

PING EDGE TECHNOLOGY BERHAD
(Registration No. 202401013537 (1559387-U))
(Incorporated in Malaysia)

CODE OF CONDUCT AND ETHICS

PURPOSE

The purpose This Code of Conduct and Ethics record the commitment of Ping Edge Technology Berhad (“the Company”) and its subsidiary (“the Group”) to conduct its business operations in a manner that is efficient, effective and fair. This Code is applicable to all directors, officers and employees of the Group. The purpose of the Code of Conduct and Ethics is to prevent wrongdoing and to promote, among other things, honest and ethical conduct and to ensure to the greatest possible extent that the Group’s business is conducted in a consistently legal and in ethical manner.

BUSINESS CONDUCTS

1.0 Fair Trade and Prevention of Corruption

The Group’s businesses are run in a fair, transparent and free competition, and strive ceaselessly to prevent corruption while maintaining appropriate relationships with its customers. As a general rule, all employees are discouraged from giving or accepting gifts, entertainment and/or other benefits to or from business partners (including potential customers or suppliers). In addition, all employees must not solicit gifts of any size at all times.

Notwithstanding the above, the Group recognizes that the occasional acceptance or offer of modest gifts and entertainment may be a legitimate contribution to a good business relationship. Please refer to the Group’s Anti-Bribery and Anti-Corruption Policy for occasional acceptance circumstances.

Prior to giving or accepting gifts, entertainment and/or other benefits (in whatever form or value), employees shall assess the appropriateness of their actions by exercising proper care and judgement and apply the general principles in determining the appropriateness of the gift, in particular when dealing with public officials, bodies and/or authorities.

Employees are required to make declaration(s) to Human Resource Department/ Directors who will then decide whether to approve the acceptance of the gift or require the gift to be returned.

2.0 Professional Conduct

All employees shall observe and adhere to the highest standards of professional conduct. Employees are expected to have respect and tolerance for other cultures and religions than those of their own whether locally or overseas and shall conduct themselves in accordance with accepted standards of behaviour. The Group does not tolerate any form of abusive or coercive behaviour whether verbal or otherwise, physical violence or sexual harassment among its employees.

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3.0 Confidentiality

Confidential information consists of any information that is not publicly available or yet to be made public. Employees working in the Group are required to keep all commercial information such as business trade secrets, business, marketing and service plans, buying rates, selling rates, profit, clients' list, agreements, etc within the office. Any document copies are strictly forbidden to be taken out of the office, unless pre-approval from the Management is obtained. Furthermore, employees are discouraged to discuss sensitive business issues and/or matters relating to the Group in public places.

Employees shall not duplicate confidential documents or records without Management's approval except for file/record keeping within the Group. All classified information shall be securely stored or be disposed in a manner that will not pose a security risk.

4.0 Conflict of Interest

A conflict of interest exists when an employee's commitments or obligations to the Group may be compromised by the employee's other interests or commitments. Although not all conflicting interests are impermissible, those involving self-gain by the employee or the employee's family may serve to compromise the employee's obligation to the Group.

To protect the Group interest when it is contemplating or actually entering into a transaction by ensuring that such transaction will not be adversely affected by any conflicting interest of an employee. Employees of the Group must carry out their responsibilities to the Group with loyalty and in the best interest of the Group, conduct their personal and business matters so as to avoid actual, potential or apparent conflict between self-interest and the Group's interest, and disclose to the Group any actual, potential or apparent conflicting interests.

5.0 Harassment & Abusive Language

We are committed to providing a work environment that is free of discrimination and harassment of any form. We will not tolerate any actions, words, jokes, comments made by any employee that are based on, among others, individual's sex, race, religion, disability, and any other. This includes language used over the phone, via e-mail or other forms of communication.

Employees must refrain from using abusive or discriminating words, jokes, comments or gestures as well as acts which include touch the body of opposite sex unnecessarily and/or tease an employee of the other sex indecently. When an employee feels uncomfortable with the words or actions of the other employee, he/she should clearly show his/her objection or inform the manager in charge if necessary.

We are encouraging the prompt reporting of acts or words of harassment, whether the actions or words are directed against the person making the report, or against another person. Prompt reporting is crucial because it will allow us to take prompt and appropriate action to deal with the problem. All complaints are considered serious and are dealt with through informal intervention or formal intervention resolution procedures. Disciplinary action will be taken in all cases where there is a finding of responsibility through a formal procedure.

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6.0 Smoking, Gambling, Drug, Alcohol-Free Workspace

Employees are prohibited from smoking at all indoor areas within the Group's premises.

Gambling in office, in the form of money or otherwise, is strictly prohibited.

Employees are strictly prohibited from taking drugs or alcohol during working hours or within the Group premises.

Violators will receive serious warning from the Management and repeated violations will lead to immediate termination of employment.

7.0 Encourage the reporting of unlawful of unethical behaviour

The Group maintaining a culture of openness and encouraging its employees to disclose and report any suspected misconduct via internal channel. The Group is committed to creating a safe environment in which employees are not afraid to bring up and disclose conflicts of interest, fair dealing, insider trading and reporting structure of non-compliance.

8.0 Social Media

Employees should not publish, post or release any information that is considered confidential. Never post any information or rumours that you know to be false about the Group, other staff, customers, suppliers and other person associated with the Group with intentionally harm someone or the Group's reputation.

9.0 Use of Computer Network and Internet Access

The computer network is the property of the Group and is to be used for legitimate business purposes. Users are provided access to the computer network to assist them in the performance of their jobs. All users have a responsibility to use the Group's computer resources and the Internet in a professional, lawful and ethical manner. The Group's computer network may not be used to disseminate, view or store commercial or personal advertisements, solicitations, promotions, destructive code (e.g., viruses, Trojan horse programs, etc.) or any other unauthorized materials.