



CODE OF ETHICS

The Code is central to our reputation, which lies at the heart of our success. We need to ensure that everything we do builds and protects that reputation. By behaving in accordance with the Code, we create a supportive, positive atmosphere that builds morale and enhances our reputation. How we do business is never a short-term consideration, but should rather contribute to our long-term sustainability. Our commitment to act as responsible corporate citizens includes specific compliance with all laws and regulations in the countries and jurisdictions where Pengg operates.

Human rights

We commit to the principles of the United Nations Global Compact, the Universal Declaration of Human Rights, and the International Labour Organisation.

- All employees at Pengg are expected to treat with the utmost respect and dignity other employees and all stakeholders with whom they interact.
- We respect diversity and promote an inclusive environment that helps all employees to fully participate and contribute to Pengg's success.
- We provide equal employment opportunities and treat applicants and employees without bias.
- No one at Pengg should be discriminated against on the basis of race, religion, colour, age, gender identity or expression, or sexual orientation.
- Workplace harassment, bullying, intimidation, or actual or threatened violence are prohibited.
- The use of child-, compulsory- or forced labour is prohibited.

Health, safety and the environment

Protecting people and the environment underpins our approach to sustainability. We place the highest priority on the health and safety of our workforce and on the protection of the environment.

- We keep up-to-date on laws, regulations and practices related to safety and the environment that are relevant to our business.
- We take all reasonable measures to maintain a safe and healthy operating and working environment and to prevent workplace accidents and injuries.

Preventing fraud and corruption

Preventing fraud and corruption is not only a moral issue; it's also about doing good business. Bribery and corruption significantly reduces our ability to produce positive economic and social outcomes and it affects Pengg's long-term viability. We will act in observance of all applicable laws and regulations, worldwide to maintain the highest possible standards in our accounting and financial procedures and statements.

- We maintain objectivity when dealing with customers and suppliers and ensure that our decisions are not influenced by gifts, entertainment or favours.
- We report all actual or attempted instances of bribery and corruption of which we become aware.
- Any activity that has the appearance of a conflict of interest – whether or not an actual conflict exists – should be avoided.
- None of our employees should use her/his company position or influence to secure an improper benefit for herself/himself or others.

Competition law

Fair competition is an essential element in the efficient working of markets. We do not join competitors or business partners in agreements or understandings that limit competition.

Use of company assets

All Pengg's assets, from computers and machines to intellectual property such as a patent or trade mark, are essential tools for our success. Misuse of these assets could negatively impact our business and/or our reputation. We need to be good stewards of the assets we use every day and accept personal responsibility for the proper use of the company assets in our care.

Privacy and confidentiality

We respect the confidentiality of personal data. Personal data is not used or disclosed improperly or used by someone who is not authorised to do so. Personal data is information that can directly or indirectly identify an individual, including employees, contractors, shareholders, customers and anyone else with whom Pengg does business.

- We safeguard Pengg's information assets and intellectual property against theft, unauthorised disclosure, or misuse.
- We use personal, supplier and customer data only to support our operations and to provide employee benefits and customer solutions.
- We have safeguards to protect personal and customer data and we expect all our employees and anyone else with access to this data to comply with these safeguards.
- We inform individuals about the collection and processing of their data, as well as their rights towards their personal data.
- We comply with all regulations and contractual commitments regarding the valid and enforceable intellectual property rights of third parties, including patents, copyrights, trade secrets and other proprietary information.

