
CODE OF ETHICS

PASB GROUP OF COMPANIES



**Issued by: Human Resource and Administration
Department (HRA)**

Revised version approved by PASB 74th Board of Directors Meeting on
28 June 2024

FOREWORD

As we embark on this journey of upholding our newly revised Code of Ethics (**“COE”**), I am proud to share our dedication to fostering a culture of professionalism, integrity, accountability, and ethical values across all aspects of our business.

The revision is essential to address the changing business environment and complex regulatory landscape and ultimately demonstrates our proactive approach to reinforce our dedication toward adherence to ethical and best practices.

This COE serves as a framework and our guidance to consistently strive for integrity in all our endeavors.

Therefore, adhering to our COE is of paramount importance as a strong ethical standard will ensure that the PASB Group operates within the legal requirements set by our laws and regulations, enhancing our long-term sustainability, uphold reputation, maintain public confidence, and may strengthen our competitive advantage. Furthermore, it is also crucial for mitigating various risks, including legal, and reputational risks.

Together, let's embrace our commitment to uphold the principles in this COE and continue to cultivate a culture of ethical conduct and ethical values.

Yours truly,

DATO ISAAC LUGUN
CHIEF EXECUTIVE OFFICER
Permodalan ASSAR Sdn Bhd

DEFINITION

For purposes of this COE, the terms shall have (but not limited to) the following meanings:

Confidential Information	<p>Confidential information shall include (but not limited) to:</p> <ul style="list-style-type: none">- Correspondences, documents or information marked “Confidential”, “Private”, “For Internal Use Only” and/or other similar legends and of under the circumstances surrounding such disclosure, a reasonable person would regard as confidential;- Information relating to current and/or future services or business dealings e.g. business and/or marketing plans or projections;- Commercial and technical information relating to PASB Group and its project as well as information pertaining to proprietary, strategic, sensitive, or personal in nature;- Internal financial data e.g. earnings records, PASB Group Budgets;- Personnel information;- Information pertaining to unitholders investment, clients and of that acquired by PASB Group in the course of its dealings with the disclosing party; <p>Other non-public information that, if disclosed, might be of use to the competitors or harmful to PASB Group.</p>
Commercial Information	<p>information regarding the purchase and sale of goods and services, including, but not limited to, information regarding marketing strategy, production data, assessments of goods and services, and compilations of data regarding commercial activities.</p>
Employee	<p>All individuals directly contracted to PASB Group on an employment basis including permanent and temporary employees.</p>

DEFINITION (Continued)

IO	shall refer to the Integrity Officer.
Laws and Regulations	means any laws, statute, regulations, guidelines, directives, circulars, standards, decision, rule, order, proclamation, notice, rule of court, or delegated or subordinated legislation having effect in the jurisdiction which applies to either of the Parties issued by the Relevant Authority or by Other Authorities.
PASB Group	shall refer to Permodalan ASSAR Sdn Bhd and its group of companies (" PASB Group ").
PEP	shall refer to a Politically Exposed Person.
PO	shall refer to Public Officials.
Principal Officer	shall refer to the Chief Executive Officer of Permodalan ASSAR Sdn Bhd, Chief Executive Officer of Amanah Saham Sarawak Berhad, and Executive Director of Assar Asset Management Sdn. Bhd (where relevant).
Relative/Connected Person	<p>means any of the following:</p> <ul style="list-style-type: none">a) a member of that employee's family;b) a body corporate which is associated with that employee;c) a trustee of a trust (other than a trustee for an employee share scheme or pension scheme) under which that employee or a member of his family is a beneficiary; ord) a partner of that employee or a partner of a person connected with that employee. <p>In paragraph (i), "a member of that employee's family" shall include his spouse, parent, child (including adopted child and stepchild), brother, sister and the spouse of his child, brother or sister.</p>

DEFINITION (Continued)

For the purposes of paragraph (ii), a body corporate is associated with that employee if;

- a) the body corporate is accustomed or is under an obligation, whether formal or informal, or its directors are accustomed, to act in accordance with the directions, instructions or wishes of that employee;
- b) that director has a controlling interest in the body corporate; or
- c) that employee or persons connected with him, are entitled to exercise, or control the exercise of, not less than fifteen percent of the votes attached to voting shares in the body corporate.

Relevant Authority means the Securities Commission Malaysia established under the Securities Commission Act 1993.

Securities has the meaning assigned to it in the Capital Markets and Services Act 2007 ("**CMSA**") and shall mean:

- (a) Debentures, stocks or bonds issued or proposed to be issued by any government;
- (b) Shares in or debentures of, a body corporate or unincorporated body; or
- (c) Units in a unit trust scheme or prescribed investments;

and include any right, option or interest in respect thereof.

Senior Management includes Head of Divisions, Chief Operating Officer and Chief Executive Officers.

Technical Information shall refer to data, specifications, details, or knowledge that relates to the technical aspects of a product, service, process, or project. It encompasses various technical details such as designs, blueprints, schematics, engineering data, software code, algorithms, specifications, research findings, and other technical documentation.

DEFINITION (Continued)

Third Parties/ Business
Associates

shall refer to any person who has a business or potential business in the process of business dealing with PASB Group and is not covered under the definition of associated person(s) including but not limited to bidder and tenderer.

ADMINISTRATION OF THIS CODE OF ETHICS

- All employees are required to comply with the provision of this COE and its relevant sections and to comply with all applicable laws and regulations.
- All employees are also required to observe all legislations which may have a more comprehensive coverage on the subject matters contained in this COE.
- Any violations or breaches of this COE shall be reported promptly to either, the Board of Directors and/or Principal Officer, Senior Management and/or the immediate supervisor and/or Human Resource & Administration (“**HRA**”) and/or Integrity Unit depending on the person being reported on. A centralized record of all breaches will be maintained and made available for inspection by the relevant authorities.
- Failure to comply with this COE may lead to disciplinary action, which may result in warning, suspension, or termination of employment.
- Any queries pertaining to this COE may be directed to:



Human Resource and Administration Department



+6082-231085



hrd@assar.com.my



Lot 357, Section 5, KTLD, Jalan Satok
93400 Kuching, Sarawak



Mon-Fri: 8.30 am to 5.30 pm

- PASB Group is dependent on all employees to report any violation or breach of this COE. Its significance cannot be understated as the violations can have serious repercussions not only for the individual involved but also for the reputation and integrity of PASB Group as a whole.
- Your vigilance and willingness for reporting violations play a vital role in upholding the fundamental principles that are enshrined in our COE.
- Therefore, all employees are encouraged to familiarize themselves with the Whistleblowing Policy and Procedures (“**WPP**”) of PASB Group on how to report any violation and breach of this COE.

- Our WPP provides specific guidelines on how to raise concerns and in general provides a formal recourse and confidential mechanism to any person related to ethical violation and the reporting process to follow. By using the designated channel provided in the WPP, it ensures that any employees who come forward with genuine concerns will be protected from any form of detrimental/retaliatory action as defined therein.

CODE TO BE READ TOGETHER WITH ALL RELEVANT POLICIES, ETC.

- This COE shall be read together with the Code of Ethics issued by the Federation of Investment Managers Malaysia, our Anti-Bribery and Anti-Corruption Policy & Procedures (**“ABC”**), Employee Handbook, and all other relevant policies and existing Standard Operating Procedures of the PASB Group and shall include all amendments which may be enacted from time to time.
- If any provision of this COE contradicts with other internal policies and/or Laws and Regulations, the provisions observing a higher standard shall prevail.

REVIEW

- Comprehensive review of this COE will be conducted a minimum once every two years.
- PASB Group reserves the right to amend this COE from time to time.

INTRODUCTION

Our **COE** is based on the following principles:-

1. Observance of compliance with laws both in letter and in spirit.
2. Upholding the reputation of integrity throughout the Organisation.
3. Avoiding possible conflicts of interest.
4. Ensuring completeness and accuracy of relevant records.
5. Ensuring fair and equitable treatment in all business dealings.
6. Avoiding misuse of position and information.
7. Ensuring the confidentiality of information and transaction.

CODE OF ETHICS

NOTE : This Section is for due observance by all employees of the **PASB Group**.

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1. PERSONAL BENEFITS

No employee may accept personal benefits whether from business associates, potential business associates, unit holders/potential unit holders (monetary or otherwise), brokers, suppliers, agent and/or any related parties acting on their behalf.

Personal benefits include items of value, gratuity, favour, service, loan, legacy, lavish entertainment and free holiday trips and any item where there is a reasonable likelihood that the employee will be or will appear to have been improperly influenced in the performance of his duties to PASB Group.

No employee shall accept personal fee or commission for any work or advice in connection with the business of PASB Group unless he has obtained prior clearance from PASB Group in writing.

Please refer to the existing ABC Policy for information and further details on the general principles of Gift, Entertainment and Corporate Hospitality ("**GEH**").

2. COMPLIANCE WITH LAWS AND REGULATIONS

All employees shall comply strictly with all laws and regulations applicable with its business, both in letter and in spirit.

PASB Group supports each employee in this responsibility and provides the necessary resources for compliance. All employees have an obligation to report non-compliance activities that may be in violation of any applicable law or regulation. If it is found that any law or regulation has been violated, corrective action will be taken.

If you have any questions or concerns regarding the specifics of any policy or laws and regulations, advice should be sought from the Legal Department and/or from any relevant parties.

3. DEALING IN SECURITIES

3.1. Employees Dealing in Securities

Trading in securities by a employee for his personal account is not encouraged and if so, should not be taken advantage and must be carried with care to ensure it is not seen as taking advantage of information not generally known to the public.

Regardless of the above, the following employee **SHALL NOT** deal, trade, or invest in securities (except for units in a unit trust scheme or prescribed

investments and includes any right, option, or interest in respect thereof) for his/her personal account:

- (a) employees who manage funds where the portfolio consists wholly or partially of securities i.e. Fund Manager Representative (FMR);
- (b) employees who deal in securities (except for units in a unit trust scheme or prescribed investments and includes any right, option or interest in respect thereof) for Company or client's accounts;
- (c) employees who maintain records of the clients' or Company funds and where in their normal duties, have access to information on these funds and their investment portfolio; and
- (d) employees who are involved in investment research on securities (except for units in a unit trust scheme or prescribed investments and includes any right, option, or interest in respect thereof) and/or portfolio management.

Notwithstanding anything contained herein to the contrary, the restriction as stated above does not apply for employees' investments in new issues or Initial Public Offering (IPO), participation in corporate entitlements exercise, and disposal of listed securities.

An employee when dealing in securities whether for Company, the client, or personal account shall constantly adhere to ethical standards in such dealings. An employee shall not engage in share dealing transactions of a nature that is questionable or illegal and therefore shall not engage in share dealing transactions, either by himself or with others which are, or which will give resemblance of false trading, market rigging, or market manipulation.

3.2. Dealing

All dealings are to be at arms-length on terms that are no more favorable than those extended to the fund and the Company and in accordance with the rules of the Bursa Malaysia regulating dealing in securities and the Guidelines issued by the Securities Commission.

4. INSIDER INFORMATION

Insider information is information obtained by an employee as a result of his employment and which is not generally known to the public and which one can reasonably foresee would have a material effect on the price of a traded security if made generally known.

All employees are strictly prohibited to trade in the affected security while in possession of insider information that has been obtained from others.

An employee who is in possession of insider information because of the nature of his work, shall not trade in the affected security whether personally or through others and shall not, directly or indirectly communicate such information to others or influence others to deal in the affected security.

In the case where the Company is the manager, advisor or underwriter for a public issue of securities, an employee of PASB Group or his relatives must not deal in the securities concerned until the security has been officially listed and traded on a stock exchange. This, however, does not preclude any employee or his relatives from subscribing to the public issue of the affected securities.

All employees shall keep secret all transactions, account information, dealings, and business affairs affecting the Company and its customers or any person or persons that the Company may have dealings with.

Where there is a possibility of being seen to be insider information, the employee should clear with the Principal Officer and/or Senior Management and/or IO prior to contemplating a share transaction.

Non-compliance with any of these prohibitions may subject the employee to investigation and disciplinary actions by PASB Group or legal sanctions of law by the Relevant Authority, particularly the relevant Laws and Regulations or any other relevant provisions under the laws and regulations which may apply to the employee.

5. CONFLICT OF INTEREST

Employees must be alert to and avoid or declare conflict of interest situations, whether real, potential, or perceived. The appearance of conflict to the public may/will erode the trust and confidence on which PASB Group's reputation rests. Conflict of interest situations either involve conflict between PASB Group and/or personal interest and/or PASB Group and the unitholder's interest or personal interest.

Where a relationship between employees and their families may give rise to a conflict of interest where PASB Group is concerned, such relationships should be declared to the Principal Officer and the Senior Management.

Employee and their business counterparties, agents, and business representatives must avoid conflict of interest situations arising between their private activities and personal interests, and their responsibilities owed to the PASB Group. They must not accept directly or indirectly any personal gain, services, or loans from a competitor, customer, supplier, or contractor of PASB Group. A conflict may arise if they or any of their close associates receive benefits, other than the contractual benefits, as a result of their position with PASB Group.

Any conflict of interest and/or suspected conflict of interest must be declared immediately.

It is essential for all to be transparent and proactive in identifying and addressing any conflicts of interest that may arise in the course of their duties.

In such a situation, he or she must recuse and abstain from participating or getting involved further in related activities/actions/discussions/decisions to ensure the highest standards of ethical conduct and ensure a fair and impartial decision-making process.

Potential scenarios that could involve conflicts of interest in terms of personal benefit, personal interest, and personal relationships are as follows:

- Outside appointment/business activities;
- Advisory board, board of directors, or equivalent fiduciary roles;
- Unpaid professional activities for organisations that have a relationship with PASB Group;
- Immediate family members who work for organisations that have relationship or compete with PASB Group;
- Previous employment(s);
- Having a substantial financial stake or occupying a position with notable financial benefits;
- Relationships with clubs, society and non-governmental organisations and communities' activities;
- Corporate directorship;
- Relationship with PEP/PO.

In addition, employees by virtue of their roles and positions, possess any private Confidential Information, must consistently recognize the necessity and significance of maintaining confidentiality. They are required to strictly adhere to the principles of confidentiality and non-disclosure.

5.1. Personal and Family Relationships Transaction

No employee may act on behalf of PASB Group in a transaction that involves parties with whom he or his family has a significant connection or material financial interest.

5.2. Employees Transaction with Other Parties

It is expected that an employee, upon knowing that PASB Group is contemplating a facility to or a transaction with a party in which he has an interest (whether direct or indirect), declare immediately his interest and abstain from any process involving the transaction or the approval of the facility. In this respect, the employee should familiarize himself with the provisions of the Companies Act 2016, CMSA, or related legislation on interested-party transactions.

No employee may represent PASB Group in any transaction with others with whom the employee has any business or personal affiliation or relationship which might give rise to a conflict of interest.

6. FAIR AND EQUITABLE TREATMENT

6.1. Dealing with PEP/PO

Providing gifts, entertainment, or corporate hospitality to PEP/PO or their family/household members is generally considered a 'red flag' situation in most jurisdictions.

All employees are prohibited from paying for non-business travel and hospitality for PEP/PO or their family members. If approval is granted for such activities, they must be modest and appropriate for the official capacity of the PEP/PO, not their personal status.

All employees must also be mindful of customs and laws regarding such practices in different countries and seek guidance from IO and/or Legal Department prior to providing any gift, entertainment, or corporate hospitality to PO/PEP.

Entertainment involving PEP/PO requires prior management approval, and any unplanned entertainment must be recorded promptly by using the Declaration Form.

Please refer to the existing ABC Policy for information and further details on dealing with PEP/PO.

6.2. Dealing with any external parties/third parties/business associates

All business dealings with relevant external parties and potential external parties/third parties/business associates should be conducted fairly, and equitably on an arms-length basis and must be carried out in compliance with all relevant laws and consistent with the values and principles of the ABC Policy.

All employees shall maintain the highest standards of integrity and objectivity in their working relationships with any external parties/third parties/business associates. Employees must uphold the interest of PASB Group at all times and not be influenced by friendship or association when making business discussions on behalf of PASB Group.

6.3. Dealing with suppliers

Unless as a matter of policy where group services are preferred, a member must award orders or contracts to suppliers strictly based on merits without favoritism.

6.4. Dealing with regulators

PASB Group is committed to fostering transparent relationships with regulators through open, cooperative, and timely engagement. As various departments within PASB Group may undergo scrutiny from regulators, authorities, and government agencies, it is therefore imperative for all employees to understand the appropriate procedures for engaging with regulators and comply with the necessary approvals.

6.5. Dealing with customers

As PASB Group aims to build trust and long-lasting relationships with its valued customers (where applicable), PASB Group always uphold principles of honesty, fairness, and respect in its interactions with the customers and ensures clear information and equal access to products and services. All information is treated with utmost confidentiality and in compliance with all relevant laws and regulations.

7. OUTSIDE BUSINESS

An employee may have personal interest in outside business subject to the written approval of the Board of Directors as the case may be. Approval will be granted only where such interests, whether direct or indirect, are not in conflict with those of PASB Group. Where participation in any outside business activity demands excessive time and attention thereby depriving PASB Group of an employee's best efforts on the job, a conflict of interest also arises.

The employee concerned is also not to use PASB Group time and facilities for his/her personal and outside business. Where such business begins to encroach on the employee's work he should discuss the matter with the Manager of each respective Department, the respective Head of Divisions, the Principal Officer, or the Chairman as the case may be.

Employees are not to hold directorships in another corporation (except within PASB Group) without the approval of the Board of Directors. Where approval is obtained, such personal and outside business should not be allowed to interfere with an employee's duties, responsibilities, and obligations as an employee.

For avoidance of doubt, except insofar as is required in the course of his duty or expressly authorised by the Board to do so, no employee shall:

- a) take part directly or indirectly in the management or business activities of any company or companies, firms, corporations, or any other activities whatsoever whether for gain or otherwise.
- b) have any interest either directly or indirectly or through nominees or trustees in any company, firm, or business.

Any permission granted may be withdrawn at any time by the Board of Directors without assigning any reason thereto.

For those intending to work part-time, prior Management approval must be obtained.

Employees under-regulated entities i.e. which is under Amanah Saham Sarawak Berhad and ASSAR Asset Management Sdn must not solicit appointments as executors, administrators, or trustees of Unit holders' estates. If such an appointment is made and the employee is a beneficiary of the estates, his signing authority for the assets must be approved by the Principal Officer.

8. ABUSE OF POSITION

An employee must not use/misappropriate PASB Group name or facilities or information acquired through their position to gain, either directly or indirectly, personal advantage or on behalf of friends or relatives. The use of position to obtain preferential treatment e.g. buying and/or selling of units, payment of dividends, or other matters relating to PASB Group is prohibited.

9. BORROWINGS

- 9.1. An employee's incurrence of personal liability such as the obtaining of personal loans and overdraft facilities from a financial institution, and the issuance of personal guarantees may to an extent relative to the amount involved and to the employee's position in PASB Group, affect the image of PASB Group. Employees should not therefore incur significant personal liabilities for monies borrowed, which they are unable to settle.
- 9.2. Should an employee in the course of his employment find himself involved directly or indirectly in some problems with regard to personal finance, or financial obligation, they should declare to the Principal Officer and the Senior Management, before these become unmanageable. Any employee found to have been involved in financial indiscretions affecting the reputation of PASB Group may be subject to dismissal.

9.3. Liability of Employees

It shall be remembered that an employee is liable for any banking facilities given or any other action taken by him without the approval of the appropriate authority.

Any payment to be made by PASB Group due to any employee's negligence or careless action or as a result of action(s) taken without approval, shall be recovered from the employee by deducting his/her salary or any other action as deemed necessary.

10. CONFIDENTIALITY

All confidential information must be kept strictly for official use only and be made available to authorized personnel only. An authorised employee in possession of such confidential information must not disclose it to any third party except when authorized by PASB Group and/or required by law. Confidential information must never be discussed outside the normal and necessary course of PASB Group business. Employee access to information is restricted to its

own Department/Unit in order to ensure that confidential information is not being misused, whether directly or indirectly, for their personal or another person gain and to minimise the risk of unwarranted disclosure. Notwithstanding anything contained herein, confidential information may be used or made available to relevant third parties or authorities only with prior written consent of the disclosing party or where disclosure is required by law.

An employee shall not make or cause to be made copies of any document or material constituting the property of PASB Group for your personal use or record for any reason whatsoever except as required for the proper discharge of his duties and functions.

All employees shall undertake to ensure any disclosure of information is strictly in adherence to the Personal Data Protection Act 2010 and/or any other relevant governing requirements and regulations.

11. RELATIONS

Where a relationship between employees may give rise to a conflict of interest between the persons and PASB Group, such relationship should be declared to the Principal Officer and Senior Management.

It is the policy of PASB Group that, where two employees marry after employment, one of the two may be transferred if it is considered that their positions give rise to a conflict of interest.

12. MAKING PUBLIC STATEMENTS

An employee, except with the written permission of PASB Group, shall not at any time make public, reveal, disclose, or furnish directly or indirectly either orally or in writing or in any other form to any other person or company pertaining to any information, affairs or document which he may acquire or come into possession during the course of his/her employment with PASB Group.

Such prohibition shall be adhered to especially where such statement or comment may reasonably be regarded as indicative of the policy of the PASB Group and/or where such statement or comment may be detrimental to the PASB Group.

Any communication with media and press shall be handled by the relevant division as may be determined by PASB Group from time to time. The employee is required to liaise with the respective Principal Officer, Senior Management and/or relevant Head of Division (as the case maybe) prior to any release of news, statements, information, publication, data, advertisements,

and interviews that may reasonably be associated with PASB Group. Disciplinary Action may be taken against the employee who makes any public statement without prior permission of PASB Group.

An employee shall not either orally or in writing or in any other form make any public statement on the **policies** or **decision** of PASB Group on any issue nor shall he/she circulate any statement made by him/her or by anyone else.

Except with written permission of PASB Group, an employee shall not either orally or in writing or in any other form make any public statement or comments on any matter relating to the work of the department in which he is or was employed:

- a) Where such statement or comment may reasonably be regarded as indicative of the policy of PASB Group, or
- b) Where such statement or comment may embarrass or is likely to embarrass PASB Group.

13. PARTICIPATION IN POLITICAL OR NGO ACTIVITIES

PASB Group's policy on this matter shall be in line with the Sarawak State Government Policy as imposed on the state civil servants from time to time.

14. PROPER RECORD KEEPING

PASB Group has established internal record keeping controls and policies in order to meet both requirements of the law and business of the group. An employee is expected to maintain and adhere to these controls and policies.

The documents of PASB Group must be complete, accurate, in reasonable detail and where necessary, to be in adherence to the record retention standards as stipulated by the regulators and/or affiliate professional organisation. These records which include both computerised and non-computerized documents and information used for internal and external reporting must be accessed and used only for management approved purposes.

Falsifications of records and willful omissions, concealment, and alteration of transactions contained in the records are unlawful. An employee must with care ensure that all transactions with other parties (including related and associated companies) are properly documented and recorded.

15. FINANCIAL INTEGRITY

Employees are to be prudent in expenditures on behalf of PASB Group and to record all business transactions in accordance with accepted accounting principles. Employees are to maintain appropriate internal controls to prevent or detect fraud.

16. PROPERTY, EQUIPMENT AND USE OF FACILITIES

Properties, equipment, and facilities of PASB Group (**“Company Property”**) are strictly to be utilized for official and work-related purposes only.

All employees shall protect the Company Property and to use it responsibly and in a manner that aligns with the values and objectives of PASB Group.

Any abuse or misuse of the Company Property by an employee, including but not limited to unauthorized personal use or any actions that compromise the security or integrity of the Company Property is considered a serious violation of this COE. Employees are also prohibited from causing any damage to the Company Property and are not permitted to use any such Company Property to commit criminal acts or engage in any misconduct.

Employees found engaging in such behavior will be subject to disciplinary proceedings, which may result in warnings, suspension, or termination of employment, depending on the severity of the violation.

Additionally, employees who abuse the Company Property may be held liable for any loss or damage incurred as a result of their actions.

17. SAFEKEEPING OF ASSETS

Employees shall undertake to ensure that the assets of PASB Group such as equipment, inventories, cash and other assets are appropriately identified and kept or secured physically, counted periodically and compared with amounts shown on control records.

18. SEXUAL HARASSMENT

At PASB Group, every employee is entitled to work in an environment that is free from any form of sexual harassment. PASB Group takes a strong stance against sexual harassment, and appropriate actions will be taken against any employee found to have engaged in such conduct. Employee shall avoid any behaviour or conduct that could reasonably be interpreted as sexual harassment.

Examples of sexual harassment include, but are not limited to, the following:

- i) Unwanted touching or physical contact.
- ii) Inappropriate comments, jokes, or gestures of a sexual nature.
- iii) Displaying or sharing sexually explicit materials.
- iv) Sexual advances or propositions.
- v) Comments about someone's appearance or personal life that are sexual in nature.

All incidents of sexual harassment must be promptly reported to the HRA and/or can be made via reporting procedures set out in WPP so that all reports can be promptly and thoroughly investigated.

19. ILLEGAL SUBSTANCES

- 19.1 The use, possession, sale, or distribution of illegal drugs or abuse of alcohol is strictly prohibited on PASB Group property, during work hours, or while representing the PASB Group;
- 19.2 **Illegal Substances** include drugs like cocaine, heroin, methamphetamine, unauthorized prescription medications, and any other substances prohibited by law;
- 19.3 **Alcohol Abuse** includes being under the influence of alcohol while at work or consuming alcohol in a way that affects job performance or safety;
- 19.4 Using, possessing, selling, or distributing these substances is not allowed on PASB Group property, during work hours, or while representing the PASB Group;
- 19.5 Violating this policy may result in disciplinary action, up to and including termination of employment;

19.6 Employees are encouraged to report any violations or concerns about illegal substance use or alcohol abuse to the HRA and/or can be made via reporting procedures set out in WPP so that all reports can be promptly and thoroughly investigated.

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APPENDIX 1

DECLARATION FORM

The PASB Group Code of Ethics (“COE”)

I, (I/C No:)
hereby declare that I have read and understood the PASB Group Code of Ethics.

I shall conduct myself with complete professionalism, integrity and be true to the spirit of the COE. I hereby undertake to comply with the requirements and provisions set out in the COE and any revisions thereto by the PASB Group from time to time.

Name :

Date:

