

DWL RESOURCES BERHAD
(FORMERLY KNOWN AS SPRING GALLERY BERHAD)
(“DWL” or “the Company”)
(Company No. 504718-U)

CODE OF BUSINESS ETHICS AND CONDUCT

The Group is committed to the highest standards of ethical business conduct. This code of conduct is binding on all employees, whose actions must always be such as to avoid any impropriety. In addition, the Group and its employees are subject to the Law of Malaysia in every respect.

Employees who have any doubts on the appropriate course of action involving matters of business ethics should consult their Head of Department/ Division or company Director.

For an employee to accept commission, a share in profits, gifts in cash, gift certificates, travel or other payment, materials, services, repairs or improvements at no cost or at unreasonably low prices, excessive or extravagant entertainment or gifts of merchandise of more than nominal value from any organisation, firm or individual doing or seeking to do business with the Group or any its affiliate/ subsidiary without prior notice to HR Department may seem to be committing a major offence.

Employees of the Group have the obligation to inform the Senior Management as soon as they become aware of practice or circumstances, which may involve them in unethical conduct or conflict of interest. This obligation applies when dealing both within the Group and externally.

In doing business with any organisation the following standards apply:

- i) Employees must deal fairly and equitably with their colleagues and external contacts;
- ii) Employees must not misrepresent themselves or the Group to anyone. If a misunderstanding occurs, immediate clarification should be made once this become evident;
- iii) Unauthorised copying or use of software and other data or documentation can results in criminal liabilities. The improper use of such proprietary information is strictly forbidden.