



JINGXING HOLDINGS (M) SDN BHD

Company No. 201901009991(1319319-U)

**CODE OF CONDUCT AND BUSINESS
ETHICS**

1. INTRODUCTION

1.1 Purpose

This Code of Conduct and Business Ethics (“Code”) defines the principles and standards that guide how we conduct our business, interact with stakeholders and uphold integrity in all our operations.

The purpose of this Code is to ensure that all individuals working for or representing Jingxing Holdings (M) Sdn Bhd (“JXM”) act in a manner that reflects:

- Ethical business conduct
- Integrity and accountability
- Compliance with applicable laws, regulations, and standards
- Respect for human rights and worker welfare
- Transparency and fairness in business dealings
- Commitment to health, safety, and environmental protection
- Protection of company assets and confidential information

1.2 Scope of Application

This Code applies to all individuals working for or representing JXM (“JXM Personnel”), including:

- Employees (permanent, contract, temporary, full-time, part-time)
- Interns and trainees
- Seconded personnel
- Directors and Management

This Code also governs the conduct of all JXM Personnel when interacting with external parties, including customers, suppliers, contractors, government authorities, and the community.

JXM expects its business partners to adhere to similar standards of integrity and ethical conduct.

1.3 Compliance Framework

This Code shall be read together with:

- Malaysian laws and regulations
- Company policies and procedures
- Labour Management Plan (LMP)
- Employee Handbook
- International standards including:
 - ADB Safeguard Policy Statement (2009)
 - IFC Performance Standard 2
 - ILO Core Labour Standards

In situations not specifically addressed, employees are expected to exercise sound judgment and seek guidance.

2. ETHICAL WORKPLACE PRACTICES

2.1 Equal Opportunity and Fair Treatment

The Company is committed to providing a workplace that promotes:

- Equal opportunity
- Fair treatment
- Diversity and inclusion

All employment decisions shall be based on merit, qualifications and business needs.

2.2 Respectful Workplace

All JXM Personnel are expected to treat others with dignity and respect.

Any form of the following is strictly prohibited:

- Harassment (including sexual harassment)
- Bullying or intimidation
- Violence or abusive behaviour

All complaints will be handled seriously and investigated accordingly.

2.3 Health, Safety and Working Conditions

The Company is committed to providing a safe and healthy working environment.

JXM Personnel are required to:

- Comply with safety procedures
- Use required protective equipment
- Report unsafe conditions

Where accommodation is provided, it shall meet required standards for safety, hygiene and living conditions in accordance with applicable laws and international standards.

2.4 Control or Prohibits of Drugs, Alcohol and Prohibited Substances

JXM Personnel are required to carry out their duties in a safe and responsible manner, free from the influence of any substance that may adversely affect their performance, judgment, or the safety of themselves and others.

JXM strictly prohibits All JXM Personnel from reporting to work or performing work duties while under the influence of alcohol, illegal drugs, or any controlled substances that may impair their ability to work safely and effectively.

The possession, use, distribution, or sale of alcohol, illegal drugs, or controlled substances within the workplace or company premises is strictly prohibited, except where such substances are prescribed for legitimate medical purposes and used in accordance with lawful medical advice.

The Company may, on selected occasions, organize official events or functions where alcoholic beverages are served. In such instances, JXM Personnel are expected to consume responsibly and comply with all applicable laws and regulations governing the consumption of alcohol.

2.5 Prohibition of Forced Labour and Child Labour

The Company strictly prohibits:

- Forced or bonded labour
- Human trafficking
- Employment of underage workers

All work must be voluntary, and JXM Personnel shall have the right to leave their employment or assigned duties at any time, subject to applicable laws and contractual obligations.

2.6 Freedom of Association

JXM Personnel have the right to join or not join any lawful organisation or association.

The Company respects these rights in accordance with applicable laws and international labour standards.

3. BUSINESS INTEGRITY AND PROFESSIONAL CONDUCT

3.1 Conflict of Interest

All JXM Personnel must act in the best interest of the Company and avoid situations where personal interests are conflicting with company interests.

Any actual or potential conflict must be disclosed to the Company as soon as reasonably practicable, and in any event within two (2) working days of becoming aware of such conflict.

3.2 Gifts, Hospitality and Benefits

JXM Personnel must not give or accept any gift, benefit or hospitality that may:

- Influence decision-making
- Create a conflict of interest
- Result in unfair advantage

Any business-related hospitality must be reasonable, proportionate, and transparent. Where the value exceeds RM300 per person, or where there is any uncertainty regarding appropriateness, it must be declared and prior approval sought from the Company.

3.3 Anti-Bribery and Corruption

The Company adopts a zero-tolerance approach towards bribery and corruption.

JXM Personnel must not:

- Offer or accept bribes
- Engage in improper payments
- Facilitate unethical business practices

3.4 Anti-Money Laundering

JXM Personnel must ensure that all business transactions are legitimate and involve reputable parties.

Any suspicious activities must be reported immediately.

3.5 Insider Information

JXM Personnel must not misuse confidential or price-sensitive information for personal gain or disclose such information without proper authorization.

3.6 Business Communication with Others

JXM Personnel are expected to communicate responsibly and must not make any false, misleading or unverified statements regarding the Company or its competitors through any form of communication, including online platforms such as social media, forums, blogs or other public channels.

JXM Personnel are not permitted to represent or speak on behalf of the Company unless they have been formally authorised to do so. Any communication relating to the Company must be transparent and must not be made anonymously.

4. INFORMATION, RECORDS AND COMPANY ASSETS

4.1 Proper Use of Company Resources

Company assets should be used responsibly and only for legitimate business purposes. Any misuse, loss or damage must be avoided.

4.2 Confidentiality and Proprietary information

JXM Personnel are obligated to safeguard all confidential and proprietary information belonging to the Company and must take reasonable measures to prevent any unauthorised access, disclosure or misuse.

This obligation also extends to any confidential information of third parties that JXM Personnel may obtain or handle in the course of their duties.

Confidential information includes, but is not limited to, technical data and expertise, business strategies and financial plans, product specifications, customer-related information, details of ongoing or planned projects, operational processes, and any non-public financial or organisational data.

JXM Personnel shall not, without proper authorisation or unless required by applicable laws or regulations, disclose such information to any external or unauthorised party, nor use it for any purpose other than the performance of their official duties.

The duty of confidentiality shall remain in effect during the course of employment, service or appointment with the Company and shall continue after the termination or cessation of such engagement.

4.3 Record Integrity

All records and reports must be:

- Accurate
- Complete
- Maintained in accordance with legal and company requirements

5. COMPLIANCE, REPORTING AND ACCOUNTABILITY

JXM Personnel must comply with all applicable laws, regulations, and Company policies, including those relating to labour, safety, environmental, and ethical standards.

5.2 Grievance and Reporting Mechanism

The Company provides accessible channels for JXM Personnel and relevant external parties to raise concerns regarding:

- Workplace conditions
- Ethical misconduct
- Violations of this Code

Reports may be made through:

- Head of Department
- HR & Administration
- Whistleblowing channels

All reports will be handled confidentially and handled in accordance with the Grievance Handling and Reporting Procedures.

5.3 Protection Against Retaliation

The Company strictly prohibits retaliation against any individual who raises concerns in good faith.

6. IMPLEMENTATION AND GOVERNANCE

6.1 Responsibility of JXM Personnel

All JXM Personnel are required to:

- Read and understand this Code
- Comply with its provisions
- Report any violations

Failure to comply may result in disciplinary measures, removal from position, or other corrective actions, as appropriate.

6.2 Training and Awareness

The Company will provide ongoing communication and training to ensure JXM Personnel understand their responsibilities under this Code.

6.3 Amendments

This Code may be updated from time to time to reflect:

- Changes in laws and regulations
- Business requirements
- International standards

Effective Date : 1 April 2026

Revision No : 00

Approved By : Management of Jingxing Holdings (M) Sdn Bhd