



Building Solid Foundations

THE PINTARAS GROUP

**CODE OF CONDUCT
MAY 2020**



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FOREWORD

Our vision and values

Pintaras's vision is to be a leading global geotechnical specialist contractor providing appropriate geotechnical engineering services which encompass foundation, geotechnical, substructure, earth retaining wall, building and civil engineering works. Our long-term economic goal is to deliver superior shareholder returns by first and foremost providing quality, efficient and on-time delivery of contracted services tailored to customer's needs and secondly, engaging in profitable and diversified ventures. We strive to create a conducive learning environment for our employees to work towards a knowledgeable, committed and motivated workforce.

Pintaras's Core Values

All our employees will demonstrate a responsible and professional approach to colleagues and customers. Our employees will be reliable, responsive, proactive, customer-focussed, innovative and act at all times in a trustworthy manner. Effective working relationships will be developed which will promote high integrity, respect, openness, fairness, reliability and good communication.

Your commitment and our expectations

The corporate culture which has been shaped by these values has played an important part in the success already achieved by Pintaras. For this reason, it is important to ensure this culture is nurtured. To achieve this we require the commitment of each employee and representative to the principles underpinning our culture, and an awareness of the obligations imposed by this commitment.

The principles on which our corporate culture is based are expressed in more detail in this Code. It also sets out Pintaras's expectations in relation to:

- Business practices
- Behaviour towards fellow employees, customers, suppliers and other business partners
- Ethical practices, and
- Recognition of stakeholder interests

Dedication to Corporate Social Responsibility

Pintaras recognises that it has obligations to a range of stakeholders with environmental or community interests. These obligations are part of Pintaras's Corporate Social Responsibility (CSR) program, which is explained in this Code. The Group expects all employees to make a personal commitment to help achieve our CSR goals.

Understanding and following the Code

The management has adopted the Code of Conduct and is committed to meeting all its requirements. The management expects a similar commitment from all employees (i.e. directors, senior executives, employees, representatives and sub-contractors) of the Pintaras Group. Complying with the Code is a condition of employment by Pintaras.

It is important that you read this document carefully and ask questions about anything in it that is not clear to you. Each of us must understand and accept our personal responsibility in preserving and enhancing Pintaras's reputation for honesty and integrity. Therefore, compliance with applicable laws, regulations and policies that govern our company is expected from all employees.



Building Solid Foundations

If you need guidance on any aspect of the Code, please speak with your superior or manager first. The Executive Directors and the Head of Human Resource can also assist you if necessary. All enquiries will be treated confidentially.

Our reputation is an asset. Pintaras's good reputation is a valuable asset. By upholding the Code of Conduct and living the Pintaras values you will help us protect it for the future.

Dr Chiu Hong Keong
Managing Director
Pintaras Group



BUSINESS PRACTICES

Overview

This section of the Code asks employees to:

- Be professional and accountable for their actions
- Consider the opinions of others and share ideas
- Listen carefully to customers
- Use software, email and the Internet appropriately
- Protect company assets
- Use common sense and discretion in all communications
- Reduce waste and duplication
- Follow company policies and procedures
- Provide accurate information to the public, and
- Respect the decision-making process within the company.

General standards and practices

Being professional and accountable

At Pintaras, employees are expected to carry out their duties in a professional, responsible and conscientious manner. Every employee is expected to promote and advance the interests of the company at all times. They are also expected to be accountable for their actions and decisions which means they will do as they say, act on what is agreed and have the courage to own the outcomes.

The company encourages and supports employees in maintaining and enhancing their skills in their particular areas of operation. The company prides itself on high standards of performance. All employees must ensure their behaviour reflects these standards. Your actions should create a positive influence on customer perceptions and the value of our business.

Sharing of ideas and listening to opinions

It is important that employees acknowledge and consider the opinions of others and encourage the sharing of ideas. The company values consultation and collaboration, a process that should be used throughout the organisation to obtain the valuable input of fellow employees, work together to obtain the best outcome, maintain positive relationships as well as identify and use experts even if outside the team.

The company also values diversity in its workforce as a force for innovation, change and in delivering high standards of customer service.

Responsibilities for dealing with customers

Listening carefully and providing good service

Customers are critical to the ongoing success of our business, and we interact with our customers in every aspect of our daily work. Employees in direct contact with external customers are expected to demonstrate high standards of behaviour in the provision of services. This means employees must always listen carefully to customers, record information accurately, use appropriate language and fulfil the commitments they make. All employees are encouraged to seek assistance from their managers or other senior colleagues if and when difficulties arise with customers. You should seek help to reach an appropriate solution.



Proper use of company resources and information

Using software, email and the Internet appropriately

The company provides employees with access to a wide range of assets and resources to help run the business. All employees must use these assets and resources appropriately, in a way that supports the company's development. You should at all times uphold the intent of the Code and other related policies and governing legislation.

The company does not allow the use of unlicensed or pirated software by any employee in the course of their duties. It also explicitly forbids the unauthorized copying of any software that may be either licensed to or owned by the company. All softwares developed or customised belong to the company.

Employees have a responsibility to use email and Internet services appropriately. Before starting work, they are required to read and sign an acknowledgement of Pintaras's Communications and Technology Policy. The company monitors all computer system operations.

Protecting company assets under your control

Employees are responsible for protecting any company property and assets under their control. They should be safeguarded from loss, theft and unauthorised use. Company property and assets includes cash, securities, business plans, third party information, intellectual property (computer programs, software, models and other items), confidential information, office equipment and supplies. As a general rule, company property and documents should not be removed from the premises without a valid reason. If removed for a particular purpose, they should be stored securely and covered by the appropriate insurance.

Using common sense and discretion in all communications

Employees should use common sense and good taste when selecting the content and language for documents transmitted or retained by Pintaras or a third party. You should not use Pintaras's electronic communications systems to access or post material that is pornographic, obscene, sexually-related, profane or otherwise offensive or violates company policies or any laws or regulations.

Any use of the company's electronic communications for non-business purposes should:

- be occasional
- not interfere with your professional responsibilities
- not diminish productivity, and
- not violate this Code of Conduct or any other company policies.

Reducing waste and duplication

All employees should ensure resources set aside for business activities are used efficiently and with consideration for reducing waste and duplication. As part of the responsible use of resources and equipment, employees are also required to ensure appropriate security measures are followed to minimise loss and damage.

Business records and internal controls

Using company policies and procedures for daily operations

The company and its employees are responsible for ensuring required standards and obligations are met in operating the business.



External activities and public comment

Providing accurate, consistent information to customers

Authorised employees or company spokespeople are the only people who can make public comment on issues directly affecting the company. Any requests for information or interviews must be cleared via the MD's office or other designated company spokespersons. Employees should always provide accurate and consistent information to customers, as it reflects on the image of the company and its employees. Take care when participating in activities outside work or making casual comment in social or work situations where information or actions may be perceived to be in conflict with the company and its views. The "Continuous Disclosure" policy discussed later in this document also provides additional guidance on how information is to be released publicly.

Making fair decisions

Using facts and considered opinions to make decisions

The company takes a merit-based approach to decision making, which means it allows facts to be presented, differing opinions to be heard and the interests of parties to be considered. Decisions will be made following a reasonable attempt to gather all of the necessary information and to anticipate the possible consequences and impact of each decision. Appeal and/or dispute resolution will be available if employees have concerns with any decisions made. These principles should also be used by employees generally, whenever they are involved in a decision-making process.



BEHAVIOUR TOWARDS FELLOW EMPLOYEES, CUSTOMERS, SUPPLIERS AND OTHER BUSINESS PARTNERS

Overview

This section of the Code asks employees to:

- Treat fellow employees fairly
- Keep the workplace free from discrimination
- Treat employees and customers with respect and consideration
- Respect cultural differences
- Be punctual and manage time wisely
- Respect the privacy of colleagues
- Understand our drug, smoking and alcohol policy at work, and use good judgment at company events where alcohol is served
- Help the company maintain a safe working environment
- Demonstrate professionalism at work and work related functions
- If managing staff, set an example for others.

Equity in employment

Treating employees fairly

The company upholds the right of every employee to be treated fairly and without bias in any work-related situation. Managers are responsible for promoting Equal Opportunity principles in all employment decisions and for continually reviewing processes to ensure the company is not directly or indirectly discriminating against any individual or group of people. Each employee is responsible for acting in a manner that supports a fair and equitable work environment.

Non-discriminatory practices

Keeping the workplace free from discrimination or harassment

The company is committed to eliminating discrimination in the workplace and ensuring no individual is subject to bias, harassment or discrimination based on factors such as gender, age, marital status, nationality or ethnic origin, religious or political belief, disability or impairment. Discrimination means denying an individual fair and equal treatment in employment on grounds other than those related to the requirements of the job. Managers at all levels within the company have a responsibility to ensure their team members are able to work in an environment that is free from discrimination.

Respect for colleagues and customers

Banishing bullying, intimidation and harassment

The company promotes and provides as far as practicable a work environment free from harassment, bullying and intimidation. Harassment is behaviour toward others that can be defined as unwelcome, or which humiliates, offends or intimidates others. Harassment or bullying of any kind by or against employees is not acceptable and will be dealt with appropriately by the company which includes termination of employment as a potential outcome.



In any situation where an employee believes harassment has taken place, the principles of “natural justice” will be applied. This means that if the employee is comfortable doing so, they are encouraged to discuss the matter directly with the “offending” employee. Sometimes the offence may have been unintended and the “offending” employee may have been unaware of the impact on their fellow employees. If the ‘offended’ employee is not comfortable approaching the other person, they are encouraged to notify their immediate manager who can then apply the above principles before escalating the matter if required. If the employee’s immediate manager is the source of the alleged harassment, then the employee should approach their next-in-line manager or a Human Resources Team member.

Valuing diversity and respecting differences

Different cultural, religious and social customs observed by employees are valued and respected. As a result all employees have a responsibility to ensure their language and behaviour does not cause offence or embarrassment to others.

Workplace behaviour

Being responsive, punctual and helpful

A significant part of the company’s culture is based on the way employees behave and interact with each other. Employees are responsible for contributing to a culture that makes everyone feel good about coming to work each day.

All employees should be responsive to customers and other staff and do things in a timely manner. This includes being punctual to work and to work meetings. It also includes showing a positive and helpful approach to customers, colleagues and other organisations, and managing work time to ensure priorities are identified and addressed efficiently.

Treating personal relationships as a private matter

Personal relationships between employees are a private matter. However, great care should be taken at work to ensure other employees and team members are not adversely affected by any personal relationship. Employees should follow the principles of unbiased judgement and decision-making, equality and privacy. Everyone has the right to attend work and to expect to do their duties without private and personal information being discussed within the workplace. Demonstrating affection or intimate behaviour in the workplace has the potential to make others uncomfortable and embarrassed, and is not considered to represent professional behaviour.

Drugs, smoking and alcohol

Keeping drugs and smoking out of the workplace and exercising good judgment with alcohol

The health and safety of employees is important to the company. Any possession or illegal use of drugs (including a drug intended for use by prescription), smoking, or being intoxicated in the workplace is not acceptable. If the company believes an employee’s work performance is influenced by alcohol, that employee will be removed from their duties and/or may be required to undertake a drug/alcohol test. Failure to agree to this request will be dealt appropriately by the company and may lead to termination of employment.



Health and well being

Meeting responsibilities in providing a safe, healthy workplace

The company is committed to providing a safe and healthy work environment for all employees, and to ensuring the public's health and safety is not adversely affected by its business activities. While the company is committed to providing a safe environment and meeting its legal and regulatory obligations, employees also have responsibilities.

At work, employees must take reasonable care of their own health and safety and the health and safety of their colleagues. Employees are also required to co-operate with the company on any action it takes to meet requirements imposed by Occupational Health and Safety legislation or regulations. Employees must not wilfully or recklessly interfere with or misuse safety equipment provided by the company, or knowingly risk the health and safety of others.

Representing the company

Demonstrating professionalism at work and at work-related meetings and social functions

The concept of professionalism underpins the standards of behaviour required of employees at all times. While this is difficult to define, the principle of respect for others can be used to assess whether behaviour or actions are professional. These standards apply whether you are working in the office, away from the office on business, at social functions, or business meetings.

If in doubt, employees should ask themselves if they would be comfortable with their behaviour or action becoming public knowledge. If the answer is 'no', the proposed action should probably not be taken without higher authority or guidance. Employees are encouraged to seek assistance from their superiors/managers on issues that affect their work and/or work environment. You can do this by approaching the superior/manager directly, or if the issue is broad and not specific to an individual, by approaching a more senior staff member, Human Resources Team member or any one of the Executive Directors.

Coaching and motivating employees to reach their potential

Employees who manage other staff should model expected behaviour and coach and develop their teams to maximise the potential of each member. The company is committed to seeking new and improved ways of motivating and supporting employees in the pursuit of their goals and activities.



POLICIES, PROCEDURES & ACCOUNTABILITY

Overview

This section of the Code asks employees to:

- Understand and comply with laws, regulations and policies related to the company
- Not disclose proprietary information
- Treat customer information with extreme care
- Be aware of our risk management procedures
- Ensure information is disclosed promptly if it impacts the share price and
- Use preferred suppliers

Laws and regulations

Complying with laws, regulations and policies that govern our company

Complying with governing legislation, regulations, procedures, practices and policies of the company, whether expressed or implied, is paramount to the integrity of the company. Therefore, all employees and representatives are required to observe the relevant laws in performing their work. Employees are encouraged to become familiar with policies covering matters that are vitally important to the company and adhere to their guidelines and requirements at all times.

These policies cover:

- Continuous disclosure
- Dealing in securities
- Occupational health and safety, and
- Equity in the workplace.

Keeping up to date with policy changes

Employees should ensure they are up-to-date with current policy and compliance requirements.

Confidential information

Using company information appropriately

It is important that all Directors and employees do not disclose proprietary information regarding the company's affairs, without authorisation from the Managing Director or Executive Directors. Proprietary information includes (but is not limited to) all financial and accounting information not disclosed publicly; all internal and external correspondence; all confidential personnel records; information relating to tenders; feasibility studies; legal disputes; contract negotiations; and all information relating to and stored in computer systems. Information such as brochures and shareholder reports when released to the public are not considered proprietary information.

In the event that a Director or any employee knows of material information affecting the Group which has yet to be publicly released, the material information must be held in strict confidence by the Director or employee involved until it is publicly released.



Privacy

Treating customer information with care

Employees must:

- Take steps, wherever possible, to ensure customer information is relevant and accurate, complete and up-to-date for its intended purpose.
- Retain information only as long as it is necessary
- Dispose of personal information or make it anonymous when it is no longer required
- Consider the privacy impacts of new systems, processes and services before they are introduced

Employees are responsible for ensuring they do not, either during employment or after they leave the company, use or disclose any such information.

Risk management and compliance

Tracking risk management performance

The Risk Management Committee advises the Board on the adequacy of Pintaras's risk management policies and procedures, particularly with regard to the impact of major changes in legislation, regulatory policies and investor and community attitudes. The committee also reviews and monitors internal processes and formal systems for identification, monitoring, management, representation and reporting of risks and recommends to the Board any action identified as necessary by these activities.

Continuous disclosure

Ensuring information is disclosed if it affects share price

Pintaras conforms to Continuous Disclosure Policy relating to its obligations under the Bursa Malaysia Listing Requirements, Securities Commission Act and other relevant governing regulations. This policy is designed to keep the market fully informed of information that may have a material effect on the share price of Pintaras, and to correct any mistakes or misinformation in the market. Employees should be aware of the requirements of this policy so they can act appropriately where it applies to them. Each employee is responsible for the integrity of the information, reports and records under their control and is expected to exercise the highest standard of care in preparing materials for public communications.

All documents should:

- Comply with any relevant legal requirements
- Fairly and accurately reflect the transactions or occurrences to which they relate and be supported by accurate and complete documentation, and
- Not contain any false or intentionally misleading information, or information that is Intentionally misclassified.

Purchasing

Using preferred suppliers

The company has an agreed procedure for purchasing goods and services and for assessing and registering preferred suppliers. Preferred suppliers are expected to be used in most cases. However, new suppliers can be added to the preferred supplier list where superior service and/or price can be obtained. Employees should familiarise themselves with this policy, which is available in the Pintaras ISO 9001:2015 Quality Management System Manual.



ETHICAL BEHAVIOUR

Overview

This section of the Code asks employees to:

- Take responsibility for their own actions
- Trade in company securities only during the designated periods
- Follow strict guidelines when trading securities
- Ensure they do not have a conflict of interest
- Not accept improper gifts, benefits or financial inducements
- Not transact on their own, family members or related party accounts
- Not to offer, give, ask for, accept or receive any form of bribe

General Standards

Taking responsibility for your own actions

Ethical standards are not defined in laws or regulations. This can mean that what is “right” or “wrong” is often open to interpretation. One of the purposes of this Code is to provide guidance on ethical behaviour, and limit the number of situations where the appropriate action is not clear. However, a Code alone cannot provide answers to every question. Each employee must accept the ultimate responsibility for his or her own actions. When an employee is faced with a situation where they are unsure about the ethics of a proposed action, they should seek advice from their immediate superior/manager. If they are still uncertain, they are encouraged to approach the Executive Directors or Human Resources Team member.

Inside Information and Securities Trading

Following guidelines when buying or selling company securities

No Director or employee shall use price sensitive non-public information, which can affect the price of the securities of the Company when it becomes publicly known (“Inside Information”), for personal benefit. Directors and employees are prohibited to trade in securities or to provide information to others to trade in securities or to provide information to others to trade in securities of the Company until the Inside information is publicly released.

Conflict of interest, anti-bribery and anti-corruption

Ensuring personal interests are not at odds with company interests

The company is committed to operating its businesses honestly, efficiently and fairly, and in accordance with ethical standards and legal requirements. Therefore, Directors and employees should avoid involving themselves in situations where there is real or apparent conflict of interest between them as individuals and the interest of the Group. Employees must ensure their actions, and the actions of those who report to them, are always fair with respect to the company’s clients, competitors and colleagues. The company respects the right of all employees to pursue personal interests outside work. However, there are times when these activities may either create or give the appearance of creating a conflict of interest with the employee’s immediate duties or the interests of the company.

A good definition of a conflict of interest is a situation where loyalties are divided. A person can have a potential conflict of interest if they can derive a personal benefit from a business decision over which they have influence. A conflict of interest may therefore occur when personal interests, the interests of an associate, a relative, or a duty or obligation to some other person or entity conflicts with a person’s duty or responsibility to the company.



As such, Directors and employees must not use their position or knowledge gained directly or indirectly in the course of their duties or employment for private or personal advantage (directly or indirectly).

In addition, a Director shall avoid any situation in which the Director has an interest in any entity or matter that may influence the Director's judgement in the discharge of his responsibility.

Recognising and avoiding a conflict

Potential conflicts of interest for employees or those acting on behalf of the company (or their family, relatives, friends or agents) should be avoided. If you feel a conflict may arise between the company, a client or a competitor on the one hand and you or a family member on the other, you should explain the situation to your superior/manager, Executive Directors or a Human Resources Team member. The company will analyse the issue and decide how it can be resolved.

The following are several examples of actual or apparent conflicts of interest:

1) Gifts and improper benefits

Company policy states employees should not seek or accept gifts, favours or other valuable consideration from individuals or organisations that have or may have business dealings with the company. In other words, an employee should not take advantage of their position or relationship with the company for personal gain. Employees also should not give unreasonable gifts when dealing with the company's clients.

Employees should not accept gifts in circumstances that:

- may appear to others to compromise their judgement, or
- would potentially embarrass the company if the gift were made public.

It is acceptable for employees to accept gifts of nominal value which are customarily offered to others who have a similar relationship with a customer, supplier or sub-contractor. Typically these gifts may include things such as pens or mugs but exclude hampers. Any hampers received are to be handed over to the Admin. Department which will then distribute them appropriately.

Employees should notify their superior/manager if they receive any gifts or are offered entertainment which may appear to provide material benefit or favour to the person, company or representative providing the gift.

A conflict of interest can also arise if an employee makes company purchases on personal credit cards or accounts linked to loyalty rewards. This practice violates the company's purchasing policy and is a conflict of interest because purchasing decisions could be influenced by the desire to increase personal reward.

2) Financial inducements

The management of financial interactions within and outside the company is important. Any commercial bribery by or on behalf of the company will not be tolerated. Commercial bribery refers to the payment of money or anything else of value to an employee, customer (or customer's agent) or supplier for the purpose of influencing the recipient's actions. Employees must refuse requests from any source to provide inducements intended to influence the outcome of business dealings. Any such requests should be reported immediately to the Managing Director or an Executive Director.



Building Solid Foundations

For further clarification, please read our Whistleblowing and Anti-Bribery and Anti-Corruption Policies on our corporate website.

3) Agents and representatives

To maintain the integrity and efficacy of business interactions, the agents and representatives of the company should be selected carefully. Agents and representatives are often contractors and sub-contractors. When selecting and appointing agents or representatives, consideration should be given not only to their ability to provide efficient service but also to issues such as integrity. The company's responsibility and potential legal liability arise from the fact that an agent or representative may act or appear to act on behalf of the company. A written agreement must be in place specifying the relationship between the parties.

4) Corporate opportunities

An employee should advance the company's legitimate interests whenever the opportunity arises. But employees must not take advantage of property, information, position in the company or other opportunities arising from their job for personal benefit. For example, if you learn of a business or investment opportunity through the use of corporate property or through your position at Pintaras, you should not participate in the business or make the investment without approval from the Managing Director. As a general principle, you should not participate in a joint venture, partnership or other business arrangement with the company without such approval.

5) Business records

Investors, customers, suppliers and government agencies rely upon the integrity of the company's records. As a result, all business records must accurately reflect the transactions they are recording, and comply with all relevant policies and requirements. Sales and other transactions for any person or organisation can only be made in accordance with the company's established business practices. All records and documentation are to be retained to comply with established retention schedules and legislative requirements.



RECOGNITION OF STAKEHOLDER INTERESTS

Overview

This section of the Code asks employees to:

- Understand the company's approach to supporting community and environmental programs
- Make a commitment to helping achieve Corporate Social Responsibility goals
- Reach out to communities where our company operates, and
- Get involved in sponsorship activities wherever possible.

Corporate Social Responsibility

Contributing to programs that improve our environment and community

The company recognises the need for a structured approach to its support of environmental and community programs. To that end, the Board and senior management of the company will establish a Corporate Social Responsibility (CSR) advisory committee to be chaired by a senior management employee. The committee will be responsible for identifying community and environmental programs and initiatives that the company can lend its support so as to determine the areas of greatest impact and the appropriate targets. It will also make recommendations to the Board on integrating CSR programs throughout the business. As an employee of the company you are encouraged to familiarise yourself with these CSR goals and make a personal commitment to helping achieve them. Our group and brand values will only be sustained if we clearly demonstrate that we have also delivered social, environmental and economic benefits.

Environment and community

Meeting or exceeding expectations of the company

Pintaras takes a serious view about its environmental responsibilities, and is dedicated to meeting or exceeding the regulatory requirements that govern our activities. We shall contribute in our own way by undertaking to encourage the development and application of environmentally friendly technologies.



FOLLOWING AND IMPROVING THE CODE

The Code of Conduct applies to all employees, directors, senior executives and representatives of the Pintaras Group, who are collectively referred to as “employee” throughout this Code. Failing to comply with any aspect of the Code is a serious issue, the consequences of which may vary from a reprimand to the termination of employment/contract. The company is committed to improving the work environment and the way in which it does business. You are encouraged to provide suggestions on the future development of the Code or any of the company’s policies or procedures. Suggestions can be forwarded to Human Resource Department or any of the Executive Directors. Please seek advice from your superior/manager or a Human Resources Team member if in doubt about anything in this Code of Conduct.

The Code attempts to address a wide range of business practices and procedures, but it cannot anticipate every issue that may arise. For this reason, it is always safest to consult a more senior member of the company if you have any questions.



COMMON QUESTIONS AND ANSWERS

Q: What if I don't understand something in the Code?

A:

In the majority of situations, you can contact your immediate superior/manager for assistance or clarification in relation to any matter regarding your work environment and activities. In some cases, where there may be sensitivities, you can seek assistance directly from a Head of Department, a Human Resources Team member or an Executive Director.

Q: Is this Code binding on all employees?

A:

The Code of Conduct is binding on all employees in the workplace or when undertaking business on behalf of any Pintaras Group businesses.

Q: How will the Company respond to a breach or suspected breach?

A:

The Company considers the principles and behaviours in the Code to be fundamental standards for working with the company. Any suggestion or allegation of impropriety or breach of the Code will be acknowledged and dealt with in a respectful manner for all parties involved in accordance with the company's policies. It will be escalated to the appropriate level in the organisation for resolution. In most cases it will involve discussions with your superior/manager and in some instances, the Executive Directors.

If the suggestion or allegation is verified, possible outcomes include official warnings, and in some cases termination of employment or immediate dismissal. The company has adopted a zero tolerance policy towards breaches of the law and will escalate issues to external agencies such as the police where this is warranted. In the most serious cases, criminal proceedings will be initiated.

Q: What should I do if I suspect someone of breaching the Code?

A:

If you observe or experience what you believe to be inappropriate behaviour, you should make an assessment as to whether to approach the person concerned directly. There may be a genuine misunderstanding that can be resolved without any further intervention. However, if your concerns are not alleviated or you feel that a direct approach would not be suitable, you should notify your superior/manager immediately. If the inappropriate behaviour involves your superior/manager or if you prefer to speak to a more senior member of staff, you are encouraged to approach Human Resources Team member or an Executive Director. If you disclose improper or inappropriate conduct, this should not result in harassment or other reprisals by other employees. The disclosure will be treated with confidentiality and sensitivity for all persons involved. Any harassment or reprisal is not acceptable and will be dealt with immediately. You may also refer to the Company's Whistleblowing policy and act accordingly.

Q: What happens if I inadvertently breach the Code of Conduct?

A:

The company encourages a culture of learning, so if you believe you may have inadvertently breached an aspect of company policy, you are encouraged to discuss this with your superior/manager or other senior staff member as soon as possible.



Q: What if I disagree with the outcome of a review of circumstances?

A:

If you are required to attend a review meeting, it is important you present all relevant facts regarding the issue under review. The outcomes of any discussions will be based on those facts, company policies and legislative requirements. There are several avenues for remedying the situation, depending on the type of breach that has occurred. Generally, you and senior management will formally review the circumstances, possibly with representatives present.



This Code of Conduct is a statement of certain fundamental principles, policies and procedures that govern actions in the conduct of the Pintaras Group's business. It is not intended to, and does not create any rights in any employee, client, customer, supplier, competitor, security holder or any other person or entity.

Pintaras Group comprising:

Malaysia

Pintaras Jaya Berhad 198901012591 (189900-H)
Pintaras Geotechnics Sdn Bhd 199401011786 (297465-H)
System Micro-Piling Sdn Bhd 199501011431 (340632-V)
E-Wall Sdn Bhd 200001016866 (519473-X)
Pintaras Megah Sdn Bhd 199601022121 (394473-T)
Pintaras Development Sdn Bhd 199201011860 (243363-K)
Pintaras Piling Sdn Bhd 199401009360 (295039-W)
Pintaras Prima Sdn Bhd 199601033496 (405848-U)
Prima Packaging Sdn Bhd 197401001001 (17795-D)
Primapac Sdn Bhd 201201014693 (988210-X)
Readycast Concrete Industries Sdn Bhd 199001016486 (208155-T)
Pintaras (East Malaysia) Sdn Bhd 199501040851 (370055-P)
Solidprop Sdn Bhd 199701029137 (444636-D)
SMPP Development Sdn Bhd 199001016296 (207965-U)

Singapore

Pintary International Pte Ltd (201713317H)
Pintary Foundations Pte Ltd (201217161E)
Pintary Geotechnics Pte Ltd (201825708Z)

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