VITROX CORPORATION BERHAD
Registration No.: 200401011463 (649966-K)
746, Persiaran Cassia Selatan 3, Taman Perindustrian Batu Kawan
14110 Bandar Cassia, Pulau Pinang, Malaysia
Tel: (+604) 545 9988 Fax: (+604) 545 9987
www.vitrox.com

Supplier Code of Conduct

ViTrox Corporation Berhad and all its subsidiaries ("ViTrox") is strongly committed to observing the highest ethical standards in all its procurement activities. As such, this Code of Conduct has been prepared to provide a clear statement of ViTrox's expectation from its suppliers in all procurement dealings and ensure that internationally recognised procurement standards are followed. Transparency and accountability should be strictly adhered to in all procurement activities. This Code of Conduct establishes the standards required for conducting business with ViTrox. Our goal is to work with our suppliers to ensure full compliance with these principles. We will consider these principles in our selection of suppliers and will actively monitor each supplier's compliance.

Continuous Improvement: The provisions as set forth in this Code of Conduct provide the minimum standards expected of suppliers to ViTrox. It is the expectation of ViTrox that suppliers adhere to all laws, rules and regulations in which ViTrox and the suppliers are operating, and strive to exceed industry best practices. ViTrox recognises that reaching the standards established in this Code of Conduct is a dynamic rather than static process and encourages suppliers to continually improve their workplace conditions.

Monitoring and Evaluation: ViTrox may conduct on-site evaluations and inspections of its supplier's facilities and those of their subcontractors to review their progress towards these principles. It is the expectation of ViTrox that suppliers, at a minimum, have established clear goals toward meeting the standards set forth in this Code of Conduct. ViTrox may monitor that milestones have been set and management systems have been put in place to ensure that the principles set out in this Code of Conduct have been met and failure to do so may impact the future ability of a supplier to do business with ViTrox.

1.Supplier Relationships

The Code of Conduct set forth the expectations of all suppliers with whom ViTrox does business. These principles apply to suppliers as well as all others with whom they do business including employees, subcontractors and other third parties. Suppliers ensure that this Code of Conduct is communicated to the employees and subcontractors of all suppliers, and that it is done in a manner that is understood by all.

(1.1) Promoting the Principles of this Code of Conduct: Suppliers should be established and maintained appropriate management systems whose scope is related to the content of this Code of Conduct, and that they actively review, monitor and modify their management processes and business operations to ensure they align with the principles set forth in this Code of Conduct. All principles contained in this Code of Conduct are of equal importance independently of their order of appearance.

(1.2) Sub-contracting: ViTrox expects that its suppliers encourage and work with their own suppliers and sub-contractors to ensure that they also strive to meet the principles of this Code of Conduct or equivalent set of principles.

2. Labour

(2.1) Forced Labour: Suppliers to prohibit any use of forced, bonded or indentured labour or involuntary prison labour, and embrace employment practices consistent with the local labour and employment laws. All work, including overtime work, will be voluntary and worker should be free to leave upon reasonable notice. Suppliers should also not mandate that workers hand over government-issued identification; passports or work permits as a condition of employment.

(2.2) Child Labour: The minimum admission to employment or work shall not be less than the age of allowed by the local labour law. Additionally, all young workers must be protected from performing any work that is likely to be hazardous or that may be harmful to the worker's health, physical, mental, social, spiritual or moral development.

(2.3) Working Hours: Suppliers to comply with all applicable working hour requirements as established by local law, and should not exceed 60 hours per week, including overtime, except in emergency or unusual situations. Suppliers must ensure that all overtime work is voluntary and compensated at the prevailing overtime rates. Workers shall be allowed at least one day off every seven days, and are free to leave upon reasonable notice.

(2.4) Wages and Benefits: Suppliers to comply, at a minimum, with all wage and hour laws and regulations, including those pertaining to minimum wages, overtime wages, piece rates, other elements of compensation and to provide legally mandated benefits to their workers.

3. Human Rights

(3.1) Harassment, Harsh or Inhumane Treatment: Suppliers to create and maintain an environment that treats all employees with dignity and respect and will not use any threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse. No harsh or inhumane treatment coercion of any kind is tolerated, nor is there to be the threat of any such treatment.

(3.2) No discrimination: Supplier shall not discriminate in its hiring and employment practices on grounds of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation, or disability.

(3.3) Freedom of Association and Collective Bargaining: ViTrox supports the rights of all workers and employers to freely and voluntarily join occupational associations and unions. All employees have the right to freedom of association, expression, opinion, and collective bargaining, in accordance with applicable laws and regulations. Suppliers agree to comply with the same standards mentioned

above and will allow their Workers to exercise their legal rights to freedom of association in the workplace in accordance with applicable laws and regulations.

4.Health and Safety

(4.1) The Suppliers shall provide and maintain a safe and healthy work environment. The Suppliers shall comply with all applicable laws, regulations and rules governing employee occupational health and safety.

(4.2) Occupational Health, Safety and Hazard Prevention: The Suppliers shall identify, evaluate and manage occupational health and safety hazards through a prioritized process of hazard elimination, engineering controls and/or administrative controls. The Supplier shall provide workers with job-related, appropriately maintained personal protective equipment and instructions on its proper use.

(4.3) Emergency preparedness: All potential emergency situations and events shall be identified and assessed by the Suppliers, and to reduce the risks by implementing emergency plans and response procedures, including but not limiting to emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

(4.4) Physically Demanding Work: Worker exposure to the hazard of physically demanding tasks, such as manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is shall be identified, evaluated and controlled by the Suppliers.

(4.5) Facilities and Living Conditions: The Supplier shall provide workers with reasonably accessible and clean facilities including lavatory, portable water and sanitary food preparation, storage facilities and eating facilities. All workers are expected to have clean and safe dormitories with reasonable living space provided by the Suppliers.

(4.6) Industrial Hygiene: The Supplier shall ensure that workers' exposure to chemical, biological and physical agents is to be identified, evaluated and controlled. Engineering or administrative controls must be used to control over exposures. When hazards cannot be adequately controlled by such means, workers' health shall be protected by appropriate personal protective equipment.

5.Environment

(5.1) Reporting: Suppliers are expected to provide regular and transparent reporting on their environmental impact. This includes disclosing information on energy consumption, waste management, emissions, and other relevant environmental metrics.

(5.2) Environmental: Suppliers to have an effective environmental policy and to comply with existing legislation and regulations regarding the protection of the environment. Suppliers should wherever possible support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental

responsibility and encourage the diffusion of environmentally friendly technologies implementing sound life- cycle practices.

(5.3) Energy Use: The Suppliers to ensure the minimization of energy consumption respectively to operate with maximum energy efficiency. The Suppliers to carry out general commitments of power and energy management such as switching off components not needed, and looking for cost-effective methods to improve energy efficiency in their operations.

(5.4) Climate Change: The Suppliers to take into consideration the climate change and extreme events while assessing the costs and benefits of environmental protection, eco-system components and sustainability along with the economic viability of the work.

(5.5) Air Emissions: Greenhouse gas emission or air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge.

(5.6) Wastewater and Solid Waste: Wastewater and solid waste generated from operations and sanitation facilities are to be monitored, controlled and treated as required prior to discharge or disposal.

(5.7) Biodiversity and Endangered Species: The Suppliers to minimize their impact on biodiversity and the wider environment during the course of business operations and use of ecosystem services, such as forest products, soil and water. The Suppliers shall ensure their business are complying with all international, national and local biodiversity laws as a minimum requirement and commit to assess the impacts of their ecological footprint due to the increase or decrease in production or change of production methods.

(5.8) Environmental Issues: The Suppliers to have a policy statement covering relevant environmental and sustainability issues. Responsibility for implementation of the policy should be held by a nominated company representative, ideally at director level backed by sufficient support of management to ensure operational implementation.

(5.9) Pollution Prevention: Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means.

(5.10) Minimise Waste, Maximise Recycling: Waste of all type, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

(5.11) Chemical and Hazardous Materials: Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.

(5.12) Conflict Minerals and Unsustainable Mined Materials: To the extent applicable to Supplier's operations, Supplier shall have a written policy and procedure in place to avoid knowingly acquiring conflict minerals or unsustainable mined minerals produced at high environmental and social costs.

6.Bribery and Corruption

(6.1) Corruption: Suppliers to adhere to the highest standard of moral and ethical conduct, to respect local laws and not engage in any form of corrupt practices, including extortion, fraud, or bribery, at a minimum.

(6.2) Conflict of Interest: ViTrox suppliers are expected to disclose to ViTrox any situation that may appear as a conflict of interest, and disclose to ViTrox if any ViTrox official or professional under contract with ViTrox may have an interest of any kind in the supplier's business or any kind of economic ties with the supplier.

(6.3) Gifts and Hospitality: ViTrox has a "zero tolerance" policy and does not accept any type of gift or any offer of hospitality beyond that of a representational nature. ViTrox will not accept any recreational trips to sporting or cultural events, offers of holidays, transportation, or invitations to extravagant lunches or dinners. ViTrox expects ViTrox suppliers not to offer any benefit such as free goods or services or a work position to a ViTrox staff member or a former ViTrox staff member in order to facilitate the supplier's business with ViTrox.

(6.4) Anti-Competitive Conduct: Suppliers shall comply to competition legislation and regulations where applicable and not engage in anti-competitive conduct such as but not limited to cartel activities, price fixing, and anti-trust activities. Suppliers to adhere to all anti-trust laws and regulations to ensure a free and open marketplace.

7.Information Protection

(7.1) Protecting sensitive, confidential and proprietary information: Suppliers are expected to ensure that all sensitive, confidential and proprietary information is appropriately protected. In its relationship with ViTrox, Suppliers must comply with all applicable data privacy laws and regulations. Suppliers must protect the sensitive, confidential and proprietary information of others, including personal data/information, from unauthorized access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures, including mitigating emerging risk to information systems by implementing appropriate IT cyber security programmes. Suppliers must report to ViTrox any suspected or actual data breach or security incident as soon they are aware.

(7.2) Intellectual property: Suppliers must comply with all the applicable laws governing intellectual property rights assertions, including protection against disclosure.

8.Non-Compliance

Suppliers found to be non-compliance with any of the provisions above agree to assist with the investigation and provide reasonable acces to information requested. If corrective action is deemed by ViTrox to be necessary, the Suppliers are expected to develop a plan and mutually appropriate timeline to rectify the issue.

ViTrox will collaborate with the Suppliers to identify actions to reach full compliance with the terms of this Code of Conduct. In case of prolonged or material non-compliance by any supplier, ViTrox reserves the right to review future business arrangements with any such non-compliant supplier and may seek alternative supply from another supplier as a remedy.

(The remainder of this page has been left blank intentionally)

The information contained herein is subject to change without notice.