CODE OF CONDUCT

EXCEL SPECIALTY CHEMICAL SDN BHD

This Workplace Code of Conduct ("Code") establishes the principles and expectations for professional conduct and ethical behavior for all employees of Excel Specialty Chemical Sdn Bhd. By adhering to this Code, we foster a positive, inclusive, and respectful work environment that aligns with our core values and organizational objectives.

1. Scope of Application

This Code of Conduct is applicable to all employees of Excel Specialty Chemical Sdn Bhd and its business partners.

Excel Specialty Chemical Sdn Bhd is committed to adhere to this Code of Conduct in order to foster a culture where responsible behavior, ethical standards, integrity and trust are key factors to protect our value and employees and its business partners.

2. Social Compliance

Excel Specialty Chemical Sdn Bhd and its business partners shall adhere to Malaysia labour laws and be further guided by the following standard.

- Respect and support the Universal Human Rights covering United Nation Guiding Principles

We uphold with dignity, fundamental freedoms and human rights of our customers, employees and business partners affected by our operations, and the environment. Our approach to Human Rights follows the United Nations "Protect, Respect and Remedy" Framework for Business and Human Rights.

3. Guidelines

Excel Specialty Chemical Sdn Bhd and its business partners shall adopt the following guidelines.

a) Equality, Transparency and Respect – shall treat all employees with respect and dignity to promote and protect human rights with equality, transparency and respect.
b) Freedom of Association and Rights to Collective Bargaining – shall respect and recognize the rights of all employees. Employees have the right to express their opinions/views concerning their rights and welfare.
c) Child labor – Child labor is not allowed. Legal minimum age for engagement to work is 18 years old.
d) Forced labor – shall not employ or support forced labor, human trafficking and cruelty or degradation of human condition.
e) Gender equality – shall ensure equal opportunities in the workplace. Employees have equal employment opportunities, remuneration, training, social security and promotion based on individual performance and job requirements.
f) Discrimination& Harassment – shall prohibit any form of harassment or discrimination in the workplace.
g) Working conditions – shall provide safe, clean, and healthy working conditions.

h) Grievances – employees can voice out any grievances through worker representative. Shall fairly treat and protect any whistleblower who reports a violation of human rights of an individual related to Company.
i) Minimum Wage Standard – shall ensure that employees are paid according to the national legal minimum wage standard.
j) Working hours – shall ensure that the working hours comply with national legislation. All overtime shall be on a voluntary basis and at least one rest day per week.
k) Bribery and corruption – shall not tolerate any form of bribery and corruption. The company is committed to conducting its business ethically and in accordance with local laws and regulations.

4. Respect the Environment

Excel Specialty Chemical Sdn Bhd and its business partners shall commit to and support environmentally responsible and sustainable business practices. All must comply with national laws, regulations and procedures concerning environmental protection. All shall keep the environmental impact of its business activities to a minimum.

5. Integrity and ethics

Excel Specialty Chemical Sdn Bhd and its business partners must act with integrity and uphold the highest ethical standards in all professional interactions.

This includes avoiding conflicts of interest and acting in the best interests of the company.

6. Reporting a Concern

Employees are encouraged to report any unethical behavior or violations of this Code.

Excel Specialty Chemical Sdn Bhd is committed to protecting the anonymity and safety of those who report misconduct.

By adhering to this Code, employees contribute to the success and reputation of Excel Specialty Chemical Sdn Bhd. Failure to comply with this Code may result in disciplinary action, up to and including termination of employment.

Excel Specialty Chemical Sdn Bhd

(NG YEW MING)
DIRECTOR