



Linergy Power Sdn. Bhd.

## Linergy Code of Conduct

### Preface:

In order to comply with relevant laws, regulations and social standards, Linergy Power Sdn. Bhd. (hereinafter referred to as “Linergy” or “the Company” or “we”) has established a set of Code of Conduct (hereinafter referred to as “the Linergy Code of Conduct” or “this Code”) as standards and guidelines, which must be strictly observed by all Employees of Linergy (including members of the board of directors, Linergy employees, branches and subsidiaries) in handling the Company’s day-to-day business. Due to the differences in applicable laws and regulations of relevant countries and regions, if there is any conflict between the provisions of this Code and the requirements of laws and regulations where overseas companies operate, they shall be implemented in accordance with the requirements of local laws and regulations; If there is no explicit requirement in the local laws and regulations, this Code shall apply.

The Linergy Code of Conduct includes the following three parts:

1. Corporate Moral Philosophy
2. Corporate Code of Business Conduct
3. Supervision and Management Program

The establishment, revocation and/or modification of the Linergy Code of Conduct shall be reviewed and approved by the Linergy Board of Directors. Violations of this Code will be subject to disciplinary action in accordance with applicable laws and regulations, internal company regulations and/or other applicable company regulations, as the case may be. Linergy shall guide the formulation of relevant policies and implementation procedures, so that the Code of Conduct meets the social responsibility requirements of RBA (Responsible Business Alliance) and laws and regulations on labor, ethics, occupational health and safety and environmental protection. In order to ensure compliance with the Code of Conduct, Linergy shall hold regular publicity training on the Code of Conduct, and continuously establish and improve relevant rules and regulations and processes.

To ensure compliance with the Linergy Code of Conduct, Linergy shall:

1. Production and distribution of an Linergy Code of Conduct manual to Linergy directors, managers and employees, and publication of the Linergy Code of Conduct on the Linergy website and on the Intranet system;
2. Hold regular internal seminars/trainings on compliance with Linergy Code of Conduct, and continuously establish and improve relevant rules and regulations and processes;
3. Set up an advisory office where Linergy employees can directly raise their questions and doubts about the Linergy Code of Conduct and solicit opinions.



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## 1. Corporate Moral Philosophy

Linergy embraces such a corporate vision—strive to be a global premier innovative technology corporation, deliver excellent contribution to the green energy resolution for mankind, and enrich the spiritual and material wellbeing of our employees. Linergy also puts forward that becoming a socially responsible and healthy corporate citizen of the world is also the basic spirit of Linergy, and every member of Linergy shall abide by it.

Our Corporate Vision :

- **Mission**

Through intelligent manufacturing and lean operations, we create real value for our customers and empower sustainable progress for the future.

- **Vision**

To become the most trusted partner in advanced manufacturing.

- **VALUES**

Agility • Resilience • Commitment • Openness

When dealing with Linergy business, every member of Linergy shall abide by the above corporate vision, abide by the corporate principles, actively raise the awareness of Linergy Code of Conduct, and promote the consensus on the significance and importance of Linergy Code of Conduct.

- 1.1 Unremitting pursuit of originality, by creating and providing safety products and services beneficial to society, we can obtain the satisfaction, trust and support of customers and stakeholders;
- 1.2 Carry out fair, transparent and free competition and reasonable enterprise activities;
- 1.3 Carry out extensive and active exchanges with stakeholders and many social people, and actively and fairly disclose all kinds of enterprise information. With regard to the secret information held by LINERGY, the information obtained from customers and suppliers and personal information shall be properly protected while thoroughly ensuring information security;
- 1.4 While respecting the diversity, personality and individuality of employees, ensure a safe and easy-to-work working environment and realize the comfort and richness of work;
- 1.5 Whenever, we shall be grateful to the earth, regard environmental protection as a common issue of mankind, as a necessary condition for the survival and development of enterprises, and carry out main activities;
- 1.6 As a “good corporate citizen”, actively carry out social contribution activities such as sports, culture, art activities and volunteer activities, and seek coordinated coexistence with society;



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- 1.7 Resolutely resist anti-social forces or groups that threaten the order and security of civil society and completely sever relations with them;
- 1.8 Actively respond to the globalization of enterprise activities, respect various international norms, cultures and habits including laws and human rights of various countries and regions, pay attention to the concerns of stakeholders, and carry out enterprise activities reasonably;
- 1.9 The management shall regard the realization of this philosophy as its own responsibility and play an exemplary role in leading the way. Carry it forward thoroughly within the enterprise and actively promote it to customers. At the same time, we shall always grasp the opinions and voices inside and outside the enterprise and establish a practical and effective internal system of the enterprise;
- 1.10 In case of any violation of the content of this philosophy, the management shall demonstrate a positive attitude to solving the problem both inside and outside the enterprise, and strive to investigate the reasons and prevent them from happening again. Fulfill the relevant explanatory responsibilities, disclose information to the society quickly and accurately, and clarify their own authority and responsibility. Severely punish relevant personnel including themselves.

## **2. Corporate Code of Business Conduct**

These guidelines provide guiding principles and specific rules to be followed by all Linergy Employees in the conduct of Linergy business.

### **2.1 Commercial activities**

#### **2.1.1 Provide excellent products and services and maintain safety**

Excellent products and services are the foundation of Linergy's career. To ensure excellent quality, Linergy shall make every effort to consolidate and improve its R&D, manufacturing and engineering departments. It shall be pointed out that excellent products and services shall be of high quality, safety and harmless to human health. Linergy shall strive for excellence in its products and services:

- 1) **Accurately understand customer needs**  
All Linergy directors, managers and employees shall always pay close attention to market evolution and be sensitive to customer needs;
- 2) **Quality control**  
The safety of all Linergy products must be continuously checked at every stage of production and sales (research, design, production and sales) to avoid accidents and damage caused by defective products. All Employees of Linergy shall comply with laws, regulations, and regulatory requirements on product safety (if any);
- 3) **Easy-to-understand instructions for use**



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Improper use of products often leads to accidents. Accidents due to improper use can be prevented by affixing correct warning labels on products. Linergy products shall be used in simple and easy-to-understand terms to ensure that consumers can use them correctly;

4) Damage control

When an Linergy defective product causes an accident, damage control measures must be taken immediately, and if necessary, the defective product shall be recalled and information about the defective product shall be released to users and consumers immediately. Linergy believes that the responsibility for preventing further accidents caused by the same defective product lies with the supplier, so the supplier shall fulfill its responsibilities;

5) Prevent the recurrence of product quality and safety problems

After a product defect occurs, unless the cause of the defect has been identified and the problem has been completely eliminated, the same or similar accident is likely to occur again. Therefore, in order to prevent the same and similar incidents, Linergy shall establish an internal system to properly keep information and records about all defective products and communicate them within relevant departments of Linergy, find out the causes of defects and propose solutions.

2.1.2 Maintain reasonable and good relationship with investors, customers, suppliers and other business partners. It is strictly forbidden to give or accept improper benefits through commercial transactions. Linergy Employees must exercise good judgment and act wisely to avoid any misinterpretation or negative impact on Linergy' s reputation.

1) Customer relationship

Hospitality and gifts shall be moderate, reasonably priced and within socially acceptable norms. It is strictly forbidden for any Linergy member to give customers kickbacks, commissions or other forms of remuneration for the personal benefit of customers without authorization;

2) Supplier relationship

Suppliers shall be selected according to reasonable standards such as price, quality and delivery. Linergy Employees can accept hospitality and gifts from suppliers that are in line with business practices and of reasonable value. Linergy Employees must refuse to accept gifts and hospitality that are obviously excessive or inconsistent with commercial practices, and if they have accepted them, they must return them in time.

2.1.3 Maintain and promote fair and free competition

Generally speaking, anti-monopoly laws and similar competition laws in many countries are aimed at encouraging free competition and trade and protecting consumers' rights and interests. Linergy must take special care to ensure that its business activities with representatives of other companies do not violate such anti-monopoly laws and similar anti-unfair competition laws applicable in the country. Linergy must have a compliant



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corporate policy for each applicable anti-monopoly law and similar anti-unfair competition law, and all Linergy Employees must comply with this policy.

#### 2.1.4 Intellectual property protection

Intellectual property rights refer to the rights enjoyed by inventions and creations produced by intellectual activities and developed commercially with good vision. Intellectual property rights include but are not limited to patents, commercial designs, commercial packaging, trademarks, copyrights, know-how and other technical and marketing trade secrets. For industrial companies, intellectual property rights are the source of income and profits. Therefore, intellectual property rights shall be vigorously protected in the world, and strict attention shall be paid to avoid infringing on other people's intellectual property rights.

##### 1) Linergy trade secrets

Improper disclosure of trade secrets belonging to Linergy may result in damage to Linergy's interests and reputation. Trade secrets may be transmitted and disseminated through electronic media, product media, oral communication and written form. In order to properly manage and maintain Linergy trade secrets, trade secrets must be clearly marked and attached with a "trade secret" label, so that third parties can understand that the labeled items are protected intellectual property rights;

##### 2) Third-party intellectual property rights

Linergy respects the intellectual property rights of third parties. Linergy Employees shall act lawfully to avoid potential civil or criminal liability for the use of trade secrets of others obtained unlawfully (under applicable law).

#### 2.1.5 Conflict of interest

Linergy Employees shall refrain from any incident that may involve or has involved conflicts between their personal interests and those of Linergy. In dealing with current and potential customers, suppliers, contractors and competitors, Linergy Employees shall put aside their personal interests and put Linergy's best interests first. Every Linergy member shall immediately make full written disclosure to his supervisor or manager when he discovers that a conflict of interest may be involved or has been involved. Situations involving conflicts of interest include:

- 1) An employee or a member of his or her family has a significant interest in an external enterprise that has business dealings (or intends to establish business relations) with Linergy or is a competitor of Linergy;
- 2) Director, officer, partner, consultant or other key position in an external enterprise with which Linergy has business dealings (or intends to establish business relations) or is a competitor of Linergy;
- 3) Acting as a broker, finder or other intermediary for the interests of third parties in transactions involving Linergy or its interests;



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- 4) Other circumstances, including family or personal relationships that may prevent the employee from bringing the best benefits to Linergy

#### 2.1.6 Keep trade secrets

All non-public information relating to Linergy and its business, employees, customers and suppliers is classified. Linergy employees are trusted to use confidential information, but only for intended Linergy business purposes. Linergy Employees are not allowed to share confidential information with anyone outside Linergy, including family Employees and friends, or to people who do not require the information for their work. Each member of LINERGY shall sign a specific confidentiality agreement or confidentiality and non-competition agreement when entering the company, and shall continue to perform confidentiality obligations after leaving the company.

1) Confidential information includes, but is not limited to:

- (a) Materials and non-public financial information relating to Linergy;
- (b) Trade secrets, including business and technical information such as procedures, methods, techniques, compilation and information of value because it is not known to all;
- (c) Inventions and processes that are “works of employment” and are owned by Linergy and developed by Linergy employees (in the course of their work at or in connection with Linergy’ s business) using Linergy equipment or trade secrets, in accordance with applicable copyright law or similar laws relating to intellectual property;
- (d) Proprietary information, such as customer list. All mass and media communications involving Linergy shall be approved in advance by the senior management.
- (e) Other non-public information.

2) Linergy Employees are strictly prohibited from:

- (a) Use the business opportunities discovered through Linergy property, address book, information or position for personal benefit;
- (b) Accept or engage in business (including consulting or similar work) that will affect its performance or duties at Linergy or its commercial interests at Linergy;
- (c) Soliciting, demanding or accepting or agreeing to accept anything of value from any person in connection with his work performance or duties at Linergy;
- (d) Participate on behalf of Linergy in any transaction that gives him or his immediate family Employees a direct or indirect financial benefit.

#### 2.1.7 Fair trade

Every member of Linergy shall abide by the principle of fairness in treating Linergy customers, suppliers, competitors and employees. In addition, no Linergy member may defraud others by tampering, concealing and abusing privileged information, misrepresenting material facts or other unfair business activities.

An Linergy member who has an employment agreement, non-competition or non-solicitation agreement, confidentiality agreement or similar agreement with a former employer that would restrict or prohibit him from performing his duties or obligations in an Linergy position shall inform Linergy before joining the position, and provide a copy of the agreement to the relevant supervisor of the relevant Linergy member. Under no circumstances



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shall any member of Linergy use trade secrets, proprietary information or other similar information obtained during his employment with other employers for his work for or on behalf of Linergy.

#### 2.1.8 Protection and proper use of Linergy assets

Linergy Employees shall protect Linergy' s property and assets and ensure their proper use. Theft, negligence and waste all directly affect Linergy' s business ability, reputation and success. Damage, loss or unauthorized use of Linergy property (including electronically transmitted and stored data and computer resources) is strictly prohibited. Employees of Linergy are not allowed to use official stationery for personal purposes.

#### 2.1.9 Linergy brand

Linergy brand is one of the most important operating resources of Linergy Company, and all Employees of Linergy shall strive to maintain and enhance its value. At the same time, Linergy Employees shall memorize Linergy' s mission and make unremitting efforts to this end, that is: *“through intelligent manufacturing and lean operations, we create real value for our customers — and empower sustainable progress for the future”*.

#### 2.1.10 Information transmission

When Linergy Employees conduct business, they shall promptly report not only good information that is beneficial to Linergy to senior management, such as management, but also adverse information even if it appears.

#### 2.1.11 Adhering to a responsible attitude when purchasing minerals

Linergy pledged to reasonably ensure that the products manufactured contain materials such as tantalum, tin, tungsten and gold that do not directly or indirectly finance or benefit from armed groups abusing human rights in the Democratic Republic of the Congo or its surrounding countries/regions.

#### 2.1.12 Integrity and self-discipline

Linergy employees shall adhere to the principles of honesty and law-abiding, abide by laws and regulations on anti-commercial bribery, anti-job embezzlement and other internal rules and regulations of the Company, and shall not accept bribes from others, pay bribes to others, pay dredging fees or introduce bribes, and shall not take advantage of their positions to occupy company property or misappropriate public funds. Company employees shall not bribe state functionaries by giving gifts, banquets and other acts. Under the condition of complying with laws and regulations and recognized business practices in the business field of the Company, employees can give gifts to non-state staff after fulfilling the Company' s gift declaration procedures, and the value of gifts given is within the normal range, and will not be regarded as or have reasonable reasons to suspect that there are improper purposes such as improperly obtaining trading opportunities or competitive advantages. Linergy shall establish employee integrity files, and use employees' integrity performance as an important reference for assessment, appointment, and dismissal.

## 2.2 Linergy and investors



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Linergy strives to improve the company's performance to reward investors and pay attention to protecting the legitimate rights and interests of minority shareholders. The relevant departments of the Company shall strictly fulfill the information disclosure obligations in accordance with the information disclosure requirements of listed companies and relevant internal regulations of the Company. Linergy shall disclose information truthfully, accurately, completely and timely in strict accordance with the Company Law, Securities Law and other laws, regulations and the Articles of Association of the Company; In addition to the mandatory disclosure of information, it shall actively and timely disclose all information that may have a substantial impact on the decision-making of shareholders and other stakeholders, and ensure that all shareholders have equal opportunities to obtain information.

### 2.3 Linergy and customers

Linergy always insists on customer-centered, creating maximum value for customers with excellent products and services, pursuing win-win cooperation, responding to customer needs quickly and exceeding customer expectations. Employees of the Company shall entertain customers and give gifts to customers in accordance with laws and regulations of the Company and within the scope of normal business practices. It is strictly forbidden for employees to give customers kickbacks, commissions or other forms of remuneration that benefit customers without authorization.

### 2.4 Linergy and suppliers

Linergy works with suppliers to make sustainable development an important part of procurement strategy, and promotes all suppliers to operate in a socially and environmentally responsible way to ensure that products and services meet the requirements of sustainable development from the source. Linergy shall open its doors, open up channels and insist on market-oriented selection of suppliers; Create a fair and open supplier selection system. Improving technical performance and reducing business costs are the improvement directions of Linergy. Relevant departments shall constantly improve the supplier access and assessment mechanism, and be objective. In principle, there are no less than three suppliers of the same type who meet the technical parameters, performance indicators and quality requirements before entering the bid evaluation stage, and the single-source procurement method (referring to the way that the purchaser purchases from a single supplier) is carefully adopted. Suppliers shall be assessed through relevant standards such as price, quality and service after access. Those that do not meet the requirements shall be downgraded or eliminated, and those that meet the requirements can be upgraded. Linergy opposes any form of commercial bribery, and suppliers must sign the Supplier Integrity Commitment Letter.

### 2.5 Linergy and employees

#### 2.5.1 Talent Developments

Linergy believes that the source of prosperity and development of enterprises lies in talents. In enterprise activities, in order to continuously practice and realize the purpose of the enterprise, the following talents shall be actively trained:

- (a) Talents with ideals and rich creativity;



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- (b) Talents who are full of courage and can play a reliable practical role in solving problems;
- (c) Talents who can gain trust, carry out honesty and dedication.

Linergy shall continue to cultivate and employ talented individuals who can think critically and act independently.

#### 2.5.2 Respect the diversity, personality and individuality of employees

Linergy respects the diversity and individuality of its employees, and constantly improves its human resources system and working conditions to ensure fair and reasonable treatment of all employees. Linergy evaluates employees fairly and objectively based on their performance. Linergy supports employees with the principle of “equal opportunities for all,” promotes their professionalism and enhances their creativity.

#### 2.5.3 Respect for human rights and privacy

Linergy respects the privacy of every employee and carefully and properly manages their personal information strictly in accordance with the Malaysian PDPA 2010. Linergy respects the human rights of its employees and there is no unlawful discrimination or unfair treatment in employment, remuneration, training opportunities, promotion opportunities and other issues related to race, creed, gender, religion, nationality, age, marital status, disability and sexual orientation.

Linergy does not tolerate any humiliating or degrading behavior, including corporal punishment, mental abuse, physical abuse, violence, obscene language and sex Harassment.

Under no circumstances shall any Linergy employee use forced or child labor in contravention of the applicable laws, rules, regulations, orders and restrictions of the country or territory in which Linergy conducts business.

#### 2.5.4

##### Working conditions and working environment

Linergy shall comply fully with all applicable laws, rules and regulations regulating minimum wages, working hours and other working conditions.

Linergy regards ensuring a safe, healthy and comfortable working environment as its top priority. Linergy shall comply with all applicable relevant laws and regulations, strengthen internal safety controls and develop safety manuals for employees.

##### 1) Eliminate work accidents

Maintaining a safe, healthy, and comfortable working environment is one of the essential components of business operations. To prevent workplace accidents, Linergy strictly complies with all applicable laws and regulations. Linergy has established and implemented internal policies and procedures regarding work safety, and regularly conducts safety training sessions to ensure that employees receive systematic training, enabling them to promptly identify and eliminate potential hazards;

##### 2) Environmental protection and disaster prevention



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It is Linergy' s social responsibility to comply with applicable environmental laws (including but not limited to the Environmental Protection Law of the People' s Republic of China and Law of the People' s Republic of China on the Prevention and Control of Environmental Pollution by Solid Wastes). Linergy establishes and operates ISO 14001 & ISO 45001 system, complies with relevant procedure and instructions such as environmental management, occupational health and safety, etc., prevents accidents, ensures the safety of "people", "machines" and "materials," and realizes safe production. Linergy employees shall fully understand and use the relevant internal Crisis Management Manuals and guidelines established and adopted by each department to (i) ensure the prevention of catastrophic events and contingencies so as not to seriously affect Linergy' s interests and reputation, and (ii) minimize and control damage in the event of such serious events.

## 2.6 Linergy and society

### 2.6.1 Comply with laws and regulations

Linergy shall comply with applicable laws and regulations, social norms and social rules in the course of its business. Linergy Employees shall be fully aware of the importance and significance of applicable laws and regulations and must act in accordance with the law in all circumstances. Linergy shall pay special attention to some laws strictly required by society. Such laws include:

- 1) Foreign Exchange and Foreign Trade Management Law  
Linergy Employees participating in import and export activities shall fully understand and abide by the internal rules and regulations of the Company, and perform their duties in accordance with the applicable foreign exchange and foreign trade management laws including but not limited to the Customs Act 1967, the Strategic Trade Act 2010, Exchange Control Act 1953.
- 2) Bribery Prohibition Law  
Linergy Employees shall not provide any illegal or illegitimate advantage to any government official, domestic or foreign, in connection with the performance of their work in strict adherence to the Malaysian Anti-Corruption Commission Act 2009,
- 3) United Nations Convention against Corruption and Overseas Anti-Bribery Act (FCPA)  
Linergy has procedures for the selection and training of personnel in sensitive positions that are particularly vulnerable to corruption, as well as appropriate procedures for the rotation of such personnel, in order to promote adequate remuneration and fair pay standards. Take measures to prevent corruption, strengthen accounting and auditing standards and, where appropriate, provide for effective, proportionate and dissuasive civil, administrative or criminal penalties for non-compliance.
- 4) Anti-money Laundering Law  
Linergy employees must strictly abide by the relevant regulations on anti-money laundering and conduct proper due diligence on the property (such as funds, goods, raw materials, equipment, etc.) received by business partners and the company, and report any suspicious problems in the ownership of business partners and payment

transactions to the legal department and financial department in a timely manner. Avoid collecting illegal funds or participating in activities and transactions involving illegal funds. Principally, Linery is governed by the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (AMLA)

5) Anti-monopoly Law and Anti-unfair Competition Law

Generally speaking, anti-monopoly laws and similar competition laws in many countries are aimed at encouraging free competition and trade and protecting consumers' rights and interests such as the Malaysian Competition Act 2010. Linery must take special care to ensure that its business activities with representatives of other companies do not violate such anti-monopoly laws and similar anti-unfair competition laws applicable in the country. Linery must have a compliant corporate policy for each applicable anti-monopoly law and similar anti-unfair competition law, and all employees of the company must abide by this policy.

## 2.6.2 Information disclosure

Linery shall maintain its impartiality and transparency by disclosing timely and accurate information required by the public (except confidential information). Linery shall endeavor to determine the type of information required by each group of customers, suppliers, employees, shareholders, and investors. Linery shall respond in a fair and sincere manner to inquiries regarding PR, Sales & Marketing, Purchasing and other relevant departments.

## 2.6.3 Global environmental protection and social contribution

Linery believes that one of Linery's important social responsibilities is to protect the global environment through business activities. Therefore, Linery shall comply with all applicable environmental laws and regulations and do its utmost to ensure that its operations, products and services will not adversely affect the global environment in any way. Linery shall continue its efforts to promote the development of energy-saving, waste-reducing, efficient recycling and environmentally friendly technologies and products. At the same time, Linery shall continue to participate in the following activities:

- 1) Development of environmental protection products;
- 2) Energy conservation, waste reduction and recycling of all Linery facilities and offices;
- 3) Proactive disclosure of environmental information and updates to Linery Employees and the outside world;
- 4) Carry out internal staff training related to environmental protection;
- 5) Linery shall coordinate and cooperate with regional social, administrative, industry and other stakeholders and potential partners to maintain good relations. On the basis of business philosophy, priority shall be given to determining social subject areas, and efforts shall be made to achieve the goal of becoming a "highly-ethical corporate



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citizen” through social contribution activities such as sports, culture, art activities and volunteer activities.

## 2.7 Special duties of managers

This Code applies to all managers and board Employees of Linergy. In view of the duties and importance of the Linergy Directors, Managers, Chief Financial Accountants and Auditors of the Company (hereinafter collectively referred to as “Managers”), in addition to the Linergy Code of Conduct listed above, which is applicable to all Employees of Linergy, these persons shall observe and perform the following special duties:

2.7.1 Managers shall perform their corresponding obligations in good faith and integrity, and strive to avoid all acts that cause and may cause conflicts of interest within and outside their duties;

### 2.7.2

Managers shall obtain, as timely as possible, information on Linergy’ s operations and finances within the scope of their responsibilities, and report to other responsible persons in an accurate, comprehensive and objective manner that is easy to understand;

2.7.3 Managers shall comply with all applicable laws, rules and regulations issued by all relevant national, state, provincial, local and private governments and regulatory authorities;

2.7.4 No manager shall, in the performance of his or her Linergy duties, distort material facts and information or adulterate his or her personal judgment. Managers shall perform their duties with the care and diligence expected of their positions, and always be aware of their abilities and obligations;

2.7.5 All managers shall keep the information obtained in the course of their work strictly confidential (except for authorized and legally required disclosure), and it is strictly forbidden to use it for the purpose of obtaining personal benefits or gains;

2.7.6 All managers shall make continuous efforts to improve their working ability and skills, and share relevant information they have with other responsible persons;

2.7.7 Managers shall proactively emphasize the importance of the Linergy Code of Conduct to colleagues and subordinates, and maintain a comprehensive awareness of the importance of this principle in the process of handling business;

2.7.8 Managers shall properly manage the assets and other management resources of the Company within their authority and utilize these assets and resources fully and dutifully for the benefit of Linergy in accordance with Linergy’ s authorization;

2.7.9 Managers shall immediately report any violations or suspected violations of the Linergy Code of Conduct to the COC Office;



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2.7.10 All managers shall adhere to the Linergy Code of Conduct. Managers who fail to comply with the code of conduct will be disciplined; Violation of the Code of Conduct may constitute an offence and may entail civil, administrative or criminal liability.

### **3. Supervision and Management Program**

#### **3.1 Purpose**

For the purpose of maintaining the validity of the Linergy Code of Conduct, this outline specifies procedures for adhering to philosophy and standards.

#### **3.2 Organizational structure and functions**

To ensure the implementation of the code of conduct, Linergy set up a Code of Conduct Committee. The Committee is under the direct jurisdiction of Linergy's Board of Directors, and its chairman is appointed by the Board of Directors and is directly responsible to the Board of Directors. The Committee is composed of responsible directors from the following departments: Finance, Human Resources, Legal Affairs and Sustainable Development. The Committee has an "advisory office".

##### **3.2.1 Duties and obligations of the Committee**

###### **1) Programming**

By guiding the formulation of relevant policies and implementation procedures, the Linergy Code of Conduct meets the social responsibility requirements of RBA and laws and regulations on labor, ethics, occupational health and safety and environmental protection.

###### **2) Education and training**

The Committee shall devote itself to the training and education of Linergy Code of Conduct.

###### **3) Problem solving**

One of the responsibilities of the Committee is to solve problems related to Linergy's Code of Conduct.

###### **4) Investigation**

In order to solve the problems related to Linergy's Code of Conduct, it shall conduct an investigation or ask the relevant institutions to conduct an investigation when it deems it necessary.

###### **5) Responsibility for confidentiality and protection of consultants**

The Committee shall maintain the confidentiality of information obtained by the Committee through the application of the Linergy Code of Conduct and shall protect consultants from any unjust treatment or loss as a result of their consulting actions.

###### **6) Propose and report corrective actions**

If it is confirmed that a member of Linergy has seriously violated laws and regulations or Linergy's code of conduct, the committee must meet to discuss corrective measures and present these proposals to the various relevant department of Linergy. If the chairperson deems a particular issue to be of special importance, they shall submit

a report on that issue to Linergy' s board of directors (or request the approval of Linergy' s board of directors). The chairperson shall also request the responsible manager to submit a report regarding the implementation of the corrective measures.

7) Assessment and improvement

Employees shall constantly evaluate the content and implementation of Linergy Code of Conduct. After making any decision, the Committee shall immediately notify the responsible managers of each department and ask the relevant departments to make improvements.

8) Meeting

The Committee shall organize Employees and advisory office personnel to hold a Committee meeting at least once every quarter.

### 3.2.2 Duties and obligations of consulting office

1) Administration and Consultation

The Advisory Office shall receive complaints, information, questions, comments, inquiries, requests and enquiries from Linergy regarding the Linergy Code of Conduct. The Advisory Office shall allow the submission of such complaints, information, questions, opinions, inquiries, requests and consultations, and make a judicial distinction between the handling of complaints, information, questions, opinions, inquiries, requests and consultations submitted anonymously and by signature.

2) Linergy sets up a hotline or e-mail to enable Linergy Employees to send complaints, information, questions, comments, inquiries, requests, enquiries and queries to the advisory office by phone or e-mail. The hotline: 03-6064 1331/6064 1432; E-mail: Linergy-COC@Linerytech.com.

3) Responsibility for confidentiality and protection of consultants

The Advisory Office shall keep confidential the information it obtains through the implementation of the Linergy Code of Conduct. The consulting office shall give priority to protecting the interests of consultants. In order to solve the consultant' s problems, the Advisory Office may disclose certain information obtained from the consultant if it deems it necessary, and the Advisory Office shall act according to the consultant' s wishes.

4) Record-keeping

The Advisory Office shall retain for three years all anonymous and signed complaints, information, questions, comments, inquiries, requests and enquiries received from Linergy Employees.

### 3.3 Training and education

To familiarize Linergy Employees with the Linergy Code of Conduct, Linergy HR and relevant departments of Linergy shall hold Linergy Code of Conduct training courses, regular training and online learning and testing.

### 3.4 Corrective and preventive measures



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In the event of reports of violations or suspected violations of the Linergy Code of Conduct, Linergy's internal rules or regulations, the senior officers or managers of the relevant departments of the Linergy must investigate the causes and take preventive measures, including improving the management system of the Linergy.

### 3.5 Report illegal and immoral behavior

3.5.1 Linergy Employees shall report any crime or suspected criminal activity involving Linergy or its Employees to the supervisor, management or advisory office. During their tenure, Linergy Employees must report any suspicious activity or conduct (including suspicious accounting or audit issues) to regulators, managers or advisory offices.

3.5.2 Linergy Employees who report crimes and suspected criminal activities are assured to be protected under the Whistleblower Protection Act 2010 as well as the Company's internal Whistleblower Protection and Reward Policy, but they must not deliberately make false reports. All Linergy Employees who report violations and suspected violations of the Code of Conduct and corporate policies in good faith will be protected from retaliation. Linergy Employees may, in accordance with the law, provide information to government regulatory authorities, law enforcement agencies, Employees of government legislatures or managers of Linergy Employees, and may cooperate with and participate in the investigation and litigation of such incidents by government regulatory authorities, law enforcement agencies, Employees of government legislatures or managers of Linergy Employees without being dismissed, demoted, suspended, harassed or discriminated against. All reports of Linergy Employees will be treated confidentially.

3.5.3 Linergy is committed to upholding the highest standards of integrity and transparency. In the event of any suspected, attempted, or actual violation of this Policy, the Company reserves the strict right and, where applicable, the legal obligation to report such matters to the relevant external authorities Relevant Authorities including, but not limited to:

- 1) The Royal Malaysia Police (PDRM) or relevant local police force;
- 2) The Malaysian Anti-Corruption Commission (MACC) or relevant anti-corruption agency; and
- 3) Any other regulatory body or judicial authority having jurisdiction over the matter.

### 3.6 Discipline

3.6.1 Violations of the Linergy Code of Conduct are subject to disciplinary action in accordance with the Company's relevant policies, the provisions under collective agreements (if any) or respective employment contracts;

3.6.2 All Linergy employees are expressly advised that the Company's internal disciplinary proceedings are separate and distinct from any legal proceedings. The conclusion of an internal inquiry (whether resulting in dismissal or otherwise) does not preclude the commencement of criminal or civil actions.



**Linergy Power Sdn. Bhd.**

**Personal Criminal Liability:** A violation of anti-bribery laws is a criminal offense. Employees involved in bribery or corrupt practices may be held personally liable and subject to:

- 1) **Imprisonment:** Custodial sentences as prescribed by the relevant anti-corruption / anti-bribery legislation;
- 2) **Fines:** Substantial monetary penalties imposed by the court of competent jurisdiction.

**Civil Recovery:** The Company reserves the right to initiate civil legal proceedings against the employee to recover any financial losses, damages, or costs (including legal fees and reputational damage) incurred by the Company as a result of the employee's corrupt conduct.

### 3.6.3 Voluntary acknowledgement.

Violators who voluntarily admit to the Advisory Office that they violate the Linergy Code of Conduct can be given a light penalty, and their voluntary acknowledgement will be used as a mitigating factor for disciplinary action.

### 3.7 Revocation and revision of Linergy Code of Conduct

The Linergy COC Committee may discuss the revocation and revision of any provisions of the Linergy Code of Conduct and submit proposals for revocation and revision to the Linergy Board of Directors. The board of directors has the right to make a final decision on this Code.