



CENTURY LOGISTICS HOLDINGS BERHAD
(Company No. 424341-A)
(Incorporated in Malaysia)

CODE OF CONDUCT

Our relationship with you is based on mutual trust and respect. Thus, you are asked to use your good judgement in dealing with customers (both internal and external) and carry out your responsibilities in an ethical manner.

Here are some general guidelines for conduct, breach of which may result in dismissal:

- Avoid conflict of interest in dealing with customers, suppliers, other individuals and organisations doing or seeking business with our Company.
- Not divulge or disclose any Company information that is confidential to unauthorised individuals during your employment or thereafter.
- Not abandon your duties and responsibilities to the Company in favour of your private and personal interests.
- Not allow your personal behaviour to bring discredit to our Company.
- Refrain from having personal, intimate relations with customers, suppliers and colleagues.
- Act in a responsible manner at all times and perform your duties, and shall not display a lack of efficiency on your part.
- Unauthorised possession or retention of Company monies.

For the purpose of this document, the term “Company” refers to any company within the CJ Century group, either collectively or individually



CONFLICT OF INTEREST

An employee who is employed by the Company on a full-time permanent basis must be free from the influence of personal interests, which interfere, might interfere, or be thought to interfere with their duties and responsibilities to the Company. Employees' act must be motivated by the Company's best interest rather than any consideration of potential or actual personal advantage.

Circumstance in which such a conflict of interest may be present include:

- Ownership, directly or indirectly, of a material interest in any competitor, or supplier, contractor, subcontractor, customer or other person or organisation doing business with the Company.
- Acting in any capacity – including director, officer, partner, consultant, employee, distributor, agent or the like – for a competitor, or a supplier, contractor, subcontractor, customer or other person or organisation doing business with the Company.
- Accepting, directly or indirectly, payments, services or loans, from supplier, contractor, subcontractor, customer or other person or organisation doing business or expecting to do business with the Company. Hampers, gifts, travel, entertainment or other forms of “gratuities” of **more than nominal value** are deemed to constitute “payments”.
- Ownership, directly or indirectly, of any property, including real estates, shares of stock, etc. which would appear to be in conflict with the interest of the Company.

An employee through relatives, close friends or otherwise, are expected to avoid being in a situation where he has or appears to have any direct or indirect business dealing in competition with the company or taking an opportunity that belongs to the Company.

An employee, who has been invited to serve on the Board of Directors of any companies outside the Company, may only do so upon obtaining a written approval from the Managing Director.

Investment or other interest in an organisation doing business with the Company would be considered material if one of the following applies:

- The employee holds an interest in a partnership, limited partnership or company, which is not widely held or publicly owned.



- If it is a public listed company, the employee, business associates or relatives owns more than **five per centum (5%)** of the shares.

An employee must not place himself in a position where he is in competition with the Company. The following are some activities which are considered to be in this category:

- Using one's position to prevent or hinder the Company from lawfully competing with others.
- Using Company employees, facilities or funds for the pursuit of unauthorised non-company interest.
- Diverting Company business or employees from the Company.
- Receiving a commission on a Company transaction.
- Otherwise improperly profiting, directly or indirectly, at the Company's expense.

An employee must not take for himself an opportunity, which belongs to the Company. Whenever the Company has been seeking a particular business opportunity, or the opportunity has been offered to it, or the Company's funds have been involved in financing opportunity, the opportunity rightfully belongs to the Company, and not to employees who may be in a position to divert the opportunity to them. Examples of taking a corporate opportunity include:

- Selling information to which an employee has access by reason of his position e.g. Know-how developed through the Company's Research & Development activities.
- Acquiring a property interest where the Company is known to be interested in an opportunity to purchase or lease the property in question.

Each employee should declare immediately in writing to the respective Heads of Department or the Manager – Group Human Resources and Administration any facts which involve the slightest probability of his breach of the Statement of Policy set forth above.

The Company recognises that there are many borderline situations. Each case shall be approached objectively, giving full recognition to the circumstances.



In some instances, a full disclosure of the facts is all that is necessary for the Company to protect its interest. In others, prompt elimination of the outside influences is required. Should the Company find, however, that an inexcusable violation of this policy is involved, more severe action will be taken, including, where appropriate, termination of employment and reimbursement to the Company for any financial losses the Company may have sustained.

An employee may be required to relinquish his position in a voluntary or charitable organisation, political party or any social groups, if in the opinion of the Company his involvement interferes with the faithful discharge of his duties in the Company or if the objectives of the organisation conflicts with the Company's policies.

In all cases, the Company's sole decision shall be final, and it reserves the right to take such action as, in its judgement, will terminate any situation which violates this Policy.

CONFIDENTIALITY

A condition of your employment is that you do not divulge confidential information. At times, you will have access to information about Company of Companies, its services, customers and business generally which is confidential.

Consistent with your letter of appointment, it is a condition of your employment that this information remains confidential. Breaches of confidentiality will result in immediate dismissal.



GRIEVANCE PROCEDURE

We maintain an open style of communication and an open door policy. This means that any employee may approach a person of higher authority for the purpose of clarification, giving suggestions, exchanging ideas and making requests.

If an employee has any reason to believe that he/she is being discriminated, he/she is encouraged to lodge a report with the Human Resource and Administration Department.

However, for work related issues you are encouraged to communicate directly with your immediate Supervisor.

In the event that you are dissatisfied with the way in which your Supervisor is handling a complaint or you feel that you have not been given a fair hearing, you may appeal to a higher authority within the Company by following these progressive steps:

- Submit your grievance in writing and request for an investigation from your immediate Supervisor with a copy given to the Head of Department. You have the right to expect a response within a reasonable period of time (generally within five (5) working days).
- If the outcome is not to your satisfaction, you may appeal to the next person in the chain of command by asking for a meeting to hear your case. An outcome from this meeting will be communicated to you in writing.
- If you are still not satisfied with the decision, you may continue to appeal to the Manager - Group Human Resources and Administration and/or the Executive Director and/or Managing Director whose review and decision will be final.

All employee grievances will be given a fair hearing and action will be taken based on the feasibility of the request and impact on the Company and other employees.



DISCIPLINARY PROCEDURE

It is our Company philosophy to coach, monitor, evaluate and counsel employees on a regular basis. Good discipline is essential to enable the Company to meet its objectives and to ensure that employees find it a good and safe place to work in.

Although disciplinary action will only be used as a last resort, it will be intended to be more corrective rather than punitive.

The management and coaching of employees will be as follows:

- After having been oriented, trained and coached to carry out your duties, should you deliberately not follow through on instructions given and make the same errors or continue to violate Company policies and procedures, your Supervisor will counsel you. Counselling will be carried out with the intention of letting you know that a change in behaviour is needed. This will be documented for mutual benefit.
- Counselling session can be conducted for actions identified as minor misconduct, as long as it does not require any disciplinary action to be taken.
- If after counselling, your behaviour has not shown improvement, you will be issued with written warning letters
- However, for actions identified as major misconduct, the above may not be applied. Instead, the action taken will be issuance of show cause letter and/or inquiry.
- Show cause letter / Inquiry - issued by the Manager – Group Human Resources and Administration on the recommendation of the HOD shall be carried out (Consequences will be based on nature of misconduct and could include dismissal, suspension without pay, demotion, transfer, no salary increment, no bonus and no promotion).

In the case of serious infractions, the Company may suspend an employee for a period not exceeding fourteen (14) days for investigation. During this period of suspension an employee will be paid not less than half (1/2) their basic salary. The employee will be notified of the offence(s) allegedly committed and disciplinary action will not be taken until given an opportunity to be heard.



As a guideline, the following must be observed before any actions are taken:

- Gravity of offence.
- Length of service.
- Blameworthiness.
- Previous service records.

ABSENTEEISM AND TARDINESS

It is essential that for the efficient operation of the Company's business, regular attendance and punctuality of all the employees be maintained. Failure to comply with this requirement tantamounts to insubordination.

Your regular attendance and punctuality at work will be taken into account for individual performance rewards and future job promotions.

Advance notice of absence should be given to the immediate superior. When circumstances make it impossible, the employee should notify his immediate superior within forty eight (48) hours. Failure to do so shall constitute as an unauthorised absence without leave.

If the employee is absent for more than two (2) consecutive days without prior approval from his superior, he will be deemed to have breached the employment contract and has terminated his service.

Where an employee has agreed to work on a scheduled overtime and he does not show up for such overtime work, it will be considered as absenteeism.

Employees are required to strictly adhere to the above rules and regulations, failing which disciplinary action will be taken against the person.

MISCONDUCT

With the general intention of the Labour Law, misconduct is an act or omission of an act that is inconsistent with the fulfilment of the expressed or implied condition of the employee's service. It can cover all aspects of improper behaviour that have the characteristics of intentional doing or omitting to do something which the person concerned knows is wrong and which he does or omits to do in a manner that is careless or without regards to what the results would be.

For the purpose of administration, any of the acts listed below shall readily constitute as misconduct. Any act or omission of an act that is not listed below can still constitute as misconduct if it fulfils the general description of misconduct as given in these rules.

The following acts or omissions, by no means exhaustive, will be treated as **minor misconducts** and are offences for which an employee is liable for disciplinary action via written warnings, which may or may not lead to dismissal:-

- Continued late attendance to work.
- Absent from work without prior permission and without valid cause.
- Interfering with another person's work during working or non-working hours.
- Knowingly concealing evidence or proof of a minor misconduct.
- Not wearing uniform, safety shoes, covers, caps or safety or protective clothing or equipment provided or improperly dressed while at work.
- Loitering within Company's premises.
- Entering restricted areas.
- Improper stacking of cargo.
- Consuming alcoholic drinks in the Company's premises without the approval of the Company.
- Gross inefficiency.
- Neglecting to keep work areas or premises in a good, tidy and acceptably presentable manner.
- Loitering, malingering or idling while on duty.
- Ceasing work before proper finishing time without permission of the immediate superior.
- Inefficiency and bad time keeping.
- Giving unauthorised person(s) a lift in the Company's equipment / commercial vehicles.
- Trading on the Company's premises.
- Not giving full attention to duty.
- Improper use of the Company's property.
- Unintentionally defacing or damaging the Company's property or equipment.
- Urinating anywhere in the Company's premises other than the lavatories provided.



- Posting, altering or removing any matter on the Notice Board or company property without the permission by the Head of Department and/or Manager – Group HRA.
- Leaving work site without approval from superior.
- Holding unauthorised meetings on the Company's premises.
- Inciting other employees to commit any of the offences listed under this category.
- Any other offences deemed by the Company to be sufficiently serious as to constitute inclusion under this category.

The following acts or omissions will be treated as **major misconduct** for which an executive/employee may be subjected to immediate dismissal from the Company's employment with loss of all benefits:-

- Misuse of position / Abuse of Power.
- Threatening or intimidating other employees or the Company's clients within the office premises.
- Endangering life through carelessness or causing injury or death by carelessness.
- Careless tallying of cargo.
- Neglecting to maintain proper entries in record book and document.
- Smoking in Dangerous Cargo area within the company's premises.
- Forging or defacing medical certificates or other official documents to defraud the Company.
- Making false statement:
 - Wilfully making a wrongful statement of overtime and other allowances.
 - Falsifying own or other employee's attendance record.
- Wilfully causing damage to the Company's property or any property belonging to the Company.
- Wilfully assaulting another employee or client of the Company or any other person on the Company's premises.
- Stealing or attempting to remove without authorisation any property belonging to the Company or in custody of the Company.
- Charged and convicted of criminal offences.
- Being under the influence of liquor while on duty.
- Persistent contravention of the Company's rules and regulations.
- Taking part in any form of strike or demonstration within or outside the Company's premises.
- In the possession of dangerous weapon within the Company's premises.
- Smoking in non-smoking area designated within the Company's premises.



- Possession, consumption, addiction and trafficking of narcotics within the Company's premises. This shall include bringing in of narcotics.
- Failure to observe safety and health, ISO 9000 rules and regulations.
- Careless with statements of returns.
- Failure to report an accident involving Company property.
- Creating a nuisance or disturbance on the Company's premises.
- Contravention of any safety regulation duly advised by circular or permanent notice, example, no smoking in the warehouse, etc.
- Wilfully slowing down work or inciting others to do so.
- Gross negligence resulting in damages to the Company's property, reputation or causing financial loss to the Company.
- Incompetence and inefficiency despite being warned.
- Immoral, indecent or disgraceful acts of conduct within the Company's premises.
- Striking work or inciting other employees to strike work in contravention of the provision of any law or rule having the force of law.
- Conflict of interest.
- Disclosing the Company's secrets or information or confidential matters concerning the affairs of the Company without prior sanction or lawful authority.
- Conviction and imprisonment for any criminal offence.
- Repetition of minor misconduct despite being issued with a final warning letter.
- Unauthorised use of Company's vehicles, equipment or any appliances.
- Wilful insubordination or disobedience of any lawful and reasonable order by a superior.
- Misrepresentation or suppression of facts, either verbal or in writing.
- Sleeping whilst on duty.
- Habitual absence without prior leave or reasonable excuse.
- Employees whether actions verbally, physically or visually that can be interpreted as acts of sexual harassment towards other employees, clients or vendors.
- Any other offence deemed by the Company to be sufficiently serious as to constitute inclusion under this category.



DRESS CODE

In line with the Company's effort to promote a professional, healthy and safe working environment, all employees are expected to ensure that their dress and grooming projects a positive corporate image of the Company to clients, customers, vendors, business visitors and the public.

Employees should dress in appropriate business attire from Monday to Thursday.

Employees must use good judgment in determining what type of dress is considered appropriate business attire.

Appropriate attire will depend on an employee's job duties and responsibilities, degree of customer and client contact, safety issues, and other activities.

Clothings should be clean and neat in appearance at all times.

The Employee Pass must be visible and worn at all times while in the Company's premises.

Casual Day on Friday and Saturday

- In the interest of employee comfort, Friday and Saturday have been designated as "Casual Day" for employees.
- On Casual Day, employees must use good judgment in determining what is appropriate to wear. Jeans and sneakers are permitted on Casual Day.
- Only collared T-Shirts are allowed on Casual Day and should be clean and neat in appearance at all times.
- Employees should remember that business reasons may require employees to wear regular business attire on Casual Day.

Unacceptable attire

- Unacceptable attire includes, but is not limited to, the following:
 - Muscle shirts, tank tops.



- Spaghetti strap tops.
 - Torn clothing and beach attire.
 - Mini-skirts and other skirts and shorts that are excessively short or “see through” clothing.
 - T-shirts, sweatshirts, sweatpants, and other workout attire.
 - Slippers.
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- Clothings that are offensive, revealing, distracting, provocative or excessively tight.

GROOMING GUIDELINES

Hairstyles, make-up, grooming of beards and moustaches and personal hygiene should be reasonable and in accordance with customary business practices.

An employee’s personal grooming and hygiene should contribute to a clean and neat appearance and impression.

Exceptions

- Supervisors or other management personnel can specify additional or alternative dress and grooming requirements for employee’s safety or based on the business needs of their departments.

- Religion, Ethnicity or Disability
 - The Company shall make reasonable accommodations for dress or grooming directly related to an employee’s religion, ethnicity, or disability.



ETHICS

The Company believes that all supplier relationships should be founded on principles of good governance such as **integrity accountability, fairness and no tolerance towards bribery and corruption**. These principles extend to the Company's procurement activities and all employees and suppliers are required to comply with the Procurement Ethics.

The Company expects that our employees and suppliers to conduct their business in accordance with the highest ethical standards. The Company's employees and suppliers must strictly comply with all laws and regulations on bribery, corruption and prohibited business practices.

CORRUPTION

- Not to accept bribes: money, favours or promise to person in position of trust to influence your judgment or conduct.
- Ensure that the suppliers are chosen based on merit and to avoid conflicts of interest or any other kinds of favoritism that might compromise the judgment of the selection process.
- Not to accept kickbacks/commission: payment received in return for influence or control over a business transaction.
- Not to accept gratuity: something given voluntarily or beyond obligation usually in return for or in anticipation of some service;
- Be alert to and report to line management activity by suppliers that is inconsistent with the Procurement Ethics.
- Be careful not to give one supplier's confidential business information (proposed rates, winning bid information, etc.) to another.
- Not to disclose confidential information to any unauthorised party.
- Maintain and observe the highest ethical standards mentioned above when dealing with customers.
- Not to accept and attend luncheon and dinners invitations by suppliers. However, exceptions are made for business meetings or discussions that extended to the normal meal times or during site visitations to the suppliers' premises for supplier's audit.



WHISTLEBLOWING

Whistleblowing is an act of disclosing information of corruption and malpractices within an organisation or a workplace.

If an employee has information or proof of any cases of corruption or malpractice, they may bring the case to the attention of the Manager – Group Human Resource and Administration and / or the Executive Director and/or the Managing Director, as follows:

- Managing Director
Name: Teow Choo Hing (Steven)
Email address: chteow@cjcentury.com

- Executive Director
Name: Yeap Khoo Soon (Edwin)
Email address: edwin@cjcentury.com

- Manager, Group Human Resource and Administration
Name: Chan Pek Yuen (Sally)
Email address: sally.chan@cjcentury.com

Under the Whistleblower Protection Act 2010, the whistleblowing procedures are as such:-

- The employee that gives information in person on improper conduct (i.e. corruption or malpractice to the designated authority).

- Besides lodging a report in person, it is possible to make a report via phone, e-mail, fax or letters.

- Information is recorded in writing and the informant will receive whistleblower protection as per Whistleblower Protection Act 2010.