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SUPPLIER CODE OF CONDUCT

1.0 Background

K2 Bitumen Sdn. Bhd. (K2B) is a Malaysian company serving customers throughout the country. K2B is proud to be the pioneer in the use of recycled materials in our products and is committed in playing its role in reducing the emission of greenhouse gases, and in lowering the pollution in our air, water and land.

K2B believes that in today's global economy it is even more vital for companies to act as responsible corporate citizens and to make their commitment known to responsible third parties, such as K2B's suppliers, vendors, contract manufacturers as well as customers.

This Supplier Code of Conduct ("Supplier Code") provides certain requirements of our suppliers, vendors and contract manufacturers (collectively, "Suppliers") so that they may operate in a responsible manner while doing business with K2B.

2.0 Scope and Application

The Supplier Code pertains to all Suppliers of K2B. By supplying goods or services to K2B, Suppliers agree to follow the Supplier Code. At the sole discretion of K2B, and in consideration of potential risks, the strategic nature of the Supplier relationship and the size of the business impacted, the Supplier Code can be:

- enforced and verified by audits to be conducted by K2B;
- required to be acknowledged, approved, and signed by an authorized representative of Suppliers; and/or
- included in Supplier Agreements and Purchase Orders, respectively, [as applicable from and after the effective date of this Supplier Code].

3.0 K2B Commitment to Sustainability

At K2B, sustainability is a business imperative and a business driver critical to our long-term success. Ensuring that our suppliers adhere to this Supplier Code is an integral part of our sustainability efforts. We encourage our suppliers to actively promote sustainable development principles within their own operations and supply chain, such as those outlined in this document.

4.0 COMPLIANCE WITH LAWS

At a minimum, Suppliers will comply with all applicable local, national and international laws and regulations that apply to the conduct of their business with K2B.

5.0 EMPLOYMENT PRACTICES

K2B is operating in regions with diverse cultures, traditions, and social norms. Our suppliers must conduct business in a manner that is consistent with K2B's ethical standards related to employment practices and working conditions. As part of this commitment, we expect our suppliers to conduct

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business in accordance with the Universal Declaration on Human Rights and Associated Covenants and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

We require our suppliers to adhere to the international standards and follow the terms of this Supplier Code.

5.1 Child Labour

Suppliers shall only employ individuals who meet applicable local minimum age requirements. In addition, suppliers must also follow the relevant ILO conventions, which ensure children are only employed when fully safeguarded from potential exploitation, when protected from health hazards, and when allowed to further their education.

5.2 Forced Labour

Employment must be voluntary and freely chosen. Suppliers will not utilize forced prison labour, other forced labour, human trafficking, or modern-day slavery in the manufacturing of its products or in its supply chain. Coercion, intimidation, or harassment of the workers by suppliers is not acceptable.

5.3 Wages and Hours

Suppliers must provide wages and benefits that comply with applicable laws and agreements, including minimum wage, overtime, maximum hour rules, and meal and rest periods. In the absence of legal mandates, wage rates should be in accordance with local industry standards.

5.4 Diversity/Non-discrimination

K2B is an Equal Opportunity Employer that values diversity and inclusion in our global organization. Suppliers must comply with all laws prohibiting discrimination in hiring and employment practices on the basis of race, religion, creed, national origin, gender, sexual orientation, gender identity or expression, age, disability, or other protected status. Suppliers shall be responsible to apply these non-discriminatory and equal opportunity practices.

5.5 Freedom of Association and Collective Bargaining

Suppliers must respect workers' rights to form and join organizations of their choice and to bargain collectively without unlawful interference. Suppliers will not discriminate, harass, or penalize workers or worker representatives because of their interest and/or membership in, or affiliation with, a trade union, or their legitimate trade union activity.

5.6 Health & Safety

Suppliers will provide employees with a safe, healthy and hygienic working environment, including but not limited to adequate emergency procedures and fire safety, management of hazardous materials, and housekeeping. Where legal requirements for occupational safety do not exist, suppliers must ensure the safety and well-being of employees by employing best practices for health and safety,

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including but not limited to training, accident prevention initiatives, and equipment to prevent injury to health associated with or occurring in the course of work.

6.0 Ethical Business

Practices High standards of ethical behaviour and business practices are upheld by K2B. This document sets forth the standards of behaviour and conduct expected of suppliers.

6.1 Fair, Ethical and Compliant Business Conduct

It is expected that while suppliers conduct their business in a competitive way it is equally fair and ethical. Applicable competition laws and regulations must also be followed.

6.2 Confidentiality

As K2B respects the confidential information of others, we expect our suppliers to equally safeguard confidential information and not to share outside the appropriate circle of communication.

6.3 Conflict of Interests, Gifts, Entertainment and Donations

In order to prevent conflicts of interest, suppliers shall not engage in any improper payments, offers, or solicitations to K2B employees. Reasonable, noncash gifts having a token or nominal value are acceptable, provided that they are not intended and cannot be construed as a bribe, kickback, or other form of compensation to the recipient.

6.4 Anti-Corruption and Bribery

K2B is fully committed to eliminate corruption from business transactions. We require that suppliers are not only compliant with all applicable legal and ethical standards, but that suppliers are equally committed to eliminate corruption in any of its forms, including bribery, facilitation payments, extortion, money laundering, and other illegal or unethical gratuities.

7.0 ENVIRONMENT

K2B is committed to sustainability in all aspects of our operations. We are working to promote the efficient use of water, energy and raw materials, and reduce greenhouse gas emissions. We believe that efficiency and responsible use of resources lowers environmental impact, mitigates operational risk, decreases operational costs, and generates competitive advantage, not only for K2B, but also for suppliers. All suppliers will conduct business in accordance with applicable local and national environmental laws. Where no local regulations exist, suppliers are expected to operate in a manner that does not pose risks to the environment.

7.1 Operations

Suppliers should employ best practices to conserve raw materials, water and energy, and reduce greenhouse gas emission in their operations through source reduction, process improvement, use of

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alternative materials, and waste recovery. Suppliers are expected to have all applicable environmental permits in place.

7.2 Collaboration

We encourage suppliers to actively participate in projects and initiatives that contribute toward K2B's sustainability commitments to jointly make a positive impact to the environment.

8.0 Non-Compliance

Suppliers found to be non-compliant with any of the provisions above agree to assist with the investigation and provide reasonable access to information requested. If corrective action is deemed by K2B to be necessary, the supplier agrees to develop a plan and mutually appropriate timeline to rectify the issue. K2B will collaborate with suppliers to identify actions to reach full compliance with the terms of this Supplier Code. In case of prolonged or material noncompliance by any supplier, K2B reserves the right to review future business arrangements with any such non-compliant supplier and may seek alternative supply from another supplier as a remedy.




Mohamed Nasser Bin Ahmad
Director