



EMERSIVE SDN. BHD. 200201029808 (597471-A)
(Formerly known as Sokachem Sdn Bhd)

27, Jalan Teknologi 3/3A, Taman Sains Selangor 1, Kota Damansara, PJU 5,
47810 Petaling Jaya, Selangor Darul Ehsan, Malaysia.

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www.emersive.com

Reference No. EMS/POL/018

Effective Date 1st Dec 2023

Revision No. 00

ETHICAL TRADE POLICY

General Integrity

EMERSIVE SDN BHD (hereinafter “**EMS**”, “the Company”) emphasizes the importance for each of us to adhere to the highest moral, ethical and legal standards.

This Policy on Business Ethics must be understood and implemented in everyday business practice throughout EMS. All employees and the directors are expected to adhere to these policies.

Compliance with the Law

Compliance with all laws and regulations applicable to EMS is essential.

Bribery

Bribery in any form is forbidden in the conduct of the business of EMS. The Company funds must never be used, directly or indirectly, for any bribe, kickback or other unlawful payment. Please refer to EMS Anti-Bribery & Corruption Policy.

Conflicts of Interest

Employees and the directors should avoid situations in which there is or may seem to be, a conflict between the personal interests of the employee or director and the interests of EMS. The term “conflict of interest” describes any circumstances that could cast doubt upon an employee’s ability to act with total objectivity regarding EMS interests. It may include:

- Engaging in activities that compete with, or appear to compete with, the Company’s interest;
- Receiving any personal or financial benefit from in providing services to or work for a supplier, customer or competitor or a company that seeks to do business with EMS;
- Using company’s property, information or resources for personal benefit or the benefit of others.



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Conflicts of Interest (Cont'd)

Employees or any director involved in such a situation must disclose the potential conflict of interest to their direct supervisor, department head or human resource representative. He or she shall abstain from participating in any of the Company's decision making or deliberations where the subject matter in question involves a conflicting matter for the employee or director. Any actual or potential conflicts of interest are to be fully disclosed to appropriate Management and where such circumstances are permitted by Management to continue, it shall not be deemed a violation of the Policy. If no disclosure being made, the employee may be subject to termination.

Supplier Relations

Much of EMS reputation for integrity and fair play comes from how EMS deals with its suppliers. EMS makes every effort to deal fairly and impartially with all suppliers of goods and services, showing them the same courtesy and consideration, we would expect them to show us. Our choice of supplier will be made based on: -

- Price
- Quality
- Services offered
- Business considerations.

Gifts, Entertainment and Hospitality

Gifts, entertainment and hospitality toward public officials and those with whom EMS does business is both proper and appropriate if it does not exceed common courtesy and is not of such magnitude as to suggest the compromise of the parties with whom EMS is dealing. No gift or entertainment may be tendered that would exceed reasonable standards. All such acts should be undertaken with the expectation that they will become publicly known.

Please refer to EMS Anti-bribery & Corruption Policy.

Political Contributions and Involvement

EMS encourages all employees to vote and to participate fully in the political process. Such participation is entirely personal and voluntary. Coercion to contribute is prohibited.



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Conflicts of Interest (Cont'd)

Confidential information and trade secrets

Employees should not, under any circumstances, disclose trade secrets and confidential information of EMS customers and suppliers to competitors or others even after leaving EMS employment.

Media Relations

Employees must obtain the prior approval of the Management before speaking at a meeting or conference. Because the press and competitors often attend these functions, all remarks must be scrutinized in advance, especially to ensure that no confidential information is disclosed.

Customer Relations

EMS will succeed only if it serves customers well. All customers deserve friendly, courteous treatment without bias or discrimination. Our customers have the right to adequate information concerning the prices of the items they purchase and the assurance that their purchase, combining price and quality, represents a fair value.

Shareholder Relations

Our ultimate accountability is to the shareholders of EMS. We should keep shareholders informed concerning matters that affect their company and its progress. The shareholders deserve corporate governance that represents their best interests.

Employee Relations

EMS is committed to a policy of equal opportunity for all employees without regard to race, colour, gender, national origin, sexual orientation or gender identity. It is EMS goal to provide jobs that are satisfying and challenging to each individual. The safety and health of employees are paramount and working conditions will reflect this. EMS provides growth and development through appraisal, counselling, training programs and on-the-job experience. EMS is committed to dealing fairly and equitably with each employee.



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Employee Relations (Cont'd)

Each employee should deal with other employees professionally without regard to race, colour, religion, gender, national origin, age, disability, sexual orientation or gender identity.

EMS expects every employee to work diligently and to deal honestly with customers and suppliers.

Obligation to report violations

All employees are obliged to report to the Management any known or suspected inappropriate use of company assets, violations of law or this policy, or other similar improprieties and are encouraged to report any concerns they have regarding any possible improper misconduct.

EMS's external and independent auditors shall immediately report to the Management any violations or suspected violations of this policy on business ethics that come to their attention as a result of conducting audits of EMS. Concealment of violations is in itself a violation of this policy.

Employees are encouraged to report any violations directly to the supervisor/ head of department. Alternatively, employees may report directly to the Director.

No Retaliation

EMS shall not take any adverse actions against any employee in retaliation for the proper and lawful reporting of improprieties.

Follow-through

Managers must maintain an "open door" policy for any employee who may have a question on ethics or this Policy on Business Ethics. The time to bring up a question of ethical behaviours is before the fact, rather than after the fact, hence, EMS encourages employees to talk to their supervisor about a question of business conduct, no matter how small or insignificant it may seem to be.



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Follow-through (Cont'd)

EMS believes attention to this policy is an integral part of managing its business. In this regard: -

- managers must investigate any suspicion that unethical or illegal activities are taking place and call upon other appropriate representatives of the Management if assistance is needed;
- EMS shall periodically provide communications and training to employees to reinforce this policy.

Approved by: The Management
Effective Date: 1 December 2023