



堡 利 安 食 品 包 装 有 限 公 司
POLYON FOOD PACKAGING SDN. BHD. (199601007325)

POLYON FOOD PACKAGING SDN BHD

Code of Conducts and Ethics

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PART 1 : OVERVIEW

1.0 Purpose and Scope of the Code

This Code of Conduct and Ethics (“**Code**”) applies to all employees and directors of Polyon Food Packaging Sdn Bhd (“Polyon” or the “Company”) and its subsidiaries (collectively, “**Polyon Group**”).

This Code sets out the principles to guide standards of behaviour and business conduct when Employees deal with third party. In this context, third party refers to any individual or organisation the Employee comes into contact with during the course of his/her work, and includes actual and potential customers, competitors, suppliers, contractors, distributors, business contacts/partners, agents, advisers, regulators, government and public bodies and officials, shareholders, investors and the community in which the Polyon Group operates in.

This Code is not a comprehensive guide that covers every ethical situation Employees may encounter in their course of work. In any circumstance which is not covered by this Code or in case of any doubt, Employees shall refer to his or her Head of Department or the Company’s Head of Human Resources Department for clarification or guidance.

2.0 Responsibility and Compliance with the Code

It is the responsibility of every employee to act in accordance with the policies, principles and guidelines detailed in this Code, and any update or amendment which may be issued from time to time by the Company. It is also the employee’s responsibility to report violations or suspected violations of this Code and support the implementation of this Code. Any violation or suspected violation of this Code shall be reported to the Chairman of the Board of Directors (“Board”) (in the case of any Director) or the Company’s Head of Human Resources Department or employee’s Head of Department (in all other cases) or such other officer designated by the Company from time to time.

Non-compliance with this Code will be treated seriously and may result in disciplinary action, including the possibility of suspension or dismissal, and if warranted, legal proceedings against the employee. Violation of applicable laws may subject employee to civil and/or criminal penalties imposed by a governmental agency or a court, in addition to disciplinary action.

This Code is to be read and applied in conjunction with all other related or applicable policies, procedures and guidelines which are published in the Polyon Group Information Portal (“PGIP”).

3.0 Amendments to the Code

This Board of Directors has approved this Code. Updates or amendments to this Code may be made from time to time to be in line with any change in applicable laws and regulations, or changes to the Company’s vision and mission or other relevant factors. Employees will be informed of any update or amendment to the Code.

PART II : CODE OF CONDUCT

SECTION A : WORKPLACE CULTURE AND ENVIRONMENT

4.0 Equal Opportunity and Fair Employment Practices

Polyon Group is committed to fair and inclusive employment practices that uphold the principles of equal opportunity, non-discrimination, and affirmative action. All employment decisions, including recruitment, compensation, training, promotion, and retirement, are based on merit, performance, and business needs. Polyon Group does not tolerate discrimination or harassment on the basis of race, gender, age, religion, nationality, disability, or any other protected characteristic. Employees are expected to help build a respectful, diverse, and inclusive workplace. Where appropriate, Polyon Group may implement affirmative action measures to promote equal access to opportunities and foster representation across the workforce.

5.0 Workplace Health and Safety

Polyon Group is committed to providing a safe and healthy work environment to all employees. Health and safety support and training will be provided to employees so that they understand their occupational health and safety obligations and diligently comply with all health and safety requirements, policies and procedures set out by the Company. Safety is everyone’s responsibility.

6.0 Harassment, Threat and Violence

Polyon Group seeks to provide a work environment where employees are treated with respect and free from any form of harassment, threat, intimidation, violence or any other inappropriate behaviour. Employees are responsible to report any harassment, intimidation, offensive or inappropriate behaviour. All complaints or grievances will be investigated and appropriate action will be taken to stop such conduct and prevent future occurrences.

7.0 Drugs, Alcohol and Prohibited Substances

Employees are expected to perform their job duties free from the influence of any substance that could impair job performance or pose unacceptable safety risk to the employee or others. Polyon Group therefore prohibits working under the influence of alcohol, illegal drugs or controlled substances. In addition, the use, possession, distribution or sale of alcohol, illegal drugs or other controlled substances in the workplace (other than for approved medicinal purposes) is strictly prohibited.

There may be company-sponsored events or functions where the serving of alcoholic beverages is permitted. In these cases, all appropriate liquor laws must be followed.

8.0 Outside Employment and Other Activities

Employees must avoid outside work or engagements that conflict with the interests of Polyon Group or interfere with their job responsibilities. Any external employment, business activity, or advisory role must be disclosed and approved by Human Resources or senior management. Employees are prohibited from using company time, facilities, or confidential information for personal gain or for outside business purposes. Engaging in outside activities that create reputational risks or conflicts of interest is not allowed.

9.0 Personal Conduct

Employees are expected to demonstrate professionalism, honesty, and respect in all their actions. Polyon Group requires all employees to conduct themselves ethically and responsibly, both inside and outside the workplace. Personal behavior that harms the reputation of Polyon Group, disrupts the workplace, or causes discomfort to others will not be tolerated. Employees

should maintain a positive, respectful working environment and uphold Polyon Group's values at all times.

SECTION B : COMPANY INFORMATION, RECORDS AND ASSETS

10.0 Data Integrity and Data Protection

Polyon Group has put in place the Personal Data Protection Policy, Information Technology Policy and Document Management Policy. Employees shall record, manage, store and transfer all data and records in compliance with applicable legal, tax, regulatory and accounting requirements.

11.0 Protection and Use of Company Assets and Resources

Polyon Group provides its employees a variety of resources and assets including licensed software for employees to deliver their work. Employees shall safeguard and make proper and efficient use of the assets and resources in compliance with all applicable laws, company policies and licensing agreements, and take all necessary steps to prevent loss, damage, misuse, theft, fraud or destruction of Polyon Group assets and resources.

12.0 Records and Reporting

Polyon Group has put in place the Document Management Policy which sets out the time period to retain and destroy data and records, based on the specific statutory and regulatory requirements, some of which are specific to a particular business operations or functions. Employees are responsible to retain and store proper records in compliance with company policy, legal and regulatory requirements.

13.0 Proprietary and Confidential Information

Employees are required to protect Polyon Group's confidential information and guard them against unauthorised disclosure or use. Employees are also required to protect confidential information of third party which employees have access to in the course of their work. Confidential information includes, but are not limited to, data and technical know-how,

business plan and budget, product design, customer list and information, information on current and future projects and work processes, and any non-published financial or other data. Unless required by law or authorised by the Company, employees shall not disclose confidential information or allow such disclosure or use confidential information for unauthorised purposes. Employee has a duty to continue protecting the confidentiality of customer information even after cessation of employment with the Polyon Group.

SECTION C : DUTIES OF GOOD FAITH, DILIGENCE AND INTEGRITY

14.0 Conflict of Interest

Employees have an obligation to act in the best interest of Polyon Group at all times. Employees are prohibited from using their position or knowledge gained directly or indirectly in the course of their duties and responsibilities or employment for private or personal advantage.

If Employee at any time thinks that he or she may have a potential or actual conflict of interest, Employee is obliged to disclose the conflict promptly to the Chairman of the Board (in the case of any Director) or the Company's Head of Human Resources Department or Employee's Head of Department (in all other cases) so that a determination can be made as to the existence and seriousness of an actual conflict. When in doubt, employees shall adopt the highest standard of conduct.

Employee shall devote his whole time and attention during working hours to his duties in the Polyon Group.

15.0 Holding Directorships in Other Entities

Employees who wish to accept a position as a director in another company or organization must obtain prior written approval from Polyon Group's management. Such appointments must not interfere with their primary job duties or present a conflict of interest. Employees are not allowed to serve as directors in competitor companies or in organizations with business relationships with Polyon Group unless explicitly approved. All directorships must be transparently disclosed and reviewed for compliance with Polyon Group's policies.

16.0 Tender, Procurement, and Purchasing

All procurement and tendering activities must be conducted with integrity, transparency, and fairness. Employees involved in purchasing decisions must follow established procedures and ensure that all vendors are treated equally. Selection of suppliers must be based on objective criteria such as price, quality, reliability, and compliance with specifications. Conflicts of interest must be declared, and employees must never accept bribes or kickbacks in exchange for awarding contracts. Confidentiality of supplier information must be strictly maintained.

17.0 Marketing, Sales, Advertising, and Promotions

All marketing, sales, advertising, and promotional activities undertaken by the Polyon Group must be truthful, ethical, and in compliance with applicable laws and regulations. Employees must ensure that representations about Polyon Group's products or services are accurate and not misleading, exaggerated, or deceptive in any way.

Sales and promotional practices must respect fair competition principles and avoid disparaging competitors. Advertising materials must be appropriate, respectful, and should not contain content that could damage Polyon Group's reputation or offend the public.

18.0 Donation and Sponsorship

All donations and sponsorships made in the name of Polyon Group must be lawful, transparent, and aligned with the company's values and community involvement objectives. Donations must not be used as a tool to obtain business advantage or influence decisions. Each proposed donation or sponsorship must undergo a proper vetting and approval process. Polyon Group will only support reputable organizations with clear objectives and will document all contributions for accountability and reporting purposes.

19.0 Accepting & Providing Gifts and other Benefits

Polyon Group discourages employees from giving or accepting gifts, entertainment, or benefits from business partners. However, occasional, modest, and reasonable courtesies may be acceptable if they are infrequent, transparent, lawful, appropriate, and not intended to influence or appear to influence a business decision. Cash, cash-equivalents, or lavish items are strictly

prohibited, and anything valued at RM200 or above must be declared using the prescribed form for management review.

20.0 Political Participation, Contribution, and Lobbying

Polyon Group maintains a neutral stance in political matters and does not support or make donations to political parties, candidates, or campaigns. Employees are free to participate in political activities in their personal capacity but must ensure that such participation does not interfere with their duties or give the impression of acting on behalf of Polyon Group. Company resources must not be used for political purposes. Any form of lobbying or political engagement on behalf of Polyon Group must be pre-approved by senior management.

21.0 Bribery and Corruption

Polyon Group is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates and in implementing and enforcing effective systems to counter bribery and corruption.

Employees shall not offer, give, solicit or accept any bribes in order to achieve any business or personal advantage for themselves or others or engage in any transaction that contravene any applicable anti-bribery or anti-corruption laws.

22.0 Fair Competition and Fair Dealing

All business dealings conducted on behalf of Polyon Group must be carried out fairly, ethically, and in compliance with applicable competition and anti-trust laws. Employees must not engage in anti-competitive practices such as price-fixing, bid-rigging, or collusive agreements with competitors. Sharing of sensitive commercial or pricing information with competitors is strictly prohibited, and competitive intelligence must only be gathered through lawful and ethical means.

Employees must treat all customers, suppliers, and stakeholders equitably, and decisions must be based solely on objective business considerations—not on personal relationships, friendships, or associations. Transactions involving insiders or related parties must be avoided; if such transactions occur, they must comply fully with applicable laws, be based on sound

commercial judgment, be well-documented, and be approved by the Board or an independent authority.

Bribes, kickbacks, or any form of improper inducement are strictly prohibited. All commissions, payments, discounts, or advantages offered in the course of business must comply with Polyon Group's policies and must be properly recorded in writing.

23.0 Securities Trading and Insider Information

Employees who possess material, non-public (price-sensitive) information about Polyon Group or any other listed company are strictly prohibited from trading in the securities of that company or advising others to do so. This includes information that could affect a company's share price, such as financial performance, mergers, acquisitions, strategic plans, or significant operational changes, if that information has not been officially released to the public.

Employees must also refrain from disclosing any insider information to third parties, including family members or friends, whether intentionally or otherwise. Unauthorized disclosure or misuse of such information is not only unethical but may also constitute a criminal offense under securities laws.

All employees are expected to comply with applicable laws and Polyon Group's internal policies on insider trading and securities transactions.

24.0 Anti-Money Laundering, Anti-Terrorism Financing, and Proceeds of Unlawful Activities

Money laundering is the process of disguising the origins of illegally obtained funds to make them appear legitimate. Similarly, terrorism financing involves the collection or provision of funds intended to support terrorist acts, regardless of whether the source of the funds is legal or illegal. Both practices, including the use of proceeds from any unlawful activities, are strictly prohibited.

Employees must ensure that all business dealings are conducted with reputable parties, for lawful purposes, and using legitimate funds. It is essential to remain vigilant to the risk of Polyon Group's operations being misused for money laundering, terrorism financing, or any

unlawful financial activity. Employees should be alert to suspicious behavior or transactions that may indicate such risks.

Any suspicion of money laundering, terrorism financing, or handling of proceeds from illegal activities must be reported immediately to the employee's Head of Department or the designated Compliance Officer. Polyon Group is committed to full compliance with all relevant anti-money laundering and counter-terrorism financing laws and regulations.

25.0 Social Media Usage

When using social media such as, but not limited to, personal blogs, social media including Facebook or Twitter, employees are to be mindful that they do not disclose confidential information about Polyon Group's business, its customers and all other matters related to Polyon Group. Employees are not authorized to make any commentaries on behalf of the Polyon Group and especially those that would adversely affect the image and reputation of Polyon Group. Employees are prohibited from using/editing the Polyon Group's logos, pictorial images related to the Polyon Group and trademarks in their own personal social media accounts.

26.0 Compliance with Laws

Polyon Group is committed to doing business the right way, by acting ethically and consistently with this Code, its policies and all applicable laws, rules and regulations. Employees have a continuing obligation to familiarise themselves with applicable laws relating to their job responsibilities and Polyon Group policies.

27.0 Whistleblower

Polyon Group has put in place a Group-wide Whistleblower Policy to uphold the highest standards of professionalism, integrity and ethical behaviour in the conduct of its business and operations. The policy sets out procedures which enables employees and members of the public to raise genuine concerns regarding actual or suspected unethical, unlawful, illegal, wrongful or other improper conduct and also sets out the process for managing any action, intimidation or harassment against a whistleblower.

This Code of Conduct and Ethics was adopted by the Board.