



CODE OF CONDUCT

Introduction

Pelangi Publishing Group Berhad, is committed to the highest standards of professional and personal conduct. The Company's culture is based upon a set of shared values and principles. These include working with integrity and commitment to the customers and the community in general. All employees of the company and all of its subsidiaries and associates (collectively, the "Company") are expected to conduct themselves at all times within the letter and the spirit of the Code of Conduct.

The aim of this Code of Conduct is to provide guidelines on the expected behavior and conduct of all the employees and also to serve as a tool to guide the employees' action when dealing with both internal and external parties.

The Code of Conduct is not intended to be exhaustive and cannot anticipate every situation which may morally or ethically compromise the employee or the Company. In this regard, the Company expects its employees to use their sensible and sound judgment. In any case of ambiguity, the employee should seek guidance and counsel from his or her immediate superior or Human Resource Division.

The Company reserves the right to add, amend, annul, vary or modify the provisions set out in this Code of Conduct as and when it deems necessary at its discretion. Employees will be notified of any changes to the Code of Conduct.

Who does the code apply to?

The Code of Conduct applies to all employees of the Company. Employees are required to comply with all applicable laws, rules and regulations, whether or not specifically addressed in these policies.

In addition to leading by example, all managers are expected to take the necessary steps to comply with this Code of Conduct and to ensure that their teams have the information, guidance and support to comply with the Code of Conduct as well as all relevant policies and procedures.

The Company also expects that suppliers, consultants, distributors and independent contractors agree to follow all applicable policies.



Enforcement

An employee who violates a provision of the Code of Conduct, condones or knowingly fails to report a possible violation, intentionally makes a false report or fails to cooperate fully in any investigation of any violation, will be subject to disciplinary action, up to and including the penalty of dismissal.

Because of the significant legal and ethical consequences of noncompliance with the Code of Conduct, disciplinary action may be taken with respect to not only those who violate the Code of Conduct, but also those who – through lack of diligence or supervision – fail to prevent or report violations.

Conclusion

All employees of the company and all of its subsidiaries and associates are obligated to read and understand this Code of Conduct and the relevant functional policies and procedures. No code of conduct, however, can address every situation for which guidance may be necessary. If an employee is unclear about a situation, he/she should seek guidance before taking action.

All employees of the company and all of its subsidiaries and associates are expected to abide by both the letter and spirit of this Code. The Managing Director or the duly authorised committee will investigate reported violations of the Code and if violations are found, may take disciplinary action, if appropriate, against the individuals involved.