

Code of Conduct

Policy statements

Business Ethics

The group is committed to conducting its business in an ethical manner and in compliance with all applicable laws dealing with customers, suppliers, associates, and shareholders. Honesty, fairness, respect and integrity are all guiding principles in our business dealings.

The Company will examine its ethical and moral principles of conducting business and does not condone bribery and corruption in the course of business. The business ethics apply to all aspects of business conduct and are relevant to the conduct of individual employees and entire group of companies.

Gifts and entertainment

An employee or his relatives should give nor accept cash commission, expensive gifts, extravagant entertainment or a benefits-in-kind of free or at very low costs from any company or individual doing or seeking to do business with the Company.

Such personal favours might induce the employee to favour the third parties and affect the judgement as to what is the best for the Company. Sometimes it is a business custom and practice to receive gifts and entertainments. To avoid conflict of interest, you should follow the guidelines.

Procedure Guidelines for Gifts and entertainment Gifts

Gifts	<p>Gifts to customers or suppliers should fulfil the following conditions:</p> <ul style="list-style-type: none">• Monetary value should not exceed RM250• The customer's or supplier's supervisor is duly informed• The gift is part of a marketing or educational activity <p>Employees should not request for gifts on behalf of the Company like to annual dinner gift, sponsorships, or welfare events unless such contributions are documented and communicated by senior management.</p> <p>You may accept gifts that are appropriate to the business relationship. Gifts of small value (not exceeding RM250) can be accepted when extended as business courtesies. This may include sales promotion items.</p> <p>Upon receipts of the gifts the employee should report to his superior and he may be required to handover the gifts to the Group Admin Department for company use or as a lucky draw gifts for employees as may deemed fit.</p> <p>And such receipt shall be properly recorded by Group Admin Department.</p>
Entertainment	<p>Customary business entertainment such as lunch, dinner, or sporting events, is appropriate if it is made known to the superior and of a reasonable nature. Its purpose is conducting business discussions or fostering better business rapport.</p>

Payments to third parties

Payments to third parties to secure sales or obtain favourable treatment are prohibited. Similarly gifts of substantial value or extravagant entertainment of such third parties are prohibited since they may be construed as attempts to illegally influence their decisions.

Third parties include government officials, suppliers, customers' representatives, or potential customers.

Company funds shall not be used as contributions to political parties, committees, organisations, or candidates in a political campaign.

Conflict of interest

All employees of the company shall act in the best interests of the Company whilst carrying out his or her responsibilities. Employees should not be involved or engaged in any way with any activities which materially interferes with the proper performance of his or her duties or obligations to the Company, whether such activities are related to the Company's business or not. The Company's code of ethics requires that all employees to avoid any conflict between their own interests and the interest of the Company.

A conflict of interest will arise where an employee's ability to perform his or her Company duties may be adversely affected by an outside appointment, relationship or activity. Employees shall not have personal or family financial interest or own shares in other companies which compete with the Company's business with the exception of the publicly traded companies or with the prior written consent of the Company.

Employee should not take improper advantage of their position as employees of the Company or of any information obtained in the course of their employment to secure personal advantage. Any action or omission by any employee for the purpose of gaining personal advantage (including for the benefit of his family or friends) as a result of knowing that the Company is contemplating or has decided upon a course of action is totally prohibited.

Confidential information

The Company's confidential information should not be disclosed to unauthorised or used to buy or sell Company securities (Company shares).

All material information concerning securities, financial condition, earnings, or activities of the Company must remain confidential until it is fully and properly disclosed to the public. Such information includes knowledge of acquisitions, divestiture, and new products or processed, audit reports and earning figures and trends.

Confidential information related to the Company's business activities must not be used after employment, given to competitors, suppliers, contractors, or other employees.

All customer information and employees' are strictly private and confidential, and must be treated as such at all times, and should not be disclosed without proper authorisation.

Whistle-blowing policy

The whistle-blowing¹ policy is to provide employees an avenue to raise concerns without fear of reprisal and to promote the highest possible standards of ethical and legal business conduct. The objective of having the policy is also to deter serious malpractice, combat corruption, and to avoid corporate crisis, thereby promoting the best practice of corporate governance at workplace.

Employees are encouraged to disclose any information or raise a genuine concern about serious breaches of Code of Conduct.

Procedure Guidelines for whistle blowing policy

Areas of malpractice that merit complaint	Any concerns about malpractice should always be raised internally in the first instance. Such breaches of code or violation of law include but not limited to fraud, corruption, malpractice, financial irregularities, dishonesty, criminal activities and personal misconduct.
Not included in policy	Whistle-blowing is not for use to raise grievances concerning personal employment or as appeals against decisions of management unless they involve fraud. Such private grievance related to personal employment matters should be directly reported to Group Human Resource Department. Any abuse of the whistle-blowing system through raising unfounded allegations shall be subject to a disciplinary offence.
Anonymous reporting	Employees who report a possible breach of the Code, have the right to remain anonymous and confidentiality will be maintained. Every effort will be made to protect the whistle-blower or complainant's identity, subject to relevant legal constraints. Where the complaint is written anonymously, the complaint can be viewed as poison pen letters. It is usually easier to conduct a full and fair investigation if the employee would identify himself and disclose as much information as possible with the facts and evidence of the complaint.
Avenue of complaint	Due to the severity of the complaint, the complaint is addressed to the Chairman of the Versatile Creative Berhad group. The following is the contact email of the Chairman: hr@vc-b.com.my The employee will be contacted on further details during further investigations conducted by the Chairman.