MUHIBBAH ENGINEERING (M) BHD
Company No. 197201001137 (12737-K)
(Incorporated in Malaysia)

SUMMARY FOR CODE OF ETHICS, BUSINESS PRACTICE AND CONDUCT

This Code of Ethics, Business Practice and Conduct ("the Code") applies to all MEB employees, employees of each subsidiary, anyone who acts on behalf of MEB Group, including all officers, directors, employees, contract and temporary employees, probationary employees, part-time and third party agents.

1. Employees – Reporting Concerns and Seeking Guidance

An employee of MEB Group is duty bound to report any real or potential violation of the Code to his superior.

2. Additional Expectations for Managers

The manager or supervisor is expected to ensure that his department operates in accordance with the highest principles of business ethics. If the supervisor or manager becomes aware of actual or suspected violations or problems, he must promptly report the issue to Internal Audit, Legal, Human Resource Departments or any Executive Director of MEB or its subsidiary.

3. Conflict of Interest

All employees are required to ensure full disclosure to his superior and Head of Department as soon as he is aware of the possibility of conflict of interest. If Directors are involved, additional disclosure to the Group's Finance Department is immediately required (in order to facilitate monitoring by the Corporate Finance Department on related party transactions based on Chapter 10 of the Listing Requirements).

4. Confidentiality and Intellectual Property Rights

All employees are obligated to ensure that confidential information unless otherwise stated, is not disclosed in the verbal, written, print, published, email, web posting, blog or other forms of communication channels to any party.

5. Upholding Quality Standards

The employees are all responsible for complying with laws and procedures and doing their part to maintain the high quality of the products, projects and services. If an employee witnesses or suspects any lapse in quality control or testing procedures, he is required to bring the issue to his manager's or supervisor's attention immediately.

6. Commercial Bribery

No employee must offer or authorize, request, receive or accept, a bribe of any kind, whether directly or indirectly. Nor may he offer, promise or give (directly or indirectly) anything of value to a public official in order to obtain or retain business or an advantage in the conduct of business, unless it is specifically permitted under the Code or under applicable written law.

7. Receiving or Requesting Gifts

Employees are strictly prohibited from requesting gifts for personal gains and shall not accept any gift or invitation that might make it appear that their judgment for the MEB Group would be compromised or that public confidence in the Company may be eroded. In principle, employees should not give gifts to vendors, suppliers, contractors, customers or other third parties that may influence, or can be perceived to be able to influence decision-making. It is also understood however, that giving practices vary among cultures. In such cases, employees are to practise good business sense and discretion. If gifts are given to external parties, employees are to declare such gifts to their respective Heads of Department or Executive Directors.

8. Fair Procurement Practices

Managing business relationships in a fair and ethical manner is critical to the Company's business. MEB Group will provide a range of competitive opportunities for subcontractors/suppliers/vendors to participate in the MEB Group procurements.

9. Business Records and Control

Under no circumstances should unauthorized, false, improper or misleading records or entries be made in the books and records of the Group.

10. Managing and Protecting MEB Group Assets

By working for MEB Group, the employees have the responsibility of protecting MEB Group's physical assets.

11. Responding to Media and Analysts

In order to safeguard MEB Group's brands and reputation by ensuring that all external communications are consistent and accurate, all enquiries from external parties, including industry analysts and members of the media, are referred the Corporate Communications and Investor Relations Departments who will have designated representatives for this purpose.

12. Complying with the Laws of Other Countries

Employees must diligently uphold the integrity of MEB Group when doing business in other countries, by complying with the local laws and customs.

13. Respect and Non-Discrimination

Each employee will be treated with respect and dignity, provided with equal opportunity based on merit and performance without regard to race, religion, gender, age, nationality or disability.

14. Safety, Health and Environment

The Management believes that it is of paramount importance to ensure a healthy and safe working environment as well as protection of the environment. Management advocates compliance with the environmental laws of any country where it has business.

15. Misconduct

Misconduct means improper behavior or deliberate violation of a rule of standard behavior. They include but not limited to the following:

a. Breach of authority limits.
b. Any fraudulent activities.
c. Activities harmful to other employees or visitor(s) in the Company's premises.
d. Violation of any laws.
e. Instigating, picketing, incitation and spreading of malicious rumours.
f. Wilful insubordination or disobedience.
g. Breach of fiduciary (entrusted) duties by the Company.
h. Gross negligence and neglect of duty.
i. Tampering, falsification and material misstatement of information.
j. All forms of harassment or indecent behavior, immoral act within Company's premises.
k. Smoking in prohibited/restricted areas or being under the influence of alcohol or drug in the course of duty.
l. Disclosing confidential information.
m. Withholding knowledge of illegal activities.
n. Failure to report serious infectious or contagious illness or disease.
o. Habitual late coming, sleeping on duty or unsatisfactory work performance owing to incompetency.
p. Failure to follow safety procedures or tampering with safety devices.

16. Sexual Harassment

It is the policy of the Company to promote a safe and healthy working environment that fosters mutual respect where individual employees irrespective of status or position are treated with dignity and free from sexual harassment which includes sexual coercion and sexual annoyance. Employees are strictly prohibited from engaging in any form of harassment, humiliation and intimidation of a sexual nature.