

PADINI HOLDINGS BERHAD (50202-A)

SUMMARY OF THE CODE OF CONDUCT APPLICABLE TO ALL EMPLOYEES OF THE PADINI HOLDINGS BERHAD GROUP OF COMPANIES

The Code of Conduct sets out the behaviours and the standards of behaviours that all employees of the Padini Group are duty-bound to either observe and maintain or to avoid at all times when they are acting in the name of the Padini.

While the types of conduct covered by the Code is fairly wide and comprehensive, the underlying principle that defines the Code is one of fairness, ethical behaviour and of being responsible. An employee is hence required to be fair, ethical and responsible when dealing with the Company, with his/her colleagues, third parties that conduct business with the Company and with the government and other regulatory authorities. The following describes the more prominent behaviours mentioned in the Code of Conduct as set out in the Employment Manual of Padini Holdings Berhad.

- Exercise of good faith, fidelity, care, commitment, diligence
- Negligence and carelessness
- Fraud and dishonesty
- Immoral and indecent behaviour
- Nepotism
- Discrimination
- Conflict of interest
- Misappropriation and abuse of authority and position
- Misappropriation, abuse and theft of resources , assets, facilities and benefits
- Making and or dissemination of unauthorised, false and or misleading statements
- Sexual harassment
- Intellectual property infringement
- Insubordination, disorderly behaviour, drug-related offences, intoxication, fighting, intimidation, gangsterism,
- Poor or non-performance
- Soliciting away of employees and other interested third parties
- Unauthorised alteration of documents or records
- Conduct beyond working hours
- Corruption and solicitation of gifts and personal favours
- Money laundering