by efficient customer relationship management consistent with the requirements of the customers to ensure their total satisfaction.

Ethical Conduct

Every employee of Innochemie Sdn Bhd, which shall include head of the company, shall deal on behalf of the Company with professionalism, honesty, integrity as well as high moral and ethical standards. Such conduct shall be fair and transparent and be perceived to be as such by third parties.

Every employee shall be responsible for the implementation of and compliance with the Code in his professional environment. Failure to adhere to the Code of conduct could attract the most severe consequences including termination of employment.

Regulatory Compliance

Every employee of Innochemie Sdn Bhd shall in his business conduct, comply with all applicable laws and regulations, both in letter and in spirit, in all the territories in which it

operates. If the ethical and professional standards set out in the applicable laws and regulations are below that of the Code, then the standards of the Code shall prevail.

Conflict of Interest

An employee of Innochemie Sdn Bhd shall not engage in any business, relationship or activity that might detrimentally conflict with the interest of Innochemie Sdn Bhd.

A conflict of interest, actual or potential, may arise where directly or indirectly: (a) an employee of Innochemie Sdn Bhd engages in a business relationship or activity with anyone who is party to a transaction with his Company,

- (b) an employee is in a position to derive a personal benefit or a benefit to any of his relatives by making or influencing decisions relating to any transaction, and
- (c) an independent judgment of the Company's best interest cannot be exercised.

Securities Transactions and Confidential Information

An employee of Innochemie Sdn Bhd and his immediate family shall not derive any benefit or assist others to derive any benefit from the access to and possession of information about the Company, which is not in the public domain and thus constitutes insider information.

An employee of Innochemie Sdn Bhd shall not use or proliferate information that is not available to the investing public and which therefore constitutes insider information for making or giving advice on investment decisions on the securities of Innochemie Sdn Bhd on which such insider information has been obtained.

Such insider information might include the following:

- Acquisition and divestiture of businesses or business units.
- Financial information such as profits, earnings and dividends.
- Announcement of new product introductions or developments.
- Asset evaluations.
- Investment decisions/plan
- Restructuring plans
- Major supply and delivery agreement
- Raising finances.

Confidentiality on Salary and Compensation

Employees of Innochemie Sdn Bhd shall not disclose their compensation package to anyone nor shall be permitted to discuss the compensation of any other employees to others. Failure to adhere to the Code could attract the most severe consequences including termination of employment.

Non-compliance and Consequence

Please find below the reasons that can lead to Termination of Employment. This list is Non-Exhaustive

- Gross misconduct or behaviour that may result in disrepute to the employer
- Misuse of office premises
- Misuse of assets made available for work
- Willful insubordination or disobedience, whether alone or in conjunction with another or others, or of any lawful or reasonable order of a superior. The order of the superior should normally be in writing.
- Going on illegal strike either singly or with other workers without giving 14 days previous notice.
- Abetment of or attempt at abetment of any of the above acts of misconduct.
- Threatening, abusing or assaulting any superior or co-worker.
- Drunkenness, fighting or riotous, disorderly or indecent behaviours while on duty at the place of work.
- Causing wilful damage to work in progress or to property of the employer.
- Conviction in any Court of Law for any criminal offence involving moral turpitude.
- Preaching of or inciting to violence.
- Refusal to accept any charge sheet or order or notice communicated in writing.
- Any material or persistent breach of the terms contained in the contract
- Disclosing to any unauthorised person of any confidential information in regard to the working or process of the establishment which may come into the possession of the workman in the course of his work or even after exiting employment.
- Failure of Background check of Employment and Education qualifications.
- Habitual late attendance and habitual absence without leave or without sufficient cause.

- Continuous absence without information and without satisfactory cause for more than two days as per the policy of Innochemie Sdn Bhd
- Habitual neglect of work.
- Habitual indiscipline.
- Any other reasons depending on the position occupied by the employee

Whistle Blowing Policy

Innochemie Sdn Bhd encourages employees to report or disclose any improper conduct by any employee, supplier, business partner, clients or any parties that has come to their knowledge which includes but not limited to;

- Fraud
- Bribery
- Abuse of Power
- Conflict of interest
- Theft or Embezzlement
- Misuse of Company's Property
- Non-compliance with Procedure

Employees report to Managing Director who is designated as the person primarily responsible for oversight of this procedure. It can be verbal communication or in writing form.

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, the employee who whistle blows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed, to the extent reasonably practicable, provided is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved.

Grievance Procedure

A grievance mechanism is a procedure that provides a clear and transparent framework to address complaints in recruitment and the workplace. It is typically an internal procedure for complaints followed by consideration, management response and feedback. Innochemie Sdn Bhd employee can raise complaint formally through email or HR Department. Grievance procedures as below,

1. Raise the issue formally with a written complaint letter to Head of Department/ Top management.
2. Formal investigation takes place
3. The investigator writes a conclusion. (A mediator can be called in for complex conflicts)

4. Grievance hearing may be required to review the evidence and for a decision to be made
5. Employee has the right to appeal the grievance outcome.
6. Follow up after final decision