

WELLCALL HOLDINGS BERHAD

Reg. No. 200501025213 (707346-W)

CODE OF CONDUCT AND ETHICS FOR EMPLOYEES

A. INTRODUCTION

This Code of Conduct and Ethics for Employees ("Code") is applicable to all employees ("Employees") of Wellcall Group ("the Company"), its subsidiary and its associate company.

B. PRINCIPLE

The principle of this Code is based on the principles in relation to competence, integrity, professional responsibility and respect for people's rights and dignity.

C. PURPOSE

This Code of Ethics is formulated to enhance the standard of corporate governance and corporate behavior with the intention of achieving the following aims:

- (i) To establish a standard of ethical behavior for employees based on trustworthiness and values that can be accepted, are held or upheld by any one person;
- (ii) To uphold the spirit of responsibility and social responsibility in line with the legislation, regulations and guidelines for administrating a company;
- (iii) To improve self-discipline, skills, work quality and productivity in performing his/her duties.

D. DEFINITION

In the context of this Code, a company employee means any persons who engaged in a contract services with the company including all levels and grades - senior managers, managers, whether full time, part time, contract or temporary, contract workers, trainees and seconded staffs.

WELLCALL HOLDINGS BERHAD

Reg. No. 200501025213 (707346-W)

CODE OF CONDUCT AND ETHICS FOR EMPLOYEES

E. CODE OF CONDUCT AND ETHICS

In the performance of his/her duties, employees should at all times observe the following codes:

1. Workplace Culture and Environment

- 1.1. Attendance/Punctuality – All employees should require to follow working hours which being determined by the company;
- 1.2. Appearance/Attire – Neat, clean and tidy;
- 1.3. Non-discrimination – Everyone in the workplace to be treated fairly and without any prejudice or discrimination in term of employment;
- 1.4. Safety and health – Training will be provided to all employees to make sure they understand and comply with all safety requirements, policies and procedures;
- 1.5. Sexual harassment and violence – The workplace should free from any sexual harassment and violence. All report of sexual harassment and violence will be investigated further by the company and disciplinary action will be taken to avoid future occurrence;
- 1.6. Drug, alcohol and other prohibited substances – Employees are strictly prohibited to be influenced by any illegal drugs, alcohol and other prohibited substances (exceptional if any drugs recommended by professional medical practitioner) during their contract services with the company.

2. Compliance with Laws, Rules and Regulations

Every employee in exercising and/or discharging his/ her powers or duties shall comply with all applicable laws, rules and regulations including the constitutions of the Company and guidance and directives issued by the authorities. All employees are responsible to be familiar with any legislation or regulations that apply to their services to the Company.

3. Conflict of Interest

Employees should avoid conflicts of interest with the Company and disclose immediately all contractual interest, whether direct or indirect, with the Company.

Employees are required to declare at all times the nature and extent of any conflict of interests, whether direct or indirect, or whether actual or potential, with the Company or its subsidiaries, and the associate company.

Where a potential or actual conflict arises, every Employee shall adhere to the procedures provided by the relevant laws.

WELLCALL HOLDINGS BERHAD

Reg. No. 200501025213 (707346-W)

CODE OF CONDUCT AND ETHICS FOR EMPLOYEES

4. Data Integrity and Data Protection

The Company has put in place the Personal Data Protection Policy, Employees shall record, manage, store and transfer all data and records in compliance with applicable legal, tax, regulatory and accounting requirements.

5. Anti-Corruption/ Bribes

To observe high standards of business, professional and ethical conduct, the Employees (whether acting in their own capacity or on the Group's behalf) are committed to refrain themselves from offering, giving or receiving any gifts and any other form of benefits (in kind, cash, advantages and/ or favour and etc) from persons or entities who deal with the Company where the gift would reasonably be expected to influence the performance of the Employee's duties in any aspect.

6. Company Assets

- 6.1. Every Employee has a duty to safeguard the Company's assets, including its physical premises, equipment and facilities as well as the records and information/ data (both physical and electronic means).
- 6.2. Company's assets shall only be used in a safe, ethical and lawful manner and shall not be used for pursuing improper personal gain or opportunity.

7. Confidentiality

- 6.1. Employees may come into possession or access to confidential, sensitive and non-public information ("Insider Information") in the course of their contract services with the Company. Employees must treat all such information in strictest of confidence, not disclose such information to any unauthorized persons and take all necessary precautions to maintain such confidentiality and not use it, directly or indirectly, for any purpose other than what it has been intended, except when disclosure is authorized or legally required.
- 6.2. The obligation to preserve the Company's Insider Information is ongoing even after an individual ceases to be employee of the Company.

7. Insider Trading

- 7.1. Any employees who possess inside information shall not:
 - a) Deal in securities; or
 - b) Communicate such information to any unauthorized persons, for the benefit of himself or any other persons.

WELLCALL HOLDINGS BERHAD

Reg. No. 200501025213 (707346-W)

CODE OF CONDUCT AND ETHICS FOR EMPLOYEES

7.2. Employees are strictly prohibited to disclose any price sensitive information to any third party.

8. Fair Dealing and Anti-competition

In the interests of preserving reputation and integrity of the Company, Employees shall act impartially, honestly and responsibly in dealing with all co-workers, stakeholders, regulators and public where he/ she shall not: -

- a) Complete or aid/ assist other competitors to compete with the Company; and
- b) Take unfair advantage of anyone through manipulation, concealment, abuse of privileged or confidential information, misrepresentation of material facts, or any unfair dealing practice.

9. Reporting Violations of the Code

All Employees must immediately report any concern about possible/ actual breaches of the Code by any employee to the Chairman (or the Senior Independent Director, where applicable) and strictly observe the relevant internal document i.e. the Whistleblowing Policy.

10. Enforcement of the Code

In the event of any violation of this Code by any Employees, the Board shall determine appropriate actions to be taken after considering all relevant information and circumstances.

11. Review

This Code shall be reviewed by the Board of the Company periodically and when internal or external events warrant a more frequent review to be undertaken and make such amendments to this Code as the Board may deem to appropriate.

12. Disclosure of this Code

This Code will be published on the Company's website for public information.

Date: 11 January 2021