

CODE OF BUSINESS CONDUCT AND ETHICS

1. INTRODUCTION

The Company is committed to uphold standards of conduct for proper ethics and behavior of all directors, officers, managers and employees. The Code of Conduct includes employees of subsidiaries companies. It is the duty and responsibility of all company personnel to be faithfully follow and comply with the policies and practices stated in the Code of Conduct.

The purpose of this Code is to promote good corporate governance as follows:

- a. to establish standards of ethical behavior which shall govern relations with the Company and with customers, business associates, suppliers, authorities and communities.
- b. to serve as a tool to prevent possible violations and conflicts on daily activities.
- c. to comply with applicable government laws, rules and regulations.
- d. accurate, fair and timely disclosure in reports and documents filed to relevant authorities and public communications made by the Company.

All company personnel are required to read and understand this Code of Conduct. Any unclear information or questions regarding their obligations under this Code should be referred to immediate managers for clarification or advice.

2. STANDARDS OF CONDUCT

2.1 HONESTY, INTEGRITY AND GOOD FAITH

Company personnel should act honestly, good faith and truthful in the conduct of business activities. They should demonstrate their personal integrity to uphold right perceptions despite pressures favoring the opposite. They should be impartial, committed to their beliefs and never compromise their principles for any objective that would do harm to the Company. The company personnel shall exercise reasonable care and diligence when discharging duties and responsibilities.

2.2 CONFLICT OF INTEREST

Company personnel shall devote entire time, attention, energy and skill to the business of the Company and shall not be interested, either directly or indirectly in any other business or work other than of the Company. Your action on the job in your free time must not conflict with your obligation to the Company. It is expected to act in the best interest of the Company, impartial and make decision based on sound business reasoning.

2.3 CONFIDENTIAL INFORMATION

Company personnel should protect Company's confidentiality information from people outside the Group including suppliers, customers, agents, etc. Such confidential information shall include any information related to the business, operations, plans, processes, financial information, trade secrets, price list, cost information, techniques, data and specification. Company personnel shall

undertake to maintain and preserve secrecy in all working matters and not to divulge any to other members even after they have left the Company.

If request seeking disclosure of Company's information is received, company personnel should promptly report to their immediate managers for appropriate action to be followed and taken.

2.4 ACCEPTANCE AND PROVISION OF GIFTS AND ENTERTAINMENT

It is important not to accept or provide inappropriate gifts, entertainment and/or expenses in any manner or form which are not related to our Group businesses as it may create conflict of interest and influence business decisions. Generally, acceptance and provision of inexpensive gifts which are occasional, customary gifts during festive or special occasions and gifts from social events attended by the directors, officers, managers and employees is permissible.

If in doubt, please consult with your immediate managers for advice and approval relating to acceptance or provision of gifts, entertainment and/or expenses.

3. COMPLIANCE WITH LAWS, RULES AND REGULATIONS

The Company is committed in complying all relevant laws, related rules and regulations of its operations. These laws include anti-corruption laws, securities laws, money laundering laws and others. Company personnel should equip themselves with appropriate legal standards, legislations and restrictions applicable to their assigned duties and responsibilities.

4. SAFEGUARD COMPANY PROPERTIES

Company personnel shall maintain Company's resources and assets in an efficient manner. They should protect company's properties from improper loss or depreciation.

5. CORPORATE SOCIAL RESPONSIBILITIES

Appropriate care is taken to ensure corporate social responsibility is upheld in the course of operations. Company personnel will ensure well-being of the society is safeguard and preserved.

6. REPORTING OF SUSPECTED VIOLATION OF CODE OF CONDUCT

In the event of suspecting another personnel may have committed or about to commit any breach of terms and conditions of service or violating Company's policies, you should promptly report it to immediate manager for investigation. This issue shall be treated as confidential and company personnel is expected to extend full co-operation during investigation process.