



Registration No. 197501001462 (23568-H)

Wisma Hubline, Lease No. 3815 (Lot 10914), Section 64, KTLD

Jalan Datuk Abang Abdul Rahim, 93450 Kuching, Sarawak, Malaysia

Tel 082 33 5393 Fax 082 33 7393 [www.hubline.com](http://www.hubline.com)

## **Code of Conduct and Ethics**

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The Board of Directors of Hubline Berhad establishes the following Code of Conduct and Ethics (the "Code") which is applicable to all the personnel (including directors, senior executives and employees) of Hubline Berhad and its subsidiaries (collectively referred to as the "Group"), regardless of locations, roles or responsibilities.

The Group is committed to complying with all applicable laws and regulations and acting in a manner that is consistent with the following principles:

- Honesty;
- Integrity;
- Fairness;
- Respect; and
- Professionalism.

The Group seeks to achieve these objectives by setting clear standards against which to guide its decision making.

The Directors and management of the Group are committed to maintaining the best practice in corporate governance and observing high standards of ethics and behaviour in all of the Group's activities, including interaction with the Group's stakeholders:

- Agencies;
- Business Associates and Partners;

- Consultants;
- Contractors;
- Customers;
- Employees;
- Government Officers;
- Securityholders;
- Service Providers; and
- Suppliers.

Nothing contained in this Code overrides any relevant laws, regulations, awards or applicable license or permit conditions.

The Board of Directors will keep this Code under review to ensure that it continues to evolve and reflect stakeholder and community expectations.

### **1. Honesty, Integrity and Fairness**

Honesty, integrity and fairness are integral to the way in which the Group's businesses operate and should guide all personnel in their decision making.

These values are expected of all personnel in order to maintain the trust of the Group's customers and the Group's colleagues, the community and shareholders.

### **2. Anti-Bribery**

Personnel must comply with and uphold all laws against bribery and related conduct in all the jurisdictions where the Group operates, from time to time.

Personnel must not offer or accept cash or other incentives, inducements or rewards in any form. This restriction also applies to agencies, consultants or contractors.

In particular, payments to win business or to influence a business decision in the Group's favour, such as bribes, "kick-backs" and similar payments, are strictly prohibited.

### **3. Corruption**

Personnel must not engage in bribery of individuals in a position of trust, such as employees or officers of our suppliers and customers or community leaders.

### **4. Conflicts of Interest**

Personnel should avoid business dealings and personal relationships that cause or may cause conflicts of interest with his or her responsibilities to the Group.

A conflict of interest may arise if personnel have a direct or indirect, through a family member, friend or associate, financial interest in a business that has commercial arrangements with the Group.

It is important to be mindful of any relationship or association which may be a conflict of interest with the Group.

### **5. Abuse of Power, Discrimination, Bullying and Harassment**

Personnel must avoid any form of discrimination, bullying, harassment or other inappropriate workplace behaviour, and take action to prevent or stop these behaviours if demonstrated by others.

All personnel are expected to be inclusive, collaborative and supportive, and must treat each other fairly and properly.

A person in a position of power or authority must not abuse that position.

It is important to act in good faith and act in the best interest of the Group.

### **6. Insider Trading**

Personnel must not trade, or communicate to others who might consider trading, in the securities of the Group, or companies engaged in transactions with the Group, where in their position they have obtained information which is not public and could materially affect the price of those securities.

### **7. Money Laundering**

Money laundering is an act of accommodating the transformation of profits from illegal activities and corruption into allegedly legitimate assets. All personnel must not engage in money laundering activities.

## **8. Gifts and Gratuities**

The Group recognises that accepting or offering gifts or hospitality of moderate value is in accordance with usual business practice. The Group, however, prohibits the offering or acceptance of gifts or hospitality in circumstances which could be considered to give rise to undue influence.

## **9. Professional and Proper Conduct**

The Group's shareholders, customers and the communities in which the Group operates expect the Group and those who work for and represent it to act in a professional manner.

Personnel must maintain their professionalism and the reputation of the Group by undertaking their duties with care and diligence, seeking to achieve excellence in their roles.

Furthermore personnel must deal fairly with all the Group's customers, suppliers, competitors and any other third parties or business partners.

## **10. Relationship with Politicians and Government Officers**

All dealings with politicians and government officers which relate to the Group and its business activities must be conducted at arm's length and with the utmost professionalism, to avoid any perception of attempts to gain advantage.

## **11. Confidential Information, Privacy and Maintenance of Business Records**

If personnel come across confidential information concerning the Group, which may include technical, strategic or financial information, commercial arrangements or intellectual property, such information must not be disclosed or misused to obtain a personal benefit or a benefit for another person.

## **12. Use of Resources and Information Systems**

Personnel are required to use properties, funds, facilities, information systems and services belonging to the Group for authorised purposes and not for personal benefit, or the benefit of unauthorised third parties.

### **13. Adherence to this Code and Reporting**

This Code has the full support of the Board of Directors and the Group, and the Group takes compliance with this Code seriously.

If personnel breach this Code, they may face disciplinary action, including termination of their employment or engagement. If the situation involves a breach of law or other regulation, the matter may also be referred to an appropriate law enforcement authority.

All personnel have a responsibility to immediately report any breaches of this Code by a colleague to their immediate supervisor or manager, and personnel should also report conduct where they are unsure whether a breach of this Code has occurred.

All reports will be kept confidential and no person will be disadvantaged or prejudiced by reporting in good faith a breach or suspected breach of a law, regulation or provision of this Code.

Personnel who raise genuine grievances or complaints will be provided a safe environment in which to speak up. However, if the Group is satisfied that any personnel has brought a false, unfounded or vexatious grievance or complaint, the Group may take disciplinary action which could include termination of a personnel's employment or engagement.