

SUPER ENTERPRISE HOLDINGS BERHAD

Code of Business Ethics

Contents

- Introduction
- Our values
- Legislative compliance
- Management
- Employees
- Customers
- Business partners and suppliers
- Shareholders
- Society and environment
- Communication
- Competition
- Business integrity
- Conflict of interest
- Confidentiality and privacy
- Integrity and safeguarding of company assets
- Insider trading
- Code compliance

Introduction

The Super Group of Companies, having its headquarters in Malaysia with subsidiaries across the Asian region and being a manufacturer of adhesive labels, stickers and nameplates, strives to ensure that its business practices are governed by integrity, honesty, fair dealing and full compliance with applicable laws. Although business practices and laws vary from country to country, and each unit within the Group is unique, yet we share common standards and responsibilities wherever we do business as contained in this Code of Business Ethics which is designed as a frame of reference to all the companies within the Group.

Our Values

Our core values are to conduct our business with honesty, integrity, professionalism, responsibility, ensuring quality in all that we do and we subscribe to good corporate governance. We respect the legitimate interests of all our key stakeholders, namely our shareholders, employees, customers, business partners and suppliers, and society as a whole.

Legislative Compliance

All the companies within the Group together with their respective directors and employees are to comply with the laws and regulations in the countries which they operate.

Management

Each company within the Group is managed independently and is headed by the respective General Manager/Country Head who is responsible to ensure that the unit is managed in accordance with sound corporate governance and corporate policies established at the Group's headquarters.

Employees

We are committed to providing a working environment in which employees can realise their full potential and contribute to the Group's business success. We are committed to creating a working environment where there is mutual trust and respect and where everyone is accountable for his/her own actions and feels responsible for the performance and reputation of our company. We aim to recruit, employ and promote employees on the sole basis of their ability to fulfill the requirements of the job. We are also committed to developing and enhancing each employee's skills and capabilities. We will provide our employees with safe and healthy working conditions in conformance with the respective countries' health and safety standards.

Customers

We are committed to providing our customers with high quality goods and services which meet all applicable safety standards. We value the trust our customers place in us and will safeguard the information provided to us in accordance with relevant laws and contractual commitments.

Business Partners and suppliers

We are committed to establishing mutually beneficial relations with our suppliers, customers and business partners. We aim to protect our property (including intellectual property) and respect the property of others.

Shareholders

We are committed to enhancing shareholders' wealth through sustainable and profitable growth.

Society and Environment

The Group strives to be a trusted corporate citizen and as an integral part of society, to fulfill our responsibilities to the societies and communities in which we operate.

We are committed to comply with all applicable environmental laws and regulations, protecting the environment and preventing pollution by applying appropriate management practices and technology.

Our operations are subject to regulatory requirements relating to the use, storage, discharge and disposal of controlled materials used during the manufacturing process. We monitor our compliance with these laws and continually improve our performance to maintain our status as a responsible corporate citizen in all locations in which we operate.

Communication

We will communicate openly with all stakeholders within the bounds of commercial confidentiality and regulatory constraints. We will ensure that all announcements are accurate, fair, timely and comprehensible, taking into account applicable standards and regulations.

Competition

We are committed to free and open competition and seek to conduct our operations in accordance with the principles of fair competition and in conformance with all applicable antitrust and competition laws and regulations.

Business integrity

We aim to be honest and fair in all aspects of our business and we expect the same in our relationships with all those with whom we do business. We do not give or receive improper financial inducements either directly or indirectly, for business or financial gain.

Our accounting system is designed to accurately capture and reflect the true nature of the underlying transactions and conform to applicable accounting standards.

Conflict of Interest

Directors and Employees must not have outside commercial interests that conflict with the best interests of the Group. Directors and Employees are expected to act only for the benefit of the Group and not be influenced by any personal interest that may result from other individual or business ventures which the directors or employee may be involved in. Any involvement in other business ventures whilst servicing or in the employment of the Company must be approved in writing by the Board of Directors. In addition, directors and employees are prohibited from working simultaneously for a competitor, customer or supplier.

Confidentiality and privacy

Directors and Employees are not permitted to disclose confidential information about the Company to persons who are not authorised to have it or use the information for personal gain, either during or after the directors or employees' tenure with the Company. Confidential information consists of any information that is not to be or not yet made public. It includes trade secrets, business marketing and service plans, consumer insights, engineering and manufacturing ideas, product designs, databases, records, salary information and any non-published financial or other data.

Directors and Employees may not receive a confidential disclosure of proprietary information from an outside source without entering into a Company-approved non-disclosure agreement.

Directors and Employees will respect and observe laws, regulations and detailed codes of conduct relating to all data privacy. Directors and Employees shall not disclose any of the Company's confidential or personal information except where authorised in connection with the conduct of Company business.

Integrity and Safeguarding of Company Assets

Directors and Employees are expected to demonstrate integrity in their respective functions and not engage in fraudulent or any other dishonest conduct involving the property or assets of the Company as this may not only entail disciplinary sanctions but also result in criminal charges.

Directors and Employees are also expected to safeguard and make only proper and efficient use of the Company's assets to prevent such assets from suffering loss, damage, misuse, theft, fraud, embezzlement or destruction. These obligations cover both tangible and intangible assets, including trademarks, know-how, confidential or proprietary information and information systems.

Insider Trading

Directors and Employees shall not use price sensitive information that has not been made available to the public for their personal benefit. In addition, directors shall comply with the Listing Requirements of Bursa Securities when dealing with securities during and/or outside closed periods.

Code Compliance

It is each employee's responsibility to ensure full compliance with all provisions of this Code. The day-to-day responsibility of promoting and implementing these Business Principles is delegated to the senior management of the Company and it is senior management's responsibility to ensure that these business ethics are communicated to, understood and observed by all employees of the Company.

Any failure to comply with this Code may result in disciplinary action, including the possibility of dismissal and if warranted, legal proceedings or criminal charges.

This Code of Business Ethics shall be reviewed periodically to ensure that it remains relevant and appropriate.