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| Table of Contents                                                         | Page |
|---------------------------------------------------------------------------|------|
| Message from Oryx Chairman & CEO                                          | 3    |
| Company Background                                                        | 4    |
| Mission Statement                                                         | 4    |
| Company Vision                                                            | 4    |
| Introduction                                                              | 4    |
| Our Work Environment                                                      | 5    |
| Human Rights                                                              | 5    |
| • Free to Choose Employment                                               | 5    |
| • Youth Protection                                                        | 5    |
| • Working Hours                                                           | 5    |
| • Fair Compensation                                                       | 5    |
| • Wage Payment Practices, Overtime Hours and Computation                  | 6    |
| • Humane Treatment                                                        | 6    |
| • Non-Discrimination                                                      | 6    |
| • Religious and Disability Accommodation Policy                           | 6    |
| • Free Association                                                        | 6    |
| Harassment Free Workplace                                                 | 7    |
| Outside Employment or Other External Commitments                          | 7    |
| Our Business Ethics                                                       | 8    |
| Business Integrity                                                        | 8    |
| Bribery and Anti-Corruption                                               | 8    |
| Grits, Gratuities, and other favors                                       | 8    |
| Corporate Opportunities                                                   | 8    |
| Fair Business, Advertising and Competition Standards                      | 9    |
| Protection and Proper Use of Company Assets                               | 9    |
| Disclosure and Protecting Confidential Information                        | 9    |
| Protection of Identity                                                    | 9    |
| No Retaliation Policy                                                     | 9    |
| Responsible Sourcing of Minerals                                          | 10   |
| Suppliers' Commitment & Responsibilities                                  | 10   |
| Contact with Customers, Distributors or Suppliers                         | 10   |
| Personal Integrity and Conflicts of Interest (Personal Conduct & Honesty) | 10   |
| Theft and Fraud                                                           | 11   |
| Investigations                                                            | 11   |
| Discipline / Penalties                                                    | 11   |

| <b>Table of Contents</b>                        | <b>Page</b> |
|-------------------------------------------------|-------------|
| Our Health and Safety                           | 11          |
| Occupational Health and Safety                  | 11          |
| Emergency Preparedness                          | 11          |
| Occupational Injury and Illness                 | 12          |
| Industrial Hygiene                              | 12          |
| Physically Demanding Work                       | 12          |
| Machine Safeguarding                            | 12          |
| Food, Sanitation and Housing                    | 12          |
| Our Environment                                 | 12          |
| Environmental Permits and Reporting             | 12          |
| Hazardous Substances                            | 12          |
| Solid Waste                                     | 13          |
| Air Emissions                                   | 13          |
| Water Management                                | 13          |
| Energy Consumption and Greenhouse Gas Emissions | 13          |
| Materials Restrictions                          | 13          |

## Message from Oryx Chairman & CEO

Dear Oryx Advanced Materials team,

At Oryx Advanced Materials, we are committed to providing products and services of the highest standards which meet agreed requirement to ensure total customer satisfaction and conducting its business in a safe, healthy and environmentally responsible manner through the implementation of a comprehensive quality, labor, ethics, environmental, health and safety management system via the continuous improvement cycle.

As a member of the Responsible Business Alliance (RBA), we are committed to supporting the RBA mission, vision, bylaws, membership requirement and goals of RBA.

Oryx Advanced Materials provides the Code of Business Conduct and Ethics as a tool to empower all employees to make the right decision and help to ensure compliance with the law and our standards of business conduct. Through your commitment to the Code of Business Conduct and Ethics, we will continue improve our quality, and performance of product.



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**Victor Tan**  
**Chairman & CEO**  
**10-Aug-2019**

## **Company Background**

Oryx Advanced Materials Sdn. Bhd. founded in 1999 is a leading producer of metals and alloys used in the production of Hard Disk Drives and Photovoltaic Modules. We are now expanding our product line to include metal powders for Additive Manufacturing.

## **Mission Statement**

To be our customers first choice for thin film materials, delivering products of outstanding quality and great service at a competitive cost through working faster, simpler, and together.

## **Company Vision**

Oryx strives to be BEST-IN-CLASS supplier of high-performance thin film materials. To that end, we continuously aim at growing and expanding our business globally through achievements of unequaled product quality and technical innovation while simultaneously adhering to high ethical standards.

## **Introduction**

This Code of Business Conduct and Ethics is to ensure that working condition in our facilities are safe, that workers are treated with respect and dignity, that manufacturing processes are environmentally responsible and that all business is conducted ethically.

Oryx Advanced Materials Sdn. Bhd. expects all employees, supplier, contractor and others to read, understand and carrying day-to day activities in accordance with the policies and procedures in professional and ethical manner.

However, the Oryx Code of Business Conduct and Ethics is only a summary of our company policies, practices and as a general guideline to all parties. You may contact the Human Resources Department if you have any questions. This Code of Business Conduct and Ethics is subject to modification because we will continue reviewing and updating our policies and practices.

Please sign the acknowledgement form at the end of this Code of Business Conduct and Ethics and return to the Human Resources Department after you have received, read, understand and agree to follow it.

You may raise concerns, ask questions or seek guidance relating to the Code of Business Conduct and Ethics by contact your Human Resources representative **(04-6402348)**.

Any non-conformance or ethics you may call our hotline 1800-22-2348, or email VTan@oryxadv.com

## **Our Work Environment**

Oryx Advanced Materials is committed to uphold the human rights and labor standards. The Company will abide by these policies or the local law in the countries where we operate and to treat them with dignity and respect as understood by the international community as below: -

### **Human Rights**

We have developed policies to reinforce our commitment to uphold these human rights and labor policy. We will abide by these policies or the local law in the countries where we operate, whichever sets a higher standard. Managers are responsible for upholding these Principles and for ensuring adherence to all company policies and guidelines in their support.

Below are some of Oryx's basic standards regarding Human Rights and Labor Policy: -

#### Free to Choose Employment

We will ensure that the overall terms of employment are voluntary. We will not require any employees to pay the Company any remuneration or withhold any employee's government-issued identification upon hire. We will ensure no forced, indentured bonded, involuntary or exploitative prison labor, trafficked or slave labor is used in the production of Oryx products. All employees shall be giving terms and conditions of employment in written and in their native of language with verbally explanation to them on the key terms and conditions of employment prior commencement.

#### Youth Protection

We strictly prohibit child labor and it is not in used in any stage of manufacturing. The term "child" refers to any person employed under the age of 16. Therefore, the Company has complied with the local law in the countries in where we operate by setting a minimum employment age of 16 and above. In the event of inadvertently hired an underage child, young worker (age range of 16 to 18 years) or any other vulnerable worker, the company is responsible to assist them in whichever step is necessary for ensuring their welfare will not be jeopardized because of laboring.

Any apprentice, intern, or student worker employment taking place in Oryx, the Company shall commit to meet their learning objectives and provided with a tri-partite agreement on keys terms and conditions between Oryx, learning institution(s) and the students.

#### Working Hours

We do not require employees to work more than 60 hours on average per work week, or in excess of the maximum hours set by the local law in the countries in where we operate. We will also provide employees with at least one day off per every seven days, on average, and comply with all applicable overtime rate requirements. For details, please refer to the Employees Handbook. Employees are allowed to take any type of leave that is under the purview of the local law in the countries in where we operate.

#### Fair Compensation

We assess performance against job requirements and consider business conditions and appropriate market comparisons to deliver compensation. The company will compensate employees with wages and benefits that meet or exceed the legally required minimum without delay and will clearly communicate to all employees their compensation earned, "Pay equals time worked".

### Wages Payment Practices, Overtimes Hours and Computation

Wage paid shall comply with all applicable wage laws including minimum wages, overtime hours and legally mandated benefits. In compliance to local law, overtime shall be compensated at a rate greater than regular hourly rates. Deduction from wages as a discipline measure are not permitted. For details, please refer to Employees Handbook.

### Humane Treatment

We are of zero tolerance to any and all forms of inhumane treatment of any parties within the company.

### Non-Discrimination

Decisions about applicants are made on qualifications against job requirements. In all employment actions, we prohibit discrimination based on age, race, color, ancestry, ethnic or national origin, disability, medical status, pregnancy, marital status, veteran standing, gender or gender identity, sexual orientation, perceived or actual religious beliefs or political opinion, or other characteristics protected by applicable law.

### Religious and Disability Accommodation Policy

We are committed to reasonably accommodate the religious needs (observances and practices) and disability needs (workplace accessibility, job modifications, or support) of any employee upon request. An employee's request for reasonable accommodations will be duly considered. Accommodation is provided unless the company operations would suffer unduly by granting the individual's request.

Employees may not be discriminated against because of their religious beliefs or practices, or because their lack religious beliefs or practices, or because of a disability. Anyone who believes he or she has been discriminated against by the denial of a requested religious or disability accommodation should contact the Human Resources Department (HR).

Employee requesting for religious, or disability accommodation may personally inform the HR or by completing the religious or disability request form and submit it to HR.

All religious and disability accommodation request will be duly considered.

### Free Association

We strive to provide an atmosphere that encourage open communication and to encourage everyone to work together to reach our goals. We encourage your constructive comments and opinions. It is important that your problem or complaints to be discussed and resolved. Worker shall be able to communicate openly with management regarding working condition without fear of reprisal, intimidation or harassment.

We respect and adhere to all applicable laws concerning the right of workers to associate freely, join or not join labor union, seek representation. However, we believe maintaining an open, unencumbered relationship between Oryx employees and their managers is the most effective means of addressing work environment questions and concerns.

Company respect legal rights of all workers to peaceful assembly where legal and peaceful assembly are allowed unless they are violence and impacting company operation and business.

## Harassment Free Workplace

We do not tolerate any form of harassment, including sexual harassment, power harassment (abuse of authority by managers towards subordinates) and discrimination based on race, religion, marital status, age, sex, medical condition, physical ability, or sexual orientation.

Sexual harassment may include harassment of women by men, of men by women, and same-sex, gender-based harassment. All employees have a responsibility to respect others in the workplace, or in any environment in which a work relationship exists. This may be on or offsite, before, during or after work hours, or during business travel. Harassment can be intentional or unintentional; however, it is the responsibility of each employee to be aware of the impact his or her conduct may have on others.

Unlawful harassment may consist of, but is not limited to, the following:

- Verbal conduct, such as derogatory comments, jokes, slurs, unwanted sexual invitations, advances or comments.
- Nonverbal behaviors such as glares, threatening body motions or hand gestures that are perceived to be threatening in nature.
- Physical conduct, such as unwarranted or offensive touching, impeding or blocking an employee's movement or assault.
- Visual conduct, such as derogatory or offensive photographs, posters, cards, cartoons, graffiti, drawings or gestures.
- Threats and demands that an employee submit to sexual requests in order to keep his or her job, or to avoid some other loss, as well as offers of job benefits in return for sexual favors.
- Victimization or retaliatory actions taken against an employee for reporting or threatening to report harassment.
- Intentional exclusion or alienation from work-related activities that precludes an individual from effectively performing the functions of his or her job.

If you believe there has been an instance of harassment, discrimination, and retaliation at work or other inappropriate conduct directed at yourself or others you must report to the Company. Report can be made to the Company via your superior or Human Resources Department. All such reports made by employees will be investigated.

## Outside Employment or Other External Commitments

The Company expects you to devote your full work time to your commitment to the Company. Therefore, all employees are discouraged from maintaining outside employment.

- Employees shall not engage in outside work or services for a customer, competitor, or supplier of the Company under any circumstances
- Employees shall not engage in any other outside work if such work lessens efficiency, alertness, interest or productivity at the Company

Employees wishing to engage in outside employment which may create a real or apparent conflict of interest must submit a written request to Human Resource Department explaining the details of the outside employment. The Company in no way assumes any responsibility for outside employment, if approved. If problems arise in connection with an employee engaging in outside employment, employees are expected to discuss the situation with the Human Resource representative. Authorization to engage in outside employment can be revoked at any time.

## **Our Business Ethics**

To meet social responsibilities and to achieve success in the marketplace, Oryx Advanced Materials, it's employees and agents are to uphold the highest standards of ethics such as Business Integrity, Fair Business, Conflict of Interest and more.

All employees should familiarize themselves with the Code and use it as a guide in resolving ethical issues that may arise during doing business. Speak up if you're aware of an illegal or unethical situation in the workplace.

### **Business Integrity**

The highest standards of integrity are to be upheld in all business interactions. Oryx shall have a zero-tolerance policy to prohibit any and all forms of bribery, improper advantage, corruption, extortion and embezzlement.

### **Bribery and Anti-Corruption**

Oryx strictly prohibits the payment or acceptance of any bribe, kickback or other transaction intended to improperly influence a person's, company's or other entity's judgment or to secure an unfair advantage or benefit. These restrictions apply to all transactions, including transactions with customers, suppliers or government officials. Regardless of local practices, you should never directly or indirectly pay or receive a bribe or kickback (whether it is cash or any other item) for any purpose.

### **Gifts, Gratuities, and other favors**

No employees shall offer, promise or reward, or accept a payment or reward of any kind, directly or indirectly from any person, organization or governmental representative in order to secure preferential treatment for the company and /or its employees.

Actions taken on behalf of the Company should be free from any suggestion that favorable treatment was sought by, received from, or given to individuals or organizations that do business or seek to do business with the Company. Employees may not solicit or accept or permit any member of their immediate family to solicit or accept, gifts money, services, or anything else of value when doing so may influence, or be perceived as influencing, a decision or action. Similarly, employees may not offer or give gifts, money, services, or anything else of value when doing so may influence, or be perceived as influencing, a decision or action. Gifts, business meals, celebratory events, and entertainment of nominal value up to RM500 are permitted, if they are not frequent or excessive, consistent with reasonable marketplace practices and Company policy. Any such offer or acceptance shall be reported promptly to Superior or Human Resource Department.

### **Corporate Opportunities**

Employees are prohibited from (a) taking for themselves, personally, opportunities that are using corporate property, information, or position. (b) using corporate property, information, or position for personal gain: and competing with the Company directly or indirectly. You owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

If you have any concerns regarding an actual or potential conflict of interest, you should seek guidance from your supervisor or Human Resource Department.

Those involved and impacted employees are subject to stern disciplinary action including termination.

## **Fair Business, Advertising and Competition Standards**

All business will be conducted in a fair, honest, ethical and lawful manner. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice. In the event of a breach of fair competition occurs, the employee will have to exclude themselves in the decision making.

All business dealings should be transparently performed and accurately reflected on Company's business books and records inclusive of advertisements and publications.

Advertisement should reflect actual condition and data facts without distortion and discrimination elements.

Business transactions are treated in fair manner and healthy competition with equal opportunity and no bias.

## **Protection and Proper Use of Company Assets**

Theft, carelessness and waste have a direct impact on the Company's profitability. Employees have a duty to safeguard Company assets and ensure their efficient use. Company assets should be used only for legitimate business purposes and Employees should take measures to ensure against their theft, damage, or misuse.

Company assets include intellectual property such as trademarks, business and marketing plans, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information is a violation of Company policy.

## **Disclosure and Protecting Confidential Information**

Any information that is not public about the business of the Company is Company confidential information. Such information includes technology, ideas, intellectual property, product plans, and employee personnel information, including information about an employee's compensation and special skills and preference.

We are committed to protecting the reasonable privacy expectations of personal Information of everyone we do business with, including suppliers, customers, consumers and employees. Comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared in line with Personal Data Protection Act 2010.

## **Protection of Identity**

Programs that ensure the confidentiality and protection of supplier and employee whistleblower are to be maintained.

## **No Retaliation Policy**

Company practices no retaliation and protecting reporter identity. Information supplied and identity of reporters are kept separately with independent investigation and reporting carried out.

## **Responsible Sourcing of Minerals**

Oryx is committed to a socially responsible supply chain and will comply with all requirements to ensure conflict-free materials are in our supply chain. We purchase tin, tantalum, tungsten, gold (3T+G) and cobalt only from suppliers that share our values on human rights, ethics, and environmental responsibilities. We do not directly purchase from miners and smelters. We are therefore reliant on our suppliers to determine the sources and conflict status of the materials supplied to Oryx. We require all suppliers of 3T+G and cobalt materials to comply with all applicable legal standards and requirements. Where practical, supplier who are certified by Responsible Minerals Initiative (RMI) will be accorded priority in Oryx's supply chain. We will take the necessary actions to transition to conflict-free materials if we discover the use of non-conflict-free materials in any of our facilities or products.

## **Suppliers' Commitment and Responsibility**

We are committed to enforce and communicate code of conduct during every procurement process in accordance with RBA and customer requirements to next tier suppliers, vendors, contractors, or any other identified interest parties in our direct supply chain relationship (all identified Major Suppliers) to implement and fulfill the requirement of RBA code.

## **Contact with Customers, Distributors or Suppliers**

Employees should be motivated to acquire goods and services and to make transactions for the company in the most favorable terms possible. Disclosure should be made to the Human Resource Department if any employees or member of his/her Immediate family acquire a gift from or otherwise an interest in supplier, customer or its business. Employees may not represent their own business in negotiation with Oryx or provide information about Oryx to assist in negotiations.

All employees shall take care to avoid any contact with customer or supplier that could reasonably appear to be improper, have the appearance of potentially biasing an employees' judgments, or might injure the company's reputation for honesty and integrity in its activities.

## **Personal Integrity and Conflicts of Interest**

Oryx reputation in the community is determined by the work we do and by the employees who represent us. All employees must maintain the highest degree of personal conduct, integrity and honesty when engaged in activities representing Oryx, not only while performing their jobs but also while out in the community.

The employee responsibilities described below are important to our success and must be a commitment shared by everyone.

### Personal Conduct

Employees are always expected to conduct themselves in an appropriate and ethical manner. Employees should refrain from: -

- Creating destructive conflict with co-workers, supervisors, visitors or others;
- Engaging in vulgar, abusive, or harassing language or conduct toward others;
- Engaging in indecent or inappropriate behavior;
- Treating anyone in a discourteous, inattentive or unprofessional manner;
- Using intimidation tactics or making threats; or
- Becoming involved in a situation that could be embarrassing to you or Oryx.

## Honesty

We expect our employees to tell the truth. No employee should make a false or misleading statement (written or oral) regarding any matter to any government official, Company official, other Oryx employees or any representative or employee of companies with which we do business.

## **Theft and Fraud**

When an employee commits theft or fraud against the Company, everyone associated with Oryx is affected. Fraud is when someone is intentionally deceitful or dishonest in a manner that could result in a gain, profit or advantage for that person or damage to the Company. Oryx does not tolerate any kind of fraud and will investigate and prosecute violators when appropriate.

Theft, misuse, or abuse of any Company assets will not be tolerated. We trust our employees to use Company assets to do their jobs more efficiently. Any theft or other abuse of this trust will be immediately investigated, and appropriate corrective action will be taken.

## **Investigations**

Reported violations will be promptly and thoroughly investigated. It is imperative that the person reporting the violation not investigate on his or her own. Employees are expected to cooperate fully with any investigation made by the Company into reported violations.

## **Discipline / Penalties**

Employees who violate this Code may be subject to disciplinary action, up to and including termination of employment. Moreover, Employees who direct or approve of any conduct in violation of this Code, or who have knowledge of such conduct, and do not immediately report it may also be subject to disciplinary action, up to and including termination of employment.

## **Our Health and Safety**

At Oryx Advanced Materials Sdn Bhd., we are committed to creating a safe and healthy work environment for all employees. In addition to minimizing work-related injuries and illnesses, a safe workplace enhances productivity, morale, and overall satisfaction. To the end, we adhere to the following healthy and safety standards:

### Occupational Health and Safety

We identify, assess, and mitigate health and safety hazards, including chemical, electrical, physical, and other risks using the Hierarchy of Controls. In situations where hazards cannot be fully controlled, we provided employees with well-maintained (PPE) and educational materials. Gender-responsive measures are implemented, such as accommodations for pregnant and nursing employees to ensure their safety and comfort.

### Emergency Preparedness

All potentials emergency situations and events are assessed, and their impact is minimized through emergency response plans, reporting procedures, evacuation protocols, and worker training. Regular emergency drills are conducted at least annually or as required by local regulations. Our emergency plans include fire detection systems, clear evacuation routes, first aid facilities and recovery measures to minimize harm to life, the environment and property.

### Occupational Injury and Illness

We maintain procedures for reporting, tracking, and managing workplace injuries and illnesses. Employees are encouraged to report incidents without fear of retaliation. Necessary medical treatment is provided, and corrective actions are implemented to address the root causes. Employees may remove themselves from situations of imminent harm and will not return to work until the issue is resolved.

### Industrial Hygiene

Exposure to chemical, biological, and physical hazards is systematically identified, evaluated, and controlled according to the Hierarchy of Controls. When hazards cannot be fully eliminated, employees are provided with appropriate PPE. Continuous monitoring ensures a healthy work environment, supported by regular occupational health monitoring for all related employees that exposed to workplace hazards.

### Physically Demanding Work

We recognize the risks associated with physically demanding tasks, including manual materials handling, repetitive lifting, prolonged standing, and forceful assembly work. These tasks will be identified, assessed, and controlled to minimize potential injuries.

### Machine Safeguarding

All machinery and equipment will be regularly evaluated for safety risks. Physical guards, interlocks, and barriers will be installed and maintained in areas where machinery presents an injury hazard to workers.

### Food, Sanitation and Housing

Employees will have access to clean and sanitary facilities, including restrooms, potable water, and cafeteria. Foreign workers' hostel provided by Oryx shall meet safety and hygiene standards, including emergency exits, adequate lighting, ventilation, and secure storage of personal belongings.

## **Our Environment**

At Oryx Advanced Materials Sdn Bhd., we recognize that environmental responsibility is an essential part of our business operations. We are committed to minimizing environmental impacts, conserving natural resources, and ensuring the health and safety of the public. The following environmental standards guide our actions:

### Environmental Permits and Reporting

All required environmental permits, approval, and registrations must be obtained, maintained, and kept up to date. Compliance with all operational and reporting requirements is mandatory.

### Hazardous Substances

All chemicals, waste, and hazardous materials that pose risk to humans or the environment must be identified, labeled, and managed to ensure safe handling, storage, use, transportation, and disposal. Hazardous waste tracking and documentation are required.

### Solid Waste

A systematic approach must be followed to identify, reduce, manage, and responsibly dispose of or recycle solid waste (non-hazardous). Waste tracking and documentation are essential to ensure compliance.

### Air Emissions

Air emissions including volatile organic compounds, aerosols, corrosives, particulates, and ozone-depleting substances must be characterized, monitored, and controlled. Ozone-depleting substances shall be managed in accordance with the Montreal Protocol and other applicable regulations. Regular monitoring of air emission control systems is required.

### Water Management

We implement a water management program that documents, characterizes, and monitor water sources, use, and discharge. All wastewaters will be characterized, monitored, controlled, and treated as required prior to discharge or disposal. We conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

### Energy Consumption and Greenhouse Gas Emissions

We established and report against an absolute corporate-wide greenhouse gas reduction goal. Energy consumption and all Scope 1, 2, and significant categories of Scope 3 greenhouse gas emissions shall be tracked, documented, and reported. We look for methods to improve energy efficiency and to minimize energy consumption and greenhouse gas emissions.

### Materials Restrictions

Oryx is committed to complying with all applicable laws, regulations, and customer requirements regarding materials used in our products and manufacturing processes. Prohibited or restricted substances must not be used in our product or processes unless permitted by regulations. All materials must be properly labeled to ensure compliance with recycling and disposal requirements.