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1. Policy Commitments

The Company is committed to conducting its business with integrity, transparency, and accountability.

This Policy sets out the standards of behaviour and ethical principles expected of all:

- directors
- employees and workers
- contractors and subcontractors
- suppliers and business partners

The Company is committed to:

1.1 Upholding standards of ethical conduct and complying with all applicable laws and regulations in Malaysia.

1.2 Promoting responsible business practices that respect human rights, labour standards, health and safety, and environmental responsibilities, in line with the Company's Human Rights and Labour Standards Policy.

1.3 Preventing bribery, corruption, fraud, and other unethical business practices.

1.4 Promoting fair dealing, transparency, and accountability in all business relationships.

1.5 Providing accessible reporting channels and ensuring that individuals who raise concerns are protected from retaliation.

2. Code of Conduct

All directors, employees, and workers are expected to conduct ethically, professionally and responsibly.

This includes, but is not limited to:

2.1 Compliance

Complying with all applicable laws, regulations, and company policies.

2.2 Human Rights and Labour Standards


Respecting human rights and labour standards in accordance with the Company's Human Rights and Labour Standards Policy.

2.3 Workplace Environment

Maintaining a safe, healthy, and respectful working environment.

2.4 Company Assets and Information

Using company assets responsibly and protecting confidential and sensitive information.

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2.5 Conflict of Interest

Avoiding situations where personal interests conflict with company interests and disclosing any actual or potential conflicts.

3. Business Ethics

The Company is committed to ethical decision-making and responsible business conduct.

3.1 Anti-Bribery and Corruption

Maintaining zero tolerance for bribery and corruption in any form, in accordance with the Company's Anti-Bribery and Anti-Corruption (ABAC) Policy.

3.2 Transparency and Reporting

Ensuring the accuracy, completeness, and proper maintenance of non-financial records.

3.3 Data Protection

Protecting personal data and confidential business information.

4. Subcontracting Engagement

To ensure proper governance and control, the Company applies appropriate measures in the engagement of all suppliers, including contractors, subcontractors and service providers providing goods or services.

4.1 All subcontracting services are formalised through a signed purchase order.

4.2 Engagement documents are reviewed upon receiving invoice billing from subcontractor and are properly documented and maintained as part of the Company's governance records.

5. Supplier Code of Conduct

Suppliers are expected to adhere to standards consistent with this standard policy.

They are expected to:

5.1 Compliance


Comply with all applicable laws, regulations, and contractual obligations.

5.2 Working Conditions

Provide safe and healthy working conditions and appropriate PPE for workers.

5.3 Ethical Conduct

Conduct business ethically and prevent bribery, corruption, and conflicts of interest.

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5.4 Environmental Responsibility

Support responsible environmental practices relevant to their operations.

5.5 ESG Cooperation

Cooperate with ESG assessments, evaluations, or audits where reasonably required by the Company.

5.6 Human Rights

5.6.1 Prohibition of Child Labour

Complying with all applicable laws relating to minimum age for employment, including the Children and Young Persons (Employment) Act 1966, and prohibiting the employment of children in hazardous work under any circumstances.

5.6.2 Fair Wages and Working Hours

Complying with all applicable laws and regulations relating to wages, minimum wage requirements, site overtime compensation, working hours, and rest periods.

5.6.3 Fair Treatment, Diversity and Inclusion

Providing a workplace that promotes equal opportunity, respects diversity, and treats all individuals fairly and with dignity, including migrant and foreign workers, where applicable.

The Company does not tolerate discrimination or harassment based on race, religion, gender, age, disability, nationality or any other characteristic protected under applicable laws.

5.6.4 Health, Safety and Well-being


Providing a safe, healthy, and supportive work environment that safeguards the physical and mental well-being of all employees, workers and any persons present at the Company's premises or work sites.

The Company is committed to maintaining a workplace that is free from:

- violence or threats of violence.
- harassment, bullying, or intimidation
- abuse or any form of inhumane treatment

All employees are required to comply with applicable occupational safety and health laws and the Company's policies and procedures.

5.6.5 Respect for Human Rights in the Value Chain

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Expecting suppliers, contractors, and business partners to uphold human rights and labour standards consistent with this Policy and to operate in a responsible and ethical manner.

5.6.6 Grievance Mechanism and Remediation

Providing appropriate mechanisms for reporting grievances or potential violations in a confidential and non-retaliatory manner and taking reasonable steps to address and remedy confirmed violations.

6. Reporting of Concerns

Any suspected or actual violations of this policy may be reported through the Company's whistleblowing or grievance reporting mechanisms.

7. Review of Policy

This policy is approved by the ESG Working Committee and is reviewed annually or when significant regulatory or market changes occur.