



# CODE OF BUSINESS CONDUCT



# Contents

## 1 Introduction

Foreword..... 03

Vision & Mission ..... 04

Infinity Core Values ..... 05

Infinity 8 Pillars of Corporate Governance ..... 06

## 2 People Policies

Human Rights ..... 08

Health and Safety..... 09

Whistleblowing ..... 10

## 3 Sustainability

Sustainability ..... 11

## 4 Business Ethics

Anti-Bribery and Anti-Corruption..... 13

Anti-Competition ..... 14

Anti-Money Laundering AMLA ..... 15

Data Protection and Privacy..... 16





# Foreword

**I**t is paramount for Infinity to conduct our business activities as ethical as possible and this Code of Business Conduct (COBC) reflect our highest commitment to all our stakeholders and business partners to create a safe, fair and inclusive society as well as a sustainable environment as per the principles stated in the Code.

This COBC provides a consistent and organisation-wide statement of our beliefs and business practices and establishes the expectations and obligations of all our stakeholders and business partners to abide by all the principles contained therein.

This COBC may not be able to address every single issue or situation that may arise during the normal course of the business, we shall review the code periodically and supplement with additional policy statements and guidance notes as deemed necessary.

Should you encounter any ethical challenges or suspected violations not adequately covered by the COBC, or you are uncertain of the appropriate response, kindly seek guidance by reaching out through our whistleblower email address [wbp@infinity.com.my](mailto:wbp@infinity.com.my).

A photograph of a young mangrove tree with green leaves and a thin trunk, growing out of a rocky, uneven shoreline. The tree's roots are visible, extending into the ground between the rocks. The background shows more rocks and a hint of water.

**WE WELCOME YOU  
ON OUR JOURNEY  
TO BUILD A  
SUSTAINABLE WORLD.**





## Vision

To be the leading regional logistics provider offering world-class services.

## Mission

To provide innovative solutions through our integrated networks.



# Infinity

## Core Values



### Integrity

We are honest in our dealings with all stakeholders, accepting responsibility for our actions and following through on our commitments and promises.



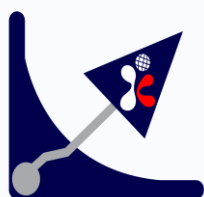
### Innovation

We continuously seek new ways and ideas to improve ourselves and strive to be leaders in our field.



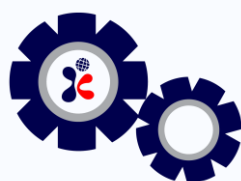
### People-Driven

We nurture and develop talents and in turn they become our strengths.



### Excellence

We consistently strive to stretch our capabilities to provide the best possible results for all our stakeholders.



### Technology-Oriented

We complement people skills with technology to achieve optimum results.



### Teamwork

We share, respect differences and work together with all stakeholders to realize our vision.



### Customer Focus

We link our success to the success of our customers, we anticipate, understand, and deliver our customers' needs.



### HSEC Responsibility

We emphasize health and safety aspects of our operations, respect the natural environment and the community in which we operate.





# Infinity

## 8 Pillars of Corporate Governance



### Independence

of our Board of Directors Oversight.



### Compliance

in all our Operations.



### Transparency

in all our Disclosures.



### Accountability

in all our Actions.



### Sustainability

in all our Developments.



### Ethics

in our Business Conduct.



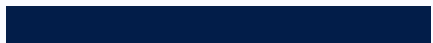
### Value-Creation

in all our Undertakings.



### Fairness

in our Treatment of Stakeholders.



# People Policies



## At Infinity we

- Incorporate the ten principles of the **United Nations Global Compact (UNGC)** in our business practices in the areas of human rights, labour, environment and anti-corruption.
- Respect the rights and dignity of all individuals, including legal rights of all other businesses and organizations.
- Respect diversity, provide equal opportunity and maintain a safe workplace for all our employees.
- Maintain professional behavior and use common courtesy.
- Hold high expectations on our stakeholders to uphold this Code of Business Conduct in fulfilling their business and social responsibilities.

For more information, please refer to:  
[Business Ethics Policy Statement](#)  
[Integrity Policy \[ILNTV-CP-14\]](#)

# Human Rights

**Infinity** provides a conducive working environment that is characterized by equality and mutual respect.

We ensure that there are

- **No** employment of child labor as stipulated by the Employment Act (1955).
- **No** employment of forced labor and no person shall be held in slavery in accordance with Article 6 of Malaysia Federal Constitution.
- **No** discrimination in employee recruitment and treatment based on their demographical backgrounds.
- **No** employee abuse or intimidation no matter in physical, verbal, psychological, sexual or any other forms.
- **No** employee exploitation in terms of wages and working hours, in any of our operations and facilities.

We enforce

- Ethical recruitment.
- Maintenance of healthy and safe work place.
- Information security to protect our stakeholder's personal data.
- Grievances redress channel to address employee feedback.

These principles extends to our business partners to align our goals in creating a virtuous business supply chain.

**For more information, please refer to:**

**[Child Labour and Forced Labour Policy Statement](#)**  
**[Integrity Policy \[ILNTV-CP-14\]](#)**



# Health & Safety

**Infinity** provides a safe and healthy working environment while demonstrating health and safety management systems that ensure as a minimum, compliance with applicable laws, compliance with customer requirements and management of hazards and risks associated with any operations.

Similarly, we believe that Infinity business partners would integrate health and safety considerations in their work activities and strive for continuous improvement by minimizing any adverse effects of its activities on their stakeholders.

We

- Provide adequate control of health and safety risks arising from work activities.
- Ensure all employees are competent to do their tasks and provide adequate training.
- Promote health and safety awareness and encourage active participation from all employees/partners in creating a safe working environment and practices.
- Actively respond and investigate all incidents and near misses to prevent any mishaps from occurring and recurring.

For more information, please refer to:

[Safety Policy Statement](#)

[Integrity Policy \[ILNTV-CP-14\]](#)





# Whistleblowing

**Infinity** employees, agents and suppliers are expected to notify the Company immediately should they become aware of something that may be unsafe, unethical or potentially harmful in the performance of their obligations for the Company or its customers.

Concerns should be raised to the Whistleblowing Committee and Management Team in the event the employees, agents and suppliers feel that any of the above do not meet the expected standards.

Employees, agents and suppliers are advised to register their concerns through email at [wbp@infinity.com.my](mailto:wbp@infinity.com.my).

Reports made thereof shall be reviewed and investigated by the Risk Management Committee. The identity of the reporting party is kept confidential and shall not have any of their statutory rights affected.

Infinity will not tolerate any form of retaliation against any whistleblower for complaints submitted under the Whistleblowing Policy.

**For more information, please refer to:**

[Whistleblowing Policy Statement](#)

[Integrity Policy \[ILNTV-CP-14\]](#)





# Sustainability

**Infinity** strongly believe that sound environmental management is a key factor in sustainable development.

As such, we pledge to minimize our carbon footprint and achieve **Carbon Neutrality by the year 2025**.

We

- Proactively monitor our environment impact in areas of Greenhouse gas (GHG) emissions, resource consumption and waste disposal to plan our business activities ahead.
- Comply with the requirements of relevant legislation in the countries and regions in which we operate.
- Implement effective waste and pollution management system and recycling program.
- Promote environmental awareness among employees and encourage every individual in the company to act in an environmentally responsible manner.
- Adopt Green technologies to reduce emission and optimizing the use of natural resources such as energy, water and raw materials.

In collaboration with Infinity, our business partners are bound to ensure their business processes are carried out with environment protection and conservation in mind.

Any potential negative impact to the environment resulting from business activities shall be treated with risk-based approach to minimize the repercussions.

For more information, please refer to:  
[Environment Policy Statement](#)  
[Integrity Policy \[ILNTV-CP-14\]](#)



# Business Ethics

**At Infinity** we are committed to the highest standard of business ethics and good corporate citizenship towards all stakeholders of our business and the communities in which we operate in. Likewise, this culture encompasses our business partners as we are responsible to carry out our business activities with utmost integrity.

We

- Comply with all local legislations and applicable laws in the region where we operate.
- Act with total integrity, avoiding conflict of interest at all times and strictly prohibit any form of bribery both in accepting or offering.
- Compete fairly in all of our markets and do not engage in anti-competitive behavior or activities.
- Respect and protect all forms of private and confidential information of 3rd parties and employees, such as proprietary and intellectual property as well as personal data that the Company has access to.

**For more information, please refer to:**  
**[Business Ethics Policy Statement](#)**



# Anti-Bribery and Anti-Corruption

**Infinity** shall not profit from improper business advantages or illegal business activities and shall carry out its business dealings with government officials and commercial partners with strict compliance to the Malaysian Anti-Corruption Commission Act 2009 and Malaysian Anti-Corruption Commission (Amendment) Act 2018.

Infinity employee, agent, customer, supplier and all other stakeholders must follow the following business conduct which includes

- Not promising or giving anything of value to a government official to secure an advantage not legally available.
- Not making small payments or gifts as facilitation payment to get government officials to carry out their obligated duties with reduced processing time compared to standard practice.
- Not providing any benefits to commercial parties to secure an improper advantage.
- Not soliciting or accepting anything of value from commercial parties which may be characterized as a bribe or kickback.

**For more information, please refer to:**  
**[Integrity Policy \[ILNTV-CP-14\]](#)**

# Anti-Competition

**Infinity** shall not engage, whether independently or collectively, in any anti-competitive behavior during the provision of goods or services. All our business activities are arranged with strict compliance to the Malaysian Competition Act 2010.

Prohibitions under Competition Act 2010 include

- Anti-competitive agreements such as horizontal and vertical agreements.
- Abuse of dominant position whether individually or collectively.

Infinity employee, agent, customer, supplier and all other stakeholders strictly do not take any actions which would interfere with fair competition, including sharing confidential information with others, entering into price fixing agreements or acting to shut competitors from the market.

**For more information, please refer to:**  
**[Integrity Policy \[ILNTV-CP-14\]](#)**



# Anti-Money Laundering – AMLA

**Infinity** observes and comply with the Anti-Money Laundering and Counter-Terrorist Financing Ordinance (AMLO) (Cap.615) and Banking Ordinance (BO) (Cap.155).

By abiding these laws, Infinity is required to conduct customer due diligence (“CDD”) on its clients where the services provided are captured by the regulations. Any work for a client cannot commence until CDD has been completed.

By being our business partner, it is imperative that precautionary screening measures are implemented and enforced with utmost prudence such that our institutions are not misrepresented in ill purposes of money laundering and funding of criminal or terrorism agendas.

**For more information, please refer to:**  
**[Anti Money Laundering Policy \[ILNTV-CP-12\]](#)**

# Data Protection and Privacy

**Infinity** respects personal data and is committed to full implementation and compliance with the data protection principles and all relevant provisions of the Hong Kong Personal Data (Privacy) Ordinance.

Personal Data (Privacy) Ordinance (Cap. 486) shall be observed when handling personal data. In accordance with Security Regulations 161(d)(iii), all personal data should be classified restricted at least, depending on the nature and sensitivity of the personal data concerned and the harm that could result from unauthorized or accidental access, processing, erasure or other use of the personal data, a higher classification and appropriate security measures may be required.

Our business partners are expected to inform their stakeholders on the necessity and purpose of personal data collection. They should be made aware of their right to request access and correct their data if needed.

The usage of personal data should be strictly limited only to the purpose communicated to stakeholders during data collection, unless further voluntary consent is obtained for subsequent usage purposes, subjecting to comply with privacy and information security laws and regulatory requirements.

**For more information, please refer to:**

**[IT General Control Policy \[ILNTV-CP-12\]](#)**

**[The Personal Data \(Privacy\) Ordinance](#)**



Infinity Logistics & Transport Sdn. Bhd. (531298-W)

Infinity House,  
No 2, Jalan Kasuarina 8/KS07,  
Bandar Botanic, 41200 Klang,  
Selangor Malaysia

603-3325 2926  
[www.infinity.com.my](http://www.infinity.com.my)

