

ETHICS POLICY

AGENCI PEKERJAAN MAGNIFICENT EMBLEM SDN. BHD. (APME) is committed to the highest standards of ethical conduct in all its business dealings

1. CONFLICT OF INTEREST

APME expects business decisions to be made in the interest of the Company. Any situation that creates/appears to create conflict between personal interest and the interest of APME must be avoided. Conflict of interest may arise when doing business with a company that employs or is partially or fully owned by an APME employee or an APME employee's family member or close friend. Suppliers should disclose all conflicts of interest to APME before any business dealings are committed

2. NO IMPROPER ADVANTAGE

APME strictly abides by all anti-bribery and corruption or any other type of laws related to bribery and corruption in Malaysia and similar laws in the many countries where APME conducts business. APME disallows payment of bribes or engagement in unfair business practices. This includes, directly or indirectly, offering or authorizing the payment of anything of value to local and foreign government officials or offering or receiving a bribe from a non-foreign official in a commercial setting in an effort to influence business decision in obtaining or retaining business, or securing business advantage

3. GIFTS AND ENTERTAINMENT

No gift/entertainment may be provided or accepted if it will obligate or appear to obligate the recipient. APME prohibits employees and customer representatives to: -

- Accept anything as part of a deal to do anything in return for the gift or entertainment
- Accept any gift, entertainment or service that is illegal or results in violation of the law
- Accept any bribes or kickbacks

4. DISCLOSURE OF INFORMATION, PROTECTION OF IDENTITY, PRIVACY

APME commits to safeguard customers' confidential information by keeping it secure, limiting access to those who have a need to know in order to do their job, and avoiding discussion of such confidential information in public areas (e.g., on planes, in elevators). Customers' confidential information will not be disclosed to unauthorized third parties without the prior written approval of the customer. Confidential information includes intellectual property, financial information, business plans, processes, contracts, customer information, employment and personnel records, identities of whistle-blowers and related investigation, and other information generally regarded as confidential. The obligation to preserve such confidential information is ongoing, even after the business relationship ends. This clause shall also include the suppliers' that we work with in our business environment

5. FAIR BUSINESS, ADVERTISING AND COMPETITION

APME believes in free and open competition, and strictly abides by all applicable fair competition and anti-trust laws in local environment and the many countries where APME conducts business

6. ACCURATE BUSINESS RECORDS

APME will record and report information accurately and honestly. APME will not hide, not record, or make false records in connection with any business that is conducted locally and overseas. All records, including financial and operational records shall accurately reflect transactions, payments and events



PHANG LI KOON
MANAGING DIRECTOR

