



BUSINESS INTEGRITY POLICY

1. SCOPE

The Integrity Policy (“the Policy”) is applicable to all employees including senior management, directors (executive and non-executive) of CSC Steel Holdings Berhad and its subsidiaries (“CSC Malaysia” or “the Group”) in his/her respective role within the Group, including when dealing with external parties.

2. COMMITMENT

As a responsible and prudent organisation, CSC Malaysia always focuses on strengthening high integrity and morals among its employees besides pursuing the growth of the businesses we are in. The Group always strives to improve its governance practices and will not compromise on malpractices, bribery and corruption that violate the principles of the Group. The Group also demands the equal of high integrity practices from its business associates, which including suppliers, contractors, customers, bankers, professional service providers, etc.

3. COMPLIANCE TO LAWS AND REGULATIONS

As the foundation of adopting integrity principles, the Group always observes and propagates all laws and regulations that applicable to the businesses of the Group, which govern corporate activities, and will not intentionally violate any laws, or intentionally mislead, manipulate or unfairly obtain advantages from any business associates.

4. CONFLICTS OF INTEREST

All employees should avoid the occurrence of conflict of interests that would enable himself, his spouse, parents, children, or any party to receive any improper benefits. The Group has formulated rules and regulations in relation to conflicts of interest which are documented in its Standard of Ethical Code and Conduct that covers all level of employees, including the board of directors.

5. FAIR TRADE

The Group is dedicated to market competition based on superior management and high-quality products and services, and does not achieve results by using unlawful or unethical means. The Group should treat the customers from which the Group purchases or to which it sells goods, the Group's competitors and its employees fairly, and must not obtain illegitimate profits by making untrue statements about important matters by means of manipulation, concealment or abuse of information obtained, or by means of other unfair trade practices.

6. BUSINESS CONFIDENTIALITY

The employees of the Group shall bear the obligation to preserve the confidentiality of unpublished information concerning the Group itself or the parties from/to which it purchases (sells) goods, except when publication is authorized or required by law. Information that should be kept confidential includes all unpublished information that can be exploited to the advantage of the competitors, or that will cause damage to the Group or its customers after it is leaked.

7. ANTI-BRIBERY AND CORRUPTIONS

The Group applies ZERO TOLERANCE on all forms of bribery and corruption regardless of public or private sectors and strives to be in full compliance with laws and regulations. The Group has established an Anti-bribery, Corruption and Whistleblowing Policy that as a guidance to its employees and business associates.

8. FACILITATION OF PAYMENTS, ENTERTAINMENT, HOSPITALITY AND GIFT

All employees should not directly or indirectly offer, promise, demand or accept any gratification, contribution, facilitation payments, etc from/to any party. In the event of entertainment, hospitality, corporate gift is given to/by business associates, there should be no obligation of any favour in return.

9. DONATIONS AND SPONSORSHIPS

All donations or sponsorships, including charitable contribution should be done in a transparent manner and must be approved in accordance to the standard operating procedures of CSC Malaysia. Donations and sponsorships should never be meant to obtain business or advantage that may influence that outcome of a business decision.

10. POLITICAL CONTRIBUTIONS

There shall be no political contribution to be made towards political parties or individual politicians. If any contribution is made, it must be permissible under applicable laws and with no expectation of favourable treatment in return.

11. RISK MANAGEMENT AND INTERNAL CONTROL MECHANISM

The Group has established a sound risk management and internal control mechanism to safeguard the tangible and intangible assets of the Group and to ensure that the corporate governance is well taken care of as to create a sustainable business for the Group.

12. REGULAR REVIEW

The Policy will be reviewed by the Board periodically to ensure that it is kept up to date. Any changes or updates to the Policy must be approved by the Board of Directors.

Approved and adopted by the Board of CSC Malaysia

Date: 15th March 2022