

Code of Business Ethics for Business Associates

Seng Fong Holdings Berhad and its subsidiaries

Seng Fong Holdings Berhad (“Seng Fong” or the “Company”) and its subsidiaries (“Seng Fong Group” or the “Group”) expect its business associates, suppliers, service providers, agents, and other Business Associates (collectively referred to as “Business Associates”) to do business and operate ethically and responsibly, including from environmental and social aspects.

We have established various policies stipulating the Group’s stance or commitment, including, but not limited to, the following:

- Sustainability Policy; and
- Anti-Bribery and Corruption Policy.

Compliance with Laws and Regulations

1. Seng Fong expects the Group’s Business Associates to comply with applicable laws and regulations with respect to their business and operations.

Fair Business Dealing

2. Seng Fong expects the Group’s Business Associates to conduct business with or on behalf of the Seng Fong Group with integrity, honesty, and fairness. Information provided by Business Associates to the Group for business purposes shall be reasonably accurate and not misleading.

Confidentiality of Information and Data Protection

3. Information made available by Seng Fong Group to Business Associates is for specific business purposes and Business Associates shall undertake that all information (including personal data) disclosed, given access to, procured, gathered, collected, received, or handled by Business Associates are confidential and shall not be made available to any third party without the written consent of Seng Fong Group.
4. Business Associates are expected to have in place the necessary systems, policies, and controls to safeguard data privacy and cyber-security to ensure the data and information of Seng Fong Group are safe and protected against cyber threats and data loss.

Insider Information and Insider Trading

5. Business Associates shall not use price-sensitive non-public information or confidential business information, which refers to information that can affect the securities price of a company when it becomes publicly known (“Inside Information”), for personal benefit or the benefit of other persons.

Business Associates are prohibited from using Inside Information to trade in securities or to provide information to others, including but not limited to their family, friends, and business associates.

Conflicts of interests

6. Business Associates are expected to avoid conflict of interest situations that may impair, or appear to impair, the independence or objectivity of the decision-making process in relation to business decisions between Seng Fong Group and Business Associates.

Where a Business Associate is aware of an existing or emerging conflict of interest situation, they shall disclose the conflict of interest situation to Seng Fong Group.

Anti-Bribery and Anti-Corruption

7. Business Associates are required to comply with Seng Fong's Anti-Bribery and Corruption Policy.

Business Associates are strictly prohibited from engaging in bribery and corruption, especially in relation to the Group's business and operations.

Anti-money Laundering

8. Seng Fong Group does not engage in money laundering or terrorism financing activities and it does not associate itself with such criminal activities of others within its business operations or value chain. Seng Fong Group will not hesitate to act in accordance with applicable laws and regulations to report any suspicious activity to the authorities where required.

Labour Practices

9. Business Partners are required to adhere to all applicable laws and regulations governing employment practices including adherence to minimum working age, minimum wage, maximum working hours, minimum rest periods, freedom of association, and right to collective bargaining, minimum workers' accommodation, amongst others.
 - a. Non-discrimination, diversity, and equal employment opportunities – Business Partners are expected to provide a work environment that is free from discrimination based on race, religion, gender, age, sexual orientation, disabilities, or nationality.
 - b. No child labour and forced labour – Business Partners shall not be involved in child labour or forced labour practices. Seng Fong Group does not work with businesses with known practices of child labour or forced labour.
 - c. Freedom of association and right to collective bargaining – Business Partners are expected to respect workers' right to freedom of association and right to collective bargaining in compliance with applicable laws and regulations.

Safe and Healthy Workplace

10. Business Partners shall ensure employees or workers work in a safe, conducive, and healthy working environment.

Environmental compliance

11. Business Partners shall comply with applicable environmental laws and regulations.

Pollution, Waste, and Emissions

12. In addition to compliance with laws and regulations, Business Partners shall avoid causing negative environmental impacts such as pollution through waste, effluent, and emissions.
13. Business Partners are expected to have relevant environmental management systems (e.g. water and effluent management system, soil quality management system, or waste management system) to systematically handle and manage the environmental impacts of their business and operations.
14. Business Partners are expected to strive towards minimising their greenhouse gas (“GHG”) emissions in their business and operations. This includes reducing reliance on fossil-based fuels.

Sustainable Plantation Practices

15. Seng Fong Group strives to source from rubber plantations which does not develop or operate on peat areas, does not practice open burning, and does not contribute to deforestation in its operations. In the longer term, relevant Business Partners are expected to be able to support Seng Fong Group in this endeavour.

Efficient Use of Resources

16. Business Partners are expected to strive towards the efficient use of resources, including raw materials, water, and energy.

This Code of Business Ethics for Business Associates was reviewed and approved by the Board on 9 October 2024.