EXIS TECH
new era in test handling



CODE OF CONDUCT

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1. Introduction

1.1 What Is Exis Tech's Code Of Business Conduct?

The Company's Code of Business Conduct is meant to serve as a compass to ensure that the Company stay on course with its values. It sets out certain non-negotiable minimum standards of behaviour in key areas. The nature of this Code is not meant to cover all possible situations that may occur. It is designed to provide a frame of reference against which to measure any activities.

1.2 Why Is There A Need For This Code?

We believe that real success is not only measured by the results achieved, but also how it is achieved. It is therefore our goal to create an open and honest environment where we can achieve our best work legally and with integrity.

This is a sign of respect to all our stakeholders, both internally and externally. They deserve the utmost integrity, honesty and fairness in all their interactions with us. It is important that our collective reputation as a corporation, business partners and a collection of individuals is upheld at all times.



1.3 Who Must Follow The Code?

The values and obligations set out in the Code apply to all our employees, consultants, agents and interns (collectively, "Company's Representatives"). We also expect all of our business partners, suppliers, customers and counterparties (collectively, "Counterparties" and each a "Counterparty") to adhere to and promote similar values. Compliance with this Code should be included in the contracts with third-party suppliers, manufacturers, contractors, vendors and distributors doing business with the Company.

1.4 Be Guided By Basic Principles

When faced with a difficult decision about business conduct, ask these questions:

- Is the conduct a violation or in conflict of the Exis Tech's Code of Business Conduct, Company policy or the law?
- Will the conduct appear unethical to stakeholders outside the Company?
- Could the conduct harm my reputation or the reputation of the Company?

2. Working Enviroment

The Company is committed to creating an environment where everyone is treated with respect, trust and dignity.

2.1 Equal Opportunity and Non-Discrimination

The Company provides equal opportunities to all and endeavours to ensure that employment-related decisions are based on relevant qualifications, merit, performance and other job-related factors and in compliance with all applicable laws and regulations.

We do not and our employees shall not discriminate based on gender, race, disability, nationality, religion, age or sexual orientation unless specific laws or regulations expressively or Company policies (e.g., for factory manpower purposes) provide for selection according to specific criteria.

2.2 Harassment and Violence

Any types of harassment and violence will not be tolerated. Such actions or behaviours include derogatory comments based on gender, racial or ethnic characteristics, and unwelcomed sexual advances, spreading of malicious rumours or use of emails, voicemail and other forms of communication channels to transmit derogatory or discriminatory material.

2.3 Illegal Substances

The Company is a drug-free workplace. Use of alcohol and drugs are strictly prohibited during work.

2.4 Environment, Occupational Safety and Health

The Company aims to provide safe and healthy working conditions on our sites. Everyone is expected to play a part by being aware of the rules, policies and procedures, and by immediately reporting any unsafe equipment and tools, hazardous conditions and accidents. The Company strives to organize periodic health and safety trainings.





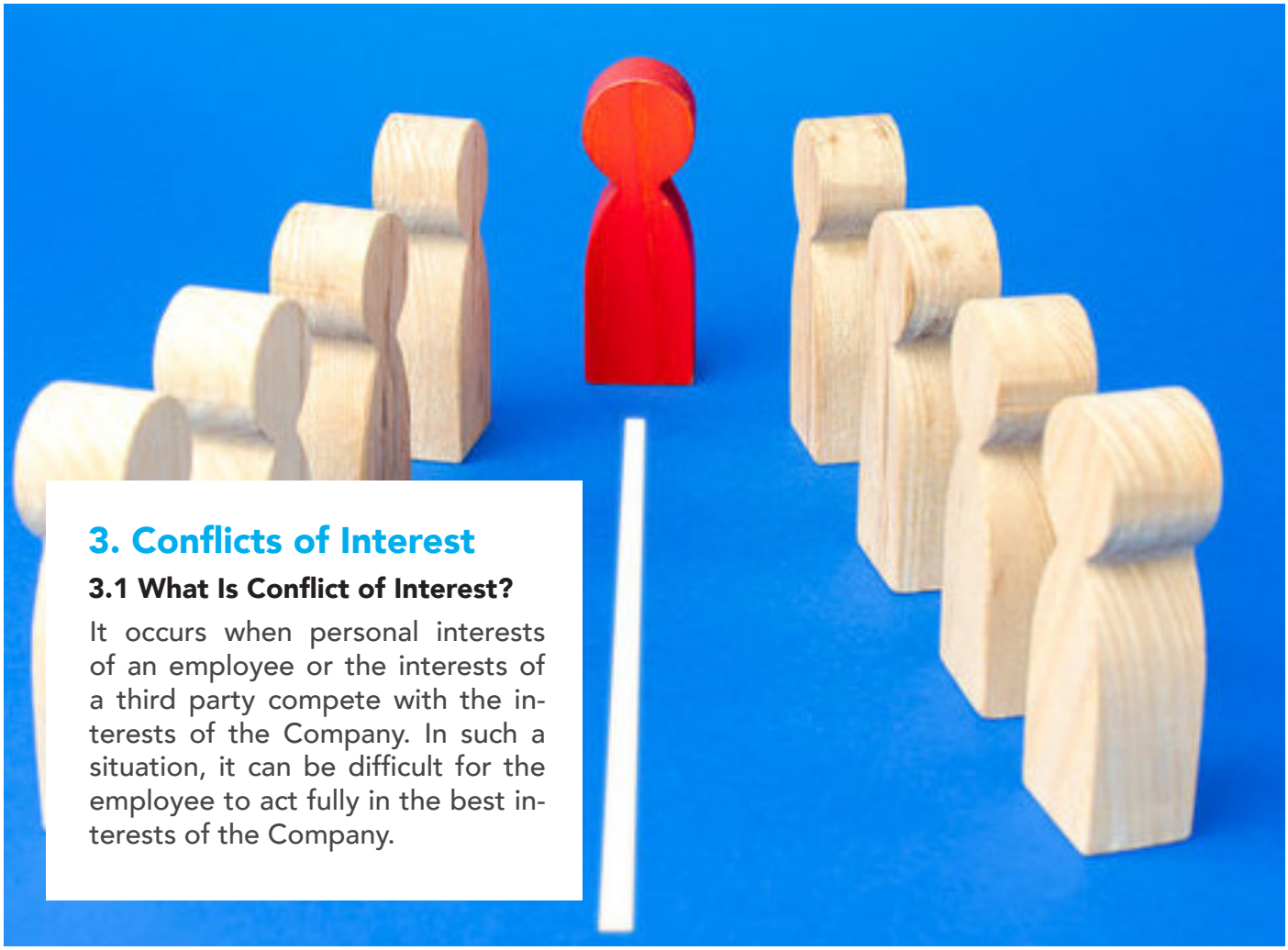
2.5 Human Rights

The Company respects, supports and upholds fundamental human rights as enshrined in Part II of the Malaysian Federal Constitution. In line with that, we respect the rights of our employees through our commitments which include but are not limited to:

- Respecting Freedom of Association
- We respect the rights of employees to join and form organisations of their own choice and to bargain collectively.
- Eradicating Exploitation
- We endeavour to eradicate any form of forced labour, slavery, human trafficking, smuggling of migrants and sexual exploitation.
- Ensuring Favourable Working Conditions
- We ensure decent working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations.
- Protecting Children Rights
- We seek to promote the wellbeing of children and safeguard them from any form of maltreatment or exploitation, including child trafficking and child labour.

2.6 Personal Data Protection

The Company respects the privacy and confidentiality of the Company's Representatives and Counterparties' personal data. Personal data received are kept private and protected, unless access is granted for legitimate business purposes. If anyone has access to such data, such person is required to comply with the applicable laws, such as Personal Data Protection Act, and the Company's policies. Appropriate measures must be taken when dealing with personal data in terms of collection, processing, disclosure, security, storage and retention.



3. Conflicts of Interest

3.1 What Is Conflict of Interest?

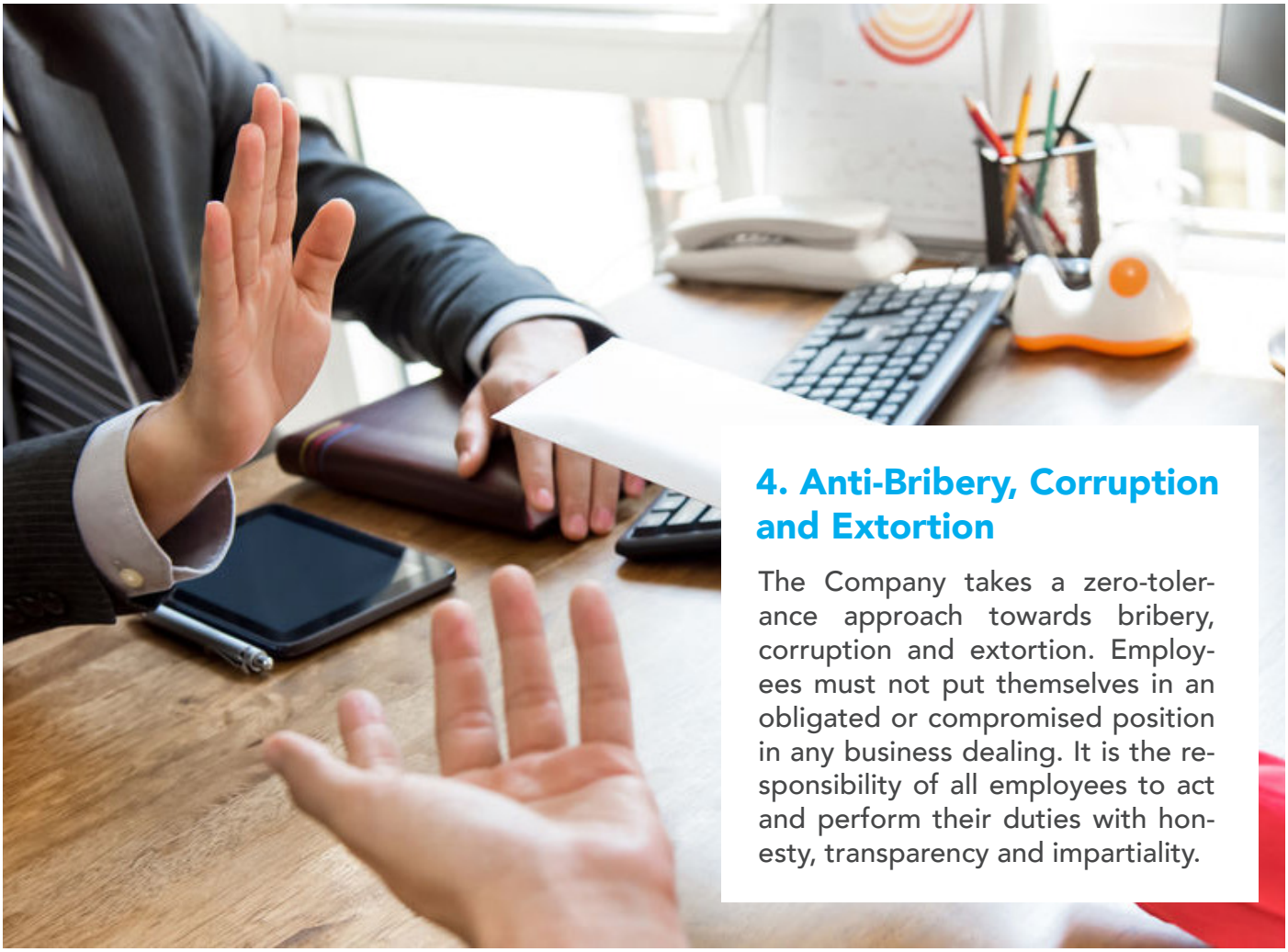
It occurs when personal interests of an employee or the interests of a third party compete with the interests of the Company. In such a situation, it can be difficult for the employee to act fully in the best interests of the Company.

3.2 Avoiding Conflicts of Interest

Employees shall avoid conflicts of interest. You must not use your position, official working hours, the Company's resources and assets for personal gain or for the advantage of those you are associated with. If a conflict of interest situation has occurred or if an employee faces a situation that may involve or lead to a conflict of interest, the employee shall disclose it to his or her superior and/or the human resource department to resolve the situation in a fair and transparent manner. Such situation must be reported in writing as soon as practicable stating the facts, nature and extent of the conflict.

3.3 Outside Activities

Outside of the Company, employees shall not engage in any business, commercial or investment activity that may conflict with their ability to perform their duties to the Company or that may be detrimental to, or be in competition with the Company, or that may in any other way conflict with the interests of the Company. When in doubt about the permissibility of an activity, employees shall consult with their superior and/or the human resource department. Some positions and activities may be acceptable if prior authorization from the Company is first obtained.



4. Anti-Bribery, Corruption and Extortion

The Company takes a zero-tolerance approach towards bribery, corruption and extortion. Employees must not put themselves in an obligated or compromised position in any business dealing. It is the responsibility of all employees to act and perform their duties with honesty, transparency and impartiality.

4.1 Anti – Bribery

The exchange of gifts can build goodwill in business relationships. However, some gifts can create improper or the appearance of improper influence. They may be seen as bribes, corruptions or kickbacks. These gifts mean anything of value and may come in various kinds of benefits, personal or otherwise. They include but are not limited to cash, any kind of gifts or prizes, transportation, use of properties and vacation facilities, holidays, stocks or other securities, favourable terms on any products or services, tickets, gift certificates, commissions and entertainment.

Employees and their families shall not, directly or indirectly, solicit, accept, promise, offer, make, give, or provide corrupt payments on their behalf from or to third parties (including governments, statutory bodies and agencies) that may influence, or even perceived to be able to influence decision making in relation to obtaining business or awarding contracts.

4.2 Nominal Value

Employees may accept meals or entertainment of nominal value in connection with performing the Company's business. 'Nominal' is dependent on the circumstances. Generally, nominal means something small, a gesture, or business courtesies. The Company prohibits giving gifts of more than nominal value in dealing with any business. Employees shall not accept any business entertainment or gift that is too lavish or too frequent.

4.3 Business Courtesies

Gift-giving and receiving practices may vary among cultures. In some situations, it would be impractical to refuse or return a gift. In such cases, employees are to practice good business sense and conscience.



In limited situations, the Company or employees may accept or give the following gifts:

- Occasional business meals.
- Company souvenirs bearing its logo.
- Promotional business items.
- Reasonable entertainment such as accompanying a foreign or out-of-town business associate.
- Gifts of nominal value presented during Hari Raya, Chinese New Year, Deepavali, Christmas or other festive occasions.

4.4 Reporting

Any suspected instances of corruption or attempted corruption in matters or dealings relating to the Company must be reported. Please refer to the Whistleblowing Policy in Section 8 of this Code.

5. Fraud, Protection of Company Assets and Accounting

Fraud is a false representation of a matter of fact, whether by words or by conduct, by false or misleading allegation, or by concealment of what should have been disclosed, that deceive or is intended to deceive another person.

5.1 Financial Reporting



Employees must never engage in fraudulent or any other dishonest conduct involving the property or assets or the financial reporting and accounting of the Company or any third party. This may not only entail disciplinary sanctions but also result in criminal charges. The Company's financial records are the basis for managing the Company's business and fulfilling its obligations to various stakeholders. Therefore, any financial record must be accurate and in line with the Company's accounting standards.

5.2 Company's Property

Employees shall safeguard and make only proper and efficient use of the Company's property. All employees shall seek to protect the Company's property from loss, damage, misuse, theft, fraud, embezzlement and destruction. These obligations cover both tangible and intangible assets, including trademarks, know-how, confidential or proprietary information and information systems. To the extent permitted under applicable law, the Company reserves the right to monitor and inspect how its assets are used by employees, including inspection of all e-mail, data and files kept on Company network terminals.



6 Anti-Competition

The Company is committed to competing ethically in the marketplace.

6.1 Requirement To Comply

The Company's Representatives and Counterparties are required to comply with all applicable competition and anti-trust laws. Infringement of such laws can result in civil and criminal liability.

6.2 Illegal and Unethical Methods

In addition, illegal or unethical methods to compete in the market is strictly prohibited. This includes without limitation:

- Exchanging competitive information with competitors.
- Fixing prices or terms related to pricing.
- Dividing up markets, territories or customers.
- Rigging a competitive bidding process (including arrangement to submit sham bids).
- Adopting strategies to illegally exclude competitors from the market, such as, without limitation anti-competitive bundling or predatory pricing.

7.1 Reporting

Employees having knowledge of credible information concerning actual or potential violations of the Company's Code of Conduct must report them immediately. Please refer to the Whistleblowing Policy in Section 8 of this Code.

7.2 Failure To Report

Failure to report actual or potential illegal behaviour or actual or potential violations may also subject employees to disciplinary action, including the possibility of dismissal and, if warranted, legal proceedings or criminal sanctions.

7.3 Cooperating In Investigation

Employees are required to cooperate in any internal or external investigation of suspected wrongdoing under the policies. Any failure by an employee to completely cooperate, or any action to hinder an investigation or audit, including for example, hiding or destroying any information or documentation, providing false answers or false information, or deleting email or other documents, may be grounds for disciplinary action, up to and including termination of employment, subject to applicable law.





8. Whistleblowing Policy

The Company aims to conduct its business with integrity, competence and professionalism. Therefore, whistleblowing channels have been established to help whistleblowers raise concerns, without fear of retaliation, on any wrongdoing that they may observe and experience.

A whistleblower is generally an insider of an organisation (e.g. employee, consultant or vendor) who reports improper conduct that has occurred within that same organisation. The Whistleblower Protection Act 2010 provides safe avenues for them to make disclosures of such alleged improper conduct (whistleblowing) to the relevant authorities in good faith, by protecting their identities, providing them with immunity from civil and criminal proceedings and protecting them from detrimental action.

8.1 What Conducts Are Improper And Reportable?

Improper and reportable conduct for whistleblowing includes but is not limited to the following:-

- Fraud
- Misappropriation of assets
- Sexual harassment
- Criminal breach of trust
- Illicit and corrupt practices
- Questionable or improper accounting
- Acts or omissions which are deemed to be against the interest of the Company, laws, regulations, or public policies.
- Giving false or misleading information (including suppression of any material facts or information).
- Breaches of the Company's Code of Conduct.
- The deliberate concealment of any of the above matter or other acts of wrongdoings.
- Misuse of confidential information.

8.2 Who should raise a concern?

Anyone has the right to whistleblow. This Policy applies to all matters involving the Company's employees (including former employees and irrespective of nature of employment status), suppliers, customers and any other stakeholders/persons providing services to the Company, including consultants, vendors, independent contractors, external agencies and/or any other party with a business relationship with the Company.

8.3 What are the whistleblowers' responsibilities?

A whistleblower must:-

a) Make the disclosure in good faith.
b) Reasonably believe that the information and allegations are substantially true.
c) Not acting for personal gain. If the case involves the whistleblower's personal interests, it must be informed at the outset.

Any person who makes a disclosure of improper conduct to the Company, knowing or believing that any material statements in the disclosure is false or untrue commits a criminal offence under the Whistleblower Protection Act 2010.

8.4 What Protections Are Given To Whistleblowers?

The Company strives to ensure that all information disclosed, including the identity of the whistleblower shall be treated with strict confidentiality. All personnel, directly or indirectly working on a whistleblowing case, shall protect the identity of the whistleblower and witnesses from unauthorized disclosure before, during and after an investigation.

The Company is also committed to protect the whistleblower from all acts of harassment, retaliation, victimization and recrimination arising from making the disclosure in good faith.

There may be certain circumstances where the identity of the whistleblower may need to be revealed on a need to know basis (e.g. requirement to testify in court). If such a situation arises, the Company willl discuss and seek consent with the whistleblower first before proceeding with the case.

The protection will be removed if it is found that the whistleblower was also involved in the improper conduct, or if the whistleblower is found to have made the disclosures in bad faith.

Email to: **confidential@exis-tech.com**

8.5 How To Whistleblow?

Any disclosure can be made to any of the following dedicated reporting channels:

Whistleblowers are advised to make their disclosures in writing and to provide sufficient details which include the following:

- The type or description of improper conduct.
- The name of individuals who have committed or are involved in the improper conduct; and
- The 'how', 'what', and 'where' in relation to the improper conduct including supporting documents or evidence, if any.

Whistleblowers are encouraged to provide their identities or contact details to facilitate the Company to clarify or obtain further information for purposes of further investigation into the improper conduct.

Any person who elect to remain anonymous is advised that no whistleblower protection will be accorded and the Company's ability to investigate the alleged improper conduct is limited to the extent of the contents of the report received by the Company.

Whistleblowers will be informed of the outcome of the investigation and action taken, if any, by the appropriate disciplinary authority or the other appropriate authority, the employer or the other appropriate person or the Public Prosecutor, as the case may be.

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