

ARTRONIQ BERHAD
(formerly known as Plastrade Technology Berhad)

CODE OF BUSINESS CONDUCT & ETHICS



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Company No: 200201023414/591077-X

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ABBREVIATIONS

AC	-	Audit Committee
ARTRONIQ / the Company	-	Artroniq Berhad
ARTRONIQ Group	-	ARTRONIQ and its subsidiary companies
AMLR	-	ACE Market Listing Requirements
BOD or the Board	-	Board of Directors
Bursa Securities	-	Bursa Malaysia Securities Berhad
ED	-	Executive Director
HRD	-	Human Resource Department
HOD	-	Head of Department
ACP / AC Policy	-	Anti-Corruption Policy
ACSOP	-	Anti-Corruption Standard Operating Procedures
PIC	-	Person-In-Charge
MACC	-	Malaysian Anti-Corruption Commission
MCCG	-	Malaysia Code on Corporate Governance
NC	-	Nomination Committee
RC	-	Remuneration Committee

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This Code of Business Conduct & Ethics has been adopted by the Board of Directors to provide clear guidance to all employees at all levels within Artroniq Berhad ('ARTRONIQ') and its subsidiary companies ('ARTRONIQ Group' or 'Group') so as to ensure a consistent approach to business practices throughout the ARTRONIQ Group.

This Code is not meant to cover all possible situations that may occur. It is designed to provide references and guidance in general circumstances. When in doubt or should non-ordinary circumstances arise, it is the responsibility for each employee should seek guidance on the appropriate course of action (especially where no clear guidance is available) from the Board or Senior Management.

Employees for the purpose of this Policy includes all directors and employees of companies within the Group.

This Code is accessible on Artroniq's website at www.plastrade-technology.com

I. **Objectives of this Code**

1. The aim of this Code is to ensure that all directors and employees of the Group act in the best interest of the Group in the course of conduct of their daily activities, striving at all times to enhance the reputation and performance of the Company and the Group at large.
2. Rights of Board members, employees and all stakeholders must be respected and each person must be accorded equal opportunity without regard to their race, skin colour, creed, religion, national origin, age, sex, marital status, lawful alien status, mental or physical disability, sexual orientation or gender identity.
3. Misconduct cannot be excused and all parties are expected to alert Management whenever an illegal, dishonest or unethical act is witnessed, observed or discovered.
4. ARTRONIQ conducts its affairs in compliance with all applicable laws and regulations where it carries out its business. Business practices, customs and traditions may differ from state to state, country to country, community to community and entity to entity.
5. Where conflict arises between ARTRONIQ's practices and the practices of the local environment, customs, laws or traditions on any particular matter, ARTRONIQ shall undertake all reasonable endeavor to resolve the conflict. If the conflict cannot be reasonable resolved, ARTRONIQ may not proceed with the required action or practice giving rise to that conflict.

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II. Code and Its Coverage

1. Respect for the Law.
2. Conflicts of Interest.
3. Corporate opportunities.
4. Insider Trading.
5. Confidential Information.
6. Fraud, protection of company assets.
7. Bribery and corruption, Favours, Gifts, Meals, Entertainment.
8. Discrimination and harassment.
9. Money laundering.
10. Reporting Violations.
11. Conclusion.

1. Respect For The Law

Directors and all employees of ARTRONIQ Group are bound by applicable laws, rules and regulations. Compliance with applicable laws and regulations are to be strictly observed.

All employees must adhere to all internal company policies, rules and regulations specific to the ARTRONIQ Group which may go beyond what is requested by law.

2. Conflict of Interest

Conflict of Interest occurs where personal interest of an employee competes with the interest of the ARTRONIQ Group.

All employees shall avoid putting themselves in a position of conflict of interest whenever possible.

Where a conflict of interest situation arises, or has occurred or where an employee becomes aware that he faces a situation that may involve or lead to a conflict of interest position, the employee is required to disclose the situation to his Head of Department or the Head of Human Resource Department so that the situation can resolved in a timely and transparent manner. Where such situation involves Management level and above, the concern should be brought to the attention of the Executive Directors, and in respect of the Board members, it should be brought to the attention of the Board as a whole.

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2. Conflict of Interest (Contd.)

All Directors are required to observe and comply with:

- a) the provisions of the Companies Act 2016 in respect of directors' duties and responsibilities;
- b) Article 80A & 81 of the Company's Constitution; and
- c) the provisions of Chapter 10 of the ACE Market Listing Requirements of Bursa Securities.

3. Corporate Opportunities

All employees are not permitted to compete with ARTRONIQ Group or take personal advantage of business opportunities that arose or discovered during the course of their employment, unless ARTRONIQ expressly waives its interest in pursuing such opportunity.

Where any employee desires to pursue business opportunities that ARTRONIQ is no longer interested in or engaged in, they shall inform their Head of Department or the Head of Human Resources Department who will then seek clearance from the Management or the Board where applicable.

4. Insider Trading

As a general policy, all employees of the Group are discouraged from engaging in speculative trading (as opposed to investing) in the Company's listed securities, and are reminded to observe the prohibitions imposed on under Insider Trading of the Capital Markets and Services Act 2007.

In addition to this, all Directors and key management personnel, identified and designated pursuant to the Board's Corporate Disclosure Policy ("designated key management personnel") are required to comply with the Provisions on Dealings in Listed Securities under Chapter 14 of the ACE Market Listing Requirements.

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5. Confidential Information

Confidential Information comprises of any information that is not or has not been released to the public and that includes business and trade secrets, business, marketing and service strategies and plans, research information, reports and data, business ideas, products, designs, databases, records, human resource information, and any non-published financial and non-financial data or other data deemed by ARTRONIQ to be confidential, sensitive or secret.

Unless required by law or authorised by Management, all employees shall not disclose, divulge or reveal any confidential information, or allow or facilitate the disclosure of such confidential information.

All employees are required to use their best effort and endeavors to avoid unintentional disclosure of confidential information, including taking precautions and care when storing or transmitting confidential information.

6. Protection and preservation of Company Assets and Financial Records

All employees are to safeguard and make proper and efficient use of ARTRONIQ's assets and financial records.

All employees shall use their best efforts and endeavors to protect the Company's assets and financial records from loss, damage, misuse, theft, fraud, embezzlement and destruction. These obligations cover both tangible and intangible assets including trademark, know-how, confidential or proprietary information and information systems.

ARTRONIQ reserves the right to monitor and inspect how its assets and financial records are being used by its employees including inspection of all correspondences, e-mails, chat messages, data and files kept by the employee or on the Group's or Company's network, computers or mobile devices.

7. Bribery, Corruption, Gifts, Meals and Entertainment

Bribery - Bribery is the offering, promising, giving, solicitation or the receipt or agreement to receive any financial or other advantage, or any other inducement from any person or company, (wherever they are situated and whether they are a public official or body, or a private person or company) by an individual employee, agent or other person or body acting on another's behalf.

Corruption – Corruption is the abuse of entrusted power for a private gain.

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7. Bribery, Corruption, Gifts, Meals and Entertainment (Contd.)

ARTRONIQ does not condone bribery or corruption in any form carried out by any employee or party acting on behalf of the Company to gain any unfair advantage in any business conduct or dealing of the Group or Company.

ARTRONIQ is dedicated to conduct its businesses in accordance with the highest ethical standards, integrity and accountability. ARTRONIQ has adopted a zero tolerance towards all forms of corruption by its employees or any person or companies acting for the Group or on behalf of the Group.

ARTRONIQ shall not make any political contributions of whatsoever in nature in the jurisdictions that it operates in.

To ensure proper standards of behaviors are observed, employees shall not be influenced in the performance of their responsibilities by receiving favours, gifts, meals, entertainment and other forms of gratification, nor shall they try to improperly influence others by providing such favours.

Employees may only offer or accept reasonable favours, gifts, meals, entertainment or gratifications which are appropriate or symbolic or commemorative gifts in nature in respect of the occasion, function or celebration. Where in doubt the employee is required highlight and clarify the position with their head of department or the Human Resources Department.

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees. Reports can be made to the personnel set out under ARTRONIQ's Whistle Blowing Policy, which is available on the Company's website: www.artroniq.com

8. Discrimination & Harassment

ARTRONIQ respects the privacy, dignity and personal rights of all employees and is committed to ensuring a workplace environment that is free from any discrimination, harassment or whatsoever nature.

The rights of fellow Board members, employees and all stakeholders must be respected and each person must be accorded equal opportunity without regard to their race, skin colour, creed, religion, national origin, age, sex, marital status, lawful alien status, mental or physical disability, sexual orientation or gender identity.

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8. Discrimination & Harassment (Contd.)

Employees who feel that they have been discriminated are encouraged to raise their concerns to their head of department or to Head of Human Resource Department or to personnel as set out in ARTRONIQ's Whistle Blowing Policy.

9. Money Laundering

Money laundering is the process of concealing true nature or source of illegally obtained funds and passing it surreptitiously typically through legitimate business channels or by means of transfers involving foreign banks.

ARTRONIQ prohibits employees' involvement in any money laundering activities, either directly or indirectly.

10. Reporting Violations

The maintenance of a strong and highly ethical environment with business conduct carried out with utmost integrity must be reinforced by an efficient reporting structure.

If you are aware of or suspect misconduct or violation of any nature outlined in this Policy, you are required report it to the appropriate level of management or the Board of Directors.

You are to report in priority firstly to your Head of Department, failing which then the Head of Human Resource Department.

If after speaking with the appropriate Management personnel or you feel uncomfortable speaking to them, you may (if you wish) elevate your concerns to the Group CEO, or failing which, you may contact the Independent Non- Executive Director.

Group CEO
Mr Leong Seng Kin

sengkin.leong@artroniq.com

Independent Non-Executive Director
Mr Tan Tian Wooi

tantw12@gmail.com

Any report that involves the Executive Directors, Non-Executive Directors or Group Accountant must be communicated to the Chairman of the Board and/or Chairman of the Audit Committee.

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10. Reporting Violations (Contd.)

All report/calls/emails will be dealt with the strictest confidentiality and will only be disclosed and shared in order to address the matter appropriately. Regardless, the Board of Directors wishes to assure that the Board will ensure that the whistle blower is protected against any form of retaliation by any other employee of ARTRONIQ Group.

11. Conclusion

- a) This Code applies to all employees of ARTRONIQ Group (including all Directors).
- b) Any reports made will be thoroughly investigated into and if such violation is proven, appropriate disciplinary actions will be taken by Management with sanction by the Executive Director's or the Board depending on the nature and level of breach of code, including dismissal and termination.

- END OF POLICY -