



## CODE OF CONDUCT AND ETHICS FOR DIRECTORS

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### 1. OBJECTIVES

The Board of Directors ("Board") is dedicated to upholding the highest standards of conduct in all business dealings and relationships. The Board acts honestly, ethically, and in good faith, prioritising the best interests of the Group, its shareholders, customers, and other stakeholders. This commitment, grounded in the core principles of integrity and accountability, is crucial for preserving the Group's reputation, ensuring its sustainability, and strengthening stakeholders' confidence.

This Code is designed to enhance corporate governance and behaviour by achieving the following objectives:

- (a) To establish a standard of ethical conduct for Directors based on acceptable belief and values.
- (b) To uphold the principles of social responsibility and accountability in line with all relevant legislation, regulations and guidelines.

This Code is not intended to be exhaustive, it shall be read in conjunction with the existing framework of all relevant laws and regulations, directives, corporate governance practices, and the Company's constitution and policies.

### 2. CODE OF CONDUCT

#### (a) Compliance with Laws, Rules and Regulations

Every Director in exercising his powers and discharging his duties shall comply with all applicable laws, rules and regulations, and the Company's constitutions.

#### (b) Anti Bribery or Corruption

Directors are committed to refraining from offering, soliciting, giving, or receiving any gifts, donations, sponsorship, and other benefits that could be reasonably expected to influence their performance. This applies whether they are acting in their personal capacity or on behalf of the Group.

#### (c) Company Assets

Directors shall safeguard all the Company's assets, which include physical premises, equipment and facilities as well as records, information and data (both physical and electronic).

The assets shall only be used in a safe, ethical and lawful manner and shall never be used for improper personal gain or opportunity.



**(d) Conflict of Interest**

Directors shall avoid all conflict of interest so far as possible. If a conflict of interest is unavoidable, whether direct or indirect, or whether actual or potential, the Directors shall disclose its nature and extent at all times and abstain from any related deliberation or decision.

**(e) Disclosure**

Directors are required to inform the Company Secretary of their directorships in other corporations, their shareholdings in the Company and its related corporations, any related party transactions, and any material interests in office, property, and contract with the Company, in compliance with all applicable laws, rules and regulations, and the Company's constitutions.

**(f) Confidentiality**

Directors shall treat all confidential, sensitive and non-public information with the utmost discretion. They shall not disclose such information to any unauthorised individuals, and shall take every precaution to maintain its confidentiality, except when disclosure is legally required and officially authorised.

**(g) Insider Trading**

Directors who possess inside information shall not deal in securities or disclose such information to unauthorised individuals for their own benefit or for the benefit of others. When dealing in the securities, Directors shall always comply with all relevant laws on trading in securities.

**(h) Environmental and Social**

The Board considers the interest of all stakeholders, including shareholders, employees, creditors and customers of the Group, by ensuring the effective use of natural resources and that the business operations do not harm the interest and well-being of the community.

**(i) Safety and Health**

The Board is committed to providing a safe and healthy working environment for all employees. To ensure this, employees are educated on health and safety information and their obligations through awareness training.



**(j) Violation of the Code**

Directors shall immediately report any concerns about a possible or actual breach of the Code by another Director to the Chairman or the Senior Independent Director. When making a report, they shall adhere to the Whistleblower Policy, ensuring the report is made in good faith and in the best interest of the Company.

In the event of a violation, the Board will determine the appropriate course of actions after considering all relevant information and circumstances.