



CODE OF CONDUCT FOR ASSOCIATED PERSONS

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Foreword:

In the course of your business dealings with Silverlake Axis Ltd (**'SAL'**) and its subsidiaries (collectively referred as the **'Group'**), you may at times face a situation where you are not able to determine whether your actions would be in violation of any policies or laws and regulations or business practices of the Group. Thus, the Group has formulated certain guidelines and good business practices and incorporated the same into this Group Code of Conduct for Associated Persons.

For clarity purposes, the term "Associated Persons" referred herein shall mean third parties who are retained to perform services or conduct business for and on behalf of the Group or those conducting business together with the Group (including, but not limited to, agents, representatives, intermediaries, introducers, brokers, contractors, suppliers, service providers, customers, consultants and joint venture entities) and its employees.

This Code of Conduct shall serve as a guide to assists the Associated Persons to conform to the ethical business standards in all their business dealings with us. Thus, it is pertinent that Associated Persons and/or their employees or agents, as the case may be, read and understand the contents of this Code.

Please take note that this Code is not intended to provide detailed and rigid practices or policies to cover every conceivable situation that Associated Persons may encounter. As such, Associated Persons are urged to carry out their duties in the spirit of good business practices and/or integrity.

This Code may be amended from time to time at the sole discretion of the Group.

Summary of Code of Conduct for Associated Persons("Code")

The Group recognizes the growing importance of sustainability development in products, services and solutions, combining economic success, social responsibility and environmental protection in our business operations and thereby enable our customers to meet current and future needs of society.

Ensuring that we can work together in an ethical and legally compliant manner is important to us. We want to partner with our Associated Persons to further develop their sustainability performance in our network. We expect our Associated Persons to fully comply with applicable laws and regulations relevant to its business in the countries where it is established and where it conducts its business. We also expect our Associated Persons to use their best efforts to implement these standards with their suppliers and subcontractors.

This Code shall apply to the following Associated Persons:

- (i) All contractors, consultants, personnel and/or their respective employees and/or agents, as the case may be, whether hired directly by SAL Group or seconded by third party suppliers, vendors and/or service providers; and
- (ii) All parties or entities engaging in business dealings with SAL Group (excluding customers), including dealers, resellers, distributors, System Integrator (SI) Partners, and content/digital solution providers.

As part of the Group's policies and procedures, the Group shall, where appropriate, conduct risk-based due diligence on Associated Persons from time to time.

It is the responsibility of the Associated Persons to act in accordance with the policies and practices as detailed in the following pages and any updates or amendments as issued from time to time. It is also the responsibility of Associated Persons to seek clarification, ask questions, report any suspected violations and express concerns regarding compliance with this Code.

If there is any violation of any policies and practices detailed in this Code, the Group will work with Associated Persons to resolve the issues arising. However, if a satisfactory resolution is not, in the Group reasonable opinion, reached, the Group retains the right to cancel and/or terminate its business dealings and/or arrangement with such Associated Persons.

This Code essentially outlines three (3) principal areas with the main objective of ensuring that **the business dealings of the Group is not tainted by improprieties or malpractices under any circumstances**, whether by its employees or Associated Persons.

Open Door Practice:

If any Associated Persons have any doubts or questions in relation to the interpretation and / or applicability of this Code, as well as concerns, queries or any knowledge or information about any unethical business practices in the Group, Associated Persons are required to immediately contact the following:-

E-mail : whistleblower@silverlakeaxis.com

Office Address: Lot 19-02, Level 19, First Avenue Bandar Utama

47800, Petaling Jaya, Selangor

Head of Risk : Anil Singh Gill

Contact No. : 012 2105233

All correspondences to and/or communications with the Group Office are treated in the strictest confidence unless required to be declared under the law.

Code of Conduct for Associated Persons Standards

We particularly expect you as our Associated Persons to support, embrace and enact to the following specific topic of “Standard/Practices”:-

(i) Work Environment & Property

It is everyone's responsibility to promote a safe work environment and to report any unsafe conditions at the workplace or any accidents and injuries to their respective supervisors or to the Administrative department.

In order to protect the safety of all persons, all Associated Persons:

- Must work and/or behave free from the influence of any substance that could prevent them from conducting their work activities safely and/or effectively. Work activities in this regard, includes any Group organised meetings, activities or events including in the performance of services or provision of deliverables under a contract with the Group, whether held outside or within the premises of the Group and/or whether held during or after official work hours;
- Are strictly prohibited from:
 - (a) making any threats or any form of menacing comments or behaving in any manner that may be construed as a threat to the personal safety and reputation of another including any comments, action and/gestures that may be deemed as sexual in nature;
 - (b) engaging in any act of violence or physical intimidation and/or harassment against the Group employees, customers and other Associated Persons;
- Must at all times takes all possible care and precaution to ensure their own safety, as well as the safety of others around them and follow all established rules, procedures and guidelines laid down on safety matters. Any non-compliance of the rules and/or guidelines on safety matters must be reported immediately; and
- Must apply their common sense and best judgement to ensure their own safety and those around them in cases where there are no formal rules, regulations or guidelines.

(ii) Environmental

The Group is committed to its responsibility to protect and maintain our planet for future generations, and we acknowledge the importance of addressing climate change. Associated Persons are expected to:-

- Comply with all applicable environmental, health and safety regulations.

- To promote the safe and environmental sound development, transport, use and disposal of your products.
- Use resources efficiently, apply energy-efficient and environmentally friendly technologies and reduce waste, as well as emissions to air, water and soil.

(iii) Health & Safety

Each of us must take personal responsibility for our own safety, the safety of our co-workers, and those for whom we are responsible. Associated Persons agree to help protect, support and prepare workers for safe careers and to advocate on their behalf, including promoting workplace health and safety.

In the event the contractors/Associated Persons are required to carry out work with any of the Group employees, Associated Persons contractors and/or any other parties as directed by the Group at any of the Group premises or worksites or any other locations as directed by the Group, the contractors/Associated Persons shall ensure that:-

- (a) They are fully vaccinated prior to having contact or working with the Group employees, Associated Persons contractors and/or any such parties as directed by the Group;
- (b) In the event the Associated Persons are not required to be physically present at the Group premises or worksites or to meet the Group employees or the Group third party contractors for the performance of work, the Associated Persons shall at all times ensure that they do not enter any of the premises or worksites and there shall be no contact or meeting between the Associated Persons and any the Group employees.

(iv) Assets and Properties

Associated Persons are responsible to protect the assets and property entrusted to them by the Group from any loss, damage, misuse, illegal use and/or theft.

Assets and property of the Group, such as product and services, vehicles, access and/or security cards, office equipment or facilities, shall only be used for official business purposes and such other purposes as may be approved by the Group.

Assets and property of the Group cannot be used for personal reasons and shall not be removed from the Group premises. All assets and property shall only be used for business purposes and provided for in the contract with Associated Persons, unless prior approval obtained.

Legislative and contractual requirements impose restrictions on the usage and copying of software. Associated Persons shall restrain from:

- Duplicating copyrighted material without the owner's consent;
- Copying software from one machine to another without the owner's documented authority;
- Copying proprietary software belonging to the Group for use on computers that do not belong to SAL Group, or for purposes other than as authorised by the Group;
- Installing unauthorised software on the computers provided by the Group; and
- Downloading non-work materials into computers provided by the Group.

(v) Information

- Associated Persons must safeguard all confidential information, keep it secure and provide only limited access to those who have a need to know the confidential information in order to execute their job functions.
- Associated Persons must not disclose confidential information to unauthorised recipients or use the confidential information to personal gain.
- Associated Persons must not misrepresent or falsify any information submitted to the Group, including personal information and data such as technical, operational, quality, safety and personnel records as well as any form of financial records.
- Storage containing confidential information or licensed or copyrighted software, must not be removed or taken off-site by Associated Persons without the consent and approval from the data owner or the relevant Head of Department of the Group.

(vi) Labour Practices

The Group expects its suppliers to adopt sound labour practices and treat their workers fairly in accordance with local laws and regulations. In addition, suppliers must comply with the following standards:-

- Suppliers shall not use any forced, bonded, or compulsory labours, and all workers shall be free to leave their engagement after reasonable notice as required by Applicable Laws and Regulations and relevant contract(s).
- Employment of foreign or migrant workers are to be done in full compliance with applicable immigration laws in the host country and local labour laws.
- No child labours. Suppliers shall comply with local minimum working age laws and requirements and not employ child labour.

(vii) Bribery and Corruption

The Group is committed to conducting its business professionally, ethically and with the highest standard of integrity. The Group practices zero-tolerance approach against all forms of bribery and corruption, and upholds all applicable laws in relation to anti-bribery and corruption. Therefore, it is fundamentally important for the Group and any Associated Persons to comply with, uphold and conduct its business in accordance with the Groups Anti-Bribery and Anti-Corruption Policy, Applicable Laws in relation to anti-bribery and corruption.

An Associated Person is strictly prohibited from directly or indirectly soliciting, offering, accepting or agreeing to or attempting to solicit, offer, accept or agree from any party, any bribe or gratification in relation to any business dealings. Such acts and / or activities include the appearance of bribery or corruption being done which may tarnish the Group's reputation and integrity.

It is the duty of all the Associated Persons to undertake periodic reviews and assessments to understand bribery and corruption risks and to ensure that they have adequate procedures in place to address such risks and that the procedures are kept up to date and remain efficient and effective.

Deliberate breach or circumvention of the principles of this policy or violation of this policy may result in disciplinary action, which may include a termination of employment and/or revocation or termination of contract in case of Associated Persons. Additionally, Associated Persons are subject to loss of access privileges, unsatisfactory performance evaluation, sanction, accountability in a court law, civil and criminal prosecution.

(viii) Data Protection

Associated Persons are to ensure compliance with the protection of personal privacy, including but not limited to, personal data in line with the Company's data protection policy and applicable laws.

Associated Persons Integrity Pledge

To: SAL Group/Subsidiaries

We/I hereby acknowledge our compliance with the Group Code of Business Conduct for Associated Persons. We/I shall fully abide by the Code and procure a similar commitment from our/my sub-contractors, suppliers and agents to abide by the same.

We/I further reiterate our agreement that we/I shall not hold the Group responsible for any loss or damage whatsoever that we/I, our/my subcontractors or suppliers or agents may suffer arising out of, in connection with and/or relating to a termination of our relationship with the Group resulting from our/my violation of the Code.

Signature of Authorised Person :

Name of Associated Person :

Name of Company :

Date :

Signature of Associated Person :

Name of Associated Person :

Name of Company

:

Date

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