



Pioneer Heat Holdings Code of Conduct & Business Ethics

1 Introduction & Purpose

Pioneer Heat Holdings (“we”, “our”, “the Company”) expects all directors, officers, employees, contractors, and representatives to act ethically, professionally, and in compliance with applicable laws and Company policies. Our Code of Conduct & Business Ethics (“Code”) provides standards and guidelines that support responsible decision-making and promote integrity in all aspects of our business.

2 Compliance with Laws

All individuals acting on behalf of the Company shall comply with all applicable laws, rules, and regulations in Malaysia and in all jurisdictions where the Company operates.

3 Accountability & Conduct

- Every person covered under this Code must act with honesty, fairness, and respect.
- Misconduct, illegal activities, or unethical behaviour may result in disciplinary action, including termination.

4 Health & Safety

We commit to providing a safe and healthy working environment. All employees must follow safety policies and participate in training to ensure workplace well-being.

5 Non-Discrimination & Respect

Pioneer Heat Holdings values diversity, and we do not tolerate discrimination, harassment, or any form of disrespectful conduct toward colleagues or third parties.

6 Business Communications

Business communications must be truthful, clear, and respectful. Employees should avoid defamatory, offensive, or misleading communications in any form.

7 Confidentiality & Data Protection

- Confidential information, including sensitive business data, trade secrets and personal data, must be protected.
- Disclosure of confidential information is only permitted when authorised or legally required.
- All employees with access to personal data must ensure it is handled in compliance with applicable data protection laws (including PDPA).

8 Conflicts of Interest

Employees must avoid situations where personal interests conflict with the Company’s interests. Any potential conflicts must be disclosed to management.

9 Anti-Corruption & Ethical Business Practices

All employees must refrain from bribery, corruption, and unethical business practices. Gifts, hospitality, or benefits that could influence business decisions must be handled transparently and lawfully.

10 Reporting Misconduct

We encourage reporting of unethical or illegal behaviour. Reports can be submitted to management or via whistleblower channels, and retaliation against reporters acting in good faith is prohibited.

11 Enforcement & Disciplinary Measures

Violations of this Code may lead to disciplinary action, up to and including termination of employment, civil liability, or legal prosecution.

12 Review & Updates

This Code shall be reviewed periodically to ensure it remains aligned with legal requirements and good corporate practice. Any changes will be communicated appropriately.