SUMMARY OF CODE OF CONDUCT

Board members are required to observe this Code as follows:

1. Have a clear understanding of the vision, strategic and capacity of the Company.

2. Ensure at all times that the Group is properly managed and controlled.

3. Stay abreast of the affairs of the Company and be kept informed of its compliance with relevant legislations and contractual requirements.

4. Devote time and effort to attend meetings and to know what is required for the Board and its member and to discharge those functions.

5. Exercise independent judgment and act in good faith and in the best interests of the Group.

6. Act honestly and responsibly in the exercise and discharge of his powers and duties for the benefit of the Group.

7. Neither misuse information gained in the course of duties for personal gain or that of others, nor divert to his own advantage any business opportunity that the Company is pursuing.

8. Any Board member who has a clear and substantial interest in a matter under consideration by the Board should declare that interest at any meeting where the matter is to be discussed. The Board member concerned should withdraw from the meeting during the relevant discussion and decision.

9. Subject to the requirements of any acts, rules or regulations that are in force from time to time and in addition to such mandatory requirements, members of the Board are required to notify the Company Secretary changes in the following:

   - Shareholdings, whether direct or indirect, in the Company or its related corporations.

   - Directorships in any other corporations.

   - Material interests, whether direct or indirect, in office, property and contract or proposed contract with the Company.

10. Be conscious of the interest of shareholders, employees, creditors and customers of the Group. Ensuring effective use of natural resource and that the business operations do not harm the interest and well-being of the community.

11. Ensuring adequate safety measures and proper protection to employees at work places.