



PRESS METAL ALUMINIUM HOLDINGS BERHAD

Registration No. 201601027232 (1198171-H)

CODE OF ETHICS

Abbreviation	Meaning
AC	: Audit Committee of the Company
Board	: The Board of Directors of the Company
COE	: Code of Ethics
Director	: Includes all independent and non-independent directors, executive and non-executive directors of the Group and shall also include alternate or substitute directors.
Employees	: All individuals directly contracted to the Group on an employment basis, including permanent and temporary employees excluding Directors and Management
Group	: The Company and its subsidiaries, collectively
HOD	: Head of department
PMAH or the Company	: Press Metal Aluminium Holdings Berhad (Registration No. 201601027232 (1198171-H)).
Subsidiary	: A corporation in which the Company controls the composition of the board of directors, controls more than half of the voting power or holds more than half of the issued share capital excluding preference shares.

1. Introduction

Commitment to ethical professional conduct is expected of every director of the Group. This COE, consisting of commitments formulated as statements of personal responsibilities, identifies the elements of such a commitment.

It is understood that some words and phrases in this COE are subject to varying interpretations, and that any ethical principle may conflict with other ethical principles in specific situations. Questions related to ethical conflicts can best be answered by thoughtful consideration of fundamental principles, rather than reliance on detailed regulations.

2. Commitment

The commitment to excellence is fundamental to the philosophy of the Group. This commitment to excellence means that every Director of the Group shares a common set of objectives and benefits from the achievement of those objectives.

3. Principle

This COE is based on the core principles of sincerity, integrity, responsibility and corporate social responsibility.

4. Purpose

This COE is intended to focus on the Board and each Director on areas of ethical risk, provide guidance to Directors to help them recognise and deal with ethical issues, provide mechanisms to report unethical conduct and help foster a culture of honesty and accountability.

This COE is designed to enhance the standard of corporate governance and corporate behaviour with the intention of achieving the following objectives:

- (a) To establish a standard of ethical behaviour for Directors based on acceptable beliefs and values.
- (b) To uphold the spirit of professionalism, objectivity, transparency, and accountability in line with the legislation, regulations and environmental and social responsibility guidelines governing a company.

No code or policy can anticipate every situation that may arise, or replace the thoughtful behaviour of an ethical Director. Directors are encouraged to bring questions about a particular circumstance that may involve one or more of the provisions of this Code to the attention of the Chairman of the Board, who may consult with legal counsel as appropriate.

5. Definition

In the context of this COE, a Director means any person who holds the position of Director in the Group, irrespective of any designation used, including anyone who follows the directives and advice of a corporate Director and who usually takes action, as well as an employee or substitute Director. It includes both executive and non-executive Directors as well as executive and non-executive chairpersons.

6. COE

In the performance of his or her duties, each Director must comply with the letter and spirit of the following codes:

Corporate Governance

- (a) To have a clear understanding of the aims and purpose, capabilities and capacity of the Company;
- (b) To devote time and effort to attend meetings and to know what is required of the board and each of its Directors, and to discharge those functions;
- (c) To ensure that the Group is properly managed and effectively controlled at all times;
- (d) To stay abreast of the affairs of the Group and be kept informed of the Group's compliance with the relevant legislation and contractual requirements;
- (e) To insist on being kept informed on all matters of importance to the Company in order to be effective in corporate management;
- (f) To limit the directorship of companies to a number in which the Director can best devote time and effectiveness;
- (g) To have access to the advice and services of the Company Secretary, who is responsible to the board to ensure proper procedures, rules and regulations are complied with;
- (h) To at all times exercise his powers for the purposes they were conferred, for the benefit and best interest of the Group;
- (i) To disclose immediately all contractual interests whether directly or indirectly with the Group;
- (j) To neither divert to Director's own advantage any business opportunity that the Group is pursuing, nor may the Director use confidential information obtained for the Director's own advantage or that of others;
- (k) To act with utmost good faith towards the Group in any transaction and to act honestly and responsibly in the exercise of the Director's powers in discharging the duties at all times; and

- (l) To be willing to exercise independent judgement and, if necessary, openly oppose if the vital interest of the Group is at stake.
- (m) Relationship with Shareholders, Employees, Creditors and Customers and other Stakeholders
 - (i) Should be conscious of the interest of shareholders, employees, creditors and customers of the Group;
 - (ii) Should promote professionalism and improve the competency of management and employees at all times; and
 - (iii) Should ensure adequate safety measures and provide proper protection to workers and employees at the workplace.

7. Conflict of Interests

Conflict of interests may arise in any situation in which a Director engages in an activity that detracts from or interferes with his or her full, loyal and timely performance of services to the Group, or has a financial interest that might influence the Director's judgment on behalf of the Group.

All such conflicts should be avoided, and Directors must report any actual, potential or apparent conflicts to the Board.

Where the conflict of interest has been appropriately disclosed, the interested director shall not participate in any discussion while the contract or proposed contract is being considered during the meeting and shall not vote on the contract or proposed contract.

8. Social Responsibilities and the Environment

- 8.1. To strive to be socially responsible persons or Group by supporting life-changing causes and efforts, in the arena of community, education and health, in addition to preserving the environment.
- 8.2. To ensure the effective use of natural resources and improve quality of life by promoting corporate social responsibilities;
- 8.3. To be more proactive to the needs of the community and to assist in society-related programmes in line with the aspirations of the concept of the Group campaign or vision; and
- 8.4. To ensure that the activities and the operations of the Group do not harm the interest and well-being of society at large.

9. Compliance Standards

- 9.1. To communicate any suspected violations of COE promptly to the Chairman of the AC and complying with the Whistle-Blowing Policy; and

- 9.2. Violations will be investigated by the Board or by persons designated by the Board and appropriate action will be taken in the event of any violations of this COE.

10. Periodic Review

This COE shall be reviewed periodically by the Board and shall be published on the Company's website.

This COE was first adopted by the Board on 10 July 2017. The first review was on 26 February 2019. The Board subsequently reviewed and approved this COE on 26 November 2020.