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**EFFICIENT E-SOLUTIONS BERHAD** (632479 H)

**CORPORATE CODE OF CONDUCT**

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## Corporate Code of Conduct

### 1. Objective

The principles of Group's Code of Conduct are:

- i. To provide guidance to stakeholders on the ethical behaviors to be expected from the Group; and
- ii. To instill, communicate, measure and monitor its values in pursuing its objectives.

### 2. Principles of the Code

This Code provides the minimum guides to the directors, employees and business partners covering advisers, bankers, suppliers, contractors, service providers and vendors ("the parties", "these parties" or "all parties") of the Group in conducting their work and it is not exhaustive.

At minimum, all parties shall observe and ensure compliance with all applicable laws, rules and regulations when carrying out their duties. Violation of this Code is amounted to breach of duties. Subject to the nature and magnitude of these breaches, the Group may act within the allowable authority to disassociate its future business dealings with the parties who have breached this Code or take appropriate disciplinary and legal actions against them.

#### *Protection and Proper Usage of Assets and Resources*

All parties must protect the assets and resources of the Group and ensure its availability for legitimate business purposes and not to be used for personal gain and enrichment.

#### *Confidential Information*

All information regarding the Group, its operations, financial condition and future prospects, should be regarded as material and price-sensitive, and must be treated as confidential unless it is already in the public domain.

All parties shall exercise caution and due care to safeguard confidential and sensitive information which is acquired in the course of their dealing and association with the Group and are strictly prohibited to disclose any of this information to third party unless such disclosure is duly authorised or legally mandated. Access to information should be restricted only to those persons who have a legitimate need for the information consistent with their duties or obligations to the Group.

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### *Health and Safety*

It is the Group's policy to conduct its business operation in a manner that protects the safety and health of its employees, customers, public and its assets. All Directors and employees must observe and comply with all the safety policies set by the Group.

Similarly, the Group expects its business partners to observe this provision in their work place.

### *Harassment*

Harassment is unacceptable. The Group does not tolerate or condone any sexual or other forms of harassment towards others.

### *Conflicts of Interest*

All parties must be accountable for acting in the Group's best interest and should avoid involving themselves in situations where there is conflict of interest between them and the interest of the Group and gaining personal advantage.

### *Securities Trading*

Parties who have access to confidential information are not permitted to use or share that information for securities trading purposes. All non-public information about the Company should be considered confidential information. Any parties who wish to trade the securities of the Company are advised to ensure relevant provisions of the securities regulations are complied with.

### **3. Board's Responsibility**

The Board should periodically review the Code of Conduct and to ensure implementation of appropriate communication channel to receive feedbacks and other appropriate internal systems to support, promote and strengthen the awareness and to ensure compliance of this Code when making their business and operation decisions.

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### **4. Management's Responsibility**

Management should ensure this Code is readily available to all employees and business partners and to communicate the Code with these parties periodically in order to reinforce its importance and relevance.

In making operational and business decisions, the management is responsible to the Board to observe the principles of this Code. Management shall ensure their action consistent with the spirit of this Code and promote good culture of ethics through their internal and external interaction with all stakeholders of the Group.

### **5. Corporate Disclosure Requirement**

Copy of the approved Code of Conduct shall be published in the corporate website.



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