

DPI HOLDINGS BERHAD
(Company No. 1249778-M)
(Incorporated in Malaysia)

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CODE OF CONDUCT AND ETHICS

PART 1

1. INTRODUCTION

DPI Holdings Berhad (“the **Company**”) aspire to be a leading and trusted aerosol products producer within the industry. This Code of Conduct and Ethics (“**Code**”) prescribed code and values which the Company has adopted and intends to adhere when conducting our business and handling the matters herein contained.

2. PURPOSE AND SCOPE

This Code applies to all employees (all permanent, contract and temporary employees, collectively, the “**Employees**”) and directors of the Company and its subsidiaries and representative offices (collectively, “**DPI Group**”). The Employees and Directors are bound to observe all provisions that covers the subject matters contained in this Code.

All employees of the Company shall keep abreast of this Code, read, understand and comply with this Code at all times. They are also required to refer to the Employee Handbook which governs their respective Business Operations.

This Code upholds our following core values:

- **Integrity** – Do the right thing
- **Dedication** – Take ownership and be proud of what we do
- **Change and Progression** – Better our everyday
- **Positivity** – Think good thoughts, do good deeds, make great products
- **Perseverance** – Just keep going

3. RESPONSIBILITY AND COMPLIANCE WITH THE CODE

The Company is committed to establish a corporate culture with clear guidelines on the principles of ethical conduct and business practices throughout DPI Group.

This includes adopting best practices in corporate governance and observing high standards of behaviour and integrity in our businesses and activities within DPI Group or when dealing with external parties.

All the suppliers, consultants, distributors and independent contractors are also expected to agree to follow all applicable policies under this Code.

This Code is not a comprehensive and exhaustive guide that covers every ethical situation Employees may encounter in their dealings.

It is the Employee’s responsibility to seek clarification, to ask questions and to report suspected breaches, violations or express concerns regarding compliance with the Code to his or her Head of Department/ Business Unit Head (“**HOD**”), the Company’s Head of Human Resources or the Chief Executive Officer (“**CEO**”).

Managers bears and shall assume the additional responsibility of supporting the implementation of the Code and monitoring compliance of the Code.

Non-compliance with this Code will be treated seriously and may result in disciplinary action, including the possibility of suspension or dismissal, and if warranted, legal proceedings against the Employee. In addition to disciplinary action any Employee who violate any laws is subjected to prosecution by the relevant authorities.

Code of Conduct and Ethics

This Code is to be read and applied in conjunction with all other related or applicable standards, policies, procedures and guidelines which are published internally, including those described in Rules of Conduct and Disciplinary Procedure in the Employee Handbook and those described in the Company's guidance documents.

4. REVIEW AND AMENDMENTS TO THE CODE

The Company reserves the right to add, amend, annul, vary or modify the provisions set out in this Code as and when it deems necessary or as and when the need to address certain ethical issues arises.

The proposed revisions or amendments to this Code will be jointly reviewed by Head of Human Resources and Risk Management Committee for the CEO's approval.

Employees will be notified of any changes made to the Code via the notice board, intranet, email or website.

PART 2

CODE OF CONDUCT

A: Business Practices and Professionalism

1. Compliance with Laws, Rules and Regulations

DPI Group is committed to conduct its business in the right way, by acting ethically and consistently with this Code, its policies and all applicable laws, rules and regulations.

Employees and Directors have a continuing obligation to familiarize themselves with applicable laws relating to their job responsibilities and Company's policies.

The Company will not condone any employees' activities who achieve results through violation of the law or unethical business dealings.

Employees and Directors are required to sign the "**Declaration of Integrity**" form in Appendix 1 as the written compliance to the Code, all applicable laws, rules and regulations.

2. Corporate Governance

DPI Group will ensure compliance with this Code and the Board of Directors ("**BOD**") shall observe high standards of corporate governance in delivering sustainable value, enhancing business integrity and maintaining investors' confidence towards achieving DPI Group's corporate objectives and vision.

The Directors shall devote time and effort to review and adopt strategic plan for the Company and oversee the conduct of the Group's business, including implementing controls and risk mitigation measures for business sustainability.

The BOD will ensure effective communication policy, business performance and financial monitoring mechanism are in place at all times in order to be effective in corporate management.

The BOD shall provide adequate safety measures and proper protection to Employees at the workplace and ensure proper and efficient use of assets and resources in the Company.

The Directors and Employees shall at all times act with utmost good faith towards the Company in any transaction and to act honestly and responsibly in the exercise of his or her power in discharging his or her duties.

3. Conduct of Business and Fair Dealings

All Employees and Directors shall endeavour to act fairly and in good faith with the Company's customers, suppliers, competitors and its employees and all other relevant parties.

The Company will not seek nor accept any business advantage that involves unethical conduct with third party business partners including contractors, consultants or any person including their employees, agents, suppliers and sub-contractors (representative).

The Company will strive to exceed customer's expectations and gain customers' and business partners' respect and loyalty. The Company will ensure the compliance to quality process and safety requirements in maintaining Company's reputation and quality of products.

Employees and Directors shall uphold our core values in all our sales and marketing activities and treating all people with respect and care.

4. Conflict of Interest

Employees and Directors have an obligation to act in the best interest of the Group at all times. Employees and Directors are prohibited from using their position or knowledge gained directly or indirectly in the course of their duties and responsibilities or employment for private or personal advantage.

Employees and Directors must declare to the Head of Human Resources or Chairman of the Board by submitting “**Declaration of Interest**” form in Appendix 2 if it has any potential and actual personal, professional or business interests that conflict with the Employee or Director’s responsibilities, so that a determination can be made as to the existence and seriousness of an actual conflict. When in doubt, Employees and Directors shall adopt the highest standard of conduct.

4.1 Competing Against the Company / Acts Detrimental to DPI Group

Employee and Directors must disclose memberships in board of directors/trustees of any business, industry or community organization to the Management. The Company retains the right to prohibit membership by employees on any board of directors or trustees where such membership might conflict with the best interests of the Company.

Employees shall not engage in any activity that are adverse and detrimental to DPI Group including any acts that runs against the interest of DPI Group , that prejudice DPI Group whether in financial , reputation, good will aspect or conflict with the business interest, even in their own time, including commercially marketing products or services in competition with the current or potential offerings of the Company.

Employees or family members of the employee are not allowed to provide any form of assistance to organisations that market products or services in competition with the Company regardless if they receive any direct or indirect remuneration of any kind for the assistance provided. Accordingly, employees shall not work for the competing organisation in any capacity as an employee, consultant or as a member of its Board of Directors.

If any Employee or Director becomes aware of a business opportunity that might fall within the Company’s business purpose and practice, the Employee or Director must not take advantage of this opportunity for personal gain and must inform his/her HOD or Chairman of the Board (in the case of any Director) of the said business opportunity for written consent on a case by case basis.

4.2 Non-business Activities

Employees and Directors are not permitted to engage in personal activities including public service or political activities that may be prejudice, affect or in conflict with the Company’s business interest.

Written permission of the Head of Human Resources or the CEO is required before employees engage on their own time in such activities. Permission will not normally be granted unless all of the following criteria are met:

- The engagement or activities must in no way conflict with the interest of the DPI Group and divide the employee’s loyalty.
- Some advantage to the Company and/or DPI Group must arise as a result of the engagement or activities.
- The time spent in the engagement or activities must not interfere with duties of the DPI Group.
- The political beliefs, commitment and involvement by the Employee does not and shall not represent the stand of the DPI Group.

5. Use of non-public information and disclosure (insider trading)

5.1 Non-public information

Employees and Directors are required to protect DPI Group’s confidential information and guard them against unauthorised disclosure or use. Employees and Directors are also required to protect confidential information of third party which Employees and Directors have access to in the course of their work except when disclosure is authorised or legally mandated.

Confidential information includes, but are not limited to, data and technical know-how, business plan and budget, product design, customer list and information, information on current and future projects and work processes, and any non-published financial or other data.

Unless required by law or authorised by the Company, Employees and Directors shall not disclose confidential information or allow such disclosure or use confidential information for unauthorised purposes. This obligation continues beyond the termination of employment or resignation from the Board.

5.2 Insider Trading

Employees who are in the possession of market sensitive information are not allowed to trade in securities of the Company or the shares of another listed company if that information has not been made public. In the context of Malaysian law, insider trading is an offence defined under the Capital Market and Services Act 2007. The laws of other countries on insider trading may be applicable in the context of inside information concerning company listed outside of Malaysia.

Further, employees shall not disclose such price sensitive information to any third party or encourage any other person to deal in price-affected securities. Employees must consult their respective HOD if unsure of the status of the information held by them.

Employees must ensure that all transactions in the Company shares comply with the procedures set out in the ACE Market Listing Requirements of Bursa Malaysia Securities Berhad and the law on insider trading.

6. Protection and use of Company funds, assets and information

Employees and Directors are responsible for the proper expenditure of the Company's funds including expenses. Employees are provided with a variety of resources and access to assets of the DPI Group, regardless of the condition of value, assets belonging to the DPI Group shall not be misused, taken, sold, lent, given away or otherwise disposed of, or used for personal purposes to the extent that would affect the interest of the Group.

It is the duty of all Employees and Directors to ensure proper use and to safeguard the Company's assets to avoid any loss, damage, misuse or theft. Company assets include not only confidential information, intellectual property, funds, equipment and products, but also the Company's resources, time and facilities.

Proprietary Information where all information (whether in written or oral form and whether on paper or electronic form) relating to technical, product and services, financial data and projections, marketing strategies and business plans, organisational and personnel information, decisions by the Company's board of directors, trade secrets, patents, trademarks, copyrights, pricing guidelines, profit sharing arrangements, customer information, databases, records and any non-published financial or other data that is not public information or if known will have an adverse effect on the Company and the Group.

All employees shall treat such information as confidential and take all necessary safeguards to protect this information. The Group's ownership of such proprietary information shall continue even after the employee leaves the Group. Violation of these rights can subject to substantial liability, including criminal penalties.

Employees shall return all the Company's assets entrusted to them upon cessation of their employment including documents, which contain the Company's proprietary information. Additionally, they may not disclose or use the Company's proprietary or confidential information.

Employees and Directors shall not use the DPI Group's funds and resources to make contributions to any political campaign, political party, political candidate or any of the employee's affiliated organisations unless otherwise authorised by the BOD.

7. Social responsibilities and environment

The BOD should ensure that necessary steps are taken in accordance with the law to properly wind-up or strike off the company register if the company has not commenced business or has ceased to carry on business and is not likely to commence business in the future or resume business as the case may be.

The BOD should ensure effective use of natural resources, and improve quality of life by promoting corporate social responsibilities that address the needs and well-being of the community and society at large.

The Employees and Directors must ensure the business activities and the operation of the Company do not harm the interest of the society and give utmost cooperation for the common good when dealing with government authorities and regulatory bodies.

8. Proper records and communication procedures

Document Management

Employees and Directors must observe prescribed accounting, financial and procurement procedures and comply with the requirements of the Company's internal control policies, guidelines and procedures to ensure honest and accurate recording and reporting of information. '

All of the Company's financial books, records, accounts and financial statements must maintained in reasonable detail, accurately reflecting transactions and events, and are to conform both to applicable approved accounting standards and/or legal requirements and to the Company's system of internal controls. No false or artificial entries may be made.

DPI Group will ensure the Document Management Policy sets out the time period to retain and destroy data and records, based on the Company policy, specific statutory and regulatory requirements, some of which are specific to a particular business operations or functions.

The Company is required to comply with the Listing Requirements of Bursa Malaysia regarding the timing, content and manner of disclosure of information relating to the Company, to Bursa Malaysia. The Communication policies and procedures below apply to all Employees and Directors of the Company:

Communication Policy

Employees and Directors are guided through the Communication Policy for the appropriate use of communications tools, including verbal, printed and digital while conducting the business with other parties. This is to ensure consistency and accuracy in the Group's information places in the public realm.

8.1 Media Relations

Requests from members of the media, journalists, authors, public relations agencies, and other organisations, for interviews, photographs, films, videotapes gifts, and/or requests for information regarding the Company and its products, should immediately be directed to the Corporate Communications & Investor Relations Division for any necessary internal approvals before any action is taken and for coordinate responses to avoid contradictions.

Any requests for visits to or tours of the Company's headquarters or facilities should also be coordinated through the said division.

8.2 Investor Relations

Only designated company spokespersons are empowered and authorized to speak to analysts, financial or investment professionals or shareholders. The designated spokespersons for the Company are the Executive Chairman, CEO, Executive Directors, CFO and the Head of Corporate Communications & Investor Relations Division. Certain other individuals may also be authorized to speak on behalf of the Company.

8.3 Company's Products and Services

When communicating about the Company's products and services, employees shall endeavour to communicate information accurately, effectively and in a proper manner and/or to promote the Company's products in an ethical, fair and balanced manner.

Company employees should not provide any information or make any claims which may not reflect approved communications, or engaged in any advertising or promotion forum about Company products which may be considered false or misleading.

8.4 Inquiries from Regulators

It is the Company's general policy to cooperate fully with any government or regulatory bodies' inquiry or investigation. Such inquiries may come in many forms, including phone, mail, e-mail or on-site visits. You should immediately contact the CEO upon receipt of any such inquiry or investigation and should not respond to any such inquiry or investigation. No employee, other than specifically designated employees, should have any communications on behalf of the Company without prior clearance from the Corporate Communication and Investors Relation Division.

Social Media Policy

The Company shall provide guidelines on proper usage of Social Media platforms (which includes but not limited to social networking such as Facebook, Twitter, WhatsApp, Telegram, online forum, blogs, weblog, micro blogging instant messaging and YouTube) to build a good perception towards the Group and reflect our values and reputation of the Group.

All employees and directors should also be responsible and accountable for any message, post or information shared in the social media sites are presumed to be public and permanent. Online messages or post can be copied, forwarded or subpoenaed and the original publisher will have no control over the ultimate use, distribution and/or publication of the message or post. As such, all Employees and Directors are strongly encouraged to exercise discretion at all times while using and publishing on online platforms.

9. Anti-money laundering, bribery and corruption policies

Anti-Money Laundering

Money laundering is the process of concealing the identification of proceeds from unlawful activities to convert the money to a legitimate source of income or asset. Money laundering is an offence under the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act (AMLATFAPUAA) 2001 in Malaysia.

Employees and Directors shall be aware of applicable anti-money laundering laws and shall seek to ensure they are appropriately and adequately informed of developments in the laws, its preventive measures and matters related to this area.

Employees and Directors are expected to be mindful of the risk of the Group's business being used for money laundering activities and to raise any suspicious transactions to their HOD or Chairman of BOD (if it is a director).

Bribes and Corruption

Employees and Directors shall not direct or indirectly offer, give, solicit or accept any form of bribery in order to achieve business or personal advantages for themselves or others or engage in any transaction that can be construed as having contravened the anti-corruption laws.

Employees and Directors shall be mindful of the fact that bribes may be in any form, monetary or otherwise including but are not limited to unauthorised remuneration such as referral fee, commission or other similar compensation, material goods, services, gifts, business amenities, premiums or discounts of an inappropriate value of an unreasonable level or that are not generally offered to others or that are prohibited by law or may reasonably be considered gross misconduct. Such Employee or Director will be subject to formal investigation under the Company's Disciplinary Procedure described in the Employee Handbook.

Employee and Directors shall conform to the general practice of common business decorum when accepting any type of business reception or arranging any activities, and must avoid accepting any gift. Prior to engaging in any activity that may lead to any concerns about corruption, Employees and Directors shall assess the appropriateness of their actions and confirm that there is no violation of the Code.

The Company's political or charity donation shall be contributed in accordance with relevant laws and regulations to ensure its reasonableness and legitimacy and to avoid surreptitiously engaging in bribery. The Company's political or charity donations will be disclosed to the public.

DPI Group shall collectively avoid making any business decisions that would cause negative consequences to the Company's reputation or create the appearance of impropriety.

10. Whistleblowing policy

DPI Group is committed to uphold the highest standards of professionalism, integrity and ethical behaviour in the conduct of its business and operations. The policy sets out procedures which enables Employees and members of the public to raise genuine concerns regarding actual or suspected unethical, unlawful, illegal, wrongful or other improper conduct. The Group encourage open communication of issues and concerns by all Employees and Directors without fear of retribution and retaliation is vital to the successful implementation of this Code.

This Policy covers but not limited to, either of the following concerns or impropriety by any person in the conduct of the business:

- Misappropriation of moneys or property belonging to the Group
- Negligence in carrying out work obligations;
- Financial malpractice or impropriety or fraud;
- Corruption, bribery, extortion, embezzlement or blackmail;
- Criminal activity;
- Failure to comply with a legal or regulatory obligation;
- Miscarriage of justice;
- Improper conduct or unethical behaviour;
- Misuse of Company's resources such as vehicles, uniforms, premises, etc;
- Unauthorized access to Company's information and/ or misuse of Company's information
- Endangerment of an individual's health and safety; and
- Concealment of any, or a combination, of the above.

Safeguards

The policy offers protection to the Employees or the whistleblower who disclose such concerns provided the disclosure is made in good faith and in the reasonable belief of the whistleblower making the disclosure that it tends to appear malpractice or impropriety.

The whistleblower will be protected from reprisal, including any form of harassment and victimisation, as a consequence of his/her disclosure to an enforcement agency under the Whistleblower Protection Act 2010.

If a whistleblower reasonably believes that he or she is being subjected to reprisal, including harassment and victimisation, as a consequence of whistleblowing, he/she may consult or report to the appointed person:

By Mail: **Strictly Confidential**
Attention: Datuk Seri Nurmala Binti Abd. Rahim (Senior Independent Non-Executive Director)
DPI Holdings Berhad
K69, Jalan Perindustrian 6,
Kawasan Perindustrian Tanjung Agas,
84000 Kesang, Tangkak,
Johor Darul Takzim, Malaysia.

By E-Mail: dsnurmala@gmail.com

Malicious or untrue allegations could lead to disciplinary action on the complainant. Any disclosure that is found to be factual, suitable rewards may be given to the whistleblower.

Confidentiality

DPI Group will treat all such disclosures in a confidential and sensitive manner and appropriate action will be taken to protect the whistleblower unless the individual agrees otherwise or unless otherwise required by law (i.e. if the evidence is required in court), a dialogue will be carried out with the whistleblower as to how the matter can progress further.

Personal information, including the identity of the whistleblower and the alleged wrongdoer shall only be revealed on a 'need-to-know' basis.

The whistleblower must not speak to any third party about the case or divulge any information received. Any violation of confidentiality by the whistleblower may lead to disciplinary actions.

Reporting procedures

DPI Group encourages all Employees and any third party to collect relevant material and contact the Human Resource Department, or use the Code of Conduct compliance hotline (03- 5131 8218) or email whistleblowing@dpiaerosol.com or other channel which is further announced to report any violation, suspected violation or any conduct that could result in a violation of the Code.

Any concerns about violation of this Code shall be reported promptly using the “**Disclosure of Malpractice or Impropriety Form**” (Appendix 3) to the Human Resource Department, and the Human Resource Department shall notify the CEO and BOD, as appropriate.

Any such concerns involving the Human Resource Department should be reported to the CEO and BOD. Any such concerns relating to accounting, internal accounting controls or auditing matters should be reported to the Chairman of the Audit Committee and Risk Committee at whykayfong@gmail.com. The whistleblower may also, for good reasons, bypass the line management structure and take their complaint direct to the BOD.

The whistleblower and the alleged wrongdoer will be treated fairly. The whistleblower will be informed of the status of this disclosure and the alleged wrongdoer will be given an opportunity to respond to all allegations at an appropriate time (not necessarily at the start, or during the investigation). Any form of unfair retaliation or treatment against the whistleblower or who have facilitated with the investigations is a breach of this Code.

The Company will thoroughly investigate any good faith reports of violations, and any violation will be dealt with immediately. All parties concerned are required to cooperate in internal investigations of misconduct and unethical behaviour.

11. Breach/ violation of Code and Disciplinary action

Non-compliance with the Code is a misconduct which will result in an investigation or inquiry to establish the fact. The Company will take appropriate action against any employee, agent, contractor or consultant whose actions are found to violate the Code or any other policies of the Company.

Disciplinary actions may include, at the Company's sole discretion, oral or written reprimand, suspension or immediate termination of employment or business relationship, or any other disciplinary action or combination of disciplinary actions as deemed appropriate to the circumstances. A record of the disciplinary action will be retained in the employee's personal file.

In determining what disciplinary action is appropriate in a particular case, the Company will take into account all relevant information, including the nature and severity of the violation, any history of warnings and violations, whether the violation appears to have been intentional or inadvertent and whether the violator reported his or her own misconduct.

The Company will strive to enforce the Code in a consistent manner while accounting for all relevant information. An alleged violator may make a written request for reconsideration within 14 days of notification of the final disciplinary decision from the CEO or the delegated Senior Management.

Employee should review the Company's policies and procedures in Employee Handbooks, notice board, intranet or website for more detailed information.

Where the Company has suffered a loss, it may pursue its remedies against the individuals or entities responsible. Certain violations of this Code may also be subject to civil or criminal prosecution by governmental authorities and others. Where laws have been violated, the Company will cooperate fully with, and report violators to, the appropriate authorities.

12. Waiver of Codes

Any request for a waiver from any provision of this Code by or on behalf of an executive of equivalent or higher rank than Manager or a Director of the Company must be brought before the Special Committee for appropriate review and approval.

For the purpose of this Code, the term “waiver” shall mean a material departure from a provision of this Code. The members of the Special Committee are:

- CEO
- Head of Internal Audit
- Head of Human Resources

The Special Committee will first conduct a thorough review of the specific facts and circumstances and the potential impact on the Company and also to consider the control measures to be implemented to protect the interest of the Company. The Special Committee may as it deem fits consult the relevant professionals or consultants to guide and assist the Special Committee in such circumstances.

Any decision to grant a waiver from this Code shall be at the sole and absolute discretion of the Special Committee. Any such waivers that are granted shall neither preclude nor prevent any further compliance of the provision(s) so waived or the strict compliance of any other provisions hereof.

Any executive of equivalent or higher rank than Manager, any Director or any other employee who wishes to request a waiver should write to the Head of Human Resources. Division who will determine whether or not a waiver from any provision of this Code is necessary and, if so, will refer the same to the Special Committee for its decision. Any such waivers that are granted, and material amendments to certain provisions of this Code, shall be promptly disclosed to all the parties concerned.

B: Workplace practices and culture

13. Integrity and Professionalism

Employees and Directors should remember that they are a reflection on the Company and should conduct themselves with the highest degree of integrity and professionalism in or outside of the workplace and must not under any circumstances, commit any act or omission that would bring damage to the Company, its property, reputation or general interests.

Employee and Directors are to collectively uphold, enforce and live out the Group's core values where it provides the groundwork for a strong company culture far into the future.

- **Integrity** – Do the right thing
- **Dedication** – Take ownership and be proud of what we do
- **Change and Progression** – Better our everyday
- **Positivity** – Think good thoughts, do good deeds, make great products
- **Perseverance** – Just keep going

Employees and Directors 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.

14. Equal opportunity and non-discrimination

DPI Group upholds the principle of diversity of workforce, equal opportunity, non-discrimination and fair treatment in all aspects of employment. The Company will strive to create a workplace where everyone is treated fairly and equally on the basis of their merits, abilities, and achievement of results.

Employees must at all times, treat all colleagues, customers, suppliers, contractors or other persons with whom they deal in the course of their employment with respect and in a fair and non-discriminatory manner.

Personal characteristics below are basis examples for discrimination:

- Race, colour, ethnicity, or national origin
- Gender or gender identity
- Sexual orientation
- Marital status
- Religion
- Disability
- Employment activity
- Age
- Pregnancy or breastfeeding
- Political opinion or membership in political group
- Veteran status
- Any other legally protected status

15. Workplace health and safety

DPI Group conducts operations in a manner that safeguards health, protects the environment and conserves valuable materials. The Group is committed to protecting the environment by minimizing and mitigating environmental impacts throughout the life cycle of operations.

Employees should comply with all existing legislation and regulations regarding environmental protection such as Occupational Safety and Health Act 1994. The Company shall contribute to minimising the use of finite resources, including energy, water and raw materials while encourage and support the implementation of effective and innovative environmental policies such as:

- Minimisation of waste, air emission and discharges of water;
- Recycling practices both at office premises as well as at client location;
- Responsible use of natural resource; and
- Sustainable practices.

16. Harassment, threat and violence

Employees shall strive to maintain a healthy, safe and productive work environment which is free from any form of discrimination, harassment, threat, intimidation, violence or inappropriate that are unrelated to DPI Group's legitimate business interests.

Below are examples of inappropriate conducts:

- Threats or comments that contain discriminatory or harassment elements;
- Unwanted sexual advances whether it is verbal, non-verbal, visual, psychological or physical harassment;
- Violent behaviour or actions;
- Misuse or abuse of position of authority;
- Inappropriate dressing in violation of the dress code or policy of the Company;
- Possession of weapons of any type; or

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- Use, possession, distribution or sale of illegal drugs, alcohol or any prohibited substance, except for approved medical purposes. The consumption of alcoholic beverages on company premises is only permitted for company-sponsored events and with prior management approval.

17. Drugs, alcohol and prohibited substances

Employees are expected to perform their job duties free from the influence of any substance that could impair job performance or pose unacceptable safety risk to the Employee or others.

DPI Group therefore prohibits working under the influence of alcohol, illegal drugs or controlled substances. In addition, the use, possession, distribution or sale of alcohol, illegal drugs or other controlled substances in the workplace (other than for approved medicinal purposes) is strictly prohibited. There may be company-sponsored events or functions where the serving of alcoholic beverages is permitted. In these cases, all appropriate liquor laws must be followed.

C: Employee Personal Conduct

18. Commitment to the Code

Every employee is responsible to ensure compliance with the Code:

- Know and comply with the Code and the Company Policies and Procedures.
- Seek guidance when in doubt.
- Avoid illegal, unethical or otherwise improper acts.
- Report any suspected violation of policies, laws and regulations.
- Assist authorised teammates with investigations.
- Take responsibility and accountability for his/her actions.
- Notify his/her supervisor immediately if any irregularity is suspected.

Employees are expected to live out the Company's core values and its mission as "a Dynamic, Progressive and Innovative maker of aerosols that you can rely on for your home and workplace".

Employees shall always treat each other with courtesy, consideration and professionalism including adhering to the standards in this Code and the Employee Handbook on the following:

- Compliance with laws
- Attendance and punctuality
- Proper dress code and personal appearance guidelines
- No gift, entertainment and others policy
- Fulfil job duties and authority
- Declare and report conflict of interest
- Ensure workplace health and safety
- Protect and use of Company funds, assets and information
- Adhere to collaboration and communication guidelines
- Do not abuse employment benefits

This Code of Conduct and Ethics is adopted by the Board.