SENG FONG HOLDINGS BERHAD

Registration No. 202101022910 (1423210-X)

Our Ethical Stance - Building Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from our employees, customers and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honourable conduct. It is easy to *say* what we must do, but the proof is in our *actions*. Ultimately, we will be judged on what we do.

When considering any action, it is wise to ask: Will this build trust and credibility for our company? Will it help create a working environment in which our company can succeed over the long term? Is the commitment I am making one I can follow through with? The only way we will maximize trust and credibility is by answering "yes" to those questions and by working every day to build our trust and credibility.

For our customers - We pride ourselves in providing the best products and services by increasing our efforts to further improve quality, productivity and to meet the customers' requirement for uniform, consistent product at a competitive price.

For the environment - We are committed to act responsibly to achieve our goals of ensuring we are environmentally responsible in all aspect of our operations, comply with legislations, continuously improve management and reporting of environmental issues

For our employees - Our employees are our greatest assets, and we continuously strive to build a respectful, equitable, fair, and diversified working environment where all our employees can thrive in their respective functions.

Code of Conduct

The Board has in place a Code of Conduct which is articulated to improve the ethical standards. All the employees are expected to always behave ethically and professionally and thereby protect and promote the reputation and performance of the Group.

The purpose of the Policy is to set forth to maintaining a working environment free from all forms of discrimination. The Policy addresses recruitment, admissions, hiring, training, discipline, promotion, demotion, transfer, layoff or termination, rates of pay or other forms of compensation and any other employment or education conditions.

The Board is cognizant of both its moral and legal obligations to ensure that all employees are provided equitable opportunities to realise their goals and purpose within the Group.

The Group communicates its Code of Conduct to all employees upon their employment.

1.0 POLICY

1.1 This policy has been prescribed as a guiding principle for doing business and is addressed to all those who does any act and on behalf of the Company. This is applicable to our Board of Director and employees of the Company.

2.0 OBJECTIVE

2.1 To set forth to maintaining a working environment free from all forms of discrimination. The Company is cognizant of both its moral and legal obligations to ensure that all employees are provided equitable opportunities to realize their goals and function effectively within the working environment.

3.0 FORCED LABOUR

3.1 There is no forced, bonded or involuntary prison labour in the Company. Employees are not required to lodge "deposits" or their identify papers with the Company and are free to leave their employment after reasonable notice (as provided for in the Handbook). Overtime shall be voluntary.

4.0 WORKING CONDITIONS ARE CLEAN AND HYGIENIC

- 4.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 4.2 Applicable occupational Health and Safety regulations will be adhered to, and a working environment which is safe and conducive to good health shall be provided. Workers shall receive regular and recorded health and safety training and such training shall be repeated for new or reassigned workers.
- 4.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 4.4 Accommodation, where provided, shall be clean, safe and meet the basic needs of the workers.

5.0 CHILD LABOUR SHALL NOT BE USED

- 5.1 The Company shall not employ or recruit child labour. Children and young persons under the age of 16 years old shall not be employed by the Company.
- 5.2 These policies and procedures shall conform to the provisions of the relevant Malaysia Employment Act standard.

6.0 LIVING WAGES ARE PAID

- 6.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 6.2 Wages shall be paid directly to the employees, at the agreed intervals and in full.

- 6.3 All employees shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for pay period concerned each time that they are paid.
- 6.4 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions of wages not provide for by the law of the country be permitted without the expressed permission of the employee concerned. All disciplinary measures should be recorded.

7.0 WORKING HOURS ARE NOT EXCESSIVE

7.1 Working hours comply with the laws of the country and benchmark industry standards, whichever affords greater protection.

8.0 NON-DISCRIMINATION

8.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on the basic of race, sex, religion, age, colour, nationality or ethnic origin; physical, mental or sensory disability; marital status and sexual orientation. Decisions affecting an individual cannot be made on the basic of one of these factors.

9.0 ANTI SEXUAL HARASSMENT

- 9.1 Sexual harassment is prohibited in the work place. Sexual harassment encompasses any sexual attention that is unwarranted. It includes both verbal and physical conduct. Examples of sexual harassment prohibited by this policy include, but are not limited to the following: -
 - (a) Physical assault.
 - (b) Direct or implied threats that submission to sexual advances will be a condition of employment, work status, promotion, grades, or letter of recommendation.
 - (c) Direct proposition of a sexual nature.
 - (d) Subtle pressure for sexual activity.
 - (e) A pattern of conduct that discomforts or humiliates the person at whom the conduct is directed which includes one or more of the following: -
 - (1) comments of a sexual nature;
 - (2) sexually explicit statements, questions, jokes, or anecdotes;
 - (3) unnecessary touching, patting, hugging, kissing, or brushing against a person's body;
 - (4) remarks of a sexual nature about a person's clothing or body; or
 - (5) remarks about sexual activity or speculations about previous sexual experience.
 - (f) Persistent, unwarranted attempts to change a professional relationship to an amorous one.

10.0 NO INHUMANE TREATMENT IS ALLOWED

10.1 Physical abuse or discipline and verbal abuse or other forms of intimidation is strictly prohibited.

11.0 RESPONSIBILITY OF DISSEMINATION AND IMPLEMENTATION

- 11.1 It is direct responsibility of all administrator, managers and supervisors to: -
 - (a) Ensure that all employees are made aware of this policy, the types of conduct prohibited by it, and the avenues available for resolutions violations.
 - (b) Monitor their respective working areas for violations of this policy
 - (c) Listen to charges of policy violations brought to their attention by employees
 - (d) Either intercede for complaint resolution or refer the complainant and/or respondent to the management for further assistance, advice or investigation

12.0 REPORT OF UNFAIR TREATMENT THROUGH SUGGESTION BOX

- 12.1 Due to the sensitive and personal nature of feeling, beside normal complaint to superior, the Company provide a separate and secure channel for workers to report any unfair treatment through suggestion box that the Company placed next to the time clock area. The said complaint will be advanced to the highest authority of the Company and the necessary investigation will be conducted according to the Company rules and regulations. The person in-charge of the Suggestion Box will monitor the box every week.
- 12.2 Unsigned suggestions as well as complaints will also be acted upon.
- 12.3 No action shall be taken against the person who makes a complaint.

13.0 FREEDOM OF ASSOCIATION

- 13.1 The freedom of association and the right to collective bargaining is respected.
- 13.2 The employer adopts an open attitude towards the activities of worker organizations.
- 13.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 13.4 Where the right to freedom of association and collective bargaining is restricted under law, the Company facilitates, and does not hinder, the development of parallel means for independent and free associations and bargaining.

This Code of Ethics and Conduct was reviewed and approved by the Board on 9 October 2024