GSI®
Your Innovation Our Solution

CODE OF CONDUCT



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MESSAGE FROM THE FOUNDERS

GSI's strategic intent by 2025 is to be a value creation partner in the global food supply chain by differentiating, re-engineering, innovative, specialty ingredients by having great people with imagination, committed to being different & bringing revolutionary ideas and solutions of tomorrow to the world.

There will always be those who see possibilities in the everyday, who see solution in problems, who see the future in the present. These are the minds our company and our customers will forever value.

~ Datuk Dr Robert Basker & Datin Shelah Basker



INTRODUCTION

Everyone at all levels of Global Specialty Ingredients (M) Sdn Bhd (GSI) (the "Company") has an obligation to know and follow this Code of Conduct (the "Code"), including:

- All members of the GSI Board of Directors.
- All employees and officers of the GSI Family of Companies. In addition to governing conduct by employees, this Code governs conduct between employees and customers, competitors, and the numerous business providers (including suppliers, service providers, vendors, contractors, and agents) who assist GSI every day. Because we want our business providers, customers, and investors to understand how we do business and what they can expect of us, this Code appears on the GSI website and is available to the public. To reaffirm their commitment to GSI's corporate values, GSI requires that all employees sign and acknowledge this Code of Conduct at least once every two years. If you are a manager or supervisor, you are responsible for leading by example and making sure your employees understand and comply with the Code.



1. CONFLICT OF INTEREST

Employees are expected to remain loyal to GSI and avoid conflicts of interest. Generally, a conflict of interest occurs when a personal or family interest interferes with our ability to perform our jobs effectively and objectively. Any situation that might put us in such a position or create the appearance of bias should be avoided.

YOUR RESPONSIBILITIES:

- All conflicts of interest, including potential conflicts of interest, must be disclosed to your manager or email directly to: coc@gsi-worldwide.com



- **You must comply with this Code as well as any local conflict of interest policies that apply to your role, which may be more restrictive than this corporate policy. Any outside employment, business ventures, or financial activities cannot interfere with the performance of your duties to GSI. In avoiding conflicts of interest, you must comply with the following principles**

a) Do not hold a financial interest in or accept employment from an entity doing business with GSI if it would or could conflict with the performance of your duties at GSI.

b) Do not take any business-related action for your personal benefit.

c) Do not use GSI equipment and resources for personal use.

d) Protect Company assets as if they were your own.

e) Do not take for yourself any opportunities that are discovered or advanced through the use of your position with GSI or any of GSI's property or information.

f) Do not facilitate a conflict with one of our suppliers, service providers, customers, or any government official, for example, by making a payment to an individual when you know the funds should go to his or her employer.

2. DISCLOSING AND ADDRESSING POTENTIAL CONFLICTS OF INTEREST

GSI requires that you disclose, in writing, any personal, business, or other relationship that might constitute a conflict of interest or could potentially create a conflict of interest. Our policy is one of disclosure and review of potential conflicts and prohibition of actual conflicts of interest. In some cases, disclosure may be all that is required. In other cases, however, the facts may require additional action(s) to correct or avoid a conflict of interest. Some matters may require periodic monitoring by local management to ensure transactions remain at arm's length. In all cases, however, you MUST disclose all actual and potential conflicts of interest.

We have listed certain activities and interests that present conflicts of interest or potential conflicts of interest that would have to be disclosed. This list is not exhaustive, and you must also disclose any other personal interests that may give rise to a conflict of interest. Because it is impossible to describe every possible conflict of interest, Reliance relies on your good judgment to seek advice when appropriate and to adhere to high ethical standards in the conduct of your professional and personal affairs.



2. DISCLOSING AND ADDRESSING POTENTIAL CONFLICTS OF INTEREST

A. FINANCIAL CONFLICTS OF INTEREST

- Having a financial or management interest (as an employee, officer, or director) in any customer, supplier, service provider, competitor, or any enterprise that you know or reasonably believe has or may have a business relationship with GSI. A financial interest need not be disclosed if it involves less than 1% of the stock of a publicly held company unless it constitutes a significant portion of your net worth.
- Engaging in business with, or as a customer, service provider, or supplier of, GSI, other than in the ordinary course, as an employee or a public consumer.
- Competing with GSI.
- Maintaining concurrent employment with GSI and with any other organization



B.GIFTS, FEES, OR OTHER PERSONAL BENEFITS

- Accepting fees, commissions, or any other personal benefit (other than as permitted in the bullets below) from any person or business involved in any business with Reliance.
- Accepting any of the following from a current or would-be customer, supplier, service provider, or competitor of GSI: excessive entertainment, meals, gifts, discounts, services, transportation, or favours that:

  i. Obligate you or influence your decision-making in any way, regardless of value; or

  ii. Might create the appearance of undue influence, unfairness, or impropriety.

- Offering or supplying entertainment, meals, transportation, gifts, or other favours to any person in a business relationship with GSI, other than what is reasonable and appropriate for the individuals involved and the business at hand.



B.GIFTS, FEES, OR OTHER PERSONAL BENEFITS

- Soliciting or accepting money (or cash equivalents such as gift cards) for your personal benefit in any amount from a current or potential customer, supplier, service provider, or competitor of GSI.
- Accepting an offer to participate, through a special allocation of shares, or otherwise receiving terms or benefits not generally available to the public in an offering of securities of, or underwritten by, any current or prospective customer, supplier, service provider, or competitor of GSI or a firm that provides or may provide investment banking, financial advisory, underwriting, or other similar services to GSI or any other entity with which GSI has a business relationship.



3. SAFETY

Safety is one of our core values at GSI and that includes providing a safe and secure work environment. Maintaining a safe working environment is of the utmost importance and is everyone's responsibility.

YOUR RESPONSIBILITIES

- All employees must familiarize themselves and comply with GSI's posted safety rules and directives.
  i. Do not undertake work you are not qualified to perform
  ii. Observe all safety rules and procedures when operating machinery and equipment
  iii. Always wear GSI-approved personal protective equipment (PPE) whenever required.



- Immediately report workplace accidents, injuries, illnesses, and unsafe conditions to your supervisor to ensure prompt medical attention (if necessary), help prevent future incidents, and ensure timely regulatory reporting (if required).
- Report all non-work-related injuries and illnesses that may affect the safe performance of your job prior to performing any work.
- Communicate our safety and health requirements to anyone coming onto GSI property, including visitors, customers, suppliers, service providers, workers, and contractors
- We apply health, safety and environmental considerations in business planning and decision making
- We stop any work at any time if it is believed to be unsafe
- We minimise our environmental impact by preventing pollution and minimising waste disposal
- We focus on preventive care, including mental health and emotional well-being



4. RESPECTING EACH OTHER AND OUR DIFFERENCES

GSI is committed to fostering a Diverse, Inclusive, Equitable workplace where every employee feels valued and respected. We believe that embracing diversity and promoting inclusion enhances our innovation, creativity and performance.



5. MODERN SLAVERY

- GSI is committed to combating modern slavery in all its forms. Modern slavery encompasses slavery, servitude, forced labour and human trafficking. This code of conduct outlines our commitment to preventing modern slavery within our operations and supply chain.

- Commitments:

  i. Respect for Human Rights: We are dedicated to upholding and promoting human rights as defined by international standards

  ii. Compliance with Laws: We comply with all laws and regulations related to modern slavery and expect our partners to do the same

  iii. Zero tolerance: We maintain zero tolerance policy towards modern slavery and take immediate action against any violations.



6. ANTI-BRIBERY AND ANTI-CORRUPTION

- The legal requirements of every country where GSI does business prohibit improper payments to government officials. In addition, this Code prohibits GSI employees and anyone acting on the Company's behalf from offering, giving, accepting, or receiving a bribe to/from anyone. We have built a reputation as a company that operates ethically and honestly, and bribery and corruption have no place in our business. Bribery and corruption can cause irreparable harm to our good name, our business, and the communities where we do business.

YOUR RESPONSIBILITIES

i. GSI employees may never offer, promise, or give anything of value that could appear to be a payment — something that might encourage or reward someone for a decision to retain or obtain business.

ii. All GSI employees required to complete anti-corruption training must become familiar and comply with the Company's Anti-Bribery and Anti-Corruption Policy, which provides more detail on the Company's policies regarding anti-bribery and anti-corruption. Any questions regarding such policies should be directed to coc@gsi-worldwide.com



7. FRAUD, DISHONESTY OR CRIMINAL CONDUCT

- GSI does not permit fraud, dishonesty, or criminal conduct. We value ethics and integrity and will not tolerate fraud, dishonesty, or criminal conduct.

YOUR RESPONSIBILITIES

i. We place a great deal of trust and confidence in our employees. In return, we expect you to act ethically and honestly in everything you do. Any use of fraudulent or illegal tactics violates that trust and carries potentially severe consequences, including discipline, up to and including termination. Reliance will also cooperate with authorities to prosecute any act of fraud, dishonesty, or criminal conduct.

ii.GSI prohibits fraud or dishonesty in connection with Company business, including taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice, criminal conduct, or any violent activity on Company premises or while performing work for the Company.

iii. If any fraud, dishonesty, or criminal conduct is detected or suspected of any employee or anyone doing business with the Company, such activities should be reported to the Manager.

8. SAFEGUARDING CONFIDENTIAL INFORMATION

- Information is one of our most valuable assets. Business records, customer information, financial information, and intellectual property are Company assets that are essential to our operations. This information is not available to the public and includes sensitive business information (customer, supplier, service provider and financial information) which has been entrusted to us. We all are responsible for keeping this information confidential.

YOUR RESPONSIBILITIES

i. You may not use any information belonging to GSI for your own personal gain. Confidential information may only be shared with GSI employees, officers, and directors who need the information in order to do their job.

ii. Confidential information must not be shared outside Reliance without a confidentiality agreement approved by the GSI Management. Confidentiality obligations continue even after you leave GSI.

iii. Any unauthorized disclosure of confidential information, whether unintentional or not, must be reported immediately to coc@gsi-worldwide.com

iv. This policy and the other provisions of this Code are not intended to prevent or dissuade employees from engaging in communications or activities protected by state or federal law, such as discussing wages, benefits, or other terms and conditions of employment. This policy also does not prevent employees from disclosing confidential information when required by law or legal process.

9. SECURITIES TRANSACTIONS

- In the course of performing your job duties, you may occasionally obtain material information about GSI that has not yet been made available to the public. When you are aware of material non-public information, it is a violation of NOT DISCLOSING IT TO THE HIGHER AUTHORITIES OF GSI.

YOUR RESPONSIBILITIES

i. Until GSI has made important information about the Company public, employees must keep it confidential and are forbidden from using it for personal gain.

ii. It is illegal to share material non-public information with anyone to help them gain some advantage, either by buying or selling GSI securities. This includes sharing or giving “tips” to spouses, brokers, friends, or family members.

iii. You may not trade in the securities of another company (including GSI customers, suppliers, service providers, or business partners) if you obtained material non-public information about them in the course of performing your duties at GSI.

iv. Never disclose any non-public information without a legitimate business purpose and proper prior authorization.



10. TRADE PRACTICES

- Antitrust and competition laws protect free enterprise. Reliance is committed to free and fair competition and complying with all applicable antitrust laws

YOUR RESPONSIBILITIES

i. It is your responsibility to be aware of the anti-trust laws and their implications, including how they apply in the countries in which you do business. While these laws are often complex and difficult to summarize, at a basic level they prohibit agreements between Reliance and our competitors that affect prices, terms or conditions of sale or fair competition.

ii. Use care in your relations with competitors. You might interact with competitors through industry meetings, conferences, and other events. When you do, be careful not to make inappropriate agreements. Never engage in practices such as price fixing, customer or market allocation, or bid rigging.



iii. Trade association meetings and other industry gatherings can pose certain risks, as they bring together competitors who might discuss matters of mutual concern and potentially cross the line of non-compliance with competition laws. Even joking about inappropriate topics, such as marketing or pricing strategies, could be misinterpreted and misreported. If any kind of anti-competitive discussion arises, you should refuse to discuss the matter and leave the conversation immediately.

iv. No employee may share any sensitive GSI business information (prices, costs, margins, research and development efforts, strategic plans, etc.) with any third party, including actual or potential competitors.

v. Employees will consult with the Manager before making any joint bids with competitors.

vi. If any inappropriate or illegal competition or antitrust conduct is detected or suspected of any employee or anyone doing business with the Company, such activities should be reported in accordance with the Laws of Malaysia. No employee may share any sensitive GSI's business information with any third party, including actual or potential competitors.



11. INTERNATIONAL TRADE LAWS

- We abide by the trade laws of all countries in which we operate, including economic sanctions and import and export laws. Most countries in which GSI operates impose restrictions on the movement of products across borders.

YOUR RESPONSIBILITIES

i. Trade sanctions, including financial sanctions, are complex. If you are involved in international transactions, such as business dealings with a sanctioned country, entity, or person, you must ensure compliance with applicable trade laws.

ii. Products intended for import or export, including equipment, software, and technology, must be classified in advance and all required labelling, documentation, licenses and approvals must be completed.

iii. Any questions about export regulations should be addressed to Sr Manager, Supply Chain/Procurement or Supply Chain Manager



12. WHISTLEBLOWING

- Whistleblowing is the voluntary disclosure of inappropriate, unethical or unlawful behaviour and practices by the management or employees. It includes how employees, customers and investors are treated. The following are generally accepted as improper and reportable conduct for whistleblowing, of which the list is not exhaustive:

a) Any unlawful or illegal activities, whether criminal or breach in civil law;
b) Breach of policies and/or procedures;
c) Fraud, theft, embezzlement or dishonesty;
d) Corruption/bribery;
e) Bullying and harassment;
f) Actions which can cause physical danger/harm to another person and/or can give rise to risk of damage to properties/assets;
g) Forgery or alteration of any documents belonging to the Company, customers, another Financial Institution, or agents of the Company;
h) Poor or unethical sales practices, including mis-selling;
i) Profiteering as a result of insider knowledge;
j) Gross mismanagement or dereliction of duties;
k) Conflict of interest;
l)Misuse of position or information; and
m) Any other similar or related irregularities.
n)We take whistle blowing seriously and your concern matters to us, so we would like to hear from you if any of your disclosure is related to improper practices occurring within GSI. Any disclosure can be made to any of the following dedicated reporting channels whistleblowing@gsi-worldwide.com

A.WHISTLEBLOWER PROTECTION

i. GSI commits to ensure that all disclosed information, including the identity of the whistleblower shall be treated with strict confidentiality. All personnel, directly or indirectly working relative to a whistleblowing case, shall strictly protect the identity of the whistleblower and witnesses from unauthorized disclosure before, during and after an investigation.

ii. GSI is also committed to protect the whistleblower from all acts of harassment, retaliation, victimization and recrimination arising from making the disclosure in good faith.

iii. There may be certain circumstances where the identity of the whistleblower may need to be revealed on a need to know basis (e.g. requirement to testify in court). If such a situation arises, the Management shall discuss and seek consent with the whistleblower first before proceeding with the case.

iv. The protection will be removed if it is found that the whistleblower was also involved in the improper conduct, or if the whistleblower is found to have made the disclosures in bad faith.

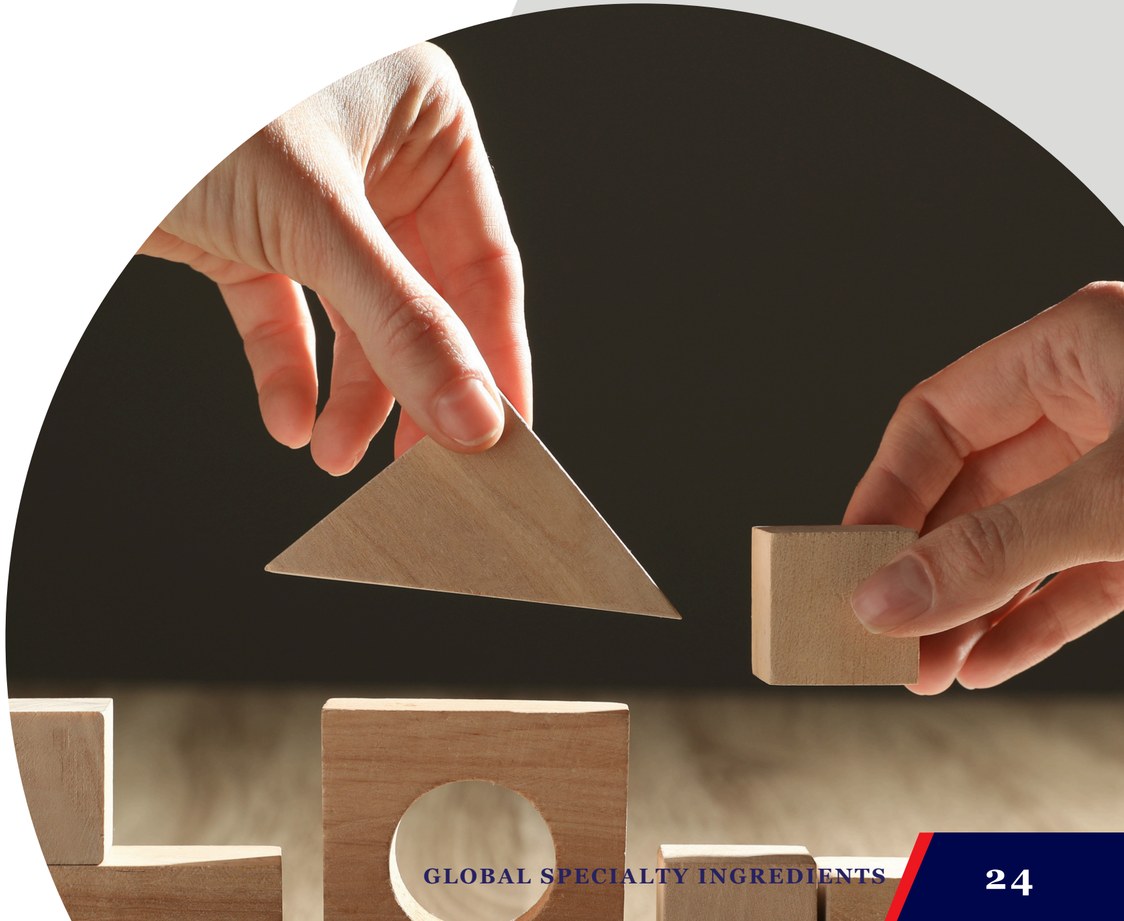


B. RESPONSIBILITY OF WHISTLEBLOWER

i. Whistleblower makes the disclosure in good faith.

ii. Whistleblower reasonably believes that the information and allegations are substantially true.

iii. Whistleblower is not acting for personal gain. If the case involves the complainant's personal interests, it must be informed at the outset.



13. SEXUAL HARRASSMENT

- All workers, regardless of their sex, age, position, type of contract or status, have a responsibility to ensure that the workplace is free from sexual harassment, to discourage and report unacceptable behaviour and to comply with the company's sexual harassment policy.

A. DEFINITIONS, IDENTIFICATION AND FORMS OF SEXUAL HARASSMENT

WHAT IS SEXUAL HARASSMENT “Sexual harassment” is defined as any behaviour of a sexual nature that affects the dignity of women and men, which is considered as unwanted, unacceptable, inappropriate and offensive to the recipient, and that creates an intimidating, hostile, unstable or offensive work environment.

Code of Conduct on Sexual Harassment in the Workplace 4 “Quid pro quo” (this for that) sexual harassment is committed when an employer, supervisor, manager or co-worker, undertakes or attempts to influence the process of recruitment, promotion, training, discipline, dismissal, salary increment or other benefit of an existing staff member or job applicant, in exchange for sexual favours. The worst forms of sexual harassment are criminal acts such as sexual assault or rape, which are covered under the Penal Code.



- FORMS OF SEXUAL HARASSMENT Sexual harassment in the workplace can be physical, verbal or non-verbal, and include the major forms as follows:

  i. Physical forms of sexual harassment such as any unwanted contact, ranging from intentionally touching, caressing, pinching, hugging or kissing to sexual assault or rape.

  ii. Verbal forms of sexual harassment include socially and culturally inappropriate and unwelcome comments with sexual overtones such as sexually suggestive jokes or comments about a person's dress or body, made in their presence or directed toward them. They also include persistent proposals and unwelcome requests or persistent personal invitations to go out.

  iii. Non-verbal forms of sexual harassment include unwelcome gestures, suggestive body language, indecent exposure, lascivious looks, repeated winks, and gestures with fingers. It also includes the unwelcome display of pornographic materials, sexually explicit pictures and objects, screen savers or posters as well as sexually explicit e-mails, notes or SMS messages.



B. ROLES AND RESPONSIBILITIES

- **EMPLOYERS**

It is the role and responsibility of every employer, regardless of the size of his/her company, to create and maintain a working environment which is free from sexual harassment. Code of Conduct on Sexual Harassment in the Workplace; Employers should respond promptly to any accusation of sexual harassment, ensuring that alleged victims do not have fear of reprisals or feel that their grievances are being ignored or trivialised. In order to effectively prevent sexual harassment at the workplace every employer should adopt, promote, implement and monitor a policy on sexual harassment within workplace regulations, collective agreement or other legal regulations of the company. The policy should be with accordance to the Employment Act 1955 to ensure its effective implementation.



- **WORKERS**

All workers, regardless of their sex, age, position, type of contract or status, have a responsibility to ensure that the workplace is free from sexual harassment, to discourage and report unacceptable behaviour and to comply with the company's sexual harassment policy.



C. THE PENALTIES AND COMPENSATION

The company policy on sexual harassment should clearly indicate the disciplinary action to be expected in the case of non-compliance. Depending on the severity of the case, consequences can range from an apology to the victim or disciplinary warning to counselling, transfer, demotion or dismissal; such disciplinary action should be included in the company's regulations. It should be clear that immediate disciplinary action will be taken against anyone who victimises or retaliates against a person who has complained of sexual harassment. If a victim of sexual harassment has suffered damages, such as a demotion or denial of a promotion, as a consequence of the harassment, it is appropriate that this person be compensated appropriately. The victim should also be compensated for any monetary loss arising out of a denial of employment-related benefits which were rightfully due to him/her. Code of Conduct on Sexual Harassment in the Workplace & Non-staff members, such as clients or contractors should also be informed that if a complaint against them is rightfully upheld, it could result in termination of a contract, suspension of service or business cooperation.



D. REPORTING OPTIONS

- All employees are empowered and have a responsibility to speak up if you detect something that goes against the values and principles in the Code.

HOW TO REPORT

You can ask a question or report an error in a variety of ways:

- To your manager or another manager at your location
- To your HR representative

E. CONFIDENTIALITY

- Employees should choose the most comfortable option. Confidentiality is a priority and information will only be disclosed to conduct and conclude an investigation



F. ADULTEROUS RELATIONSHIP

- GSI commits to ensure that there is no Adulterous relationship between the Management and workers and between the workers of GSI.
- Adultery occurs when a married individual engages in sexual activity with someone other than their spouse. In a legal context, adultery is sexual activity between a married man and a married woman, or at least one of them are married. Malaysian law penalises any man who takes away or entices a woman he believes to be married to another man.
- The law targets men intending to engage in illicit sexual intercourse with her. This is expressly declared in **Malaysian Penal Code section 498.**

“Whoever takes or entices away any woman who is and whom he knows, or has reason to believe, to be the wife of any other man, from that man, or from any person having the care of her on behalf of that man, with the intent that she may have illicit intercourse with any person, or conceals, or detains with that intent any such woman, shall be punished with imprisonment for a term which may extend to two years, or with fine, or with both.”

F. ADULTEROUS RELATIONSHIP

- To tempt or abduct a married woman intending to engage in sexual intercourse with her against her husband's will is illegal and a crime in Malaysia, as stated above. Upon conviction, the man is subjected to up to two years in prison and/or a fine. Elements that must be fulfilled under Section 498:

  i. Taking, seducing, concealing, or detaining another man's wife from that man OR any person caring for her on his behalf (i.e., a family member).

  ii. Knowledge or belief that she is the wife of another man

  iii. Such taking/enticing/concealing/detaining must be done with the intent that she may engage in unlawful intercourse with him

- If any found to be in adulterous relationship, GSI will not hesitate to terminate the workers and even any personnel from the Management found to be involved is required to tender their resignation immediately.



15. DRUGS AND ALCOHOL

- GSI is a drug and alcohol-free workplace. We will not tolerate anyone being under the influence of drugs or alcohol while at work for GSI. Tests for drugs and alcohol may be conducted whenever deemed necessary and in accordance with applicable laws.

YOUR RESPONSIBILITIES

i. Never work under the influence of drugs or alcohol

ii. Be conscious about work-related events where alcohol is served and show moderation



16. WHAT WE EXPECT FROM GSI EMPLOYEES?

- Every day live with purpose, values and behaviours
- Know and follow the Code of Conduct
- Aim to do the right thing, the first time and every time
- Do not engage in actions unless you are sure they are ethical
- SPEAK UP! Ask questions and raise issues when arise.
- Integrity is a TEAM effort
- Whether you are a Senior Manager, or this is your first week at GSI, you are empowered to openly discuss and raise questions about ethics and compliances. Proud to perform with integrity and raise concerns about behavior that does not represent our GSI values. Remember that achieving integrity is a team effort – we must all help each other in meeting targets with integrity and not push colleagues to take unethical actions.



17. OUR COMMITMENT AT WE EXPECT FROM GSI EMPLOYEES?

A) CONSEQUENCES OF NON-COMPLIANCE

- Non-compliance with this code of conduct by employees may result in disciplinary action, up to and including termination of employment.
- Suppliers and partners found to be in violation of this code may face termination of contracts and business relationships.

B) COMMITMENT TO CONTINUOUS IMPROVEMENT

- We are committed to continuously improving our practices to prevent violation and will regularly review and update this code of conduct.

By adhering to this code of conduct, GSI reaffirms its dedication to ethical business practices.



GSI®

Your Innovation Our Solution

Functional Ingredients
TAILORED TO YOUR NEEDS

Thank You









