



HAI-O ENTERPRISE BERHAD AND GROUP OF SUBSIDIARIES

CODE OF BUSINESS ETHICS (“Code”) FOR SUPPLIERS AND BUSINESS ASSOCIATES

Hai-O Enterprise Berhad and its subsidiaries (the “Hai-O Group” or “Group”) is committed to conducting its businesses in a lawful and ethical manner and to driving and upholding Hai-O Group’s corporate values. Similarly, Hai-O Group also expects the same level of integrity, honesty, openness, and transparency being upheld by the Group’s Directors, Employees, Suppliers and Business Associates when dealing business with Hai-O Group.

This Code of Business Ethics sets out the standards of ethical business practices and conduct that Hai-O Group expects from all parties involved in the Group’s business, including its suppliers, vendors, agents, consultants, JV partners, associate companies and business partners as well as service providers etc (“Suppliers & Business Associates”). This Code makes reference Hai-O Group’s Anti-Bribery Policy and collectively promote good and sustainable business practices (extract of this policy is available on Hai-O Group’s corporate website at www.hai-o.com.my).

1. Laws and Regulations

Hai-O Group has a zero-tolerance approach to bribery and will not pay any bribes to anyone for any purpose. Hai-O Group takes the upholding of its anti-bribery stance across the Group’s business seriously and expects the same from stakeholders internal and external to the Group’s businesses, extending to all the Group’s business dealings and transactions in all countries in which it operates. All suppliers and business associates must adhere to Hai-O Group’s Anti-Bribery Policy.

All suppliers and business associates undertake to:

- a) not involve in fraud, bribery, corruption, extortion or any other illegal conduct in carrying out business with Hai-O Group or on its behalf;
- b) not involve in any form of money laundering or terrorism financing activities;
- c) comply with all applicable laws and regulations applicable in the suppliers/ business associates’ base countries and as well as in any countries in which provision of products or services are made to Hai-O Group;
- d) practice fair competition in accordance with applicable laws and to avoid activities restricting competition;
- e) not infringe intellectual property rights in relation to products or services supplied to Hai-O Group;
- f) abide by any other applicable laws and regulations which may be applicable from time to time.

2. Business Dealings

All suppliers and business associates undertake to:

- a) conduct business, either with Hai-O Group or on its behalf, with integrity, honestly, fairly, openly, and transparently. Information provided in the conduct of business shall be accurate and not misleading;
- b) not use any “side agreement” which is intended to circumvent an official, primary agreement or contract; or entered into between other third parties and without the consent of the parties involved in the primary agreement or contract
- c) be fully accountable for the delivery of their contractual obligations (based on formal contracts, letter of appointment, or other documentations), including the provision of services and goods, on a timely basis;

- d) protect confidentiality of information from sensitive information to personal data related to business dealings and not utilise this information for own personal advantage, directly or indirectly.

3. Conflict of Interest

All suppliers and business associates undertake to:

- a) avoid situations of any actual, potential, or perceived conflict of interest. Conflict of interest situations arise when the ability to serve its contractual obligation with Hai-O Group may be compromised by other external or personal interest or factors;
- b) declare any possible conflict of interest situations to related Hai-O Group as soon as possible for Hai-O Group to assess the situation and undertake any necessary mitigative actions.

4. Labour Standards

All suppliers and business associates undertake to:

- a) take reasonable measures to ensure their employment practices do not contravene the local legal minimum working age and minimum wage in any country in which the suppliers/ business associates operates;
- b) respect the dignity and human rights of all individuals regardless of their race, age, gender, religion, country of origin, sexual orientation, marital status, disability, or political views by adopting non-discriminatory practices;
- c) not involve in the use of forced labour, trafficked labour, or child labour within its business operations.

5. Health & Safety and Environment

All suppliers and business associates shall take reasonable measures to:

- a) ensure the health and safety of all its stakeholders and creating and maintaining a conducive and productive working environment;
- b) minimise the impact of business operation through strengthened efforts towards protecting the environment.

6. Rights to Audit Suppliers and Business Associates

Subject to the provisions of the business arrangement with Hai-O Group, the Group retains a right to audit, at its own cost and expense, its Suppliers and Business Associates in relation to adherence to this Code of Business Ethics. Suppliers and Business Associates shall co-operate and provide the Group's auditors with the information and documents required, especially if the audit is one that is required in relation to compliance with laws and regulations.

7. Reporting of violations of this Code

All suppliers and business associates undertake to report the concerns on any suspects of a violation of the Code through the whistleblowing mechanism set out under the Group's Whistle Blowing Policy, which is available on Hai-O Group's corporate website at www.hai-o.com.my.

No individual will be discriminated against or suffer any sort of retaliation for raising genuine concerns or reporting in good faith on violations or suspected violations of this Code. All reports will be treated confidentially.