



MYCRON STEEL BERHAD

(Co. No. 622819-D)
(Incorporated in Malaysia under the Companies Act, 1965)

CODE OF CONDUCT AND ETHICS (“Code”)

1. Introduction

- 1.1 Directors hold a position of trust with the public and other stakeholders as well as with each other, and with officers and employees of the Company and its subsidiaries (“Group”). Appropriate standards of conduct and ethical behaviour are fundamental to the preservation of the Group’s reputation and the success of its operations.
- 1.2 All employees play an important role in establishing, maintaining and enhancing the reputation and brand of the Group. It is required that all employees display the highest level of professionalism in all aspects of their work and comply with this Code and all applicable laws, regulations and other policies applicable within the Group.
- 1.3 This Code of Conduct is intended to prescribe certain values and principles which the Group is committed to. The nature of this Code is not meant to cover all possible situations that may occur. It is designed to provide a frame of reference against which to measure any activities.

2. Objective

- 2.1 The objectives of the Code are as follows:
 - (a) Enhance public confidence and trust in the integrity, objectivity and impartiality of the Group;
 - (b) Describe the standards of business conduct and ethical behaviour of Directors and employees in the performance and exercise of their responsibilities as Directors and officers of the Group or when representing the Group;
 - (c) Guidance to all Directors and employees in the conduct of their business and that of the Group.

3. General Principles

3.1 Duties to act in the best interest of the Group

Directors and employees have a duty to act in the best interest of the Group and in accordance with the mandate of the Group.

3.2 Selflessness

Directors and affected employees shall make decision with the interest of the Group in mind and will not act to gain financial or material benefit for themselves, their family or friends.

3.3 Integrity

Directors and affected employees shall not place themselves under any financial or other obligation to any person that might reasonably be thought to influence them in the performance of their duties.

3.4 Objectivity

Directors and affected employees shall make decisions solely on merit, without regard for personal gain, when carrying out the business of the Group.

3.5 Honesty

Directors and employees have a duty to act honestly and declare any private interests relating to public duties and take steps to resolve any conflicts arising in a way that protects the interest of the Group.

3.6 Fair Dealing

All business dealings shall be conducted in a fair and equitable manner and must not be influenced by friendship or association.

All commercial transactions shall be properly and accurately recorded and documented.

Corrupt practices, whether directly or indirectly through intermediaries, are unacceptable. No bribes or improper payments, gifts or inducements will be made or accepted from any party, irrespective of business customs or practices.

3.7 Confidentiality

Directors and employees shall keep confidential all information that would reasonably be considered to be confidential including but not limited to terms and conditions of transactions entered into by the Group, financial details and policies and procedures of the Group.

Business or financial information may only be made to third party when disclosure is required by law and/or relevant authorities.

3.8 Insider Trading

Directors and employees shall not use price sensitive non-public information which can affect the prices of the securities of the Company when it becomes publicly known, for personal benefit or for the benefit of others. Directors and employees are prohibited to trade in securities or to provide information to others until such information is publicly released.

3.9 Diversity

The Group recognises the benefits brought to the Group by having a diverse multicultural and multidisciplinary workforce. The Group is expected to respect and value the different culture, gender, religion and uniqueness of others.

4. Compliance with Laws

- 4.1 Directors shall comply with the laws and regulations governing their conduct. Directors have a responsibility to be sufficiently familiar with any legislation or regulations that apply to their directorship.
- 4.2 Business of the Group shall be conducted in compliance with applicable laws and regulations.

5. Non-Compliance

- 5.1 The reporting of non-compliance with this Code may be made in accordance to the Whistle-blowing Policy, which sets out the channel to report on any malpractices.

6. Conflict of Interest

- 6.1 Directors should avoid conflicts of interest so far as possible.
- 6.2 Directors are required to comply with the appropriate disclosures of circumstances which may lead to conflict of interest positions as described in the Board Charter under Paragraph 5 of Part A – Defining Governance Roles on Conflict of Interest and related party transactions.

7. Public Comment

- 7.1 According to the Company's Corporate Disclosure Policies and Procedure, only appointed spokespersons are allowed to speak on behalf of or make any press statement or conduct any interview in relation to the business and affairs of the Group.

8. Review of the Code

- 8.1 The Board of Directors shall review and reassess the adequacy of this Code periodically and make such amendments to the Code as the Board may deem appropriate.