

Code of Conduct

Ditrolic Energy



DATE

16 July 2024

CODE OF CONDUCT – DITROLIC GROUP

1. DEFINITION

- 1.1 A code of conduct is a set of rules outlining the policies plus responsibilities of, or proper practices for, an individual, party or organization.
- 1.2 Ditrolic Energy Holdings Sdn Bhd (“**Company**”) and its subsidiaries’ (collectively “**Ditrolic Group**”) Code of Conduct sets forth the standards of conduct in which personnel of the Ditrolic Group ought to conduct themselves in line with the best practices and standards adopted by the Ditrolic Group.
- 1.3 Each such person agrees to be bound by the provisions of this Code of Conduct and policies referred to herein upon notification of the most recent copy being given to them or which may be found at <https://www.ditrolicenergy.com/my/about-us/corporate-governance>.

2. OBJECTIVE

- 2.1 The aim of this Code is to ensure dissemination of the principles and guidelines to all levels of the Ditrolic Group, including all management and operational personnel (for ease of reference, “**Employees**”), Business Associates and other stakeholders (e.g. agency staff, volunteers, agents, sponsors and other concerned parties), of the best practices and standards which have been adopted by the Ditrolic Group.

3. CODE OF ETHICS

The code of ethics is organized into categories, as set out below.

3.1 Conflict of Interest

All Employees shall act in the best interests of Ditrolic Group and free from any personal, financial, non-financial or other conflicts that may compromise their judgment or impartiality. This is to protect Ditrolic Group’s interest from any harmful conflict of interest situations to safeguard Ditrolic Group’s reputation, minimise legal liability, and enable Ditrolic Group to effectively fulfil its responsibilities to all its stakeholders, society, and the environment. For more information, please refer to **Ditrolic Group’s Conflict of Interest Policy**.

3.2 Harassment

The company is fully committed to a safe, healthy and harassment-free work environment for all employees and believes that employees should be treated with respect and dignity. Harassment means any verbal, written or physical conduct that is known or ought reasonably to have been known to be unwelcomed, inappropriate or otherwise offensive to a person, and that conduct demeans, humiliates, threatens him/her or otherwise violates his/her dignity. Any employee who is experiencing or affected by harassment may seek help of his/her supervisor or HOD (Head of Department) to informally approach the alleged harasser on his/her behalf. If the employee is dissatisfied with the informal approach or finds it inappropriate in the circumstances of unsuccessful, he/she may proceed with formal complaint via Whistleblowing form. For further information on Ditrolic

Group's **Anti-Harassment Policy**, please refer to the **Company Employee Handbook**. Please also refer to the Company's **Human Rights, & Diversity and Inclusion Policy**.

3.3 Discrimination

Ditrolic Group practices an equal opportunity & non-discriminatory approach in its recruitment and retention policy. Employees are recruited and selected on the basis of qualifications and experience, merit and fitness. It is the Company's policy to recruit, hire, train, promote, assign and compensate employees on the basis of personal competence and potential for advancement without regard to race, marital status, color, religion, sex, national origin, age, physical impairments or disabilities. (Please refer to the Recruitment and Retention portion of the **Company Employee Handbook** and **Ditrolic Group's Equal Employment Opportunity Policy**). Please also refer to the Company's **Human Rights, & Diversity and Inclusion Policy**.

Harassment may be motivated by race or ethnicity, skin colour, religion, sex, or gender, place of origin, culture or age, which is prohibited under Ditrolic Group's Harassment Policy, under the Company Employee Handbook.

3.4 Safety and Health

Ditrolic Group is committed to providing and maintaining a safe and healthy working environment for our employees, visitors, and all people using our premises as a workplace. Ditrolic Group also prohibits the use of child labour, forced labour and human trafficking within the Company and those that supply to or sub-contract to it. Ditrolic Group strives to ensure that all of its employees work voluntarily for it and not intimidated or threatened to enforce employment. This includes establishing effective occupational health and safety management procedures to eliminate or reduce hazards in work processes and premises, thereby reducing the occurrence of accidents. The main goal of safety and health programs is to prevent workplace injuries, illnesses, and deaths, as well as the suffering and financial hardship these events can cause for workers, their families, and employers.

Please refer to the following Company policies:

- a. Environment, Health and Safety (HSE) Plan;
- b. Corporate Sustainability Policy
- c. Human Rights, & Diversity and Inclusion Policy;
- d. Child Labour, Forced Labour Policy;
- e. Environmental and Social Management System; and
- f. Occupational, Safety And Health Administration.

3.5 Environmental and Social Management System ("ESMS")

The Environmental and Social Management System has been developed so that any potential environmental and social impacts associated with the Company's facilities and operations are identified and managed to prevent adverse impacts to the natural and human environment. Please refer to the **ESMS** in full.

3.6 Confidentiality / Intellectual Property / Trade Secret

The employee will take necessary actions not to disclose to any third party of Company's business intellectual property, including but not limited to customer, supplier, logistical, financial, research and development information, even after the term of the employee's employment. Please refer to the Intellectual Property / Trade Secrets policy under the **Company Employee Handbook**.

3.7 Anti-Bribery

Ditrolic Group is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. Ditrolic Group has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate. Please refer to the Company's **Anti-Bribery & Anti-Corruption Policy**.

3.8 Anti-Money Laundering, Anti-Terrorism Financing, And Proceeds Of Unlawful Activities

Ditrolic Group strictly adheres to the ethical standards associated with our business practices and are committed to combat to participating in international efforts to combat money laundering and the financing of terrorist and criminal activities. Please refer to the Company's **Anti-Money Laundering, Anti-Terrorism Financing, And Proceeds Of Unlawful Activities ("AML") Group Policy**.

4. CODE ADMINISTRATION

4.1 Reporting – Whistleblowing Policy

Ditrolic Group is committed to maintain good corporate governance practices and ethical standards in the conduct of its businesses and operations across Ditrolic Group. All Directors, Bord Members, employees, consultants, and other stakeholders (e.g. agency staff, volunteers, agents, sponsors and other concerned parties) are strongly encouraged to report genuine concerns on improper conduct relating to the Company and/or Ditrolic Group. The Whistleblowing Policy provide an avenue for all employees of the Company and other relevant parties to disclose any improper conduct through the mechanisms as provided for under this Policy and to provide protection for employees and members of the public who make such reports. Please refer to the Company's Whistleblowing Policy.

4.2 Human Resource (HR) responsibilities

Where Ditrolic Group's Human Resources ("**HR**") has reason to believe that an improper conduct(s) has / have occurred, pursuant to any internal investigation by HR under the grievance procedure in the Employment Handbook ("**Grievance Procedure**"), then the HR shall report the Improper Conduct to the Compliance Officer under the **Whistleblowing Policy**.

5. VIOLATION OF THE CODE OF CONDUCT

When the Code of Conduct is violated, and the violation is a misconduct under the Employee Handbook or a breach of any of the policies by Ditrolic Group, the Employee(s) involved in the violation may be subject to the disciplinary action in accordance with these rules and policies.

The code is subject to change and will be revised as and when required.

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