

**K999**

Engineering &  
Construction Co., Ltd.

**K999**

**Engineering &  
Construction  
Code of Conduct**

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Owner: Managing Director

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# 1. INTRODUCTION

The board of directors (the “Board”) and the management of K999 Engineering & Construction Co., Ltd. (“K999” or the “Company”) is committed to upholding the highest standards of ethical conduct in the interests of the stakeholders, the wider community, and the environment. Ethical conduct is not merely related to standards of behaviour characterised by complying with the law and the various K999 policies, which are referred to in this standard Code of Conduct (“Code”) but also by acting fairly, honestly, and with integrity.

K999, its board of directors, Managing Director (MD), senior management, and employees (“K999 People”) will abide by and ensure every decision and every action comply with this Code.

# 2. PURPOSE AND SCOPE

This Code aims to set a standard of behaviour and culture throughout the Group, which guides K999 People to perform their work, make decisions, hold themselves accountable for their performance, and protect K999’s value and reputation.

All K999 People are expected, at all times, to act consistently with the Code, and this Code applies to K999 People whenever they are identified as a representative of K999, which includes outside working hours or the workplace. The Code will also extend to anyone who works for the Company, including suppliers and contractors, regardless of location. Therefore, K999 People should advise the contractors, consultants, suppliers, and their employees, agents, and subcontractors that they are expected to observe the Code when the Company engages them to perform any work.

# 3. VALUES & VISION

*“K999 vision is to grow sustainably, delivering mutually beneficial outcomes for all stakeholders.”*

We built the Code based on integrity, openness, accountability, and our culture (the way we think and operate) that is underpinned by our values as follows: (“Values”)

## SAFETY

We never compromise on safety. We look out for one another and stop work if it’s not safe.

## INTEGRITY

We have the courage to do what’s right, even when it’s hard. We do what we say and treat each other fairly and with respect.

## RESPONSIBILITY

We take responsibility for our actions. We talk and listen to others to understand what they expect from us. We work to improve our commercial, social and environmental performance.

## EQUALITY

We recognise and value the advantages of having a workforce that reflects the demographics of the wider community. We encourage the recruitment and participation across all demographics, genders and ethnic backgrounds

## SIMPLICITY

We work efficiently and focus on what’s important. We avoid unnecessary complexity and look for simple, pragmatic solutions.

We stand by our Values and are committed to achieving our targets; our focus on continual improvement and innovation; our performance driven attitude and pursuit of excellence; our confidence to influence and challenge; and our commitment to working together collaboratively with K999 People, its clients, suppliers, subcontractors or any organisations guides our future success.

Further details of this section can be found in the Sustainability Policy and Quality Policy.

## 4. WORKING TOGETHER

### 4.1 Health, Safety and Environment

*“A safe and healthy working environment for all K999 People and the employees of any supplier, subcontractor or consulting at a K999 site, is crucial to the continuing success of the business.”*

We are committed to the health and safety of everyone impacted by its operations and to zero harm approach to environmental aspects. No topic is more important to us. We always meet all legal requirements as a minimum and strive for industry best practice. The K999's Critical Safety Essentials is adhered to throughout the business and facilitates a best practice approach to ensuring a healthy and safe working experience for all.

Further details of this section can be found in the Health & Safety Policy and Environmental Policy.

#### **We ALWAYS**

- Strictly comply with all health and safety rules and procedures.
- Immediately stop any work that appears to be unsafe.
- Identify and report unsafe behaviours, incidences, spills or uncontrolled release of materials.
- Properly use the necessary protective equipment provided.
- Present ourselves fit for work.

#### **We NEVER**

- Prioritise other objectives over health and safety.
- Walk past unsafe behaviour or hazards.
- Bend the health and safety rules.
- Undertake work unless we are fully fit, competent, and trained to do so.
- Ignore the potential impact of our work on the environment.

### 4.2 Employment Equality

*“K999 is committed to providing equal opportunities in all aspects of employment. The Company will recruit staff based on genuine merit and suitability for the job, without bias or prejudice.”*

We deserve and are entitled to equal treatment at work. This includes the opportunities to be hired and promoted. We aim to develop a talented and diverse workforce that represents the wide range of cultures in our community to the benefit of K999. We also adopt a proactive approach to indigenous training and recruitment.

Further details of this section can be found in the Equal Opportunity Policy.

#### **We ALWAYS**

- Recruit and promote on the basis of skill, ability and positive attitude.
- Ensure training and development programs are identified and made available to all employees.
- Ensure the best possible understanding of cultural considerations that may impact workplace experiences.

#### **We NEVER**

- Make decisions based on attributes unrelated to job performance (for examples race, impairment, gender, age, religion belief or activity, gender identity or family responsibilities).

- Tolerate any form of discrimination

### 4.3 Harassment and Bullying

*“K999 is committed to a safe and fair working environment which is free from violence, aggression, bullying, humiliating or intimidating, and bullying behaviour.”*

We have a zero-tolerance approach towards any form of harassment and bullying, which includes unwelcome, offensive and/or humiliating behaviour or persistently unreasonable behaviour on any grounds, whether by race, gender, sexual preference, marital status, age, religion, colour, national extraction, social origin, political opinion, disability, family or carer’s responsibilities, or pregnancy. These behaviours have a very serious impact on our work experience and can also impact a person’s life outside of work. Harassment and bullying are also illegal and may lead to penalties for us and for anyone engaging in the behaviour.

Further details of this section can be found in the Workplace Behaviour Policy.

#### **We ALWAYS**

- Treat harassment and bullying as workplace hazards in the same way we treat all other health and safety hazards
- Treat all complaints promptly, privately and seriously
- Take action against an employee who contravenes this Code including disciplinary action where appropriate
- Encourage employees to speak up for themselves or others

#### **We NEVER**

- Tolerate harassment or bullying in any form or under any circumstances.
- Behave in a hostile or unprofessional manner.
- Threaten anyone with physical or verbal violence.
- Engage in sexual harassment including inappropriate physical contact and suggestions.

## 5. ETHICAL BUSINESS PRACTICES

### 5.1 Bribery and Corruption

*“K999 conduct business activities with integrity, and do not participate in bribery or corruption, in any form, whether direct or indirect, whether in the private or public sector.”*

We will not engage in corrupt business practices and strictly prohibits bribery and corruption by any director, employee, contractor or other party representing K999.

Further details of this section can be found in the Anti-Bribery & Anti-Corruption Policy

#### **We ALWAYS**

- Perform our work in lawful and ethical ways.
- Take all practical steps to ensure third parties conduct themselves to the same standards.
- Record substantial gifts and entertainment accurately and transparently.
- Report any evidence of bribery or corruption.

#### **We NEVER**

- Make payments greater than the fair value of the goods or services received.
- Make or receive facilitating payment, facilitation payment, or grease payment.
- Make unapproved political contributions.

- Take action to circumvent K999's accounting controls

## 5.2 Gifts and Entertainment

*"K999 does not give or receive gifts or entertainment which goes beyond common courtesies, or which could be perceived as compromising a person's objectivity."*

We require that gifts and entertainment given and received in the course of business must be for a valid purpose or relationship, of modest value, occasional, comply with the law of the jurisdiction and are not intended to facilitate preferential treatment.

Further details of this section can be found in the Anti-Bribery & Anti-Corruption Policy.

### **We ALWAYS**

- Exercise care when receiving or offering any gifts or entertainment.
- Ensure that any gifts or entertainment we offer or receive is legal, customary and of reasonable value.
- Record all gifts and entertainment with a value above USD\$100 given or received in a register.

### **We NEVER**

- Offer gifts or entertainment to government officials, without prior approval.
- Give or receive gifts or entertainment in excess of USD\$100 in value, without prior approval.
- Offer or accept gifts or entertainment if we think they will impair someone's objective judgment or improperly influence a decision.
- Offer or accept any cash.

## 5.3 Conflicts of Interest

*"K999 People ensure that its personal interests do not conflict with the interests of the Company."*

A conflict of interest arises when K999 Peoples' personal activities or interests have the potential to influence someone's behaviour or actions which is contrary to the Company's best interest. It is important to ensure that even an appearance of a conflict of interest is avoided. We promote an individual's privacy and pursuit of interests outside of work; however, it is important any potential conflict of interests are made known and resolved urgently.

### **We ALWAYS**

- Seek approval from their direct managers or HR Manager before proceeding with any business dealings with K999's People family and friends.
- Report any actual or potential conflicts of interest.
- Disclose remuneration band of all the employees' who are related to our directors or the Managing Director or the substantial shareholder on our Annual Report.
- Remove ourselves from any decision-making process (in particular contract awards) where our independence may be an issue.

### **We NEVER**

- Use our position or internal K999 knowledge for personal gain including for our friends and family
- Accept any outside paid employment or consultancy without prior approval through their direct managers or by HR Manager.
- Negotiate fees or prices other than on the basis of fair market value.
- Invest in a supplier or subcontractor or competing company, if the investment might influence our decisions.

## 5.4 Anti-Competitive Conduct

*“K999 promote fair and open competition in the markets in which it operates.”*

K999 is subject to competition laws which prohibit it from engaging in anti-competitive conduct, including but not limited to price fixing, bid rigging and collusive tendering, abuse of market power, misleading or deceptive conduct, and unconscionable conduct.

The consequences of not complying with these laws can be very serious for both the Company and the relevant K999 People and extend to significant fines and potential criminal proceedings. There is also significant potential reputational damage flowing from such actions.

### **We ALWAYS**

- Consider the appearance of our interactions with competitors and suppliers, whether in a business or personal setting
- Provide full and accurate information and maintain open, transparent communications
- Ensure that all subcontractor and supplier awards are made following a competitive bid process
- Contact the Managing Director if you have any concerns or doubts

### **We NEVER**

- Agree with competitors on the price of our bids
- Agree with competitors to exclude certain subcontractors or suppliers
- Intimidate or threaten subcontractors, suppliers or competitors

## 6. USES OF ASSETS AND RESOURCES

### 6.1 Use and Protection of Personal Information

*“K999 Group treat all personal information as confidential.”*

We are subject to laws which regulate how personal information can be recorded and used. Personal information means documents or information about a person where the identity of the person is apparent or can be worked out from the document or information.

Further details of this section can be found in the Privacy Policy

### **We ALWAYS**

- Collect only the data that we need for legitimate business purposes.
- Give full and accurate disclosure of why data is being collected.
- Promptly report any loss of data or breaches of confidentiality and do our best to contain the loss or breach.

### **We NEVER**

- Collect unnecessary personal data or keep it for longer than required.
- Share personal data unless it is in accordance with K999's policies and procedures.

## **6.2 Financial Controls and Record Keeping**

*"K999 maintain appropriate financial controls to ensure the integrity of our accounts, keep records and adopt reporting practices which are correct and complete."*

It is imperative that we maintain financial controls and records for many reasons, including audit and compliance, internal forecasting and timely payment and receipt of funds.

All financial controls are designed in compliance with Singapore Financial Reporting Standard (International), Thailand accounting standard or other applicable local accounting standard and to minimise risk of any dishonest behaviour.

### **We ALWAYS**

- Ensure that any financial data we record is correct and supported by primary documentation Comply
- with the K999's financial controls and report any suspicion of wrongdoing
- Fully co-operate with our accountants and auditors
- Ensure that compliant contract documentation has been finalised and authorised prior to making any commitment and / or to the commencement of any work

### **We NEVER**

- Knowingly make an incorrect or misleading record for any purpose including any expense claims
- Sell company assets without proper approval
- Never destroy or amend any records that must be kept in order to comply with an investigation or audit
- Give verbal instructions to perform work in the absence of contract documentation

## **6.3 Protection of Assets**

*"K999 protect its assets and ensure that they are used properly and for legitimate business purposes."*

K999's assets are fundamental contributors to, and a demonstration of our success, and all care should be taken to protect them. We also consider our people to be our greatest asset. Other important assets are physical assets like plant and equipment, and also intangible assets such as reputation and business strategy. It is in everyone's interests that these assets are protected.

### **We ALWAYS**

- Use all available means to prevent loss or damage to K999 equipment
- Use assets and resources for business purposes



- Seek to ensure that third parties who are using K999 assets do so lawfully and comply with any relevant management plan(s).
- Challenge and report anything which may compromise the security of the Company's assets.
- Maintain all K999 equipment in accordance with Manufacturer's recommendations and, or best industry practice.

**We NEVER**

- Make assets or resources available to people outside of K999 or for a non-K999 purpose. Use
- K999 assets or resources for personal gain.
- Use K999 assets to access inappropriate material.

## 6.4 Use of Technology

*"K999 People use the IT systems responsibly."*

K999's IT systems are powerful assets. They include laptops, smart phones, and tablets. They are to be used for business purposes. Any personal use should be reasonable and appropriate.

Further details of this section can be found in the Security Policy,

**We ALWAYS**

- Use K999's IT systems for employment and other business purposes.
- Ensure we protect K999's IT systems against loss, damage or theft.
- Advise our IT personnel of any unsolicited emails containing inappropriate content.
- Maintain the security of IT Equipment by logging off when not in use, changing passwords regularly, not sharing passwords and not allowing unapproved external people access.

**We NEVER**

- Access, create or store any objectionable or offensive material on K999's IT systems.
- Use K999's IT systems for excessive personal communication, or to harass, bully or discriminate against others.
- Install software without permission.
- Are reckless about the content of emails, on the basis they are informal communications.

## 7. ENGAGEMENT WITH THIRD PARTIES

### 7.1 Relationships with third parties

*"K999 act with integrity, transparency, respect and professionalism in our dealings with third parties, to promote mutually beneficial relationships."*

We interact with many clients, real and potential, and engage subcontractors, suppliers and consultants of varying size, skills, and track records of working for K999. We strive to maintain high standards of behaviour at all times as these relationships, together with our people, are the keys to our success.

Further details of this section can be found in the Investor Relations Policy and Modern Slavery Policy.

**We ALWAYS**

- Seek to add value to client's businesses and always deliver on our commitments.
- Seek relationships with third parties who share a commitment of the standards set out in this Code.
- Seek to resolve any disputes in a non-adversarial, transparent, collaborative and timely manner.
- Comply with the laws of the countries in which we operate.
- Undertake appropriate due diligence before engaging third parties to perform work for us or represent us.

- Communicate honestly and transparently at all times.

#### **We NEVER**

- Ignore client requirements or forget that satisfying client requirements is crucial to our success.
- Disregard or conceal the results of any due diligence conducted in respect of third parties.
- Destroy or conceal any documentation requested by a court or official.

## **7.2 Media, Public Disclosures**

*"We communicate honestly, accurately and in a timely manner."*

Any breach of our continuous disclosure obligations can lead to severe penalties for the Company and our employees, and it can also lead to other legal issues and reputational damage for K999.

Further details of this section can be found in the Social Media Policy.

#### **We ALWAYS**

- Obtain the necessary approvals prior to releasing any material to someone outside K999
- Exercise caution when discussing K999 matters in public situations

#### **We NEVER**

- Misrepresent information
- Behave recklessly with electronic communications or social media
- Represent personal views as the company views

## **7.3 Sponsorship and Donations**

*"We support charities and community groups through ethical sponsorships and donations."*

As a socially responsible organisation, it is important for us to support our community by giving back through charitable activities and initiatives.

#### **We ALWAYS**

- Ensure a charity is correctly registered.
- Obtain approval from the Managing Director before making any contributions on behalf of the company.
- Encourage participation in charitable events and non-profit initiatives.

#### **We NEVER**

- Promote initiatives that are not aligned with this Code.
- Support organisations with political affiliations or agendas.
- Sponsor individuals, other than through organised events.

## 8. LAWS AND REGULATIONS

*“K999 People are required to understand and comply with the laws and policies that apply to them at all time.”*

K999 takes its legal responsibilities very seriously and expects K999 People to do the same.

We are committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates. We take a zero-tolerance approach to breach of laws and the Company’s policy and it is our best practice objective that third parties take a similar zero-tolerance approach.

### **We ALWAYS**

- complies with all laws, regulations and regulatory obligations in each place we do business.
- complies will all K999’s polices, standards and procedures.
- ensure everyone work with the company observe and act in accordance with the laws and policies.

### **We NEVER**

- conduct business with any country or organisation which is subject to any UN Security Council sanctions or Thai autonomous sanctions.
- conduct business with any countries and organisations otherwise prohibited.

## 9. REPORTING CONCERNS/ WHISTLEBLOWING

*“K999 aims to provide an avenue for K999 People and external parties to raise concerns and offer reassurance that they will be protected from reprisals or victimisation for whistleblowing in good faith.”*

We have a responsibility to detect, prevent and report any violations of this Code and any other suspicious activity or wrongdoing in connection with the Companys businesses. All concerns reported will be treated in confidence and fully investigated, and the identity of the Whistleblower who has raised the concern is only revealed on a ‘need-to-know’ basis. If anonymity is requested, we will make every effort to ensure such confidentiality. However, if matters need to be referred to the police, it may be necessary for the officer raising the concern to assist the police in their inquiries.

We will not tolerate victimisation of a Whistleblower and any K999 People found to have victimised another will be subject to disciplinary action.

### 9.1 Mechanisms for K999 People to Voice Concerns

We are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage with our direct supervisor or managers, which includes matters in relation to the company's policies or the code of conduct under the Whistleblowing Procedure; whether it is to report any behaviour, to seek approval where required or to seek advice. with our direct supervisor or managers, who have a responsibility to investigate and keep their department managers fully informed.

If it is not appropriate – for any reason – to engage with our direct supervisor or managers, we may speak to:

- the General Manager of the subsidiary/division in which we are employed or for which we perform work;
- HR Manager;
- Managing Director;
- Directors and shareholders; or

At all times, confidentiality will be maintained to the fullest extent possible and, if requested where a concern is being raised, the identity of the person raising the concern will remain anonymous.

We also need to ensure that the investigation process is not misused. We could be subject to disciplinary action for any deliberately false reporting, such as raising an untrue, unfounded or malicious allegation/s.

However, this should not deter anyone from raising genuine concerns (even if subsequently unfounded but made with good intent) as, in so doing; we will be supported in every possible way.

## **9.2 Training**

We provide training for fraud, corruption and official misconduct awareness during the induction program and toolbox meetings for K999 People. Managers of the Company are responsible for ensuring that briefings and issues aimed at maintaining awareness of the procedure on fraud risk management are included periodically in team and section briefings. We will ensure that changes to the procedure are promoted throughout the organisation and that significant fraud control initiatives are communicated to employees through existing channels.

## **10. REVIEW**

We will take into account internal control weaknesses identified through the assessment and investigation in designing the internal audit program. We will maintain a register of recommendations arising out of the assessments and investigations and will report on the progress of responding to those recommendations to the Directors of K999.

The Code has been approved by the Directors of K999. It is reviewed regularly and continuously improved.