

CODE OF CONDUCT

INTRODUCTION

1. This Code of Conduct shall be applicable to and be binding on all directors and employees of JCY International Berhad and of its subsidiaries.

COMMITMENTS

2. All directors and employees shall be committed:-
 - 2.1 to act in the best interest of the Company;
 - 2.2 to fulfill their fiduciary duties to the shareholders of the Company;
 - 2.3 to comply with all laws, regulations, requirements and policies;
 - 2.4 to act in good faith, competence and diligence;
 - 2.5 to promote ethical behavior at all times;
 - 2.6 to conduct themselves in a professional, courteous and respectful manner;
 - 2.7 to safeguard and enhance the image of the Company;
 - 2.8 to avoid situations that may give rise to conflict of interest with the Company;
 - 2.9 to protect the confidentiality of information of the Company; and
 - 2.10 not to take personal advantage from their authority and information arising from their position in the Company.

DISCLOSURES

3. In case of any breach of this Code of Conduct by any director or employee, the director or the employee, or other directors or employees are required to:-
 - 3.1 in the soonest possible time, disclose to the Chairman of the Board, any other directors or the lead internal auditor;
 - 3.2 try their best to reduce or mitigate the magnitude of any damages/loss, if any; and
 - 3.3 observe the whistle blowing policy.

WAIVER

4. In exceptional and rare circumstances, a waiver of observing this Code of Conduct could be recommended by the Audit Committee and approved by the Board of Directors.