

NORTHPORT(MALAYSIA)BHD

CODE OF ETHICS

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MESSAGE FROM THE CHAIRMAN

In today's dynamic business environment, long term profitability and sustainability transcends beyond organizations' ability to conduct business. It demands greater attention on our commitment to effective corporate governance, compliance with rules and regulations and being ethical and accountable to our decisions and actions. Therefore, it is imperative that all individuals within MMC Group adhere to the company's policy on business ethics. This Code of Ethics is to guide us on the expected behaviours and act as our moral compass as we fulfill our duties and responsibilities for the company's growth and business values.

Further, this Code of Ethics guides us to act in a manner which supports our mission and drives our core values that protects the interests of our shareholders and reflects our character to the clients, business partners and members of the public at large. We should always maintain the highest degree of integrity, exercise proper care and judgement, avoid any conflict of interest and refrain from misappropriation and taking advantage of our position for personal gains. This in return would propagate a good business image and reputation, encourage long term business relations and inspire collaboration for the greater good of the company and its employees.

We are required to comply and uphold the Code in the course of discharging our duties. Non-compliance is viewed seriously and will attract the appropriate disciplinary action. It is also the individual's responsibility to report any form of violation of the Code.

Moving forward, this enhanced Code of Ethics will provide the integrity framework on how we conduct our business.

Tan Sri Che Khalib Mohamad Noh

Chairman

Northport (Malaysia) Bhd

Note

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The Company reserves the right to review, amend or update this Code from time to time.

For any enquiries, please contact the Human Capital Division.

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1.0 Introduction

Northport (Malaysia) Bhd, is a member of MMC Group, Malaysia's leading utilities and infrastructure group with diversified businesses under four divisions: ports & logistics, energy & utilities and engineering & Industrial Development. Northport (Malaysia) Bhd ("Northport" or "the Company") has identified and adopted the following Mission Statement:

- (a) Maximize shareholder value
- (b) Service excellence to stakeholders
- (c) Lead in value innovation
- (d) Be the preferred employer

As we pave our way forward through the implementation of sound business principles and financial investments, we also commit ourselves to maintaining the highest standard of integrity and professionalism in our business dealings. That is why we have adopted this Code of Ethics ("the Code") to be implemented throughout the Company as a guide for our employees and directors (collectively referred to as "individual" in this Code) to understand and adopt the basic standards of conduct that is required of them.

2.0 Individual's Responsibilities

Each individual covered by the scope of the Code is expected to be familiar with and understand the Code. Where there are doubts on the application of the Code, it shall be the individual's responsibility to seek clarification from the Company's Human Capital Division.

The individual must also understand the underlying basic principles entrenched in the Code. These principles form the basis of the individual's conduct towards their co-workers, customers, suppliers and the general public. The basic principles are:

- (a) Honesty.
- (b) Integrity; avoiding situations where the personal interest of the individual appears to be in conflict with the interest of the Company.
- (c) Leadership; avoiding abuse or misuse of an individual's position in the Company.
- (d) Professionalism; maintaining secrecy at all times of confidential information obtained in the course of the individual's employment or appointment in the Company and not disclosing or using such confidential information for personal advantage.
- (e) Loyalty; avoiding placing the reputation of the Company in jeopardy.
- (f) Responsible; disclosing and seeking clarification from relevant persons in the Company whenever in doubt or whenever ethical concerns arise.
- (g) Trustworthy; avoiding misuse of the Company's resources or assets for personal gain.
- (h) Personal Conduct; conducting or behaving in any manner at any place and time that does not bring disrepute to the good name of the Company.

3.0 Business Practices and Professionalism

Each individual of the Company should maintain his/her integrity, honesty and professionalism at the highest level at all times during his/her employment or appointment with the Company. As a matter of policy, every individual should observe and follow the Code in the course of performing their duties and obligations to the Company. Adherence should be given not only to the letter but also the spirit of the Code as well:

- (a) An individual should not make any explicit commitments regarding the Company's businesses without prior authorization in accordance with the Company's procedures, which are in force from time to time. All commitments with another party, which may create legal obligations on behalf of the Company should be expressed clearly, documented and confirmed in writing by a person having the mandate to confirm the same.
- (b) An individual shall not make any comments or make any negative statements about the Company, other companies or individuals, its business dealings or its policies or behave or engage in any activity, which may be construed in any way as causing injury to the reputation or standing of the Company. An individual shall refrain from making any statements concerning the Company to the media or in any publication without prior written approval of the Company unless the individual is specifically assigned to furnish such corporate information on behalf of the Company.
- (c) An individual shall be aware at all times that being part of Northport, he/she represents a company with sound ethical standards and therefore should not cause the reputation or standing of the Company to be damaged in any way whatsoever or be held in ridicule by his/her actions/omissions or take advantage of his/her employment or appointment in the Company to obtain any preferential treatment for his/her personal benefit.

4.0 Conflict of Interests

A conflict of interest situation arises when an individual's ability to perform his/her duties in the best interest of the Company is impaired or likely to be impaired by an external appointment, relationship, activity or personal interest. An individual should avoid any situation where his/her personal interest appears to be in conflict with interests of the Company or reflects unfavourably on the individual's integrity.

The following relationships, activities and individual's conduct are examples of situations where a conflict of interest situation would arise. In the event of such a situation, full and frank disclosure must be made by the affected individual to the Company and/or prior written approval from the Company must be obtained in respect of the same, failing which the affected individual may be subjected to disciplinary proceedings in accordance with the Company's procedures as the case may be:

- (a) An individual or his/her immediate family member having a substantial interest in any firm or organization, which has or is seeking to conduct business dealings with the Company where there is an opportunity for preferential treatment. Immediate family members include the individual's spouse, parents, brothers, sisters, children including adopted children and stepchildren and their spouses and this definition shall apply throughout the Code;
- (b) An individual or his/her immediate family member holding a substantial interest in any competitor of the Company;
- (c) An individual or his/her immediate family member competing directly or indirectly with the Company through outside business activities;
- (d) An employee of the Company serving as an employee or as an executive director of any other company, or in a management capacity for or as a consultant to any firm or organization;
- (e) An individual's immediate family member is employed by a competitor or is self-employed in a common business with the Company where the said individual or his/her immediate family member could have access to highly sensitive information of competitive value in relation to the Company;

- (f) The acceptance by an individual of membership on the board of directors of any organization which is or is going into business with the Company or as a consultant or adviser to any such board of directors or to the management of a firm, person or organization which is or is going into the same business as the Company;
- (g) The acceptance by an individual's immediate family member of membership on the board of directors of any organization which is or is going into business with the Company or as a consultant or adviser to any such board of directors or to the management of a firm, person or organization which is or is going into the same business as the Company;
- (h) An individual in his/her way of authority approving or administratively controlling contracts or other business arrangements between the Company and his/her immediate family member or with another person, firm or organization employing the individual's immediate family member in activities under the individual's administrative control;
- (i) Undertaking employment concurrently with any other firm or organization if such employment encroaches or interferes with the actual employment or appointment of the individual with the Company;
- (j) Lending money, guaranteeing debts, borrowing money (save for borrowings from licensed financial institutions or other licensed money lenders) or accepting extravagant gifts or benefits in any form whatsoever so as to place the individual under an obligation to a third party having business dealings with the Company;
- (k) The use by an individual of the Company's personnel, equipment supplies or other resources for his/her personal benefit contrary to the Company's policies and procedures;

The above list is not exhaustive. The Company may from time to time revise, amend or add situations, which in the opinion of the Company may lead to a conflict of interest situation between the Company and the individual. The individual must refrain from putting himself/herself in a conflict of interest situation.

5.0 External Directorship

- (a) It is the Company's policy to restrict an employee's directorship outside the NORTHPORT and to prohibit the acceptance of such a position if it would involve, *inter alia*, a conflict of interest situation or interfere with the complete and proper discharge of the employees' duties to the Company.
- (b) An employee wishing to serve as a director outside the Company must apply in writing to the Company providing justifications for the holding of such directorships. All directorship posts held whilst in the employment of the Company must be declared and approved by the Company. The consent from the Company must be in writing and is subject to review from time to time. The Company in giving consent may further impose specific conditions as deemed appropriate on a case-by-case basis.
- (c) Directors' fees, meeting allowances and all other remuneration received by the employee relating to his/her position as a director outside the Company shall be declared to the Company.

6.0 Bribery and Corruption

NORTHPORT is committed to conduct business ethically and in full compliance with all applicable laws and regulations in every jurisdiction that NORTHPORT operates. NORTHPORT shall treat every client, business partner, authority and members of the public with integrity, responsibility, accountability, respect and courtesy.

Each individual and/or any agent, person or entity engaged under a contract for service or engaged by NORTHPORT for any business-related activity, either formally or informally, should maintain the values of integrity, honesty and professionalism at the highest level at all times during his/her employment/engagement under NORTHPORT or when representing NORTHPORT in business transactions with third parties.

The NORTHPORT Anti-Bribery And Anti-Corruption Policy and Framework will be the reference point for this section.

7.0 Rewards and Gifts

- (a) The acceptance of a gift by an individual must always be subject to the provisions allowable under the relevant legislations currently in force and any integrity obligations adopted by the Company. The following provisions serve as a guideline on what constitute appropriate gifts or token that may be received by an individual.
- (b) Individuals shall not accept or offer gifts, gratuities or favours, except those associated with common business courtesies of a nominal value of RM500 or less. Gifts exceeding this amount may be made to customers or other persons subject to the Chief Executive Officer's or Chairman's approval. The following are categories of gifts of a nominal value of RM500 or less which are deemed acceptable:
 - (i) Exchanging of gifts at the company-to-company level as part of company visit or courtesy call. Such gifts are treated as property of the Company;
 - (ii) Gifts from the Company to external institutions or individuals in relation to the company's official functions, events and celebrations (festive gifts, commemorative gifts or door gifts to guests attending the event);
 - (iii) Gifts from the Company to employees and directors and/or their family members in relation to internally or externally recognized Company function, event and celebration (recognition of service to the Company);
 - (iv) Tokens of nominal value normally bearing the Company's logo or event name (t-shirt, pen, diary, calendar and other promotional items) that are provided to delegates, partners, customers, stakeholders for attending conference, exhibition, training or events. This is applicable to either receiving gift from or providing gift to external parties;
 - (v) Gifts either monetary or gifts in-kind to external parties who have no business interests or dealings with the Company (charitable organizations).
- (c) An individual shall not solicit or accept any benefit, reward or gift of any kind, intended to create an improper advantage or that which may create the appearance of impropriety, either directly or indirectly from third parties or from any other individuals within the Company.
- (d) An individual shall not offer, give or promise any benefit, reward or gift of any kind, intended to create an improper advantage or that which may create the appearance of impropriety, either directly or indirectly to any employee or agent of any organisation that has business dealings with the Company.

- (e) The provisions above shall extend to inter-Company business transactions and to any governmental body/officials. The onus to report/declare the receipt or giving of rewards or gifts above is on the individual concerned.
- (f) The above provisions do not prohibit lawful reimbursement for reasonable and bona fide expenditures incurred by an individual which is directly related to the promotion of the Company's products and/or services.
- (g) Any appointments or approvals for selecting persons or third party to represent the Company in matters must be exercised with due care and diligence.
- (h) If the reward or gift value is more than RM500, approval from the Chief Executive Officer or Chairman must be obtained on the treatment of such reward or gift.
- (i) For provision of gifts to individuals or organization, approval from the Chief Executive Officer or Chairman must be obtained for gifts of a value of more than RM500. Gifts with a value less than RM500 would require the approval from the Head of Business Units/Departments or to refer the relevant Financial Limits of Authority.

8.0 Entertainment of Customers

Where it is necessary, in the interest of maintaining or improving customer relations, entertainment of clients and/or prospective clients may be offered and financed from the Company's funds. In all such cases, such entertainment expenditure will be recorded in the Company's accounts supported by receipts and made subject to normal audit. The Head of Business Unit/Department will decide such entertainment expenditure in accordance with their current Financial Limits of Authority.

9.0 Facilitation Payment

Individuals are prohibited from directly or indirectly offering, promising, requesting, accepting or receiving facilitation payment either in a form of cash, financial assets or any sort of advantage in order to secure or expedite matters.

10.0 Sponsorships or Charitable Contributions

- (a) The Company may be requested to sponsor or provide charitable contributions and may respond to such requests as part of its philanthropic gestures or corporate social responsibilities. However, all sponsorships or charitable contributions should not be disguised to fund illegal activities.
- (b) All sponsorships, charitable requests and contributions must undergo applicable processes and obtain all necessary authorisations set out by the Company. It must be stated clearly in the Company's accounts and records to ensure the Company is safeguarded from being perceived as having received improper advantage as a result of the sponsorship or contribution or having been involved in unlawful activities.

11.0 Political, Social, Professional Bodies or External Activities

- (a) Contributions to political or social parties or movements or professional bodies where permitted by applicable laws and practice must be authorized by the Company in writing.
- (b) An individual engaging in political, social or professional body-related activities will do so in his/her personal capacity as a private citizen and not as a representative of the Company, and this should be made a matter of public record. He/she shall ensure that his/her activities do not interfere with the efficient and due discharge of his/her duties to the Company. The individual shall also ensure that the Company is not perceived as supporting the individual's activities. If such activities encroach into the actual work and working hours that should be devoted to the Company, prior written approval from the Company must be obtained.

12.0 Anti-Money Laundering and Counter Financing of Terrorism

- (a) Money Laundering is generally defined as occurring when the criminal origin or nature of money or assets is hidden in legitimate business dealings or when legitimate funds are used to support criminal activities, including the financing of terrorism.
- (b) Individuals are prohibited from undertaking or being involved in any practices relating to the offence of money laundering which includes situations where a person:
 - (i) Engages directly or indirectly in a transaction that involves proceeds of an unlawful activity or instrumentalities of an offence;
 - (ii) Acquires, receives, possesses, disguises, transfers, converts, exchanges, carries, disposes of or uses proceeds of an unlawful activity or instrumentalities of an offence;
 - (iii) Removes from or brings in proceeds of an unlawful activity or instrumentalities of an offence;
 - (iv) Conceals, disguises or impedes the establishment of the true nature, origin, location, movement, disposition, title of, rights with respect to, or ownership of, proceeds of an unlawful activity or instrumentalities of an offence;
 - (v) Is prejudiced or obstructs an investigation and failing to report suspicious activity.
- (c) The laws governing money laundering offences may have extra territorial effect and the penalties can be severe including extradition or imprisonment.

13.0 Insider Trading

An individual is not allowed to indulge in the practice of Insider Trading in the manner prohibited under the Capital Market and Services Act 2007, Companies Act 2016, the Bursa Malaysia Securities Berhad Main Market Listing Requirements, Bursa Malaysia Securities Berhad Ace Market Listing Requirements and other relevant laws and guidelines as may be imposed by the relevant authorities from time to time.

(a) Insider

For the purpose of this section, an insider shall include:

- (i) Beneficial trustees of such individual and/or his/her immediate family member; and
- (ii) Other persons acting on behalf of or in conjunction with such individual and/or his/her immediate family member who possesses information by virtue of his/her being connected with the Company;
- (iii) Possesses information which if generally known might reasonably be expected to have a material effect on the price or the value of securities of the Company, its customers and/or suppliers; and
- (iv) Knows or ought to have reasonably known that the information is not generally available.

(b) Dealing in Securities of the Company

No insider shall deal in the securities of the Company:

- (i) During the period commencing from one month prior to the targeted date of announcement to the relevant stock exchange of the quarterly results up to one full market day after the announcement of the Company's results for the financial quarter; or
- (ii) Where the individual has knowledge of price-sensitive information not generally available to the public, during the period commencing from the time information is obtained, up to one full market day after the announcement to the relevant stock exchange of a matter that involves price-sensitive information in relation to the securities concerned has been made.

(c) Dealing in Customer or Suppliers' Securities

At any time when the individual has knowledge of price-sensitive information not generally available to the public, no dealings in the securities of customers or suppliers, on the basis of information gained as an internal party should take place.

(d) Dealing in Merger / Acquisition Situations

An individual or his/her immediate family member shall not in any way whatsoever deal in the securities of any target company from the time when there is reason to suppose that an approach or offer is contemplated unless an announcement of completion or termination has been made to the public.

For the avoidance of doubt, "dealings" shall mean any transaction relating to;

- (i) Shares in or debentures of the Company or any interests other than shares or debentures within the meaning of Section 84 of the Companies Act, 2016;
- (ii) rights or options in respect of the acquisition or disposal of such shares, debentures or interests.

14.0 Confidentiality

(a) Company Data

- Individuals must always treat all information concerning the Company as private and confidential. Information on Company's businesses including but not limited to financial or business forecasts, competitive bids, accounts, administrative activities and investments whether electronically or manually kept should never be discussed internally or in public except when required in the normal course of business or by regulations or law.
- Every individual is to seek prior approval from his/her respective Head of Business Units/Departments should a request for information or disclosure be made by third parties before disclosing the said information to third parties.
- An individual is strongly advised not to discuss Company matters among immediate family members, relatives, friends or acquaintances as this may cause misinterpretation or create misunderstandings on the Company's operations, business undertakings, image and reputation.
- An individual is prohibited from using directly or indirectly, information that is not available to the public for his/her personal gains.

(b) Disclosure

The following areas are not to be disclosed by an individual without prior written approval from the Company unless it is deemed to be within the public domain:

- Audit and any report on Company's businesses
- Information provided to authorities in relation to the Company
- Company's proprietary information regarding earnings, corporate financial matters, business plans, marketing strategy, investment strategy, technical data on projects processes and/or methods, technology and business opportunities
- The Company's computer-based data codes or passwords and source codes
- Any other confidential information or documents, which in the opinion of the Company should be treated as confidential.

(c) Price-sensitive Information

- All price-sensitive information is strictly confidential to the individual concerned and should not be used by any individual in connection with the sale and purchase of securities or products of the Company or discussed with any third party except in certain circumstances for instance disclosure to professional advisers appointed by the Company and relevant authorities as required to be disclosed under the law or regulations.
- Price-sensitive information is any information on the Company, which if made known generally to the investing public would likely have an effect on the price of the Company's securities.
- Such price-sensitive information may include amongst others, any information on profit/losses, cash flow, mergers and acquisitions and major capital expenditure.
- It is imperative that an individual be aware of the Company's policy on confidentiality.
- Confidential information does not only relate to information regarding the Company but also information relating to the Company's customers/partners, which the individual has obtained during the course of his/her employment.
- An individual should always secure all records of his dealings/ transactions.

15.0 Working Environment

- (a) It is the Company's policy to provide a healthy working environment that fosters mutual respect among individuals and a harassment-free working relationship.
- (b) The Company strictly prohibits any form of harassment, which includes but is not limited to unwelcomed verbal or physical sexual advances, sexually, racially or otherwise derogatory or discriminatory materials, statements or remarks during the performance of official duties where the inappropriate conduct has the purpose or effect of:
 - creating an intimidating, hostile or offensive working environment;
 - unreasonably interfering with an individual's work performance; or
 - affecting an individual's employment opportunity.
- (c) Any individual who believes that he/she has been subjected to harassment and any individual who observes or becomes aware of any harassment should immediately report the incident to his/her immediate superior or to the Human Capital Division. All such reports will be treated as confidential.

16.0 Sexual Harassment

(a) Section 2 of the Employment Act 1955 defines sexual harassment as any unwanted conduct of a sexual nature, whether verbal, non-verbal, visual, gestural or physical, directed at a person which is offensive or humiliating or is a threat to his well-being, arising out of and in the course of his employment. In the Code of Practice “On The Prevention And Eradication Of Sexual Harassment In The Workplace” issued by the Ministry of Human Resource, sexual harassment means any unwanted conduct of a sexual nature, which is unwanted, unwelcomed, unsolicited and imposed on, having the effect of verbal, non-verbal, visual, psychological or physical harassment that might:

- On reasonable grounds, be perceived by the recipient as placing a condition of a sexual nature on his/her employment;
- On reasonable grounds, be perceived by the recipient as an offence or humiliation, or a threat to his/her well-being, but has no direct link to his/her employment.

(b) Based on the above definitions, sexual harassment can be categorized as:

- Sexual coercion that results in some direct consequence to the victim's employment. Failure to accede to the coercion may result in withholding of pay increase, bonus, promotion and other benefits;
- Sexual annoyance is sexually-related conduct that is offensive, hostile or intimidating to the recipient, but has no direct link to any job benefit. A sexual harassment by an individual against another individual falls into this category.

(c) Within this context, sexual harassment in the workplace includes any employment-related sexual harassment occurring outside the workplace and outside official working hours as a result of employment responsibilities or employment relationships.

(d) Sexual harassment encompasses various conducts of a sexual nature which can manifest themselves into five general forms, namely:

- Verbal harassment: offensive or suggestive remarks, comments, jokes, jesting, kidding, sounds and questioning;
- Non-verbal/gestures: leering or ogling with suggestive overtones, licking lips or holding or eating food provocatively, hand signal or sign language denoting sexual activity, persistent flirting;
- Visual harassment: showing pornographic materials, drawing sex-based sketches or writing sex-based letters, sexual exposure;

- Psychological harassment: repeated unwanted social invitations, relentless proposals for dates or physical intimacy.
- Physical harassment: inappropriate touching, patting, pinching, stroking, brushing up against the body, hugging, kissing, fondling, sexual assault.

17.0 Violation

- (a) Non-compliance of provisions of the Code is a misconduct which will result in an investigation/inquiry to establish the facts and if substantiated may lead to disciplinary action being taken.
- (b) In the case of suspected corruption or other forms of criminal activity or breach of law or regulations, the Company has the right to report the case/breach to the appropriate authorities.
- (c) An individual who has any knowledge of any questionable or possible breach of the Code or possible illegal action affecting the Company is expected to promptly report such actions to his superior or to the Company immediately. Additionally, full disclosure and co-operation of the individual with the parties involved in the investigation is essential. Any concealment regardless of any reasons will be considered a violation of the Code.

18.0 Procedural Guidelines

- (a) The Chief Executive Officer may propose any amendments to this Code of Ethics and the Board will consider approving such proposal. Where necessary, the Board may recommend the same to other companies within NORTHPORT.
- (b) General Manager, Human Capital will be the custodian of this Code and its related processes.
- (c) Human Capital will circulate the Code to all individuals, permanent and contractual. All new employees will be given a copy of the Code on the first day of work. All individuals, upon receipt of a copy of the Code, are required to acknowledge understanding and acceptance of the Code and submit such acceptance directly to the Human Capital Division.
- (d) The Human Capital Division will also develop a mechanism of implementation and monitoring to ensure that individuals are conversant with the Code at all times.
- (e) Individuals who wish to report on any non-compliance regarding any part of this Code can lodge a complaint directly to the General Manager, Human Capital by including relevant details of such violation. The identity of the complainant shall be kept confidential at all times.
- (f) The complainant must not disclose such information relating to the violation of the Code to anyone unless authorized by the General Manager, Human Capital.
- (g) The General Manager, Human Capital will undertake an investigation by utilizing resources at his/her disposal in order to establish the facts pertaining to the alleged violation.
- (h) The findings and conclusion of such investigation will be submitted to the Chief Executive Officer for further action.
- (i) Any findings of fraud activities must be reported to the Audit Committee.
- (j) In the event that there is a basis for disciplinary action, the Human Capital Division will undertake all actions deemed necessary to institute the appropriate disciplinary measures.

- (k) If the allegations are found to be untrue, the findings will be communicated to the complainant. The findings of the investigation will be treated as confidential at all times and the complainant is not allowed to disclose such findings to anyone unless authorized by the General Manager, Human Capital Division.
- (l) Individuals who have been solicited for gifts or rewards or have received the same as described in Clause 7.0 of the Code, must report such matters in writing directly to the Head of Division/Department or to the Chief Executive Officer, whichever is applicable.
- (m) Individuals must obtain prior approval from the Head of the Division/Department on matters pertaining to the entertainment of customers, herein included in Clause 8.0 of the Code.
- (n) Individuals must also declare their participation in any form in any other businesses, political or social bodies to the General Manager, Human Capital. Prior written approval must be obtained before the individual can be allowed to participate in such organizations. Approval shall be at the discretion of the Company.
- (o) The Company may require any individual who has such interests as stated above, to relinquish their positions in such businesses, political or social bodies, if the Company finds that such involvement is detrimental to the well-being of the Company and/or that it violates any part of this Code. Such decisions will be communicated to the individual in writing.