

Doc. No. SYSCorp/code of ethics/14	Version Number. 3.0	
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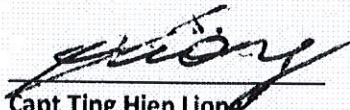


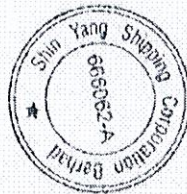
SHIN YANG SHIPPING CORPORATION BHD

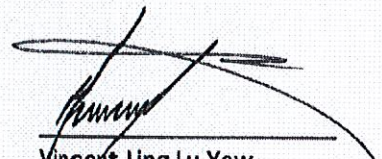
Code of Conduct & Ethics

Document No. SYSCorp/code of ethics/14, Rev. 3.0

This document is authorized and endorsed by the signed signatory below for distribution and implementation applicable to all companies


Capt Ting Hien Liong
Chief Executive Officer




Vincent Ling Lu Yew
Director

Doc. No. SYSCorp/code of ethics/14	Version Number. 3.0	
Status: Approved		

Document Status

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As a controlled document, this document should not be printed without permission or disclosed to any irrelevant outsider.

APPLICATION OF THE CODE OF ETHICS

This code applies to all employees (permanent / temporary/contract/under probation) of Shin Yang Shipping Corporation Bhd including all subsidiaries.

Doc. No. SYSCorp/code of ethics/14	Version Number. 3.0	
Status: Approved		

PART A: GENERAL

1.0 PURPOSE/OBJECTIVES

The Shin Yang Shipping Corporation's Code of Conduct and Ethics guideline is intended to serve as a guide to the daily professional and ethical attitudes of the staff. It provides an objective approach to decision and promotes responsibility and transparency in all decision made. Code of conduct was intended to assist and guide us to practice our trust in accordance with the rules and laws that must be observed.

Shin Yang Shipping Corporation Bhd does not accept child labour and against all forms of exploitation of children in any of its global operations and facilities and does not provide employment to children before they have reached the legal age to have completed their compulsory education, as defined by the relevant authorities. The Company respects different cultures and values in countries where The Company operates and sources its products, but does not compromise on the basic requirements regarding the Rights of the Child.

The company will not make use of any kind of corruption or bribery, However, the company has freedom of association and the right to collective bargaining are respected. The company has the right of all workers to form and join trade unions and bargain collectively shall be recognized. The company shall, in those situations in which the right to freedom of association and collective bargaining are restricted under law, facilitate parallel means of independent and free association and bargaining for all workers. Workers representatives shall not be the subject of discrimination and shall have access to all workplaces necessary to carry out their representation functions.

The objective of this Code of Conduct and Ethics is as follows: -

- a. As a guidelines on the attitude and behavior while performing duties.
- b. Stressing that SYSCorp has a fair reputation and is responsible for all actions to employees, customers and dealer/vendor.
- c. Integrating ethics influence with laws that are more successful and effective in the fight against all forms of corruption, misconduct, and abuse of power.
- d. Consistence forming in the appearance of every employee while on official duty either within or outside the office.
- e. Skills to create a culture that is neat, professional and ethical to increase confidence among SYSCorp staff.

Employees who fail to comply with the provision of this code may be subject to disciplinary action or may be terminated from employment, depending on the offence they made.

Doc. No. SYSCorp/code of ethics/14	Version Number. 3.0	
Status: Approved		

PART B: CODE OF ETHICS

A code of ethics can be defined as a set of moral principles or moral values which are uniformly excellent and established by an organization to serve as the beliefs and practices of each of its staff.

1.0 OFFICE RULES AND REGULATIONS

1.1 Regular and Punctual Attendance

Punctuality reflects good character, promotes goodwill and respect. Every staffs must be punctual in regards to the working hours. Clock-In reporting for work on or before 8.00 am. Under no circumstances should any staff leave the Company's premises during or after clock in, unless prior permission or approval has been obtained from authorized personnel.

The office working hours must be strictly observed by all staffs. Should any of the staffs required to go out during office hours, he/she should apply to HRM System and register their clock out time at the finger vein machine.

The company observes the following office working hours:-

Monday to Friday	8:00 am to 12:00 noon
	1:30 pm to 5:00 noon
Saturday	8:00 am to 12:00 noon

No Personal **Video Watching** on any computer and **Napping** are allowed during office working hours.

1.2 Clock In/Out

It is compulsory for all employee from SYSCorp Office to clock in and clock out by using our Finger Vein Machine and no excuses will be accepted for being unable to clock in/out unless under special circumstances which has prior approval from the Top Management.

1.3 Newspaper, periodicals and story books

Staffs are instructed to refrain from reading newspaper, periodicals, story books or any reading materials that have no concern with his/her works during office hours.

1.4 Telephone

Any private or personal calls should be kept as short as possible. Fellow colleagues must cooperate with the operator to answer the phone next to you when the person wanted is not available and to answer the phone during lunch break.

Doc. No. SYSCorp/code of ethics/14	Version Number. 3.0	
Status: Approved		

1.5 Files, Documents, Records and Office Equipment

Staff should not leave office files, documents and records on their desk or on the floor after office hours. All files, documents, and records of confidential in nature should be properly put away and all office equipment like computers, lights, photo copiers and air condition units to be switched off. Photo copier machine is strictly for company use only and personal photocopying is prohibited.

1.6 Tidiness and Cleanliness

All staff has the responsibility of ensuring all part of the office is clean and tidy at all times. The waste paper baskets provided in the office areas should be used.

1.7 Mutual Respect and Courtesy

All staff is expected to show mutual respect and courtesy to one another and display good and proper conduct at all times.

1.8 Working Atmosphere

Staffs are not permitted to "chit-chat" or spread malicious gossips in the office. Even during power failure, staff are prohibited to group together to "chit-chat". Every staff should be concerned to each own working area unless necessary and not going around from one table to another to "chit-chat". During discussion or conversation, voice must be kept low.

1.9 Handling over Duties

When an employee is required to hand over his/her duties to another staff, he/she should ensure that all documents and files are passed to the successor with the list of duties and procedures for the job.

1.10 Staff travelling local and outstation

Staff travelling local and outstation on company's duty should apply travel request through the HRMS.

1.11 Medical

Staff are entitled maximum RM300.00 medical expenses per annum (include the dental and optical treatments) by a qualified registered doctor and medical certificate shall be provided.

Doc. No. SYSCorp/code of ethics/14	Version Number. 3.0	
Status: Approved		

1.13 Medical/ Expenditure Claims

All medical/expenditure claims shall be submitted by fill in the Expenditure Claim Form to Account Department. Staffs Medical Claim shall be verified by HR Department before proceed to Account Department for final process.

1.14 Uniform

Female staff upon confirmation shall be provided with two sets of uniforms. All female uniform shall be worn at all times during working hour from Monday to Saturday and should be always dressed neatly and appropriately for the type of works performed.

2.0 CONFLICT OF INTEREST

2.1 A conflict of interest occurs when personal interests interfere, or are perceived to interfere, with the independent judgement required by employees in order to perform their duties and responsibilities in the interest of the company.

All employees shall

- Avoid all forms of illegal discrimination;
- Disclose any conflict of interest or other circumstances known to them which may reasonably introduce or appear to introduce bias into the performance of their duties;
- Respect the confidentiality of information they receive through the performance of their duties about any other employees; such information may only be used or disclosed where such use or disclosure has the individual's consent, or is required in the performance of his/her duties as an employee.

3.0 SUPPLY CHAIN CODE

SYSCORP ensure an ethical, professional and accountable procurement program and committed to being the industry leader in providing outstanding value to its customers, a safe and stimulating work environment for its employees.

3.1 Personal Integrity and Professionalism

All individuals involved in purchasing or other supply chain related activities must act, and be seen to act, with integrity and professionalism. Honestly, care and due diligence must be integral to all supply chain activities within and between all suppliers and all other stakeholders.

Doc. No. SYSCorp/code of ethics/14	Version Number. 3.0	
Status: Approved		

3.2 Accountability & Transparency

Supply Chain activities must be transparent and accountable. In particular, tendering, contracting and purchasing activities must be fair, transparent and conducted with a view to obtaining the best value for public money. All employees must ensure that the public sector resources are used in responsible, efficient and effective manner.

3.3 Compliance & Continuous Improvement

All employees involved in purchasing or other supply chain related activities must comply with our code of ethics and the law of Malaysia.

Employee should committed and continuously work to improve supply chain policies and procedures, improve supply chain knowledge and skill level and to share leading practices among each others.

In applying to these standard employees should follow the guidelines set out as below:

3.3.1 Declaration of Interest

Any personal interest which may impringe or might reasonably be deemed by others to impringe on that employee's impartiality in any matter relevant to their duties should be declared to the company through a person's immediate superior.

An employee who has any interest, directly or indirectly, in any contract, transaction, proposed contract or proposed transaction under consideration by Company and is part of the decision-making process with respect thereto, shall:

- Declare the nature and extent of the interest as soon as possible and no later than any meeting in which the employee participates and at which the matter is to be considered;
- Refrain from taking part in any discussion or decision-making vote in relation to the matter;
- Withdraw from any meeting when the matter is being discussed if requested to do so by a majority of the employees present at the meeting;
- Any personal information gathered about an Employee under this Policy shall be held in accordance with the principals outlined in *Confidentiality Policy (CP/HR/17/01)*.

Doc. No. SYSCorp/code of ethics/14	Version Number. 3.0	
Status: Approved		

3.3.2 Business Gifts

To preserve the image and integrity of both the employee and the company, business gifts should be discouraged in any kind in cash, no matter what the value is) from our vendors, suppliers, clients, contractors and any other individual or organisation.

We practice no-gift policy to conform our code of conduct and professional ethical standard of behavior within our group of companies. Gifts and favours valued must not be accepted from individuals or organizations in any form of monetary or non monetary. (Refer to our Group Memo by our Group Managing Director by 12 Oct 2017)

Gifts using Company funds will be treated as all other expenditures and as such, will require the necessary procedures for expenses to be followed

3.3.3 Hospitality

All employees should not allow themselves to reach a position whereby they might or might be deemed by others to have influenced in making a business decision as a consequence of accepting the hospitality. All types of hospitality should be declined when you are in doubt or directly refer to your immediate superior or Board of Management.

4.0 ABSENCE OF DUTY

Shall any staff is absent from office on any other than those leave approval, he/she should inform the manager or respective heads of department on the day he/she is absent, a proper leave application through HRM System will be processed when he/she commence duty or in the case of illness, sick certificate from the panel doctor should be presented on that day.

5.0 SECURITY AND CONFIDENTIAL INFORMATION

5.1 All employees have the responsibility to maintain confidentiality of, and not use or disclose other than in the carrying out of official duties, any information, documents, and private and personal information which is directly or indirectly related to the company.

5.2 SYSCorp employees who have access to important and confidential company information will be subject to disciplinary action if they fail to comply this.

- For employment or at any time thereafter disclose any confidential information or information regarding the business of the Company or management or employees or any other person under any circumstances SYSCorp staff shall at all times:
- Ensure all information and classified documents are always protected and stored in a safe place.
- Do not behave negligently so may endanger the safety or cause vulnerability confidentiality of classified information or documents.
- Do not disclose any classified information in any way during or after serving.

Doc. No. SYSCorp/code of ethics/14	Version Number. 3.0	
Status: Approved		

- Do not copy or use any of the classified documents in any way for personal gain except after obtaining written permission from the Department.
- Submit all existing classified documents to the Department Head of retirement or transfer

6.0 HARASSMENT / SEXUAL HARASSMENT

6.1 SYSCorp prohibits harassment, and sexual harassment. Employees who violate this policy may be disciplined up to and including termination.

6.2 No form of harassment is acceptable. This includes joking remarks or other abusive conduct (including verbal, non-verbal, or physical conduct) that demeans or shows hostility toward an individual because of his or her race, color, religion, national origin, gender, age, marital status, sexual orientation, gender identity, disability, veteran status, genetic information or any other prohibited basis and that creates an intimidating, hostile, or offensive work environment; unreasonably interferes with an individual's work performance; or otherwise adversely affects an individual's employment opportunities.

6.3 SYSCorp is firmly committed to maintain a positive working environment for all employees, whether male or female. Sexual harassment is prohibited because it may be intimidating or an abuse of power and it is inconsistent with our policies, practices, and management philosophy. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and certain other verbal, non-verbal, or physical conduct that is sexual or based on gender if that conduct could reasonably offend another person, whether or not such conduct was intended to offend.

7.0 ABUSING ASSETS / OFFICE FACILITIES

7.1 Any SYSCorp properties, equipment or resources allocated or available to staff is to be used for official purposes only, unless specifically approved for private use by the appropriate delegate.

7.2 Misusing facilities, equipment and resources belonging to SYSCorp, or aiding others in doing so, is a breach of this code which will result in disciplinary action.

7.3 All SYSCorp employees are:

- Required to use the asset / property department for official purposes prudently and responsibly without causing damage or loss to the Department;
- Do not use the assets / property or facility for the Department of personal interests unless approved by management of the Department / Head of Department. The Department has the right to claim any damages or loss arising from the use of a care less, wasteful and careless.

Doc. No. SYSCorp/code of ethics/14	Version Number. 3.0	
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8.0 DRUGS / LIQUORS

8.1 Every employee of SYSCorp is prohibited at any time:

- Engaging directly or indirectly in the drug.
- Using or take drugs (except for medical purposes as prescribed by a medical practitioner registered under the Medical Act 1971)
- Possess, sell or distribute or drink alcohol in the workplace are prohibited.

9.0 CAREER DEVELOPMENT

9.1 Each employee is responsible to equip themselves with knowledge and skills through courses organized by the Department and external parties in order to achieve success and career development. SYSCorp employees who wish to attend any of the courses organized by the Department or an outside party must receive the approval of the Head of Department in advance.

10.0 ATTITUDE PROFESSIONALISM

10.1 SYSCorp employee at all times shall adopt and carry out their duties professionally in dealing with issues relating to the enforcement or other forms of work it performs. Employees should always know their roles and responsibilities and strives to create a good relationship with the community. They cannot be negative smear own department and always deny such noble efforts that have been undertaken by the department in improving the image of the department.

11.0 OFFICE ATTIRE AND APPEARANCE

- Female staff to wear full set uniform provided by the company during office hours.
- **No slipper** and sandals during office hours. For female staff, wearing of sport shoes not permitted. Stockings worn should be close to skin color.
- Wearing of **Jeans not permitted** in the office during office hours. Appearance should be neat and tidy.

Doc. No. SYSCorp/code of ethics/14	Version Number. 3.0	
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PART C: BREACHES OF THE CODE OF CONDUCT AND ETHICS

Code of Conduct and Ethics is one document that sets out the standards of conduct, performance and behavior of staff. Disciplinary action may be taken when employees violate the Code of Conduct and Ethics. Level offenses will be dealt with as listed below:

- a. Corrective action
- b. Disciplinary action
- c. Termination of employment
- d. Formal and informal counseling

Each employee will be given the opportunity to explain the situation and their behavior before any discussion is made for action to be taken against the individual. Show cause letter will be required if it involves relatively serious cases or after several warnings but no action was taken.

Procedures for dealing with violations of the Code of Conduct and Ethics will be dependent on and adhering to the principles of due process and procedural fairness. All parties involved will be given information about the process. Those responses, along with mitigation conditions will be taken into consideration before any final decision is made.

Doc. No. SYSCorp/code of ethics/14	Version Number. 3.0	
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To: Human Resource Department

ACKNOWLEDGEMENT

I affirm that I have read and understand the SHIN YANG SHIPPING CORPORATION BHD'S CODE OF CONDUCT & ETHICS and agree to observe and to be bound by the provisions therein. I understand these rules and regulations are strictly for Shin Yang Shipping Corporations' employees and shall not disclose the content to anyone.

Name:

Signature: _____

Designation:

Date: