

# SYNERGIC HALLMARK SDN. BHD.

(Co. No. 514374-U)

No.4 & 6, Jalan Makmur 2, Taman Perindustrian Cemerlang,  
81800 Ulu Tiram, Johor.

## CODE OF ETHICS AND BUSINESS CONDUCT

### 1. Purpose

The Code of Ethics and Business Conduct outlines the principles and standards of behavior expected of all employees, officers, directors, and third parties acting on behalf of Synergic Hallmark. It ensures integrity, compliance with laws, and responsible business practices.

### 2. Scope

This Code applies to all employees (full-time, part-time, and contract), directors and officers, subsidiaries and affiliates, as well as suppliers, agents, consultants, and business partners acting on behalf of the company.

### 3. Core Principles

#### 3.1. Compliance with Laws

We are committed to conducting our business in full compliance with all applicable local and international laws, including but not limited to Malaysian Anti-Corruption Commission (MACC) Act 2009, Employment laws and labor regulations, and Health, safety, and environmental laws

#### 3.2. Integrity and Honesty

All employees must act with honesty, fairness, and integrity in all interactions, both internal and external. Fraud, theft, or deliberate misrepresentation is strictly prohibited.

#### 3.3. Anti-Bribery and Anti-Corruption

We prohibit all forms of bribery and corruption. Employees shall not offer, give, solicit, or accept bribes or facilitation payments, either directly or indirectly.

#### 3.4. Conflict of Interest

Employees must avoid situations where personal interests conflict or appear to conflict with those of the company. Any potential conflict must be disclosed immediately.

#### 3.5. Confidentiality

Employees must safeguard proprietary and confidential information. Such information should not be shared outside the company without authorization.

#### 3.6. Equal Opportunity and Fair Treatment

We are an equal opportunity employer. Discrimination or harassment based on race, gender, age, religion, disability, or any protected status is not tolerated.

#### 3.7. Workplace Health and Safety

Employees must adhere to all health and safety policies. Everyone has a responsibility to maintain a safe and healthy working environment.

#### 3.8. Environmental Responsibility

We are committed to minimizing our environmental impact and complying with all applicable environmental regulations.

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### 3.9. Use of Company Assets

Company assets must be used responsibly and only for legitimate business purposes. This includes physical assets, financial resources, IT systems, and intellectual property.

### 3.10. Accurate Financial Reporting

All financial records and disclosures must be complete, accurate, and timely. Employees involved in finance and accounting must follow accepted accounting practices and legal standards.

### 3.11. Fair Business, Advertising and Competitive Marketing

We are committed to fair business practices, including truthful advertising and responsible marketing. Employees must ensure that all marketing, sales and advertising activities are accurate, not misleading and in compliance with applicable laws and ethical standards. Unfair competition, false claims or deceptive practices are strictly prohibited.

## 4. Reporting Violations

### 4.1. Whistleblowing

Employees are encouraged to report any suspected violation of this Code. Reports can be made to:

- Immediate supervisor
- Human Resources
- Ethics Compliance Officer
- Whistleblower email - whistleblowersynergic@gmail.com

No retaliation will be tolerated against anyone who reports violations in good faith.

## 5. Disciplinary Action

Violations of the Code may result in disciplinary action, up to and including termination, legal action, and reporting to authorities.

## 6. Acknowledgment

All employees must acknowledge in writing that they have read, understood, and will comply with this Code.

Approved by:



[Managing Director]

Doc No: ETH-POL-01

Revision: 0

Effective Date : 16/06/2025

Last Reviewed : 16/06/2025